

EMPIRE OF DECEIT:

An Investigation of the Gülen Charter School Network

Book I

AMSTERDAM & PARTNERS LLP

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Foreword

The following book collects together a vast body of public records research, investigation, and analysis of the conduct of the massive US charter school network tied to Fethullah Gülen.

This research was compiled and published by Amsterdam & Partners LLP on behalf of the Republic of Turkey. That being said, we should inform the reader that all of the information within these pages has been gathered, analyzed, collated and reported by a team of American lawyers, researchers and education experts. The entire body of this work was independently produced and overseen by our firm, without any information or contribution supplied by the Government of Turkey.

When I was asked by the Turkish government to begin this investigation, one year before the coup attempt, I was openly skeptical of the claims that a single imam living in Pennsylvania could so profoundly influence education, politics and the rearing of American citizens. It was when I encountered various American parents who had spoken out for years against the growth and political activity of the Gülenists in the United States that I realised the depth and the danger of this hidden movement, and what it represents to all of those who believe that there is no greater trust than that extended to those who educate our children.

Teaching our children the essence of citizenship and American values should not be left to an organisation that appears structurally incapable of operating within a discipline of truthtelling. Quite simply, the entire fabric of this charter network is permeated with lies and deception which those who have studied Gülen argue is contained within his actual teachings.

This book contains within it one request - that is that authorities at the federal, state and local levels stop taking the free trips to Turkey, the under-the-radar donations to their political campaigns, and begin to actively investigate the public record information we have brought to their attention in this volume.

Please treat this information critically. Don't accept it, challenge it. But at the same time force these schools to disclose what our research has identified as their hidden agendas, their phony real estate practices, their systemic visa fraud violations, their inflated kickbacks, tithes, legal subsidies, and carefully monitor taxpayer money so it might be used to educate American children as American citizens, and not be used to fund a foreign agenda.

Gülen is not a political threat to any political party rather it is an institutional threat to all political parties both Turkish and American.

The Turkish perception of America and its government is largely that the US can no longer be trusted as a Turkish ally. No small part of this view is based on Gülen's ability to manipulate both American public opinion and its political leadership, while Turks feel that this man and the cult he operates represent an existential threat to the Republic of Turkey.

The collateral benefit to Turkey will be that the Gülen organization will lose their major source of funding, that being the American taxpayer.

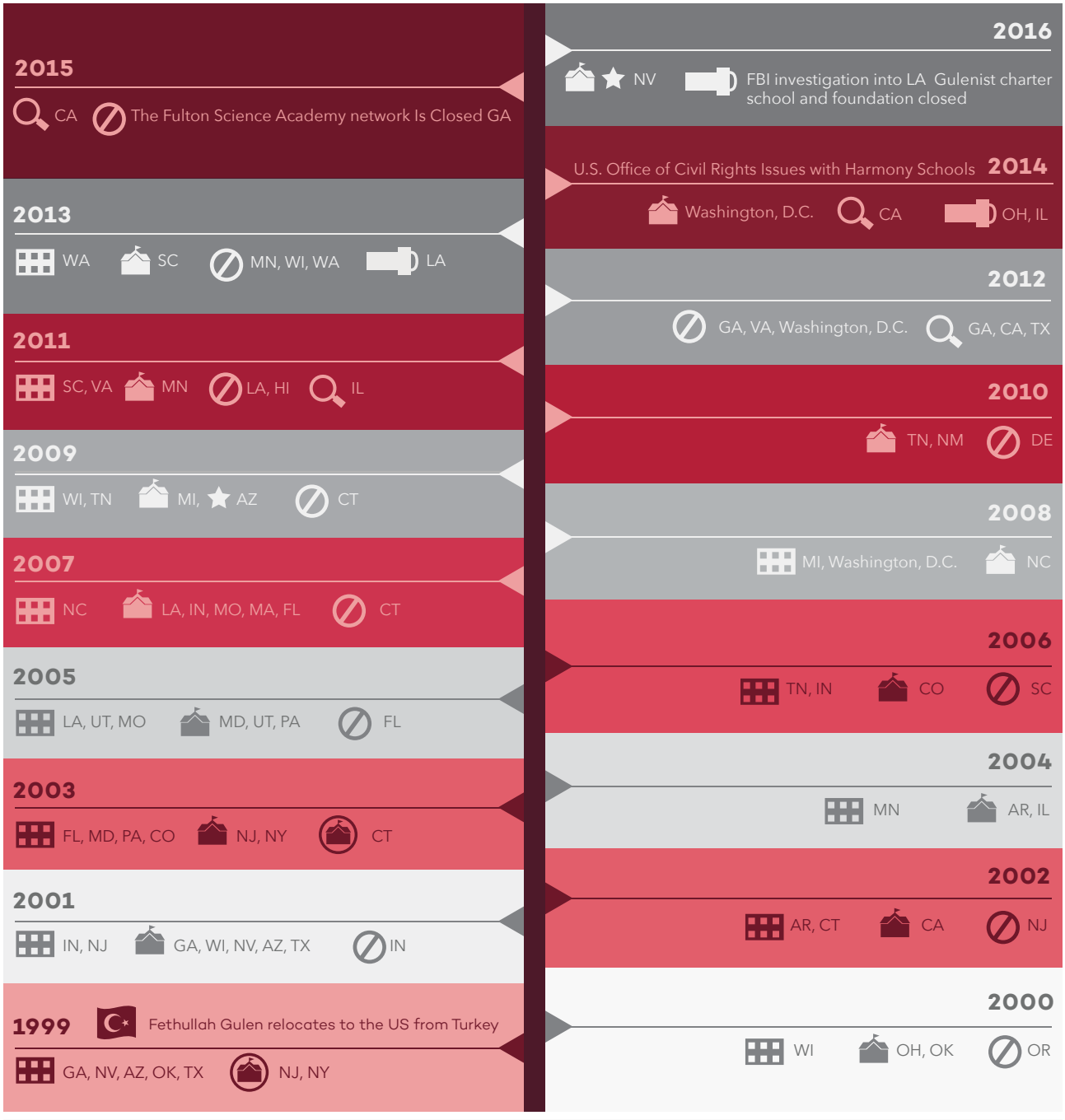
-- Robert R. Amsterdam



Introduction



TIMELINE OF GULENIST EXPANSION 1999-2016



Gülen Charter Fraud in the United States: A Primer

Introduction

Amsterdam & Partners has been engaged by the Republic of Turkey to conduct a global investigation of the Gülen movement. As part of that mandate, we have conducted an investigation of the American charter schools operated by followers of Fethullah Gülen, a controversial Islamic religious leader living in the United States. Gülen is estimated to have millions of followers worldwide, but his largest base is within Turkey and countries in its immediate sphere of influence. On their face, Gülen's sermons encourage his millions of followers, known as Gülenists, to share the fundamental values of Turkish Islam through establishing schools across the world, supported by Turkish business interests and cultural institutions. Gülen's vision has been successful thus far—while there are approximately 165-170 schools (both public charter and private) in the United States operated and controlled by Gülenists, there are thousands in operation worldwide, with heavy concentrations in Turkey, Africa, the Netherlands, and Indonesia.

The Republic of Turkey engaged Amsterdam & Partners to conduct a comprehensive accounting of all Gülenist-controlled charter schools within the U.S. to document the breadth and scope of the Gülenist network. Through this investigation, Amsterdam & Partners ultimately uncovered an extensive nationwide network of Gülenists, charter schools, charter management corporations, educational foundations, real estate companies, school vendors, and Gülenist cultural associations working together to exploit the American charter school model to orchestrate large-scale private profit at the public's expense through using affiliated vendors outside of procurement practices, apparent self-dealing, forced tithing by Turkish employees as reported by whistleblower testimony, and excessive use of the H-1B visa program to immigrate yet more Turkish Gülenists into the United States.

This national network of entities owned, operated, and/or controlled by Turkish individuals affiliated with each other through their ties to Fethullah Gülen and his teachings are hereinafter

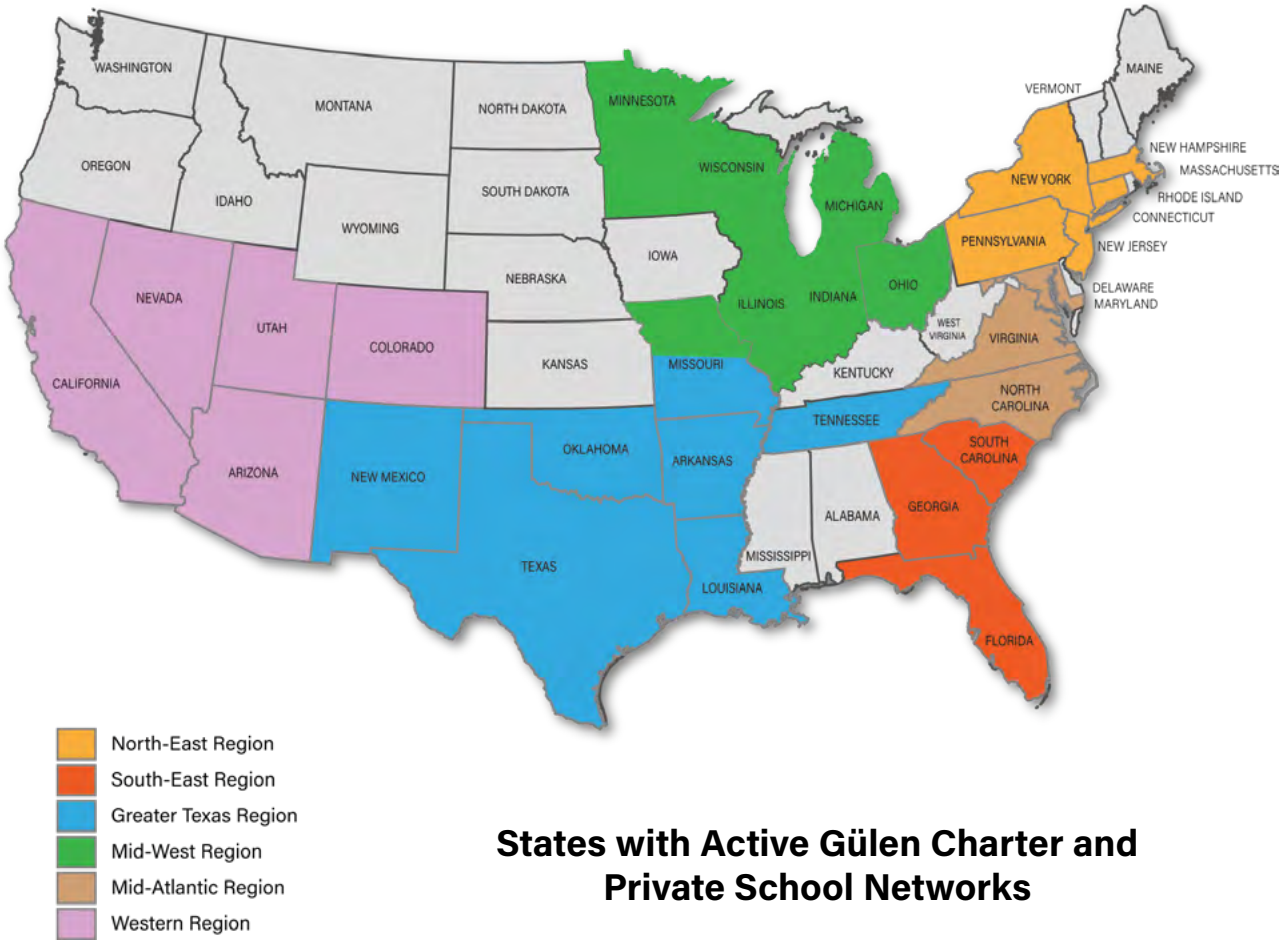


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referred to as the Gülen Organization. The Gülen Organization divides the United States into six distinct regions with localized Gülenist leadership at the city, state, and regional levels. Each region shares overlapping Gülenist founders, leaders, employees, accountants, and vendors, which preserves the Gülenist grip and power over their schools' funding sources and helps them replicate their system across the country. The Gülen Organization has essentially created both a vertical and horizontal economy onto itself, whereby Gülenist charter management organizations create their own charter school customer base who are reportedly forced to utilize Gülenist vendors, rent from Gülenist landlords, and hire Gülenist employees, all at a premium to participate. By controlling all sides of every transaction in this way, we believe the Gülen Organization effectively siphons large amounts of public dollars from its charter schools, enriching key Gülenists within the Organization. Moreover, the Gülen Organization utilizes the same framework throughout each region of the U.S. where it operates, and it has already laid the groundwork in several states where it has not yet expanded.

This report discusses in detail the methods used by the Gülen Organization to exploit the American public educational system. It also presents the life cycle of a Gülen Organization charter network from its inception to full sophistication, outlining each stage of its growth and providing a set of common markers that should alert local, state, and federal attention to Gülen Organization activity within their jurisdiction.

The report then outlines the Gülen Organization itself, divided up by region and then state. Regional Summaries include information about key Gülenists, charter networks, vendors, and cultural associations active at the



States with Active Gülen Charter and Private School Networks

regional level. These summaries are followed by in-depth state profiles that detail the key Gülenists, charter schools, networks, vendors, and cultural associations active within each state in that region. State profiles also include evidence demonstrating the Gülen Organization system at work in that particular state. In its entirety, this report provides a complete picture of the Gülen Organization's movement within U.S. public education today, with the intention that it spurs local, state, and federal authorities to pursue further investigation and legal action.

Methodology

The investigation and its findings were accomplished by an exhaustive review of information largely available in the public record, including tax documentation, property records, news coverage, previous litigation, corporate documentation, and educational records. This publicly available information was supplemented by interviews with former employees of the Gülen Organization charter schools and networks, as well as concerned parents, community members, and Gülenists who have since left the Organization.

An Introduction to Fethullah Gülen

Gülen's followers are a powerful force in Turkey, with public good works, but more private political aims... They're a threat to our relationship with Turkey and thus to the stability of the Middle East.

– Statements attributed to former U.S. Ambassador to Turkey, James Jeffrey, by CBS News[1]

Fethullah Gülen began preaching as an Imam in Turkey in the 1960s. He rose to prominence in Turkish politics as well as Turkish Islam for what many claim to be his moderate Islamic beliefs, emphasis on education, democracy, and a fervent strain of Turkish nationalism. Gülen eventually moved to the United States in 1999, allegedly seeking treatment for health issues. He later fought for permanent resident status in 2006, claiming the Alien of Extraordinary Ability designation due to his global network of schools and universities. The green card, which was denied initially, was later approved when two CIA officials and the U.S. Ambassador to Turkey vouched for Gülen, a fact that has unsettled many over the U.S. government's involvement with Gülen's politics and presence in the United States.[2] Over the next few decades, Gülen's popularity within Turkey and around the world continued to grow, and his movement, known as Hizmet, accumulated millions of followers throughout Turkey and its bordering countries, including Azerbaijan, Turkmenistan, and Bosnia & Herzegovina.

In 2013, Gülenists within the Turkish judiciary filed a series of corruption charges against President Erdogan's son and several of his government officials. The charges were later dropped, but tensions increased exponentially between Gülen and Erdogan and their respective supporters. Gülenists had infiltrated every aspect of Turkish government, from the judiciary to the military, and controlled major Turkish banking institutions and numerous schools and universities within Turkey. A now famous video was discovered of one of Gülen's sermons, with the cleric clearly stating, "You must move within the arteries of the system, without anyone noticing your existence, until you reach all the power centres ... You must wait until such time as

[1] Brennan, Margaret, "Are Some U.S. Charter Schools Helping Fund Controversial Turkish Cleric's Movement?" CBS News, March 29, 2017, available at: http://tinyurl.com/l7tvkw3 (last checked 4/5/2017).

[2] Champion, Marc. "U.S. Risks Losing an Ally and This Jailed Prosecutor Knows Why." Bloomberg, August 22, 2016, available at: http://tinyurl.com/kzepws6 (last checked 4/5/2017).

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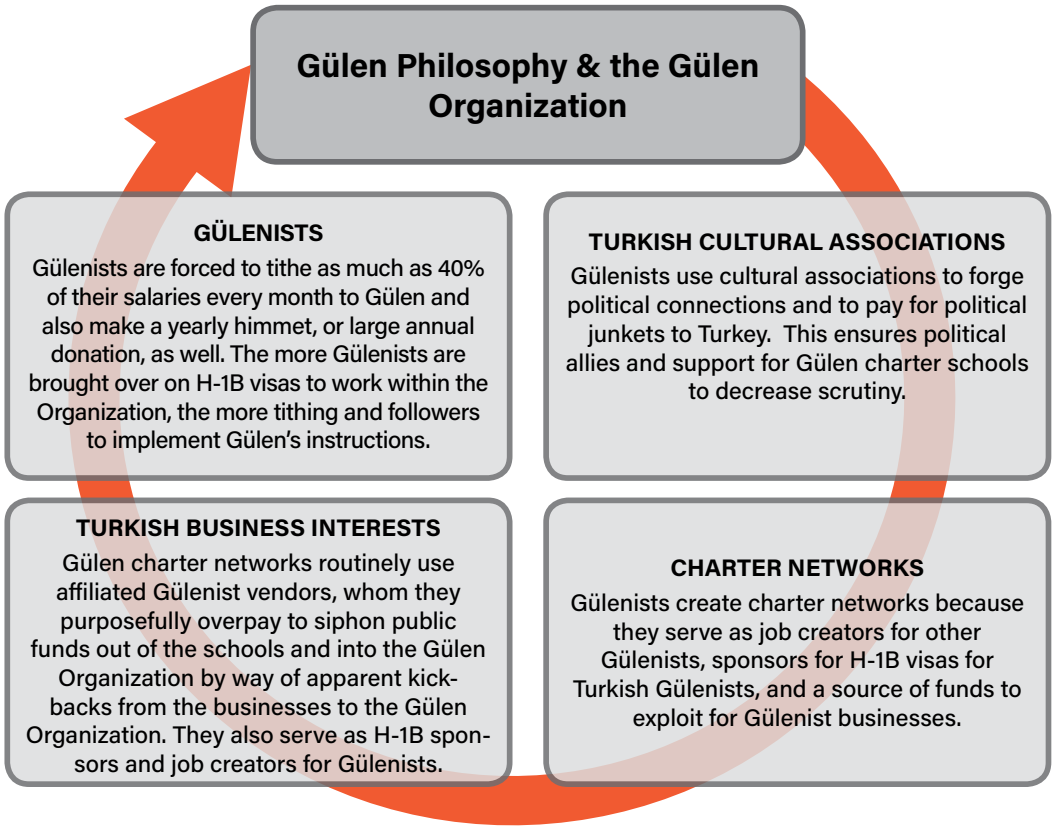
you have got all the state power, until you have brought to your side all the power of the constitutional institution in Turkey."[3] These statements, though denied by Gülen, are now considered as his ultimate statement of intent for both the public-facing Hizmet movement as well as its darker side, the Gülen Organization.

To understand the aims of the Gülen Organization, it is important to understand the themes underpinning Gülen's philosophy and religious teachings. Gülen's nationalist sermons focus on the reestablishment of the Ottoman Empire, whereby Turkey will rise again in prominence to become the moral, religious, and economic leader of a new world order. The Turkish Muslims who will rebuild this empire per Gülen's instructions are referred to as the "Golden Generation," which is also the name of Gülen's compound in Pennsylvania—the Golden Generation Worship and Retreat Center. Gülen believes that this new world order will be achieved through a symbiotic relationship between educational institutions, Turkish business interests, and Turkish cultural associations led by his Golden Generation of Gülenist Muslims. Thus far, Gülen has been extremely successful in realizing his vision while simultaneously expanding the scope of his power and influence in the U.S. and throughout the world.

Gülen's Philosophy in Action: A Model for Apparent Fraud

Gülen's emphasis on establishing partnerships between Gülenist educational institutions, business interests, and cultural associations seems innocuous on its face, but in reality forms the foundation of the Gülen Organization's system in American public education.

[3] Weise, Zia. "Who is Fethullah Gülen, the Exiled Cleric Blamed for Coup Attempt in Turkey?" The Telegraph, July, 22, 2016, available at: http://tinyurl.com/zb2qxec (last checked 4/5/2017).



Before the first charter school is established within a state, the local Gülenist cultural association has already laid the groundwork in the community, establishing favorable relationships with key stakeholders and politicians through dialogue dinners, award ceremonies, and numerous financial contributions. By the time the charter school application is submitted, these important relationships have already been forged, easing the charter school application's process to approval and building a staunch cadre of supporters.

Priming the Pump: Spotlight on Gülenist Cultural Associations at Work in Mississippi

The first record of Gülenist cultural association activity in Mississippi was in 2005, well before the state passed its first charter school authorization legislation in 2013. In 2006 and perhaps earlier, the Institute of Interfaith Dialog began leading and subsidizing trips to Turkey for Mississippi politicians, local business owners, and key community members. Early trip participants included Ronni Mott, Jackson Free Press; former Governor William Winter; Secretary of State Delbert Hosemann; State Senator John Horhn, D-Jackson; Tougaloo College Assistant Professor of Religious Studies Loye Ashton, who wrote a book about Gülen; and Andrew Mullins Jr., Chief of Staff to the Chancellor at Ole Miss and Associate Professor of Education.[4] In 2008, the Raindrop Turkish House, the Texas-based Gülenist cultural association affiliated with Harmony Public Schools, was incorporated in Mississippi and began hosting dinners and social events to expose Mississippi to Gülenist teachings.[5] Fatih Ozcan, one of the founders of the Gülenist Frontier charter network in Missouri, was instrumental in these early Gülenist efforts in Mississippi and continues work there and in the region as the Executive Director of the Institute of Interfaith Dialog. Despite the early attention Gülenists gave to Mississippi, however, the Mississippi Charter Schools Act ultimately passed in 2013 contained language that prevents the Gülen Organization from opening charter schools there by making it difficult to use work visa programs to hire charter school personnel and requiring transparency regarding funding sources that are affiliated with foreign entities.

Our research suggests that a charter school is first and foremost a renewable source of funding for the Gülen Organization, extracted through the Gülenist vendors the school is reportedly forced to use. Because the charter school is managed by Gülenist administrators and overseen by a Gülenist governing board, we believe a structure is created where no one argues when the charter school hires Gülenist vendors with bad contract terms, high pricing, and little to no value provided to the charter school. The charter school seemingly overpays these Gülenist vendors, who are believed to provide kickbacks to the Gülen Organization under the "Pay to Play" model. From our investigation's conclusions, these Gülenist vendors are often bogus middlemen, existing only to provide a legitimate disguise for the Gülen Organization's extraction and use of the charter school's public funding.

The charter school serves secondarily as an immigration pipeline by providing valuable H-1B visa sponsorships and employment to Turkish Gülenists who wish to immigrate into the U.S. With no meaningful oversight from an impartial governing board, the charter school appears to exploit the H-1B program by hiring untrained Turkish nationals for teaching and staff positions that are crucial to maintaining Gülenist control over the school. These positions include principal, business manager, human resources officer, budget analyst, financial officer, and counselor. According to whistleblower testimony, these H-1B employees are more than just willing participants to the Gülen Organization's system—they are also forced to kick back as much as 15-40% of their own salaries back into the Gülen Organization. Just like the Gülenist

[4] Mott, Ronni. Imam in the Middle, Jackson Free Press, Nov. 30, 2011 (article discussing Gülen Movement, trips to Turkey, key players in Mississippi) available at: http://tinyurl.com/yc2nxqck (last checked 6/2/2017).

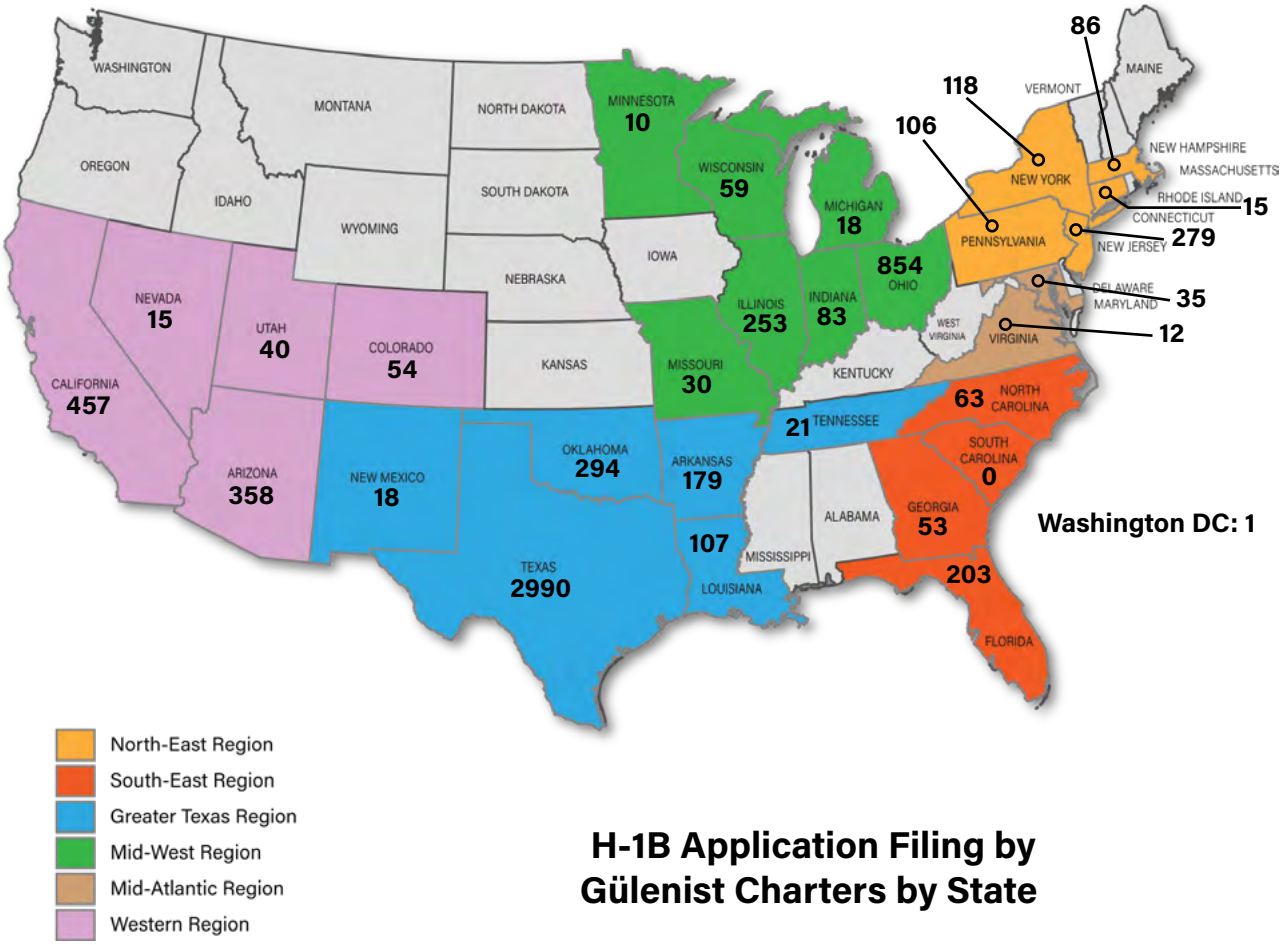
[5] Corporate filing 2008, available at: http://tinyurl.com/ybvabh69 (last checked 6/2/2017).

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vendors, the H-1B hires are legitimized recipients of the charter school's funding, which the Gülen Organization then takes from.

Once the Gülen Organization has successfully opened a charter school in an area, the charter school's leadership immediately seeks to open more charter schools in the area. Our research indicates that replication simultaneously grows the renewable sources of funding to the Gülen Organization while providing more H-1B jobs to Gülenists and more business to Gülenist vendors.

Meanwhile, students within these schools are taught by inexperienced Gülenists from Turkey, often with poor English language skills and no teaching credentials. Numerous sources confirm the students are given high grades, fake awards, and are taken on free/low-cost field trips to Turkey and around the country to competitions attended only by other Gülenist charter schools. Seemingly unaware parents rave about how their students used to struggle but are now receiving A's and B's. The few American teachers within these schools report that state assessment security protocols are not followed, that students have been spotted helping Gülenist teachers and principals change answers on the tests, and that Gülenist principals and counselors change final grades and student transcripts to inflate performance. When a scandal ignites over the charter school's behavior, we have found that typically the Gülenist cultural association calls in its favors to its political friends, which in turn pressure the charter school's authorizer so that a real investigation never occurs. Our investigation reveals that then the scandal eventually dissipates, the American teachers that blew the whistle are fired and replaced with Gülenists, and the Gülen Organization network grows unobstructed by accountability.



H-1B Application Filing by Gülenist Charters by State

Maintaining Academic Credibility: How the Gülen Organization Skews Testing Data and Academic Performance

Anecdotal reports of forced grade changes, testing fraud, illegally enrolling only the brightest students, and student cheating on state mandated assessments in Gülenist charter schools have been made throughout the country, including Georgia, Ohio, Florida, Texas, New York, and California. A Florida student whistleblower reported that his teachers encouraged students who did not expect to perform well on assessments to not take them, which has the effect of only the brightest students attempting assessments. Furthermore, the same student reported that whether a student ultimately did the work or not, the teachers would ensure the best grade was given to that student and that GPAs never matched what students actually earned. When that student first enrolled in the school, the administration asked him whether he was gifted and to bring in his test scores. He reportedly did not have to go through the state-mandated lottery as a result. In Ohio, a student reported to local media that he was paid in pizza by the Gülenist administrators to go over state mandated assessment answer sheets to correct wrong answers. As the examples above show, by inflating grades, enrolling only the brightest students, and committing testing fraud, the Gülen Organization ensures that its schools' academic scores remain high, which in turn lowers external accountability from the charter authorizer and state department of education.

Another disconcerting aspect of the Gülenist agenda is the apparent recruitment and indoctrination of American students and families by Gülenist H-1B teachers and administrators. According to whistleblowers and related documentation, H-1B teachers are required to select three to five students each to lavish extra attention and favors on as part of their mandatory participation within the Gülen Organization. H-1B teachers' outreach to these select students, often the highest performing students in the school, are assessed and rewarded via a points system. H-1B teachers receive points for hosting sleepovers for these students at their private homes on the weekends, study retreats, school trips, and after school activities. The H-1B teachers give these students junk food and treats and show them obvious favoritism, with this behavior occurring across the country as reported by former employees, parents, and students. The H-1B teachers are rewarded for the points they earn, with the ultimate reward being a trip to visit Fethullah Gülen himself at the Golden Generation Compound in Pennsylvania. Based on our findings, we believe the recruitment behavior and favoritism shown to the schools' top American students mimics the same recruitment measures used in Turkey to recruit the H-1B teachers to the Gülen Organization initially.

Building Student Loyalty and the Gülen Organization's Point System

According to Turkish whistleblowers from Colorado, Arizona, the West Region, Texas, and New York, the Gülen Organization places a premium on Gülenist teachers and administrators earning "points" by bringing select charter school students for home visits (sometimes overnight) to the teachers' homes, visiting students at their homes, playing games together, providing additional free tutoring, having students participate in Turkish activities and dinners, participating in a college mentorship program, and even taking the students on trips to Turkey, which we understand was the ultimate goal. Each Gülenist teacher is expected to form

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a "seed group" or "core group" of 4-5 students with bright academic futures to bestow this special attention on. Importantly, our investigation reveals that these special trips and activities for select students are paid for with public funds. The Florida student whistleblower confirmed preferential treatment for select students, as well as the special activities such as home visits, weekends away, trips to Turkey, and more, but only for the same small group of preferred students. When asked why the Gülen Organization requires this extra student attention, one Turkish whistleblower stated that it was because the Gülen Organization wanted good relationships with students with brilliant futures because they would later become important judges or community members that could help the Gülen Organization. Like the dialog dinners hosted by Gülenist cultural associations, which routinely invite judges, attorneys, law enforcement, and intelligence personnel, the Gülen Organization wants "to have friends in critical points."

We understand that the points earned for these extra activities coincided with a "monthly activity target" that only applied to the schools' Gülenist employees. For example, male Turkish teachers are expected to hit 220 points earned for their monthly activity target, while female Turkish teachers only have to hit 170 points earned since they are expected to care for their house and family. Each school's point tallies would be reviewed at regional Gülen Organization meetings, with the highest point-earning schools receiving acclaim and rewards. According to one whistleblower, the point tallies were sent to Gülen himself for review, and the ultimate reward for high earners was a trip to Gülen's Golden Generation Retreat Center in Pennsylvania. If a Turkish employee failed to meet his/her monthly activity targets, however, the teacher would be threatened with termination and deportation back to Turkey.

Educational Institutions

It is no coincidence that 1999, the year that Gülen relocated to the U.S., is also the year that multiple charter networks within the Gülen Organization got their start. Turkish Gülenists formed non-profit educational foundations in 1999 across the U.S. that shortly thereafter filed applications with local school districts and/or state charter authorizers to open public charter schools. At the time, the American charter school movement was in its infancy, with very few regulations or oversight procedures imposed on the hybrid public schools operated by private entities. The Gülen Organization, also in its infancy, took advantage of the built-in lack of oversight in the charter school model and grew powerful because of it.

When the first wave of Gülenist charter schools received approval to open, the Gülenist non-profit foundations became the governing boards of these charter schools. We believe they used the federal H-1B immigration program, which allows U.S. employers to hire foreign employees to fill positions that cannot be filled by local candidates, to immigrate large numbers of Gülenists from Turkey on three-year H-1B visas. The legal and immigration costs for the employee and his/her family are often paid for with public funds entrusted to the schools for educational purposes. In addition to this sponsored immigration, Gülenist H-1B employees are usually paid significantly more than their American counterparts. In reality, however, Gülenists serve as much cheaper labor for the Gülen Organization as well as an additional source of funding. This is because the Gülenists who wish to work within the U.S. Gülen Organization must "Pay to Play," just like the Gülenist vendors. In order to be hired via H-1B and placed by the Gülen Organization within one of its charter schools, the Gülenist employee must agree to tithe back up to 40% of his/her salary every month to the Gülen Organization. If the money is not voluntarily given, the Gülenist employee may lose the

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GÜLEN SCHOOLS BY THE NUMBERS

U.S. Totals As of 7/20/17 (Rev.)

	CHARTER SCHOOLS* 2015 - 16	NEW SCHOOLS 2017	SCHOOLS CLOSING 2017	PRIVATE SCHOOLS	STUDENTS 2015 - 16	REVENUE*** 2015 - 16	VISA APPS. 2000 – 2016	EST. COST TO PROCESS VISA APPLICATIONS ($2,000 - $4,000)
Southeast	14	1		1	5084	$34,837,068	256	$512,000-$1,024,000
Western	28				9875	$99,140,545	924	$1,848,000-$3,696,000
Greater TX	73	7			38,770	$378,056,299	3884	$5,632,000-$11,264,000
Northeast	35	2		3 (NJ, NY, CT)	8694	$105,000,000	451**	$902,000-$1,804,000
Midwest	32		1	1	14,091	$113,161,501	1286	$2,600,000-$5,100,000
Mid-Atlantic	7	1		1 (VA)	4327	$33,373,441	103	$206,000- $412,000
	189	**11**	**1**	**5**	**80, 841**	**$763,568,854**	**6504**	**$13,008,00-$26,016,000**

*Separate buildings or separate accountability ratings received from state
(EX: may be same school name/charter contract – but different schools for different grade levels)

**NJ visas decreased by 9

***Revenue is for public charter schools only, not inclusive of private schools.

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job, his immigration status, and be sent back to Turkey. The H-1B employees are also required to work additional hours after school and on weekends, and in some cases, perform the work that the sham Gülenist vendors are paid for but never actually deliver. This is in part why we believe the Gülen Organization makes so much money from running charter schools—it appears that they engage in activity that qualifies as per se human trafficking by exploiting their own massive religious base of Gülenists.

The Tuzuk Agreement and Forced Tithing for Employees of the Gülen Organization

Mustafa Emanet, a former H-1B employee of the Gülen Organization, provided a copy of the tuzuk agreement that describes the various financial arrangements for members of the Gülen Organization. This agreement was created in 2005 and has been translated from Turkish to English. Both agreements are located in Appendix I and II of this report. The tuzuk prescribes the amount of salary each Gülenist employee earns, regardless of what that employee supposedly earns on the charter school's financial ledgers. The amount the Gülenist earns depends on the marital and family status of a Gülenist employee, with small additional stipends for seniority and level of leadership position held. The transcribed chart that lays out the salary amounts is as follows:

Figure A	**A**	**B**	**C**	**D**	**E**
Singles	1550	1650	1750	1850	1900
Married without children	1850	2050	2250	2550	2750
Married with one child	1950	2150	2400	2700	2900
Married with two children	2050	2250	2500	2800	3100
Marginal Payment for the:					
3rd Child	300	300	350	400	400
4th Child	300	300	300	300	300
5th Child	400	400	400	400	400
6th Child	300	300	300	300	300

Importantly, any amount allegedly "paid" to the Gülenist employee by the school above the amount listed for the category of worker was tithed back to the Gülen Organization. For example, a single employee working as a teacher may earn $2,500 per month according to his paystub, but in reality only take home $1550 because of the 40% tithe required by the Gülen Organization. Emanet and other Turkish whistleblowers stated in addition to the required 40% tithe of their monthly earnings, they were also required to donate to other Gülenist causes periodically, as well.

Many of the 1999 founders that forged the first wave of Gülenist charter schools went on to create additional charter school networks throughout the country, replicating the same charter school model and system for each new network. Some founders eventually left the charter school arena to work at other Gülenist institutions, and many have returned to Turkey. In the case of the Utah network's founders, three of the original governing board members have already faced trial in Turkey for their involvement in the Gülen Organization.

Like their Gülenist founders, the schools'

H-1B employees are routinely transferred between Gülen Organization charter networks. When confronted with the high percentage of Turkish staff or excessive use of the H-1B program to avoid hiring local educators, the Turkish principals of these charter schools often claim that there is no overarching Gülenist network, and that any connections between these charter schools are organic and coincidental. However, that does not explain why these H-1B employees work only at charter schools within the Gülen Organization, and numerous ones across the country at that. The teaching profession is not known for its mobility. States require state-specific teaching credentials, and schools cannot typically afford to recruit talent from outside of the area. Despite this, these H-1B employees are shuffled to, on average, three to five Gülen charter schools across state lines and over a relatively short period of time. Notably, they never take positions at traditional public schools or at other charter school chains. The work histories and relocations of these H-1B employees alone are demonstrative of the overarching network's existence.

Business Interests and the Gülenist's American Dream

Gülenist vendors are often owned and operated by former H-1B employees of the charter schools they now service. There are numerous examples around the country of individuals that started out on H-1B visas to teach within the charter school. It appears that if the Gülenist works hard, tithes back, donates politically as told, and fulfills the requirements of the Gülen Organization which rewards recruitment of key community members, parents, and students, the H-1B employee is promoted from teacher to assistant principal or counselor, and then to principal. This promotion occurs often within two to three years of the H-1B employee starting out, which is far sooner than in traditional public schools or even other charters.

If the region has a Gülenist charter management corporation, the H-1B employee may then be promoted from principal to a leadership position within the management corporation itself. During this time, the H-1B employee transitions to green card status paid for with public funds. The culmination of the Gülenist's American dream ends with the Gülenist exiting the charter management corporation to become the owner of a new small business. Within months of the new business's formation, the charter school hires the business, despite its lack of experience or credentialing, for a major contract. The Gülenist business owner then typically appears on political contribution websites as a major donor for Gülen-friendly politicians, and his business continues to grow as other Gülenist charter schools and networks secure work from him. This cycle is the origin story of many of the biggest players within the Gülen Organization around the country.

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Figure B	Brighten Technologies	Advanced Solutions for Education	Charter Housing Corporation
Region	Greater Texas	Midwest	Southeast
Services	IT services, Network services, telecommunications services	IT services, Network services, curriculum services, telecommunications services, grant consultation	Construction
History	Yusuf Duzgun (alias Joseph Duggan) was a former computer teacher at Harmony Public Schools. He later created Brighten Technologies and now regularly wins millions in contracts paid for with federal funds such as E-Rate and Race to the Top from his former employer. Tellingly, Brighten Technologies has little business outside of its work for Harmony, bidding almost exclusively on Harmony E-Rate contracts. Duzgun is a wealthy individual now as a consequence of Harmony contracts, as demonstrated by his regular individual donations to politicians favored by Harmony. Duzgun individually donated nearly $80,000 in 2012 alone.	Ozgur Balsoy, owner and founder of Advanced Solutions, has profited extensively off of his relationship with Concept Schools. Balsoy is a former Concept administrator and is listed as the incorporator for Concept in Ohio. In addition to the millions Balsoy has received from Concept Schools since forming his own company, Balsoy is also the landlord for one of Concept's Ohio schools. After Balsoy purchased the building, he more than doubled the rent to the Concept school. Balsoy is heavily implicated in the ongoing FBI investigation for defrauding the federal E-Rate program but continues to receive business from Concept Schools.	Vedat Akgun, owner and operator of Charter Housing, was one of the original founders of Concept Schools, the Midwest region, and their real estate arm before relocating to Georgia to help establish the now-closed Fulton Science network. In Georgia, Akgun created Charter Housing which received a major million dollar contract from the Fulton Science schools to renovate the elementary school and to build out a new campus. Akgun remains a board member at Fulton Science Academy Private School, which opened after the charters were terminated for fraudulent use of public funds.

The Gülen Organization's system of apparent kickbacks between Gülenist vendors and charter networks is extensive and has been documented by authorities in at least one major network, Concept Schools, in an ongoing federal investigation. The most common types of Gülenist vendors include construction, IT services funded through the federal E-Rate program, and sham charter management service providers, but Gülenist vendors also provide website design, data management systems, uniforms, and food services.

Kickbacks and Conspiracy to Defraud Federal Funds – the FBI Investigation of Concept Schools

A joint investigation by the FBI and the USDOE was officially launched in June of 2014 with the filing of a search warrant application that alleged the collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[6] According to the FBI's search warrant application, Concept executives violated the competitive bidding rules of the E-Rate program by directing their E-Rate approved vendor to divert hefty subcontracts to affiliated Turkish individuals and companies in exchange for a cut of the proceeds without actually doing any of the federally funded work.[7] The court granted the application, and the FBI

6 Mihalopoulos, Dan and Seidel, Jon, Charter Firm Suspected of Cheating Federal Grant Program, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

7 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

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conducted raids of Concept administrative buildings, Concept-controlled charter schools in Illinois and Ohio, and Concept vendors. Former Concept executive Ozgur Balsoy was one of the purportedly fraudulently enriched Turkish vendors. Balsoy was heavily affiliated with the key Gülenist cultural organizations in the Midwest and notably serves as a landlord to Concept's Noble Academy Cleveland property charging excessive rent.[8] While Balsoy's business is under suspicion in the FBI investigation and has already been raided, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[9]

One of the more lucrative offshoots of Gülenist vendors suspected fraud concerns the acquisition of school properties by Gülenist landlord entities that then lease those properties to Gülen Organization charter schools at exorbitant rates. With Gülenists on both sides of the property transaction, it appears that the interests of the charter school are disregarded in favor of extracting public funds through unconscionably high rents. Our research indicates that the excess profits ultimately pass through the Gülenist landlord to fund the Gülen Organization, while the charter schools are trapped paying rents they cannot afford in 30-year leases with abusive terms and annual rental escalation clauses. In some regions, the property acquisitions are funded by large bond financing agreements, which provides the

[8] See id.; see also Mihalopoulos, Dan and Seidel, Jon, Charter Firm Suspected of Cheating Federal Grant Program, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[9] See Mihalopoulos, Dan. Targeted Firms Still Get Tax Money After Charter Raids, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).



States with Suspect Property Deals

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Gülenist landlord entity control over the bond proceeds as well as title to the properties. By vesting title in a private Gülenist entity, we believe the Gülen Organization effectively funds its property acquisitions with public tax dollars while minimizing the risk of losing the property should the charter school's authorization be terminated or revoked by its authorizer for misconduct.

The Most Egregious Examples of Insider Property Deals in Each Region

Midwest
(IL) Chicago Math and Science Academy (CMSA) and the $40 Million Gym: CMSA bought its property in 2009 for $10.4 million. Two years later, CMSA sold its building to New Plan Learning (NPL), Concept Schools' real estate arm, at a loss and entered into a lease-back arrangement with NPL with extremely poor terms. The lease had a non-cancelable term of thirty-five years, with annual rents ranging from $1 million to $1.2 million set to increase each year and tied CMSA's revenues to an extensive bond issuance. In return, NPL built CMSA a gym for $1 million that within a year after its completion has already had numerous issues with its roof, flooring, foundation, heating, and rodents. Over the term of this lease, CMSA will pay well over $40 million in rent for a building it once owned and sold at a loss for the construction of a poor quality gym. Furthermore, these transactions occurred under a significant financial conflict of interest. CMSA's board president, Edip Pektas, was also a paid business consultant for NPL at the time of the property sale and lease negotiations, and he also was the registered agent for Quality Builders of Midwest, the Gülenist construction company hired by NPL to construct the poor quality gym.

Greater Texas Region
Harmony Public Schools (Texas) created Charter School Solutions (CSS) in 2015 as a private, nonprofit organization to serve as a third-party real estate arm for Gülen schools in the region and to replicate the Harmony model in additional states.[10] CSS will operate in ten states including Arizona, Arkansas, Kansas, New Mexico, Mississippi, Missouri, Louisiana, Oklahoma, Texas, and Tennessee.[11] CSS will develop and finance school properties, serving as the owner/landlord and leasing the properties back to the schools. In Texas and New Mexico, CSS borrowed $51 million in public bonds in 2016 to finance school projects, charging schools inflated rents that are significantly higher than the bond service payments and more than the bond reserve fund requirements.[12] These two bond issues alone will provide CSS with $750,000 per year more than the bond repayment, a total of $22.5 million in extra payments over the life of the two bonds. When the bonds are repaid through rent paid by schools using public funds, CSS, not the schools, will own the school facilities. Our research suggests that CSS will use the excess rental payments to fund its own operations and programs and fuel an expansion of the Harmony model to other states.[13] CSS is governed by three directors and a paid staff member who all have close ties to Harmony and other Gülen schools and organizations.[14] CSS activities should be closely monitored because it is positioned to expand its multi-million-dollar real estate operations into additional states.

Southeast
(FL) The River City Science Academy (RCSA) Windfall: Yazan Khatib, a prominent Gülenist businessman in Jacksonville and director of the local Gülenist cultural association, bought a building for $100 in 2010 and the building next door for $340,000 and later sold them to RCSA in 2015 for $12.5 million. In the five interim years between purchase and sale, Khatib used his business partner Mehmet Taskan's construction company, Blue Ocean Construction, for renovation of the two properties. Even though RCSA did not

[10] See Charter School Solutions Certificate of Formation, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

[11] Id.

[12] See Charter School Solutions - Official Statement from bonds for Harmony Public Schools (Apr. 27, 2016) and Albuquerque School of Excellence (June 8, 2016), available at: Harmony: http://tinyurl.com/y9xs5rdd and http://tinyurl.com/ybjw932j; Albuquerque http://tinyurl.com/y8qbdljt and http://tinyurl.com/yary29pl (last checked 6/27/2017).

[13] See Charter School Solutions Certificate of Formation, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

[14] Id. Also Charter School Solutions - Official Statement from bonds for Harmony Public Schools (pg. A-1 and A-2) (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd (last checked 6/27/2017).

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officially own either building, RCSA began paying Blue Ocean directly for the renovations in 2014. All told, Khatib made a $10.5 million profit off of RCSA; Taskan made a $2 million profit; and RCSA will ultimately pay $29.3 million for both buildings due to bond financing and interest.

Northeast
(NJ) Paterson Science and Technology (PST) and the Chain of Gülenist Profits: PST rented its building from Milkyway Education, a Gülenist foundation that runs a private Gülenist school in NJ, from 2005 until 2012. Over this time, Milkyway made millions in profit due to the low purchase price of the building and the high annual rents it charged PST. In 2012, PST's vendor Apple Education purchased the building from Milkyway for $10.5 million, with Milkyway clearing a net profit of $4.7 million from the sale alone. Apple then rented the building plus an additional property to PST for an annual rent of $2.4 million, which represents a $400,000 profit to Apple each year at its customer's expense. Over the life of the leases for these buildings, we approximate that Apple will make $12 million in profit off of PST's public school revenues, and PST will still not own its buildings.

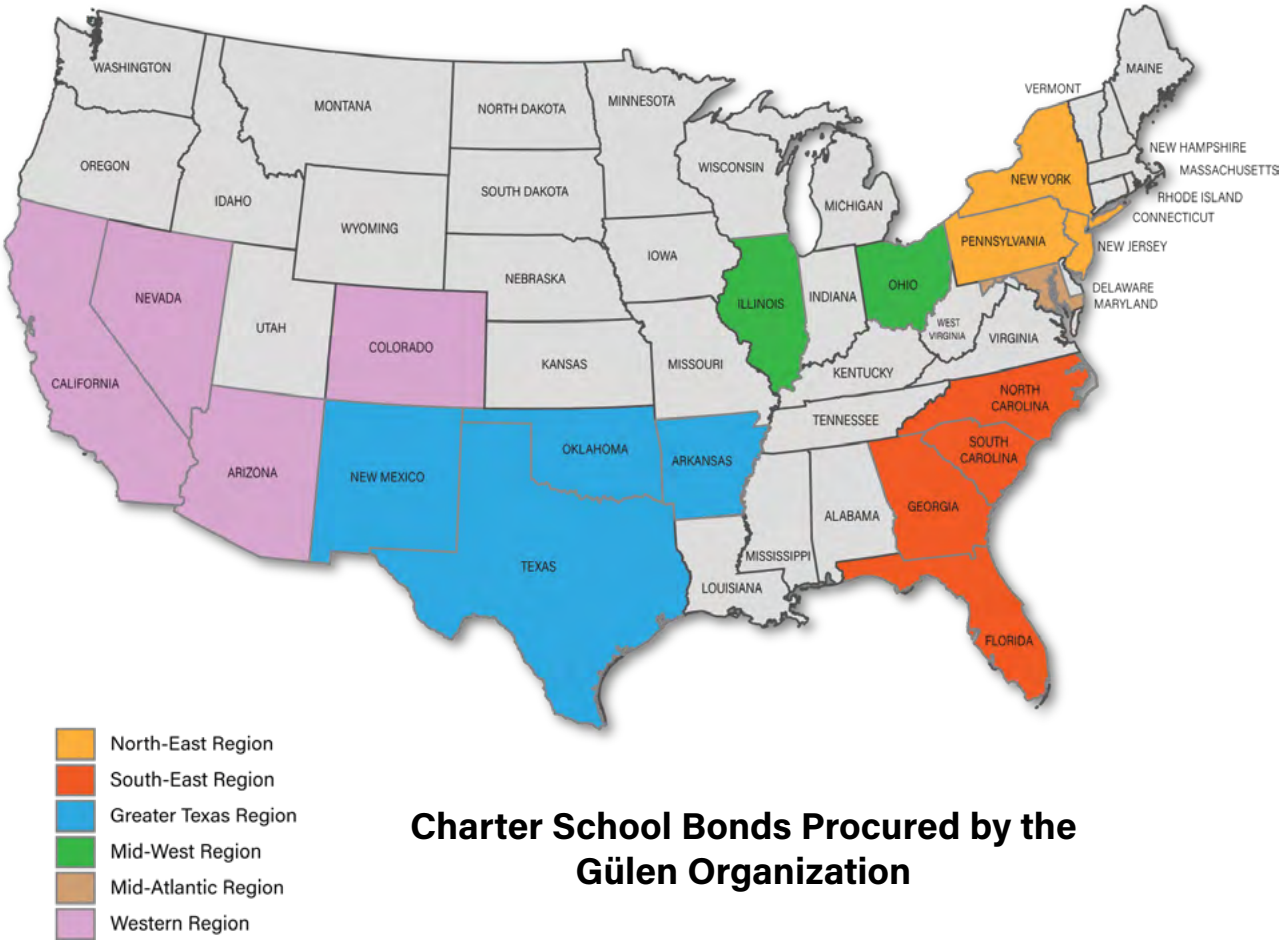
West
(NV) Coral Academy of Science-Reno (CASR) and the Middleman Model: Like Harmony in Texas, CASR uses a Gülenist real estate entity to serve as its bond financing middleman, the Coral Education Corporation (CEC). In this model, CEC procures the bond financing by securing the bond debt with CASR's public fund revenues. CEC uses the bond financing to buy and renovate property, which it then holds title to and rents at excessive prices to CASR. We believe this allows the Gülen Organization's private entities to maintain control over property purchased with CASR's public funds, and if the charter school ultimately is terminated or closed, the publicly financed property will remain in the Gülen Organization's hands. In CASR's case, CEC procured $7.7 million in bond financing to buy and renovate two properties. CASR collectively pays $900,000 a year in rent to CEC for these properties, while the bond debt and interest owed each year is actually $630,000. The remaining $270,000 constitutes public funds that endow CEC, the Gülenist middleman. Over the term of the bond agreement and lease, we believe that CASR will pay over $8 million in excess of the actual bond debt and interest to CEC just so that the Gülen Organization can privately own publicly-financed properties.

Mid-Atlantic
(MD) Chesapeake Lighthouse Foundation (CLF) and the Middleman Model: Like CASR in Nevada and Harmony in Texas, the Chesapeake charter schools also use a related Gülenist middleman, Chesapeake Education Services (CES), to procure bond financing and hold title to their properties at extreme premiums. CES has procured extensive bond financing to buy and renovate three of the four Chesapeake charter campuses in Maryland. When looking at a breakdown of the renovations these schools will receive in comparison to their ultimate costs, these schools will pay $135,077,544.93 from public school revenues through 2046 to receive assets worth well less than half that amount. Furthermore, CES will make almost $6 million in profit during the same time period apparently just for existing as the Gülenist middleman.

The use of bond financing to expand the Gülen Organization's property assets has increased significantly in recent years. In fact, Mr. Vahap Uysal, a Gülenist board member in the Concept (Midwest) region, wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[15] Uysal's network had just engaged in its own bond financing deal with a third party Gülenist landlord. The system has now been replicated across the country.

[15] Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

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Charter School Bonds Procured by the Gülen Organization

Cultural Associations

As previously discussed, our research indicates that the Gülenist cultural associations lay the groundwork in states for the growth of Gülenist charter networks and business interests. This is accomplished by hosting dinners, award ceremonies, making large political contributions, and sponsoring free/low-cost trips for politicians and key members of the community to Turkey to visit notable Gülenists, Gülenist sister schools and universities, and tourist sites. The cultural associations sometimes serve the Gülen Organization in hybrid roles by acting as the cultural relationship partner as well as a vendor to the schools. This is most clearly seen by associations such as the Pacifica Institute, which in addition to its political relations work also hosts large Turkish cultural festivals that the charter schools in surrounding Gülenist networks pay to attend and Gülenist vendors pay to sponsor.

Spotlight on Niagara Foundation and Pacifica

Gülenist cultural associations play a myriad of important roles for the local Gülenist charter networks and vendors. Two of the most powerful and involved organizations, Niagara and Pacifica, are compared here:

Niagara Foundation:

- Based in Chicago, IL
- Fethullah Gülen is the honorary president
- Closely affiliated with Concept Schools
- Operates Science Academy of Chicago, a Gülenist private school
- Hosts interfaith dialog dinners

throughout Midwest region
- ▷ Hosts political events throughout Midwest region
- ▷ Hosts, plans, and subsidizes trips to Turkey for politicians and key community members
- ▷ Provides private loans to Concept-controlled schools and Concept's real estate subsidiary arm
- ▷ Utilizes same H-1B immigration attorney as other Gülenist charter networks and Gülen's home compound, the Golden Generation Retreat

Pacifica Institute:

- ▷ Based in Los Angeles, CA, with branches throughout West region
- ▷ Lists Fethullah Gülen and the Hizmet Movement as the Organization's inspiration
- ▷ Closely affiliated with Magnolia Public Schools
- ▷ Hosts interfaith dialog dinners throughout West region
- ▷ Hosts classes and seminars about Gülen
- ▷ Hosts political events throughout West region
- ▷ Hosts, plans, and subsidizes trips to Turkey for politicians and key community members
- ▷ Hosts Anatolian Cultures and Food Festival in California attended by West region Gülenist charter networks and sponsored by key West region Gülenist vendors
- ▷ Utilizes same H-1B immigration attorneys as other Gülenist charter networks and vendors

The work of Gülenist cultural associations is not limited to establishing relationships that benefit solely the local charter school networks and businesses of the Gülen Organization, however. For example, we believe the effects of Gülenist cultural association lobbying can be seen most frequently by state legislation introduced by Gülen-friendly politicians that support Fethullah Gülen's own political agenda. There are larger political interests pursued by Fethullah Gülen and his followers, as well, particularly regarding Gülenist-controlled oil interests in Azerbaijan. Kemal Oksuz, owner of a major Gülenist vendor in the Harmony (TX) network, leads the Turquoise Council of Americans and Eurasians (TCAE), a regional umbrella organization over several smaller Gülenist cultural associations. Oksuz and TCAE came under federal scrutiny by the Congressional Ethics Committee for coordinating a trip where dozens of U.S. Members of Congress traveled to Azerbaijan for a conference illegally sponsored by its state oil company, SOCAR. Oksuz ultimately pled the Fifth Amendment regarding his role during the investigation. The Congressional Ethics Committee also penalized participating lawmakers for accepting illegal payments from a foreign government's oil company to attend the conference.

As these examples demonstrate, Gülen's sphere of influence has affected American politics at every level and will continue to do so as his American funding base increases.

The Gülen Organization's Primary Aims in Public Education

Our research reveals that every tactic utilized by the Gülen Organization serves one or more of its three primary aims:

1. To increase revenues, thereby increasing power and the Gülen Organization's footprint;

2. To maintain control over the Gülen Organization's assets, charter schools,

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and businesses through creating a closed loop immune from external oversight and accountability; and

3. To remove transparency and maintain secrecy of the Gülen Organization itself.

Over the course of this investigation, numerous tactics have been identified that allow the Gülen Organization to accomplish its three primary aims. These tactics, the legal violations that result from their use, and the charter networks that use them have been outlined in an extensive table located at the end of this chapter.

Markers of a Gülen Organization Charter School

Over the course of this investigation, Amsterdam & Partners developed a set of common markers to easily identify Gülen-controlled charter schools. These markers are present in every charter school identified in this report and correlate to the Gülen Organization's system replicated throughout the country.

These markers include:

- The charter school has a focus on science, math, and technology education (STEM) and offers Turkish language instruction;
- The charter school's governing board consists of appointed, not elected, individuals, with those of Turkish descent and/or national origin operating in a constant supermajority or majority;
- The charter school's administration is dominated by Turkish employees, generally male;
- The charter school uses closely affiliated vendors, also operated, owned, governed, and/or staffed by Turkish individuals;
- The charter school uses the H-1B visa program to sponsor, employ, and immigrate high numbers of Turkish teachers and employees;
- The charter school's Turkish employees have worked at other Gülen Organization charter networks and/or vendors;
- The charter school uses poor recordkeeping and ambiguous financial practices with the suspected motive of diverting public funds to the Gülen Organization for private purposes; and
- The charter school's governing board, leadership, and vendors are often affiliated with the same Gülenist cultural associations.

The Life Cycle of a Gülen Organization Charter Network

The Gülen Organization is divided into six main regions within the U.S., the Northeast, Mid-Atlantic, Southeast, Midwest, Greater Texas, and West. The oldest and most advanced regions include Greater Texas, Midwest, and Northeast. The West has expanded significantly in recent years, as well, but the Southeast remains underdeveloped due to issues that culminated in the Georgia network's closure in 2012. Researching each region's history revealed a common pattern of development for Gülen Organization charter networks within those regions, which we used to develop a classification system to assess the size, scope, power, and influence of each network from inception to sophistication.

CROSS-REGIONAL KEY INDIVIDUALS, FOUNDERS, EMPLOYEES

Most individuals working within the **Gülen Organization** tend to stay within their region of the Gülen Organization, though these individuals will often move from state to state within that region to **fulfill different roles as necessary**. That is not always the case, however, as demonstrated by the figure below. These individuals include **key Gülenist founders**, **board members**, **employees**, and **vendors** of **Gülen Organization charter networks** who have moved between regions of the Gülen Organization.

Key Individuals of the Gülen Organization

INDIVIDUAL	NORTHEAST	MID-ATLANTIC	SOUTHEAST	GREATER TEXAS	MIDWEST	WEST	CULTURAL or BUS. ASS'NS	VENDORS
Alp Aslandogan				√	√		√	√
Ehat Ercanli	√				√			√
Vahap Uysal				√	√		√	√
Bilol Ozturk		√		√				
Varol Gurler	√					√		
Namik Sercan	√		√				√	√
Suleyman Bahceci				√		√	√	√
Levent Bulut			√	√				
Vedat Akgun			√		√		√	√
Ibrahim Duya				√	√			
Ali Tombak		√	√		√		√	
Ali Gumus				√				
Nurcan Civelek	√							√
Adem Oksuz	√			√		√		√
Ugur Zengince		√			√			
Nuh Gedik	√					√	√	
Kemal Gur			√			√		√
Timur "Tim" Saka	√					√	√	√
Tarik Celik			√	√	√		√	√
Ahmet Ozarslan			√	√	√			√
Levent Elibal					√	√		√
Serkan Gunpinar			√		√		√	
Zhandos Utegulov					√	√	√	
Fatih Kandil	√	√			√			
Volkan Akbas					√	√	√	
Bunyamin "Ben" Karaduman		√				√		√
Adem Dokmeci	√	√						√
Ali Korkmaz					√	√		√

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Stage One: Setting the Stage

During Stage One, Gülenist cultural associations and business associations are actively building relationships with key community members and local/state politicians. No charter schools are opened during this stage.

Stage One activities include:

- Dialogue Dinners with notable community members
- Award ceremonies with local and state politicians honored
- Donations and campaign contributions to local and state politicians
- Lobbying and advocacy for favorable charter school authorization legislation
- Free/low-cost trips to Turkey for community members, local and state politicians
- Establish a critical mass of Turkish Gülenists in local graduate-level programs and groom them for leadership within the Stage Two educational foundations.

Stage One Charter Networks:

- Mississippi
- Oregon
- Washington

Stage Two: Creating the Customers

During Stage Two, the educational foundation is formed which develops and submits a charter school application for charter authorization. Once the charter school application is approved, the Gülen Organization begins to build a wider customer base by opening additional charter schools within the area and state.

Stage Two Activities include:

- Creation of the educational foundation which develops and submits the charter school application
- Approval of the initial charter school application and opening of the charter school
- Hiring Turkish vendors, generally from more advanced regions until the local Gülenist community creates its own businesses and vendors to service the charter school
- Hiring Turkish Gülenists on H-1B visas to work at the charter school
- Creation of Gülenist vendors within community and state
- Attempts to open additional charter schools prior to the end of the first charter school's term
- Charter schools may buy buildings, which they later sell in Stage Three to Gülenist landlords at a loss, usually due to balloon payment financing they cannot meet
- Ongoing relationship and community work by Gülenist cultural and business associations

Stage Two Charter Networks:

- Florida
- North Carolina
- Tennessee
- Minnesota
- Indiana
- Wisconsin
- Michigan

Stage Three: Creating the Boss

During Stage Three, the Gülen Organization has successfully opened enough charter schools in a state to create a Charter Management Organization (CMO), a private corporate entity that each of the charter schools will pay a percentage of their revenues to in order to receive certain educational management services. The CMO oversees each of the schools within a state and works to open more charter schools that will also receive its services. The CMO is useful because it removes transparency from its charter schools' operations and is often used to coordinate hiring through the H-1B program and the shuffling of funds among the schools to obscure the schools' periodic insolvency. According to whistleblower testimony from Yunus Avcu, a former Gülenist employee for the Western Region CMO Accord Institute of Education Research, Accord also collected the monthly tuzuk payments from the schools' H-1B employees, forged documents regarding the use of federal education funds, and required schools to use certain Gülenist vendors.

Stage Three Activities include:

- The CMO is incorporated and created
- Schools contract for CMO services for a fee
- Schools within the CMO's network intermingle funds to obscure periodic insolvency
- CMO takes over hiring, finances, and professional development for schools
- Local Gülenist vendors are now up and running for use by the schools
- Charter schools typically are renewed for additional five-year charter terms
- More charter school applications are filed, in state and sometimes out of state
- Charter schools lease buildings from Gülenist landlords
- Charter schools sell their buildings at a loss to Gülenist landlords, who lease the buildings back at inflated prices
- Gülenist landlord and network have entered into 1-2 bond financing arrangements

Stage Three Charter Networks

- Arkansas
- Ohio
- Illinois
- Missouri
- Oklahoma
- California

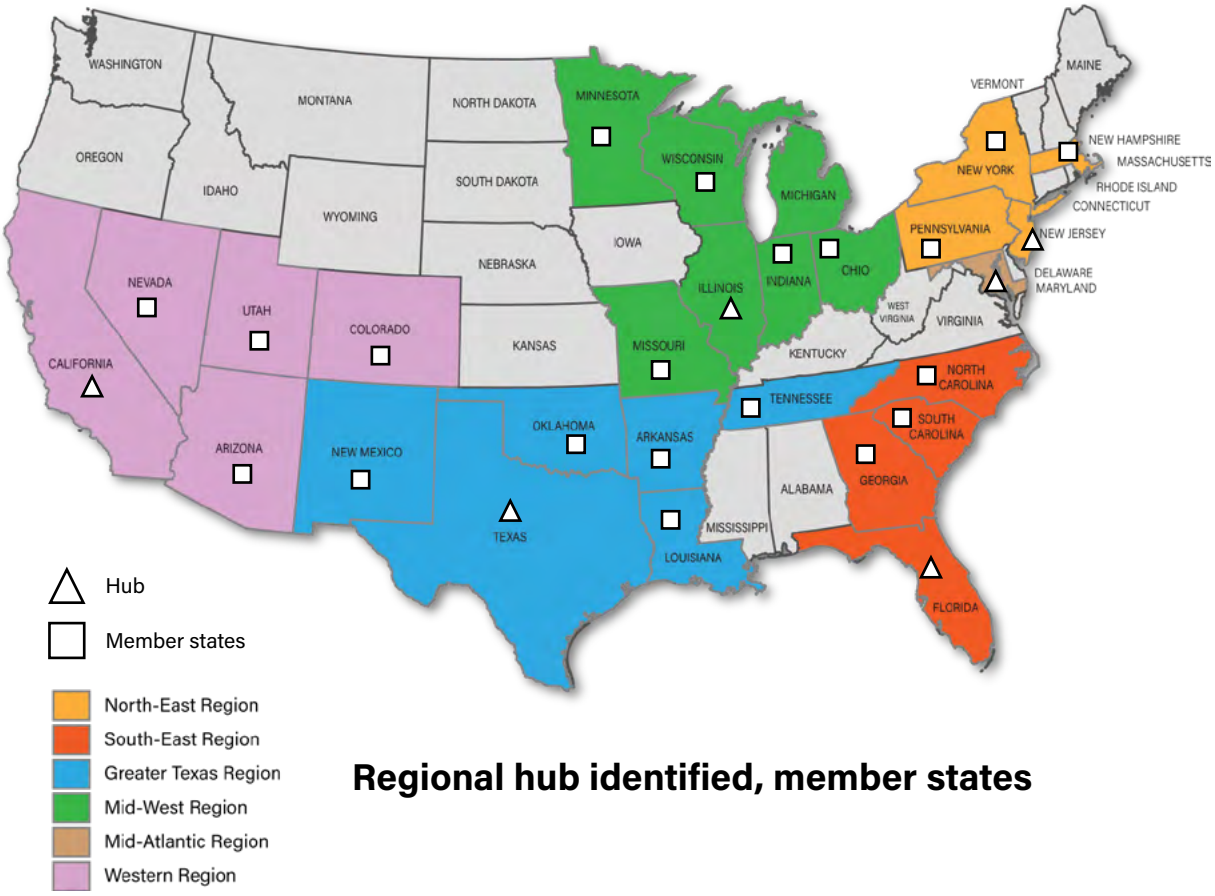
Stage Four: Too Big To Fail

By Stage Four, the Gülen Organization charter network within the state has grown too big to fail. We believe that at this stage enough state resources are tied up within the charter network that meaningful oversight and accountability by the authorizer lapses because the effect of holding the network accountable would have far-reaching detrimental effects in the state. By Stage Four, the Gülen Charter network has generally withstood serious allegations and scandals from the community regarding its operations.

Stage Four Activities Include:

- CMO files charter school applications in surrounding states, establishes regional presence
- CMO secures contracts to provide educational services to other Gülen Organization charter networks in surrounding states within the region
- CMO enters into licensing and support service agreements with other Gülen Organization charter networks throughout the country
- Gülenist landlord entity has secured significant bond financing and owns

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Regional hub identified, member states

several properties, perhaps crossing state lines, which it leases back to charter schools in 30-year leases with abusive terms and steep rental escalation clauses

- ▷ Gülenist vendors rise to prominence as regional providers of services to all Gülen Organization charter networks within the region
- ▷ Longstanding, established friendships with state lawmakers, who now attend ribbon-cutting ceremonies and school functions, sometimes serving on powerless advisory boards

Stage Four Charter Network:

- ▷ Texas

Now that each region except the Southeast has at least one major charter network operating within it, recent expansion attempts into new states are led primarily by existing charter networks. For example, Sonoran (AZ) attempted to open a charter school in Hawaii, and Coral (NV) attempted to open a charter school in Washington. Each region has a regional state hub, where the CMO that oversees the entire region is located generally. The other states within the region are member states, and further expansion in those states is led by the Gülen Organization charter network in that state under the purview of the regional CMO.

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Dismantling the Gülen Organization Charter Empire

With objective evidence gathered from the public record corroborated by personal accounts of wrongdoing witnessed by former employees, parents, and students of these charter schools, it is time for those with the power and authority to hold the Gülen Organization accountable and dismantle its grasp on public education. Charter authorizers, local school districts, state departments of education, state auditors, attorney generals, state and federal law enforcement agencies, state legislatures, teachers unions, and charter school associations all can take action to halt the Gülen Organization's exploitation of American public education.

Charter Authorizers, Local School Districts, and State Departments of Education: The entities with direct authority to oversee charter schools within its jurisdiction can often take the most effective and immediate action against Gülenist charter schools. The entity that authorized the charter school to open has discretionary authority to conduct financial reviews, review school documents and information, perform drop in visits, conduct interviews with staff and families, and generally oversee the school's operations. Such discretionary oversight can be utilized to conduct deeper investigations into the school's financial conduct and dealings with affiliated vendors.

While charter authorizers may believe that the annual independent audit charter schools are required to submit would catch evidence of Gülen Organization abuse, this is not often the case. Annual audits are extremely high level and omit review of line-item expenditures. They do not contain information about which entities the school pays for what services, or whether the services paid for were ever in fact received. To uncover a network of self-dealing and misuse of public funds, a forensic accounting audit must be conducted. This can be demonstrated by both the Magnolia network in California, whose annual audits did not pick up on the rampant misuse of funds later caught by the Los Angeles Unified School District's series of forensic audits conducted, as well as the Fulton Science network in Georgia. Like Magnolia, the Fulton Science charter schools had annual audits that indicated periodic insolvency, but did not provide information as to its causes. When the Fulton County School District hired a forensic accounting of the schools to untangle the schools' handling of their public funds, the forensic audits showcased widespread misuse of school funds, use of affiliated vendors, self-dealing among paid employees of the schools, and the use of a sham educational management organization that in fact provided no services for their hefty annual fees. In light of these cases, the single most effective measure to take is for charter authorizers to conduct a forensic accounting audit of the Gülenist charter schools in their jurisdiction.

Similarly, the local school district that houses the Gülenist charter school can pressure the charter authorizer, if separate from the district, to conduct appropriate oversight over the charter school. State departments of education also have general oversight authority over all public schools within the state and can conduct their own investigations into Gülenist charter schools. What is required is a hard look at the schools' actual use of funds down to the line item level, and if possible, interviews with the Turkish H-1B employees at all levels of the schools' organization. These interviews can prove useful as demonstrated by the Fulton Science forensic audits. During the course of the H-1B employee interviews, the auditors gained information that exposed the Gülenist educational management organization as a sham corporation that was collecting fees from the Fulton Science schools without providing any meaningful services.

State Auditors, Attorney Generals, and State/Federal Law Enforcement Agencies: State auditors have plenary authority to conduct in-depth audits and investigations on entities receiving public funds within the state, including Gülenist charter schools. In fact, the

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Oklahoma State Auditor uncovered the Dove Science Academy real estate scam by doing a specific investigation of the schools' use of funds. In doing so, the Auditor discovered that the Dove Science Network's allegedly non-profit organization, the Sky Foundation, was in effect leasing property it owned to itself for use by the schools at an outrageous mark-up. The Auditor also found a large facially illegal and unjustified payment of Oklahoma public funds from Dove Science to its regional Gülenist management organization, Harmony Public Schools, to sponsor a student competition that no Dove Science students attended or participated in.

Similarly, offices of the Attorney General and other local and state law enforcement agencies should take action to investigate the networks of Gülenist charter schools within their jurisdictions. While there is evidence of apparent self-dealing and white collar criminal-type kickbacks between schools and affiliated vendors, there are also troubling concerns regarding what appears to be the human trafficking of Turkish Gülenists. Former H-1B employees have provided testimony that they were required to hand over their passports to the school's Turkish leadership. If the H-1B employee did not tithe back up to 40% of their salary on a monthly basis, work extra hours, recruit students, or relocate to other states and schools as mandated by the Gülen Organization, the H-1B employee's visa sponsorship would be cancelled, and the individual would be forced to return to Turkey as an enemy of the Gülen Organization. After arriving to the U.S., these H-1B employees are often forced to live together in the same apartment in complexes owned by Gülenists within the Organization who keep close control over them. According to the U.S. Trafficking Victims Protection Act, human trafficking encompasses recruiting, transporting, harboring, and obtaining individuals for compelled labor through the use of force, fraud, or coercion, which includes threat of deportation to compel action. As such, offices of the Attorney General and local/state law enforcement should investigate the exploitation of Turkish Gülenists by the Gülen Organization.

State Legislatures: The State Legislature can initiate its own investigations and audits, as California did with Magnolia Public Schools and Utah did with Beehive Charter Academy, but it can also proactively pass legislation that makes it difficult for the Gülen Organization's model of abuse to thrive. For example, the Gülen Organization was actively building its presence in Mississippi and was preparing to submit charter petitions to expand its presence there when the legislature passed House Bill 369 that made its abuse model impossible. The 2013 Mississippi legislation specifically prevented the charter school's use of immigrant work visa programs without special permission for each role hired and proof that the school was unable to hire a lawful permanent resident first, as well as mandatory disclosure of gifts and donations from foreign governments and legal entities and domestic entities affiliated with foreign governments and legal entities. Because it is apparent that the Gülen Organization depends on filling its schools with Turkish Gülenists to increase profits through requiring tithing and also to perpetuate the abuse which obscures the school's true use of public funds and performance, legislation which requires judicious use of the H-1B program effectively stopped the Gülen Organization's spread to the state's public education sector. Other states can easily pass similar requirements for charter schools to prefer lawful residents of the United States prior to utilizing the visa work programs without affecting the overall charter school movement.

Teachers Unions and Charter School Associations: Teachers Unions are important advocates not only for the teachers that belong to their organizations, but also for the teaching profession as a whole. Unions can play an important role in educating their members of the Gülen Organization and its charter schools, as well as reaching out to teachers within the Gülen charter schools to alert them of their rights. In at least one state so far, Illinois, the Gülen Organization has ardently fought against its teachers' right to unionize and won. Because it is apparent that the Gülen Organization's profit model depends

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on its schools overpaying Turkish H-1B teachers, who are later forced to tithe back almost half their salaries to the organization, unionization of the Gülen charter schools' teachers would seriously disrupt the Gülen Organization's ability to profit by standardizing payment among the American and Gülenist H-1B teachers. Unionization would also disrupt the Gülen Organization's model of hiring H-1B teachers without qualifications over local educators and also the promotion of complicit H-1B employees to leadership positions within the schools that participate in the Gülen Organization's abuse.

In every state that has charter schools, a charter school association typically exists, as well. Charter schools pay membership dues to belong to these advocacy organizations, which propose legislation that favor charter schools and advocate for their growth and expansion in sometimes hostile states. Like unions, Charter school associations can also play an important role in standing against the corruption and fraud rampant among Gülen charter schools while still remaining pro-charter. Charter school associations should take a hard look at their membership ranks and ascertain whether the association's assets should be utilized to defend bad actors within their own ranks who, by disregarding the law, discredit the American charter school movement. As many charter advocates can attest, once scandal hits a state's charter school community, it becomes significantly more difficult to open new charter schools within that state. If, however, a state's charter school association used its connections and insight to advocate for a proactive investigation of Gülen charter schools by state actors such as charter authorizers, the state legislature, or the state department of education, it would serve dual purposes by disassociating the charter school association with Gülenists as well as safeguarding the charter movement within the state.

Moving Forward

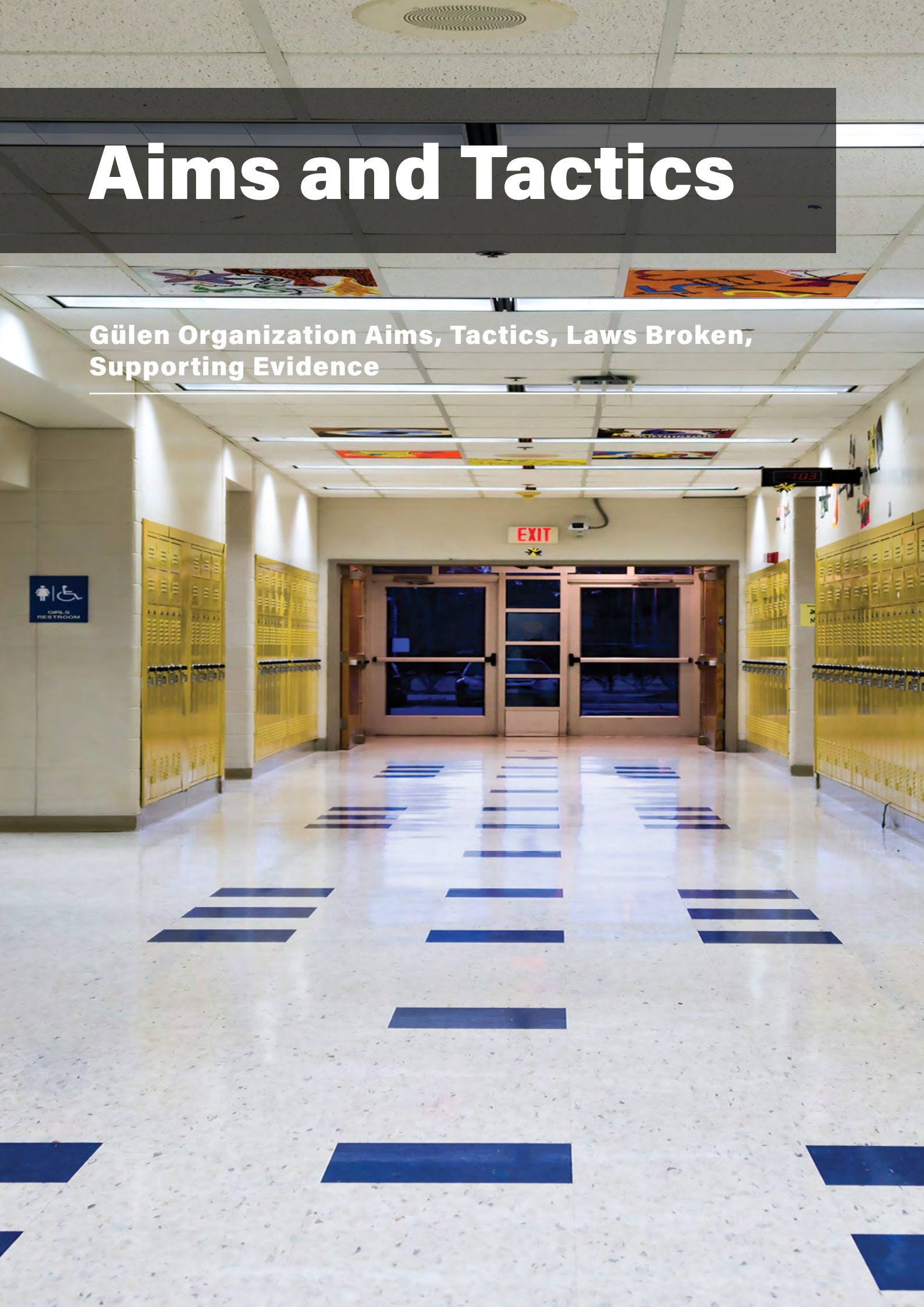
Amsterdam & Partners request that all of these stakeholders, from unions to the legislatures, take the action within their jurisdiction to put an end to the Gülen Organization's exploitation of the public education system and harmful manipulation of the charter school movement. While certain identifying information in this report has been redacted to protect whistleblowers, this information may be available on a confidential basis to assist in investigations.

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Aims and Tactics

Gülen Organization Aims, Tactics, Laws Broken, Supporting Evidence



AIMS	TACTICS	Gülen NETWORKS USING TACTIC	TACTIC RATIONALE	TYPES OF LEGAL VIOLATIONS (Potential and/or Documented)	TYPES OF SUPPORTING EVIDENCE FOR LEGAL VIOLATIONS (Potential and/or Documented)	NETWORKS REPORTED FOR LEGAL VIOLATIONS BY EXTERNAL ENTITIES* *Not comprehensive
Increase Revenues to Gülen Organization	Opening New Charter Schools	Networks in 27 states and 1 District have succeeded in opening new charter schools. Networks in at least 6 states have attempted to open charter schools, but have not yet succeeded.	By opening new charter schools, the Gülen Organization creates a guaranteed source of income from public funds – state and federal. It also creates its own customer base for Gülenist vendors and a source of funding to exploit (uniforms, furniture, playground equipment, etc). New charter schools also provide jobs to Gülenists coming from Turkey on H-1B visas, who in turn tithe up to 40% of their salaries back to the Gülen Organization.	Misrepresentations within charter petitions and applications	Fraudulent petitions indicating community support; use of fake names	Arts and Science (NJ) Young Scholars (PA)
					Fraudulent lists of anticipated faculty and staff members for new schools	Magnolia (CA)
					Fraudulent use of individuals' names as founding board members within petition (not sure to include)	Hampden (MA)
					Use of founding Board members as "community representatives" to endorse the new school	Pelican (LA)
					Petitions listed founding board members who at the time were still undergraduates in Turkey	LISA (AR)
	Applying for supplemental Federal/State funding through grants and funding programs (for example, E-Rate)	Of the networks currently in operation, all have attempted and/or succeeded in applying for supplemental federal/state funding. Specifically, 13 networks have applied for E-Rate funding with an affiliated Gülenist vendor.	By applying for additional state and federal funding through grants and programs, the Gülen Organization exponentially increases its funding sources. When the state and federal funding is approved, the Gülen Organization hires Gülenist vendors to complete the work, which further increases the revenues received by the Gülen Organization.	Failure to adhere to federal bidding/ procurement procedures as required by federal funding programs and some state laws	Use of affiliated Gülenist vendors for E-Rate program, despite federal requirements to award projects to unrelated vendors/bidders	Harmony (TX) Frontier (MO) Concept (OH) Concept (IN) Concept (IL) Concept (MI) Concept (MN) Concept (WI) Magnolia (CA) Sonoran (AZ) Coral (NV) Arts & Science (NJ) Hampden (MA) Chesapeake (MD) Lotus (CO)
				Failure to use federal funds according to grant/program requirements	Audit findings of network's use of federal funds	Sonoran (AZ) Harmony (TX) Arts & Science (NJ) Concept (OH) Concept (IN) Hampden/Pioneer (MA) LISA (AR) Pelican (LA) Concept (OH) Lotus (CO)
				Fraudulent misrepresentations on documents submitted to federal funding programs regarding use of funds	Whistleblower testimony	Sonoran (AZ)

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Increase Revenues to Gülen Organization				Misuse of federal funds to provide "kickbacks" to Gülenist vendors and charter network	E-mail correspondence between Gülen charter network and affiliated vendors detailing impropriety, kickbacks, and organized misuse of federal funds under investigation by FBI); whistleblower testimony	Concept (OH) Concept (IL) Concept (IN) Concept (MI) Concept (MN) Concept (MO) Concept (WI) Lotus (CO) Sonoran (AZ) Magnolia (CA)
	Hiring H-1B Teachers from Turkey and other countries within Gülenist sphere of influence (Azerbaijan, Turkmenistan, Bosnia & Herzegovina)	Of the networks currently in operation, all have hired H-1B employees from Turkey.	Hiring H-1B teachers from Turkey increases revenues to the Gülen Organization because H-1B employees are forced to tithe back up to 40% of their salaries to the Gülen Organization in exchange for their immigration sponsorship and employment within the Gülen Organization. While H-1B employees are often paid more than other employees on paper, in reality these employees are making much less because of the forced tithing. Many Gülen employees also make significant political contributions to state and federal campaigns.	Violation of the H-1B program requirements to pay the prevailing wage in the application	Tuzuk payments: By requiring H-1B employees to pay 15-40% of their salaries back to the Gülen Organization through forced tithing, these charter networks are violating the H-1B requirement to pay the designated prevailing wage identified in the H-1B application process. This is reported through whistleblower testimony	Concept (Midwest) Magnolia (CA) Lotus (CO) Sonoran (AZ) Academy of Science (NY) Harmony (TX)
				Use of multiple related entities to hire H-1B employees to same location to prevent "H-1B dependent" designation, which requires additional oversight	Gülen networks often process H-1B applications under multiple similar names and/or related entities, which prevents the charter network or school from being identified by the U.S. government as H-1B dependent. This can be verified through examining the DOL H-1B application paperwork.	Coral (NV) Beehive (UT) Magnolia (CA) Sonoran (AZ) LISA (AR) Harmony (TX) Dove Science (OK) Concept (OH) Concept (MI) Concept (MN) Concept (IN) Concept (IL) Hampden/Pioneer (MA) Chesapeake (MD) Fulton Science (GA) FL (all networks) Young Scholars (PA) Frontier (MO)
				Hiring through H-1B without trying to hire domestically first	Local employment hiring paperwork, job postings, and/or lack thereof often indicate that the charter network or school did not meaningfully attempt to hire locally before resorting to the H-1B process. This is reported through whistleblower testimony, lawsuits, and audit/investigation findings by local/state authorities.	Fulton Science (GA) Coral (NV) Academy of Science (NY) Magnolia (CA) Sonoran (AZ) Lotus (CO) Beehive (UT) Concept (OH) Concept (IL) Hampden/Pioneer (MA) Chesapeake (MD)

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Increase Revenues to Gülen Organization				Misuse of public funds by paying immigration expenses of H-1B employees and/or governing board, including their family members	Annual audits of the charter school spending; reports and findings by local/state authorities.	Magnolia (CA) Concept (OH) Harmony (TX) Concept (WI) Arts & Science (NJ) Beehive (UT)
	Failure to Report Truancy	Unknown	Gülen charter networks have been found to under-report truancy data, which has the effect of increasing education funding for students that no longer attend the school.	Misrepresentation in financial record-keeping which increases education funding fraudulently	Comparison of Truancy reporting to local attendance records; audit findings.	Magnolia (CA) Fulton Science (GA) Sonoran (AZ) Concept (IN)
	Hiring Gülenist Vendors	Of the networks currently in operation, all routinely hire related Gülenist vendors to provide goods and services to the charter network.	By requiring the schools/networks to hire Gülenist vendors, the public funds are transferred out of the school but stay within the Gülen Organization itself. Gülenist vendors also have to tithe portions of the money they receive to the Gülen Organization, make significant donations and contributions to local, state, and federal politicians to secure favor for the Gülen Organization and its political agenda. Sometimes, the Gülenist vendor does not perform any of the services purchased but still is paid, giving the Gülen Organization a front for extracting funds from the schools for its own purposes. Vendors may also have more than one contract with the Gülen schools at the same time but under a different company name. Addresses for vendors may be the same as a Gülen schools showing the close relationship and failure to adhere to fair and open bidding process.	Failure to adhere to state, local, or federal bidding/procurement requirements for hiring vendors paid for with public funding	Evidence or lack thereof of appropriate bidding and/or procurement procedures followed as documented by external local/state authorities.	Fulton Science (GA) Concept (Midwest) Academy of Science (NY) Pelican (LA)
				Nepotism, including failure to avoid organizational and/or personal conflicts of interest when hiring related Gülenist vendors	Reviewing network contracts with vendors; School financial statements; Vendor ownership information; Documented overlap between school governing board or charter network leadership with Gülenist vendors chosen	Magnolia (CA) Fulton Science (GA) Concept (Midwest) Lotus (CO) Sonoran (AZ) Young Scholars (PA) Pelican (LA)
				Waste of public funds	Comparison of scope of work paid for to work received; Reasonableness review of amounts paid to Gülenist vendors; Whistleblower testimony	Harmony (TX) Lotus (CO) Fulton Science (GA) Magnolia (CA)

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Increase Revenues to Gülen Organization				Violation of charter governing board fiduciary duties of loyalty and due care to make decisions in the best interest of the charter school (as opposed to the Gülen Organization)	Reviewing network contracts with vendors; School financial statements; Vendor ownership information; Documented overlap between school governing board or charter network leadership with Gülenist vendors chosen; Comparison of scope of work paid for to work received	Concept (Midwest) Magnolia (CA) Fulton Science (GA) Harmony (TX) Young Scholars (PA)
	Tuzuks & Tithing	Of the networks currently in operation, all are suspected of engaging in the forced tithing system for H-1B employees. Furthermore, networks typically pay Turkish H-1B employees more than other employees in light of the forced tithing and H-1B prevailing wage requirements.	By requiring the H-1B employees to tithe up to 40% of their salaries monthly in order to be hired and immigrated to the U.S., the Gülen Organization increases its revenues significantly each time it hires a H-1B employee. The Gülen Organization also requires additional, often unpaid labor from its H-1B employees, as well as Gülenist cultural outreach to spread its message. In the cases of Fulton Science (GA) and Concept (Midwest), the charter schools paid Gülenist vendors for work that was in reality being performed by the schools' H-1B employees after hours for free. In case of Harmony, employees of the school network are shown as full-time with full-time salaries paid by state dollars; yet Harmony is providing at least $1.2 million in support services to other Gülen schools billed at an hourly rate or a percent of total state funds. There is no record of who is providing these services.	Federal Human Trafficking by requiring H-1B employees to tithe large portions of their wages in order to remain on the H-1B visa; requiring H-1B employees to leave passports with school/network.	Tuzuk contract; Employee pay records; Bond documents; Whistleblower testimony	Lotus (CO) Beehive (UT) Coral (NV) Sonoran (AZ) Magnolia (CA) Academy of Science (NY) Concept (Midwest)
				Violation of H-1B prevailing wage by not truly paying H-1B employees the amount declared on application due to forced tithing	Tuzuk contract; Employee pay records; Whistleblower testimony	Lotus (CO) Beehive (UT) Coral (NV) Sonoran (AZ) Magnolia (CA) Syracuse (NY) Concept (Midwest)
				Violation of Equal Pay Act by paying males more than females for same work tendered	Employee pay records	Harmony (TX) Concept (Midwest) Pelican (LA)
				Violation of Title VII Employment Discrimination on the basis of favoring individuals of Turkish national origin in hiring, pay, and promotion to leadership positions within the school and network	Employee pay records from state education agencies; Review of personnel records; Review of employee contracts; Review of staffing history for school/network; Litigation	Harmony (TX) Concept (Midwest) Lotus (CO) Academy of Science (NY) Pelican (LA) Fulton Science (GA)

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Increase Revenues to Gülen Organization	Bond Financing	Of the networks currently in operation, 18 have attempted and/or succeeded to secure bond financing to pay for facilities expansion.	The Gülen Organization uses bond financing to significantly expand its facilities and to create a long-term debt and presence in the state. This is an important step to creating a network that is "Too Big to Fail," such as Harmony (TX) who has over $500 million in bond financing currently.	Misrepresentations within bond financing documentation	Comparison of bond disclosure to external documents	Fulton Science (GA) *misrepresentations in bond financing
	Support Service Agreements	Of the networks currently in operation, 8 pay public funds to external Gülenist charter networks for support service agreements.	The Gülen Organization increases revenues by coordinating a variety of "support service agreements" between Gülenist charter networks, including intellectual property licensing agreements, support services generally, and debt/bond guaranteeships.	Misuse of public funds	Audits of schools; contracts between charter networks	LISA (AR) Excellence (TN) Pelican (LA) Dove Science (OK) Harmony (DC) Excellence (NM) Riverwalk (TX) Frontier (MO)
	Creating/Using Gülenist Landlord Entities	Of the networks currently in operation, 21 lease from affiliated Gülenist landlord entities.	By creating Gülenist-controlled landlord entities to purchase land and facilities to rent back to the schools, the Gülen Organization is again on both sides of the transaction. The Gülenist landlord entities overcharge on rent, which is another way for the Gülen Organization to funnel public funds from the school to the Gülen Organization under the guise of a legitimate expense. Furthermore, if the schools are terminated or non-renewed, the publicly-financed property remains in Gülenist hands.	Nepotism, including failure to avoid organizational and/or personal conflicts of interest when hiring related Gülenist vendors	Review school/landlord leases; Review property ownership; Review overlap between school, network, and/or landlord entity; Bond documents	Concept (OH) Concept (IL) Concept (IN) Concept (MO) Concept (MN) Dove Science (OK) Harmony (TX) Coral (NV) Buffalo (NY) Young Scholars (PA)
				Waste of public funds	Reasonableness review of lease agreement and/or property sale between school, network, and/or landlord entity; Comparison of rental prices to value of property	Concept (OH) Dove Science (OK) Young Scholars (PA) Coral (NV)
				Violation of charter governing board fiduciary duties of loyalty and due care to make decisions in the best interest of the charter school (as opposed to the Gülen Organization)	Review school/landlord leases; Review property ownership; Review overlap between school, network, and/or landlord entity; Lease/sale terms that benefit Gülenist landlord at expense of school	Concept (OH) Dove Science (OK) Coral (NV) Young Scholars (PA)

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Maintain Control of the Gülen Organization & Its Assets	Appointing Gülenists to charter governing board (school and/or network level)	Of the networks currently in operation, nearly all have governing boards at the school and/or charter network level that are dominated by a Gülenist majority or supermajority.	By maintaining Gülenist control over the school/network's governing board, the Gülen Organization can control the school's spending and remove oversight by stacking Gülenists on all sides of every transaction, creating closed -loop decision-making process.	Violation of charter governing board fiduciary duties of loyalty and due care to make decisions in the best interest of the charter school (as opposed to the Gülen Organization)	Review of school/network/vendor agreements, contracts, leases, and/or invoices for reasonableness, excessive charges, and/or underperformance of goods/services provided	Most schools have majority/super-majority Turkish boards except: Beehive (UT) (reconstituted after state audit finding issues) Dove Science (OK) (Reconstituted after state audit finding real estate issues with Turkish-controlled board) Coral (NV) Harmony (DC)
	Third-Party Control of Bond Financing	Of the networks currently in operation, 18 have attempted and/or succeeded to secure bond financing. Of those 18 networks, 14 have attempted and/or secured bond financing through a Gülenist-controlled third party.	By placing bond financing in the hands of Gülenist-controlled private entities, the Gülen Organization effectively maintains ownership and control over properties purchased with that financing as well as decreasing transparency over the use of the bond financing.	Misuse of Public Funds; Waste of public funds	Bond financing documents; Large disparities in rents paid in comparison to real estate purchase price, actual renovation costs, and annual bond debt	Academy of Science (NY) Science/Tech (NJ) Young Scholars (PA) Triad (NC) Green (SC) Harmony (TX) Excellence (NM) Dove Science (OK) LISA (AR) Coral (NV) Magnolia (CA) Concept (OH) Concept (IL) Chesapeake (MD) *All networks that use affiliated 3rd party for bond financing
	Using Gülenist landlord entities	Of the networks currently in operation, 21 rent or have property arrangements with a related Gülenist landlord.	Typically, if a charter school loses its authorization to operate, its assets are redistributed to the state or the authorizing school district. By creating Gülenist landlord entities to legally own the school properties paid for with public funds, if the charter schools are terminated or non-renewed, the Gülenist landlord entity retains ownership of the school property, despite the fact that it was paid for with public funds.	Violation of charter governing board fiduciary duties of loyalty and due care to make decisions in the best interest of the charter school (as opposed to the Gülen Organization)	Review school/landlord leases; Review property ownership; Review overlap between school, network, and/or landlord entity; Lease/sale terms that benefit Gülenist landlord at expense of school	Dove Science (OK) Harmony (TX) Coral (NV) LISA (AR) Concept (MN) Concept (IN) Concept (OH) Concept (IL) Concept (MO) Young Scholars (PA) Academy of Science (NY) Triad (NC) Green (SC) Multiple networks (FL) Science/Tech (NJ) Excellence (NM) Frontier (MO) Magnolia (CA) Lotus (CO) Chesapeake (MD) Hampden (MA)

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Maintain Control of the Gülen Organization & Its Assets	Hiring Gülenist Administrators	Of the networks currently in operation, all routinely fill senior leadership positions at the school and network level with Gülenists.	By hiring Gülenists in school and network leadership positions, including CEO/superintendents, principals, business managers, CFOs, human resource directors, and school counselors, the Gülen Organization is able to control the school/network's spending and remove oversight and accountability for how the school spends its funds and who the school hires for its services/goods. In addition, it allows the schools to manipulate student records, such as transcripts. It also enables the Gülen Organization to continue filling as many positions as possible with H-1B hires from Turkey.	Violation of Title VII Employment Discrimination on the basis of favoring individuals, generally male, of Turkish national origin in hiring, pay, and promotion to leadership positions within the school and network	Review of personnel records; Review of employee contracts; Review of staffing history for school/network; Litigation; interviews with former administrators	Harmony (TX) Concept (OH) Concept (IL) Academy of Science (NY) Lotus (CO) Fulton Science (GA) Pelican (LA) Magnolia (CA) *Those receiving suits, complaints, or with whistleblower testimony.
	Shuffling H-1B employees between schools and networks	Of the networks currently in operation, all routinely fill leadership, teaching, and staff positions at the school and network level with Gülenist H-1B employees.	The Gülen Organization routinely shuffles its H-1B employees between schools, networks, regions, and vendors, allowing them to maintain control over key positions by filling them with Gülenists. They are also able to implement systems across networks and expand the operation within different states, using experience gained on the job in the previous school/network. In addition, the extensive network of Gülen schools allow employees who experience problems in one network to move to another where those problems are not known or disclosed.	Violation of Title VII Employment Discrimination on the basis of favoring individuals, generally male, of Turkish national origin in hiring, pay, and promotion within the school and network	Review of personnel records; Review of employee contracts; Review of staffing history for school/network; Litigation; Review H-1B employee resumes	All
	Extensive political outreach and donations	Of the networks currently in operation, all routinely engage in political outreach to local, state, and federal lawmakers, as well as key members of the community.	The Gülen Organization dedicates substantial revenues to political outreach and campaign donations to politicians at all levels of government and from both major political parties. This provides the schools/networks with political support when outside entities question the schools/networks' operations and financial misuse.	Misuse of public funds	Campaign donations listing Gülenist employees of the charter schools, networks, vendors, governing board members, and affiliated Gülenist cultural organizations	Harmony (TX) *Harmony is the only network we have researched for this issue at this time.

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Maintain Control of the Gülen Organization & Its Assets				Money laundering. Some Gülenist H-1B employees are listed as donating as much as their entire salaries in a given year, which may be the result of money laundering to divert public funds from the schools to politicians.		
	Providing Free/ Low Cost Trips to Turkey	Of the networks currently in operation, all routinely provide free or low-cost trips to Turkey for local, state, and federal politicians, as well as key members of the community, parents, students, and teachers.	While in Turkey, participants often stay in Gülenist educational institutions, Gülenist host homes, and are taken to cultural sites throughout Turkey. They also meet with notable Gülenist Turkish businesspeople. This provides participants with favorable impressions of Gülenists, Turkey, and the charter networks. This curries favor and support, which allows the Gülenists to maintain control over the schools and networks.	Misuse of Public funds	Review of documentation (or lack thereof) regarding Turkey trip itinerary, including addresses of where students were housed, safety protocols followed; investigation by Office of Congressional Ethics; Whistleblower testimony	Fulton Science (GA) for legal issues surrounding trips; All state networks provide trips, however.
				Violation of local authorizer policies regarding health and safety requirements for international field trips for students		
	Turkish language and culture instruction in schools	Of the networks currently in operation, all provide Turkish language and culture instruction schools.	The spread of Turkish culture and language throughout the world is a key tenet of Gülen's philosophy that prioritizes the re-creation of the Ottoman Empire, with Turkey standing at the cultural and financial center of the world.	None	Curriculum	All
	Turkish culture, dialogue dinners, events, and Turkish festivals (community)	Of the networks currently in operation, all engage in Turkish cultural outreach throughout the community.	The spread of Turkish culture and language throughout the world is a key tenet of Gülen's philosophy that prioritizes the re-creation of the Ottoman Empire, with Turkey standing at the cultural and financial center of the world.	None	Review of affiliated Gülenist cultural organization's calendar of events; Review of field trips to Turkish food/cultural festivals attended by charter networks	All

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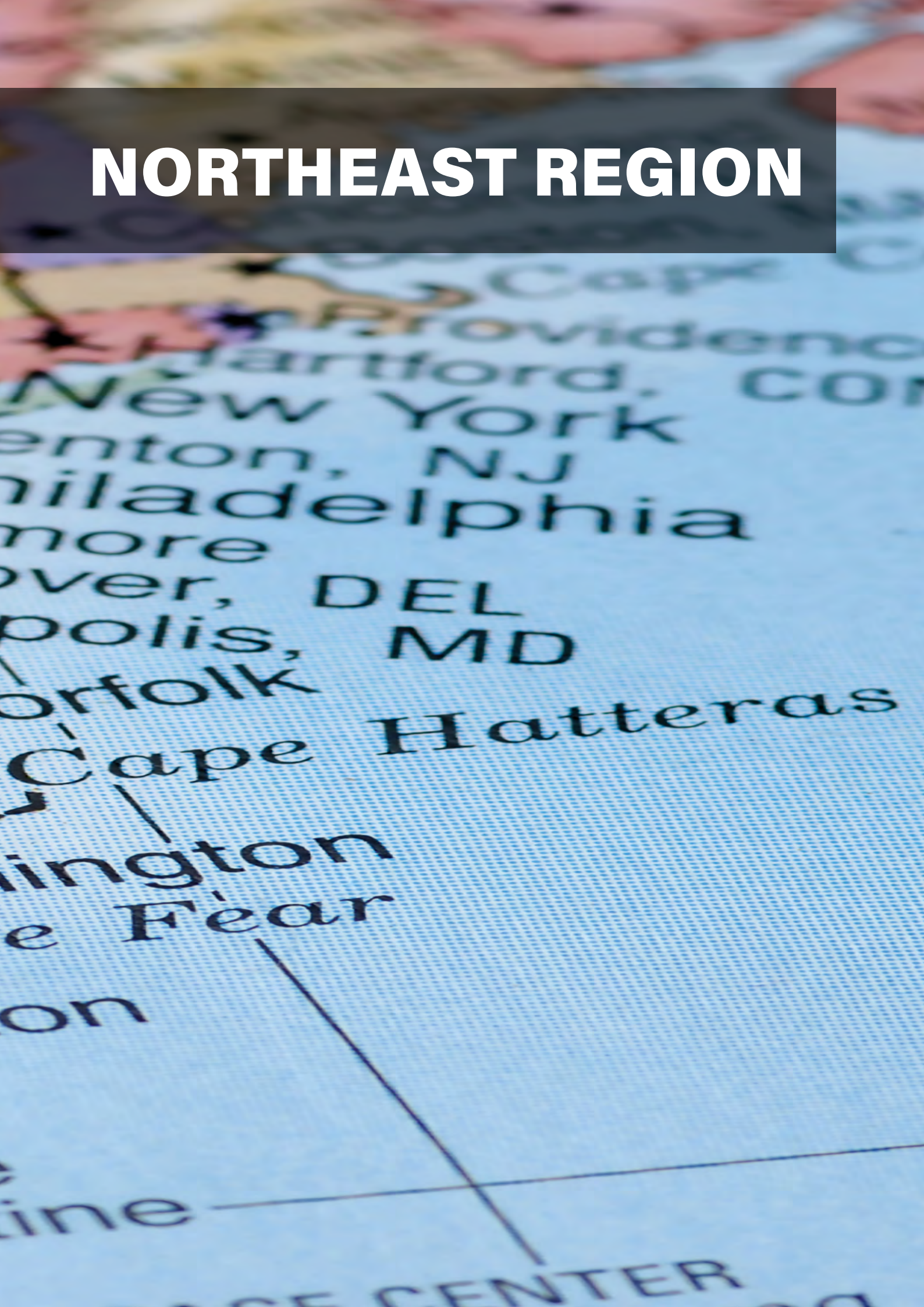
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Maintain Control of the Gülen Organization & Its Assets	Barriers to Enrollment for Vulnerable Student Populations	Of the networks currently in operation, several serve statistically lower averages of vulnerable student populations than that served by the district/state.	By preventing students with special needs, such as students with disabilities, English language learners, and students eligible for free/reduced lunch, schools are able to keep their scores on state assessments higher, which ensures that the charter contracts will be renewed and expansion approved.	Violation of anti-discrimination laws for students with disabilities (IDEA, ADA)	Comparison of charter school averages for vulnerable student populations vs. district and state averages; Individual testimony; Whistleblower testimony	Concept (MN) Concept OH) Concept (IL) Fulton Science (GA) Multiple networks (FL) Harmony (TX) Arts & Science (NJ) LISA (AR) Coral (NV)
				Violation of anti-discrimination laws for minority students and/or students of different national origin	Comparison of charter school averages for vulnerable student populations vs. district and state averages; Individual testimony; Whistleblower testimony	
				Violation of requirements to have an open enrollment and admissions process for charter schools without illegal admissions criteria	Comparison of charter school averages for vulnerable student populations vs. district and state averages; Individual testimony; Whistleblower testimony	
	Gülen Organization-Sponsored Competitions (national, international)	Of the networks currently in operation, all routinely participate in Gülen Organization-sponsored student competitions, both nationally and internationally.	By holding their own student competitions, Gülen charter networks can artificially bolster the amount of awards "won" by their students, thereby increasing parent satisfaction with student performance while increasing student satisfaction with numerous field trips. Furthermore, this is another "legitimate" expense that Gülen charter schools can overpay for and extract more funds out the public schools and parents.	Misuse of public funds	Report from Oklahoma State Auditor re: payment from schools/networks to Gülen Organization-sponsored competitions that those schools/networks did not participate in.	Dove Science (OK)
	Falsifying assessment data, student cheating	Of the networks currently in operation, at least 4 have had claims of tampering with assessment data and student cheating.	Tampering with assessment data and high school transcripts and allowing student cheating on assessments serves to artificially inflate Gülen charter school performance.	Fraudulent reporting of assessment data	Individual testimony; Whistleblower testimony; State investigations	Concept (OH) Academy of Science (NY) Fulton Science (GA) School of Science (FL)

AIMS	TACTICS	Gülen NETWORKS USING TACTIC	TACTIC RATIONALE	TYPES OF LEGAL VIOLATIONS (Potential and/or Documented)	TYPES OF SUPPORTING EVIDENCE FOR LEGAL VIOLATIONS (Potential and/or Documented)	NETWORKS REPORTED FOR LEGAL VIOLATIONS BY EXTERNAL ENTITIES* *Not comprehensive
Obscuring the Gülen Organization itself, its Use of Public Funds, and Removing Transparency	Poor financial controls and documentation procedures	Of the networks currently in operation, at least 17 have had audit findings, investigations, reports, and/or documentation by outside oversight entities (authorizer, auditor, etc.) of inadequate, vague financial documentation and procedures.	Poor maintenance of financial documentation and records allow Gülenist administrators at the school and network level cover for how public funds are in actuality spent.	Misuse of public funds	Review of Annual audits; Annual reports; Financial statements; Signature authority for vendor contracts; Financial investigations; Financial procedures and policies at school and network level	Magnolia (CA) Fulton Science (GA) Beehive (UT) LISA (AR) Concept (IN) Concept (OH) Concept (MI) Triad (NC) Arts & Science (NJ) Frontier (MO) Academy of Science (NY) Coral (NV) Lotus (CO) Sonoran (AZ) Chesapeake (MD) Hampden/ Pioneer (MA) Young Scholars (PA)
	Lending and/or unauthorized payments between schools, and between schools, school employees, governing board members, networks, and vendors	Of the networks currently in operation, at least 17 have been documented by external oversight entities for engaging in lending practices between related parties.	The Gülen Organization widely uses lending to obscure periodical fiscal insolvency at the school and network level. It also may be engaging in money laundering as back-and-forth loans between related entities is a warning sign for money laundering behavior.	Misuse of public funds	Review of Annual audits; Annual reports; Financial statements; 990 tax documentation; Financial investigations	Dove Science (OK) Magnolia (CA) Beehive (UT) LISA (AR)
				Money laundering, obscuring periodic insolvency; inappropriate lending; conflicts of interest	Review of Annual audits; Annual reports; Financial statements; 990 tax documentation; Financial investigations; Comparison of stated use for loan vs. how the loan's proceeds were used	Concept (OH) Concept (MI) Concept (IN) Triad (NC) Harmony (TX) Dove Science (OK) LISA (AR) Green (SC) Multiple networks (FL) Fulton Science (GA) Chesapeake (MD) Pioneer (MA) Young Scholars (PA) Coral (NV) Lotus (CO) Sonoran (AZ) Magnolia (CA)
	Hiring Gülenist Administrators	Of the networks currently in operation, all routinely fill senior leadership positions at the school and network level with Gülenists.	By hiring Gülenists in school and network leadership positions, including principals, business managers, CFOs, human resource directors, and school counselors, the Gülen Organization is able to control the school/network's spending and remove oversight and accountability for how the school spends its funds and who the school hires for its services/goods.	Violation of Title VII Employment Discrimination on the basis of favoring individuals, generally male, of Turkish national origin in hiring, pay, and promotion to leadership positions within the school and network	Review of personnel records; Review of employee contracts; Review of staffing history for school/network; Litigation	Harmony (TX) Concept (OH) Concept (IL) Academy of Science (NY) Pelican (LA) *Those receiving suits/complaints. All hire a majority of Gülenists in leadership positions.

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AIMS	TACTICS	Gülen NETWORKS USING TACTIC	TACTIC RATIONALE	TYPES OF LEGAL VIOLATIONS (Potential and/or Documented)	TYPES OF SUPPORTING EVIDENCE FOR LEGAL VIOLATIONS (Potential and/or Documented)	NETWORKS REPORTED FOR LEGAL VIOLATIONS BY EXTERNAL ENTITIES* *Not comprehensive
Obscuring the Gülen Organization itself, its Use of Public Funds, and Removing Transparency	Hiring Gülen Organization oversight entities	Of the networks currently in operation, all engage a Gülenist management organization which may be disguised as a vendor, which conducts the Gülen Organization's regional business.	Schools/networks use Gülenist management organizations, which act as the Gülen Organization's oversight entity over the region. These regional oversight entities coordinate H-1B hiring, collection of the Tuzuk, hiring and coordination of Gülenist vendors for their participating charter schools/networks, financial systems, student information systems, curriculum, and teacher development. Because these entities are private in some cases, their records are protected from state and district authorizers who are entitled to see school records.	Misuse of public funds	Review of vendor-school contract; Whistleblower testimony; Investigations; bond documents	All
	Using multiple corporate entities	Of the networks currently in operation, at least 5 have utilized multiple corporate entities, mergers, and other filings.	The Gülen Organization practices strategic ambiguity, which makes it difficult to trace its actions and ultimately, the flow of its revenues collected at the schools' expense.	Violation of H-1B program filing requirements	Comparison of H-1B filing entity names with actual locations where employment occurred; Network Articles of Incorporation; 990 Tax documentation	Chesapeake (MD) Concept (MN) Concept (WI) Concept (IN) Sonoran (AZ)
	Failure to post governing board meeting agendas, minutes, and general lack of accessibility for governing board meetings	Of the networks currently in operation, most fail to post governing board meeting information, agendas, and minutes in a timely fashion, as well as critical financial documents and reports. In addition, governing Board meetings in some states are held in a city hundreds of miles from cities where there are Gülen schools, making if impossible for parents/teachers/public to attend the meetings.	By making governing board meetings and minutes inaccessible to the public, the Gülen Organization maintains secrecy over its business.	Violation of state open records requirements for public or quasi-public entities	Review of websites to see if information is provided; submission of public information requests that are delayed and challenged	Magnolia (CA) Coral (NV) Sonoran (AZ) Harmony (TX) Concept (OH) Concept (IL) Concept (IN) Concept (MI) Concept (MN) Concept (MO) Concept (WI) Frontier (MO) Excellence (NM) Pelican (LA) Dove Science (OK) Green (SC) Harmony (DC) Young Scholars (PA)

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NORTHEAST REGION
Providence
Hartford
New York
Philadelphia
DEL
MD
Cape Hatteras
Cape Fear

Quick Facts

- Total # of Schools in Region: 35 schools/ campuses, 2 private schools

- Total Regional Revenues for the 2015-16 school year: $105 million

- Regional Charter Networks:
  - iLearn Schools – Arts and Sciences (NJ) – 4 schools
  - Paterson Charter School for Science and Technology (NJ) – 1 school
  - Central Jersey College Prep (NJ) – 1 school
  - Thomas Edison EnergySmart Charter School (NJ) – 1 school
  - Young Scholars (PA) – 3 schools
  - Vision Academy (PA) – 1 school
  - Hampden Charter School of Science (MA) – 2 schools
  - Pioneer Charter School of Science (MA) – 2 schools
  - Academy of Science (NY) – 3 schools
  - Rochester Academy of Science (NY) – 1 school

- Total Student Enrollment 2015-16: 8,694 students

- Total # of H-1B applications filed from 2000-2016 in region by Northeast Region Gülen Charter Schools: 451 applications at an estimated cost of $902,000 -$1,804,000 in public funds spent to immigrate Turkish individuals.[1]

- Regional Vendors:
  - Apple Educational Services (Subsidiaries: Ivy Learning, Railway Avenue Properties, Johnson Road Properties)
  - Terra Science and Education Foundation
  - Technotime Business Solutions (Subsidiaries: ProAcademy, Vestell, Inspire)
  - Lotus Media
  - iLearn Schools
  - Dream Schools, Inc. (Subsidiary: Newport Drive Properties)

- Regional Founders and Key Members:
  - Adem Oksuz: Founding CEO, Vision Academy (PA); Regional Director, Apple Education Services – Gülenist vendor (Northeast Region)[2]; CEO, Daisy/Sonoran Schools (AZ)[3]; CEO, Accord – Gülenist vendor (Western Region)[4]; Petitioner, failed Mokapu STEM charter school (HI); Petitioner, Lancaster Science Academy proposal (PA);[5] Educational consultant, ABECS charter application (PA).[6]
  - Ehat Ercanli: Founder and original Board member, Syracuse Academy of Science; at time of founding, Ercanli was Assistant Prof Elec Engineering/Computer Science, Syracuse University; founder of Horizon Education Center in 1998, the parent organization of Horizon

1 H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

2 Oksuz resume available at page 196, http://tinyurl.com/hrzqv5r (last checked 1/30/2017).

3 See 2003 Daisy Education 990 tax form, available at: http://tinyurl.com/jjcrxh9 (last checked 2/15/2017).

4 Accord Business profile listing Oksuz as CEO, available at: http://tinyurl.com/hc7v9lm (last checked 2/15/2017).

5 Information taken from: Article discussing petition and Oksuz, available at: http://tinyurl.com/hxsmlvw (last checked 2/15/2017); Application for Grants under the Charter Schools Program (CSP); Grants to Non-SEAs; Planning Program Design, Implementation, U.S. Dep't of Education (Oct. 6, 2015), available at http://tinyurl.com/lhhw3f6 (last checked 4/17/17).

6 Gil Smart, *Academy of Business & Entrepreneurship Charter School Has Eye on Lancaster City*, LancasterOnline (Nov. 4, 2012), available at http://tinyurl.com/hxsmlvw (last checked 4/15/2017).

Academy Charter Schools; Gülen-affiliated charter network in Ohio; B.S. Istanbul Technical University (Istanbul, Turkey).[7]

- Ahmet Ay: Founder and original Board Member, Utica Academy of Science; at the time of founding, Assistant Professor Department of Biology and Mathematics, Colgate University; Board Member (2012-present) Syracuse Academy of Science; Ph.D., Mathematics and Quantitative Biology, Michigan State University; Bilikent University (Turkey);Yavuz Selim High School (Turkey); Member (2009-2010), Niagara Foundation, key Gülen-affiliated organization that is member of the Alliance for Shared Values; Board Member (2007-2009) Great Lakes Society of Friendship and Culture.[8]
- Fehmi Damkaci: Founder, Pioneer Charter School of Science (MA); President, Syracuse Academy of Science (NY);[9] proposed President, Academy of Science and Citizenship Charter School (NY);[10] President, Terra Science & Education Inc. (NY), which serves as the landlord for Syracuse Academy of Science and engaged in transactions with interested persons due to Damkaci's overlapping roles;[11] currently Associate Professor, SUNY – Oswego.[12]
- Nurcan Civelek: Founder, Pioneer Charter School of Science (MA); Director and Teacher, Ace It Education Center (Gülenist landlord and cultural association, sold property to Apple) (MA);[13] currently Teacher, Harmony Public Schools (TX).[14]
- Murat Kilic: Founder, Pioneer Charter School of Science (MA); Founder and President, MNK Construction Consulting Inc.;[15] former President, Ace It Education (Gülenist landlord, cultural association, sold Hampden Charter School of Science property to Apple);[16] Founder, Boston Dialog Foundation (MA);[17] Petitioner, attempted Queen City Academy Charter School (ME);[18] Construction Consultant, Zurich Financial Services; currently Director of Forensic Delay Analysis and DSU Claims, Brashear Construction Consulting.[19] In an interview, Kilic admitted to reading books by Fethullah Gülen but simultaneously deflected questions about his connections in an example of

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7 Ehat Ercanli biographical information taken from Syracuse Academy of Science Charter Application (Dec. 2, 2002), available through open records request to the New York State Education Department, (last checked 5/19/2017).

8 Ahmet Ay biographical information taken from the Utica Academy of Science Charter Application (July 31, 2012) available through open records request to the New York State Education Department, (last checked 5/19/2017).

9 Syracuse Academy of Science 990s available at: http://tinyurl.com/nxto2sl (last checked 5/9/2017).

10 Matt Jarchow, Proposed Charter School Facing Criticism, Spectrum News (Oct. 11, 2016), available at: http://tinyurl.com/msxlfpg (last checked 5/9/2017).

11 Terra Science & Education Inc. 990s available at: http://tinyurl.com/n3zqvpy last checked 5/9/2017).

12 LinkedIn Profile available at: http://tinyurl.com/md2cn8f (last checked 2/23/2017).

13 Pioneer Charter School of Science ("PCSS") Application, available through open records request to Massachusetts DESE.

14 LinkedIn Profile available at: http://tinyurl.com/hwkmmbr (last checked 2/23/2017).

15 Corporate documents for this entity are available at: http://tinyurl.com/lof39pu (last checked 5/9/2017).

16 Corporate documents for this entity are available at: http://tinyurl.com/n22enjc (last checked 5/9/2017); Turkish Cultural Center Boston, Mission and Vision, available at: http://tinyurl.com/n27a6ey (last checked 5/9/2017); see also Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

17 Corporate documents for this entity are available at: http://tinyurl.com/ml28bxv (last checked 5/9/2017).

18 Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

19 LinkedIn Profile available at: http://tinyurl.com/mqnh9uw (last checked 2/23/2017).

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strategic ambiguity.[20]

- Kadir Peker: Founder, Pioneer Charter School of Science (MA); Vice President, Milkyway Education Center Inc. d/b/a Pioneer Academy (Gülenist landlord, sold property to Apple) (NJ);[21] Former President, Ace It Education (Gülenist landlord and cultural association).[22]
- Riza Ulker: Co-authored a paper with fellow PA founder Bulent Tarman while both attended Penn State University;[23] registered the name "Snowdrop School"; Acting director, Snowdrop Elementary School – Gülenist private school (PA);[24] Board member, Young Scholars of Central Pennsylvania (PA);[25] President, Dream Schools, Inc. – Gülenist landlord entity (PA);[26] CEO, Truebright Science Academy (PA);[27] Left Truebright in March 2011 in the midst of turmoil surrounding the school's charter renewal to teach at Zirve University in Turkey;[28] Petitioner, Allentown Science Academy (PA);[29] Adjunct professor, Manchester Community College (NH).[30]
- Bulent Tarman: Attended Penn State University and co-authored a paper with fellow PA founder, Riza Ulker;[31] Tarman Founding Vice President and Secretary of Dream Schools, Inc. - Gülenist landlord entity (PA);[32] Board Member, Young Scholars of Central Pennsylvania (PA);[33] Teacher, Selcuk University, Necmettin Erbakan University, and Gazi University (Turkey);[34] Employee, Justice Academy of Turkey, Tubitak (a known Gülenist research institute), the Ministry of Labour and Social Security, the Turkish National Agency;[35] currently Editor in Chief,

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20 Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

21 Milkyway Education Center Inc. 2005 990 available at: http://tinyurl.com/mdknvzx (last checked 5/15/2017).

22 Corporate documents for this entity are available at: http://tinyurl.com/n22enjc (last checked 5/9/2017).

23 Young Scholars of Central Pennsylvania Charter School's application, with founders' biographies, was made available through an open records request to the Pennsylvania Department of Education [YSCP Open Records Request, part 13 at 2-5, 26-30].

24 Pennsylvania Corporate Records, available at: http://tinyurl.com/z6ogbfd; Jacqueline Shoyeb, *Muslim Elementary School Opening Tomorrow in Monroeville*, Pittsburgh Post-Gazette (Sep. 5, 2005) available at: http://tinyurl.com/mxzjebr (last checked 4/12/2017); Mary Niederberger and Rich Lord, *Some Practices Questioned at Baldwin Charter School*, Pittsburgh Post-Gazette (Sep. 4, 2011), available at: http://tinyurl.com/ky9bx7v (last checked 4/12/2017).

25 Young Scholars of Central Pennsylvania 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017).

26 Dream Schools, Inc., 2005-2007 990s, available at: http://tinyurl.com/luskcjd (last checked 4/17/2017).

27 Young Scholars of Central Pennsylvania, 2005-2010 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017); Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017).

28 Compare Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012) (board minutes state Ulker left to address family issues), available at: http://tinyurl.com/nysuuuy (last checked 4/15/2017), with Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017) (Ulker began teaching at Zirve University in March 2011 in Turkey).

29 Steve Esack, *Allentown School Directors Question Charter School Applicant's Ties to Gülen Movement*, The Morning Call (Dec. 16, 2012) available at: http://tinyurl.com/l9fxrbs (last checked 4/15/2017).

30 Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017).

31 Young Scholars of Central Pennsylvania Charter School's application, with founders' biographies, was made available through an open records request to the Pennsylvania Department of Education [YSCP Open Records Request, part 13 at 2-5, 26-30].

32 Dream Schools, Inc., 2007 990, available at: http://tinyurl.com/nxala87 (last checked 4/17/2017).

33 Young Scholars of Central Pennsylvania, 2005-2011 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017).

34 Bulent Tarman, LinkedIn, available at: http://tinyurl.com/mgj4jq5 (last checked 4/17/2017).

35 Id.

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Journal of Social Studies Education Research in Turkey.[36]

- ► Regionally Active Turkish cultural associations:
  - ▻ Peace Islands Institute
  - ▻ Golden Generation Worship & Retreat Center, Inc.
  - ▻ Alliance for Shared Values
  - ▻ Turkish Cultural Center

The Origins of the Northeast Region

The Northeast region is one of the oldest and most established regions within the Gülen Organization. When Fethullah Gülen relocated to the United States in 1999, it prompted a wave of schools opened by his followers throughout the United States. The first two schools opened by Gülenists in the Northeast region were both private schools in 1999—Brooklyn Amity School in New York and Pioneer Academy of Science in New Jersey. The first school in Pennsylvania was also a private school—Snowdrop Elementary School—however Pennsylvania's network of Gülen schools started later in 2005. After the first schools in 1999 opened, providing an important source of funds for the budding Gülen Organization and visa sponsorship for many Turkish individuals, the Gülenists then began opening public charter schools. New York and New Jersey both opened their first charter schools in 2003, Pennsylvania opened its first charter school in 2005, and Massachusetts opened its first charter school in 2007.

The Northeast region is a leader within the Gülen Organization for the creation of charter management organizations and educational service providers that service the Gülen charter schools as well as Gülenist landlord entities that purchase property using bond issuances paid for with their Gülen charter school customers' public funds. Three out of the four networks in the Northeast, PA, NY, and NJ, all have charter management organizations created and controlled by affiliated Turkish individuals within the Gülen Organization. All four Northeast networks have affiliated Turkish-controlled real estate companies that purchase property and rent that property back to the Gülen Organization charter schools at an extensive profit at the public taxpayer's expense.

The Northeast region utilizes Apple Educational Services ("Apple") to provide student information management services and IT services, with Apple or one of its wholly owned subsidiaries also serving as an affiliated landlord for several of the schools within the Northeast's state networks. Apple is somewhat distinct as a regional oversight entity from Harmony Public Schools in the Greater Texas region, Concept Schools in the Midwest Region, or Accord Education in the West region. Unlike Harmony, Concept, and Accord, Apple provides a more limited set of services instead of serving as a comprehensive charter management organization. Also, Apple provides its set of services alongside serving as the schools' landlord, while Harmony, Concept, and Accord utilize external yet closely related entities operated by Harmony, Concept, and Accord/Magnolia staff respectively to provide landlord services to their schools. While the regional oversight entities in the Southeast and Mid-Atlantic regions, Charter Educational Services & Resources and Washington Education Foundation, also provide a limited scope of services to their Gülen Organization charter school customers, they do not as of yet engage in what our investigation identifies as the Gülen Organization's real estate acquisition model.

Three out of four of the Northeast charter networks operating in the Northeast region have been documented by external entities for lack

[36] Id.

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of transparency, financial impropriety, and/or misuse of public funds. All four networks use the same regional vendors, rent properties from affiliated Gülenist landlord entities, and display the other markers common to all Gülen Organization charter networks. Within the region, New York and Pennsylvania have experienced the most scrutiny from their authorizers, however New Jersey has received significant scrutiny from the media. Massachusetts' Hampden and Pioneer schools seem to have the cleanest record, perhaps due to the fact that Massachusetts performs the most stringent accountability review over its charter schools in the Northeast region, the MA schools are newer, their Gülenist administrators are seasoned from elsewhere in the Northeast network, and the MA schools appear to engage in the overuse of the H-1B program less than other networks. Despite this cleaner record, MA schools still utilize the same vendors that have been found to overcharge charter schools in NY, NJ, and PA, and MA schools have also been engaged in problematic real estate dealings with affiliated Gülenist landlord entities.

Two of the four state networks (NY, NJ) have experienced major investigations, while four out of four have received significant audit findings signaling the financial misuse and impropriety endemic throughout the Gülen Organization.

Highlights of these investigations and audit reports include:

New York

- Failure to Exercise Due Diligence in Entering Lease Agreement (with affiliated landlord Apple):
  - Failure to exercise fiscal responsibility and ethical conduct by board members;
  - Failure to establish an appropriate fiscal environment;
  - Failure to investigate alternate options to leasing building;
  - Failure to conduct a transparent, arm's length transaction with lessor (Apple);
  - Failure to select an appropriate lessor with real estate experience; and
  - Failure to negotiate an appropriate lease agreement that did not grossly benefit the lessor at the school's expense.

- Inappropriate Procurement Policies (with affiliated vendors Apple, Technotime, and Lotus Media):
  - Use of overly restrictive procurement policies that did not encourage competition or ensure school received best prices and services;
  - School officials routinely purchased school equipment and furnishings from a limited group of four vendors that were affiliated with one another;
  - Failure to obtain the requisite number of quotes;
  - Failure to obtain quotes prior to selection of vendors;
  - Failure to obtain quotes from non-affiliated vendors;
  - Failure to document verbal quotes received from selected vendors;
  - Acceptance of quotes from vendors with no experience in the provision of those goods or services;
  - Failure to appropriately record purchases and inventory;
  - Discrepancies between purchasing records and actual inventory received and accounted for; and
  - Unnecessary use of vendors with excessive prices and mark-up on goods that could have been bought by the school online for thousands cheaper.

- Inadequate Record-keeping and Financial Practices:
  - Failure to appropriately document student addresses, thereby resulting in incorrect billing for public funds to

the wrong school districts;
- ▷ Failure to document provision of services and goods prior to payment of invoices;
- ▷ Over 25% of the 76 disbursements that were randomly reviewed (totaling $58,200) did not contain original receipts or did not contain sufficient supporting documentation for the service provided;
- ▷ Invoices were paid before the services were completed;
- ▷ Vendors did not fulfill contract terms, resulting in overpayment;
- ▷ Invoices for the same items were purposefully split so that payment did not hit the $5,000 threshold that would require Board approval for the purchase;
- ▷ Selection of vendors with no experience in the specific provision of goods and services; and
- ▷ Payments to different companies that were actually owned by the same individual and had the same addresses.

- ► Lack of Required Transparency in Board Meeting Minutes:
  - ▷ Use of different versions of board meeting minutes for public view than those submitted to State Department of Education.

- ► School Contractor Hired by Apple Convicted in Federal Court:
  - ▷ Contractor used illegal methods to remove asbestos from school, thereby endangering student and staff lives in the process;
  - ▷ Contractor had no knowledge or training in asbestos removal;
  - ▷ Contractor was hired by Apple to conduct renovation; and
  - ▷ Contractor hired was an affiliated Turkish individual to Apple, Terra (the school's landlord), and certain members of the school's governing board and leadership.

New Jersey

- ► Inappropriate Use of Public Funds:
  - ▷ Illegal use of school revenues to pay for legal expenses and immigration costs of H-1B teachers.

- ► Misuse of Federal Title I funds:
  - ▷ Using funds to pay for inappropriate staff positions;
  - ▷ Using funds to pay for a program that requires students to pay a participation fee;
  - ▷ Failure to inform parents about Title I opportunities for their children or to involve them in planning for how the funds will be used, as required by federal law;
  - ▷ Failure to expend program funds at all, thereby not providing services to students in need; and
  - ▷ Failure to provide information to parents in languages other than English, even in a school where parents speak at least five different languages.

- ► Poor Financial Health and Practices:
  - ▷ The Bergen Arts and Science Charter School showed a combined net position of -$3,481,336 for 2016 and -$2,166,484 for 2015, with a decrease in the school's fund balance of $890,649 in 2016 and $174,362 in 2015;[37]
  - ▷ The Paterson Charter School for Science and Technology had a combined net position of -$1,905,122 for 2016, -$1,567,254 for 2015, and a $500,530 decrease in its fund balance in 2016;[38]
  - ▷ Failure to use purchase orders in a timely manner after procuring goods

[37] Bergen Annual Financial Report June 30, 2016: http://www.state.nj.us/education/finance/fp/cafr/search/16/6013.pdf

[38] Patterson Annual Financial Report June 30, 2016: http://www.state.nj.us/education/finance/fp/cafr/search/16/7503.pdf

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and services;
- ▷ Acceptance of interest-bearing loans from current vendors; and
- ▷ High percentage of school funds expended on administration instead of instruction.

- ► Fraudulent and/or Misleading Information Included Charter Petitions:
  - ▷ Inclusion of incorrect performance data for the district to justify opening of a new charter school in the area;
  - ▷ Falsified documents intended to demonstrate community support for the petition;
  - ▷ Forged and fictitious signatures on community support document; and
  - ▷ Conflicts of interest with founding board members also employed in paid positions by the proposed school's charter management organization.

- ► Systemic Underrepresentation for Students in Vulnerable Student Populations:
  - ▷ Failure to enroll students with disabilities, English language learners, Hispanic students, African American students, and economically disadvantaged students.

Pennsylvania

- ► Lack of Compliance with Required Financial Procedures and Accounting Standards:
  - ▷ Failure to properly segregate financial duties;
  - ▷ Necessity of material adjustments to Young Scholars of Western Pennsylvania's records;
  - ▷ Altered check dates by Young Scholars of Western Pennsylvania to move expenses into subsequent fiscal years; and
  - ▷ Lack of a fixed asset tagging system.

- ► Teacher Qualification Issues:
  - ▷ Non-compliance with Pennsylvania's requirement that 75% of professional staff have state certification;
  - ▷ Non-compliance with Pennsylvania's principal certification requirement.

- ► Possible Ethics Act Violations:
  - ▷ Common officers between Young Scholars of Central Pennsylvania and its landlord that did not disclose their overlapping financial interests.

- ► Inappropriate Lending Between Entities:
  - ▷ Loans to Young Scholars of Western Pennsylvania from governing board members.[39]
  - ▷ Inappropriate Real Estate Transactions:
  - ▷ Inappropriate use of a circular leasing agreement with its affiliated landlord, Dream Schools, Inc.
  - ▷ Inappropriate conflicts of interest regarding leasing agreement with affiliated landlord, Dream Schools, Inc.

Massachusetts

- ▷ Lack of Compliance with Required Financial Procedures and Accounting Standards:
- ▷ Lack of controls over financial statements preparation, including note disclosures, in accordance with generally accepted principles;
- ▷ Limited adequacy of segregation of duties;
- ▷ Late-filed grant reports;
- ▷ Overstatement of transportation revenue requiring a correction of $105,978;
- ▷ Overstatement of surplus for Pioneer Charter School of Science and Pioneer Charter School of Science II

[39] Audits available at: http://tinyurl.com/koo7wzz and http://tinyurl.com/k8xjhtz (last checked 4/13/2017). YSWP and YSCP audits available through public records requests.

by $24,571 and $65,302, respectively;
- ▷ Procurement officer lacked necessary certification;
- ▷ Failure to comply with federal awards program requirements;
- ▷ Failure to timely file federal reports; and
- ▷ Failure to comply with grant requirements by failing to hire highly qualified teachers with grant funds.

As these findings demonstrate, the same financial and operational issues endemic to all charter schools within the Gülen Organization are present throughout the Northeast region and in each state where the Gülen Organization is active.

Real Estate and Bond Financing

As mentioned previously, the Gülen Organization charter schools in all four states engage in concerning property transactions and leasing arrangements with affiliated Gülenist landlord entities. We believe the Gülen Organization's real estate model depends on its schools' unquestioned acceptance of expensive leasing agreements with affiliated Gülenist landlords, who in the Northeast often serve as vendors to the schools in other capacities, as well. There is significant overlap between the schools' leadership, the landlord entities, and the charter management organizations used by the schools, demonstrating the self-serving nature of the Gülen Organization's use of insider businesses to drive up its privately held profits and property acquisition at its schools' expense.

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State	Schools Affected	Gülenist Landlord(s)	Issues	Bond Financing
New York	Buffalo Academy of Science	Apple	The Buffalo governing board accepted a lease that resulted in over $4.4 million net profit to its vendor, Apple, without reviewing other property sites or attempting to negotiate the lease to obtain better terms. This lease garnered an audit by the New York State Comptroller who heavily criticized the board's decisions and ethical conduct in accepting the lease. Later, the Buffalo governing board agreed to purchase the building from Apple, resulting in an even greater profit than anticipated by the State Comptroller for Apple through the use of bond financing.	Yes
	Syracuse Academy of Science	Terra	The Syracuse governing board's president also sits on Terra's governing board. Despite this overlap, the school signed a lease agreement with Terra. Now all of the school's campuses are owned by Terra and rented to the Syracuse governing board. Before the first lease agreement was signed, Terra had no experience in real estate and less than $15,000 in annual revenues, calling into question how it managed to purchase the building to rent to Syracuse initially. The school's paid business operations employee, Mustafa Coban, also served as Terra's financial manager.	No
	Rochester Academy of Science	Terra	The Rochester governing board's president also sits on Terra's governing board. Despite this overlap, the Rochester governing board signed a lease agreement with Terra for a property and paid almost $1 million in rent in its first year (well over Terra's purchase price of the property). After one year of rent, the Rochester governing board purchased the building from Terra. Terra made a net profit of over $1.2 million on its lease and sale of the building to the Rochester governing board in little over one year.	No
New Jersey	Paterson Charter School for Science and Technology	Apple d/b/a Railway	Paterson first rented its building from Milkyway, the governing entity for NJ's first Gülenist school (private). Milkyway then sold its building to Paterson's vendor Apple for a significant net profit of $4.7 million. Apple used bond financing to purchase the building secured by Paterson's school revenues. Apple now charges Paterson extensive rent, above and beyond the actual annual bond debt. Apple will clear an estimated $12 million net profit off of this transaction at Paterson's expense.	Yes

State	Schools Affected	Gülenist Landlord(s)	Issues	Bond Financing
Pennsylvania	Young Scholars Western Pennsylvania	Dream Schools, Inc./ Newport Drive Properties	Dream Schools through its subsidiary Newport Drive Properties owns the YSWP building, which it rents to YSWP at an excessive price. From 2011-2016, Dream Schools has made a net profit of $783,000 at YSWP's expense. YSWP also loaned its landlord funds for improvement to the parking lot in exchange for rent abatement. This has the effect of Dream Schools/ Newport owning improved property privately that is publicly financed and paid for with school revenues. Should YSWP's charter terminate one day, Dream Schools/ Newport would still own the publicly paid for building out right.	No
	Young Scholars Central Pennsylvania	Dream Schools, Inc.	Two YSCP Board members were paid staff for its landlord, Dream Schools Inc. The State Auditor criticized the school's lease with Dream Schools as a circular leasing agreement in 2013, as well as the associated conflicts of interest. Since 2007, Dream Schools has already made a net profit of $2.5 million at YSCP's expense.	In progress
Massachusetts	Hampden Charter School of Science	Apple/ Johnson Road Properties	HCSS originally rented its building from Ace It Education, d/b/a Turkish Cultural Center of Boston. Ace It Education shared board members with Massachusetts' other Gülen charter schools, Pioneer Charter School of Science. Ace It sold the building to Apple through its subsidiary Johnson Road Properties, netting a $1.5 million net profit in just three years based on the rent to HCSS and the sale price to Apple. Apple continues to rent the building to HCSS and will make millions of net profit over the term of the lengthy lease.	No

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
New York			✓	
New Jersey			✓	
Pennsylvania			✓	
Massachusetts		✓		

Of the four state networks, New Jersey has the most campuses and is the most poised to expand due to what appear to be favorable, lax state charter laws and strategic relationships with New Jersey politicians. New Jersey's success in gaining expansions and new approvals is in direct contradiction to the media coverage exposing problematic real estate agreements

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with affiliated landlords, overpayment for goods and services to affiliated vendors, and the existence of a network that favors insider business deals for private profit. If left unchecked, the New Jersey network could reach "Too Big to Fail" status.

Regional Vendors

- Apple Educational Services, Inc. (Apple): Apple has three distinct business lines: it serves as landlord (often through a third party, wholly-owned subsidiary) to Gülen Organization charter schools in MA, NY, and NJ; provides IT services and student information management systems; and offers after-school programs through its wholly-owned subsidiary Ivy Learning.[40] Apple was also selected as the general contractor for a renovation project at the Syracuse Academy of Science in which an Apple sub-contractor, a Turkish-owned and controlled construction company, was convicted of removing and disposing of asbestos illegally.[41] The sub-contractor apparently had no experience and endangered student and staff lives. Apple's leadership is directly connected to other Gülen-affiliated organizations and charter schools. For example, Apple founder Faruk Apaydin is also a founder of the Peace Islands Institute (formerly the Interfaith Dialog Center), a Turkish cultural organization openly aligned with Gülen.[42] The Apple website was recently redesigned and scrubbed of information linking Apple to Gülenist charter schools in the Northeast. Apple is controlled and operated by Turkish individuals, many of whom later go on to work in the Gülen Organization charter schools directly or for other preferred Gülenist vendors.

- Technotime Business Solutions (Technotime): Technotime has contracts throughout the Northeast region with Gülen Organization charter schools for IT services. Technotime also has several subsidiaries which receive contracts from these schools as well: Vestell, Inspire, and ProAcademy. M. Murat Kaval is one of the original founders of Technotime[43] and also served as the CEO of the Peace Islands Institute,[44] an organization that is openly affiliated with Gülen. Kaval previously worked in public relations for Apple Education Services, and in 2013, he served as the CEO of the Turkish Cultural Centers that have affiliates in eight northeastern states.

[40] Apple Education Services Certificate of Formation; NJ Dept of Treasury; available at http://www.state.nj.us/treasury/revenue/searchfile.shtml

[41] Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017); Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)

[42] Peace Island Institute/Interfaith Dialog Center; IRS Form 990 – 2004; available at https://projects.propublica.org/nonprofits/organizations/550826499

[43] Technotime Certificate of Formation, 12.10.09; available at NJ Department of Treasury business entity search http://www.state.nj.us/treasury/revenue/searchfile.shtml

[44] M. Mural Keval; LinkedIn available at https://www.linkedin.com/in/m-murat-kaval-84921644/

Regional Employee Overlap*

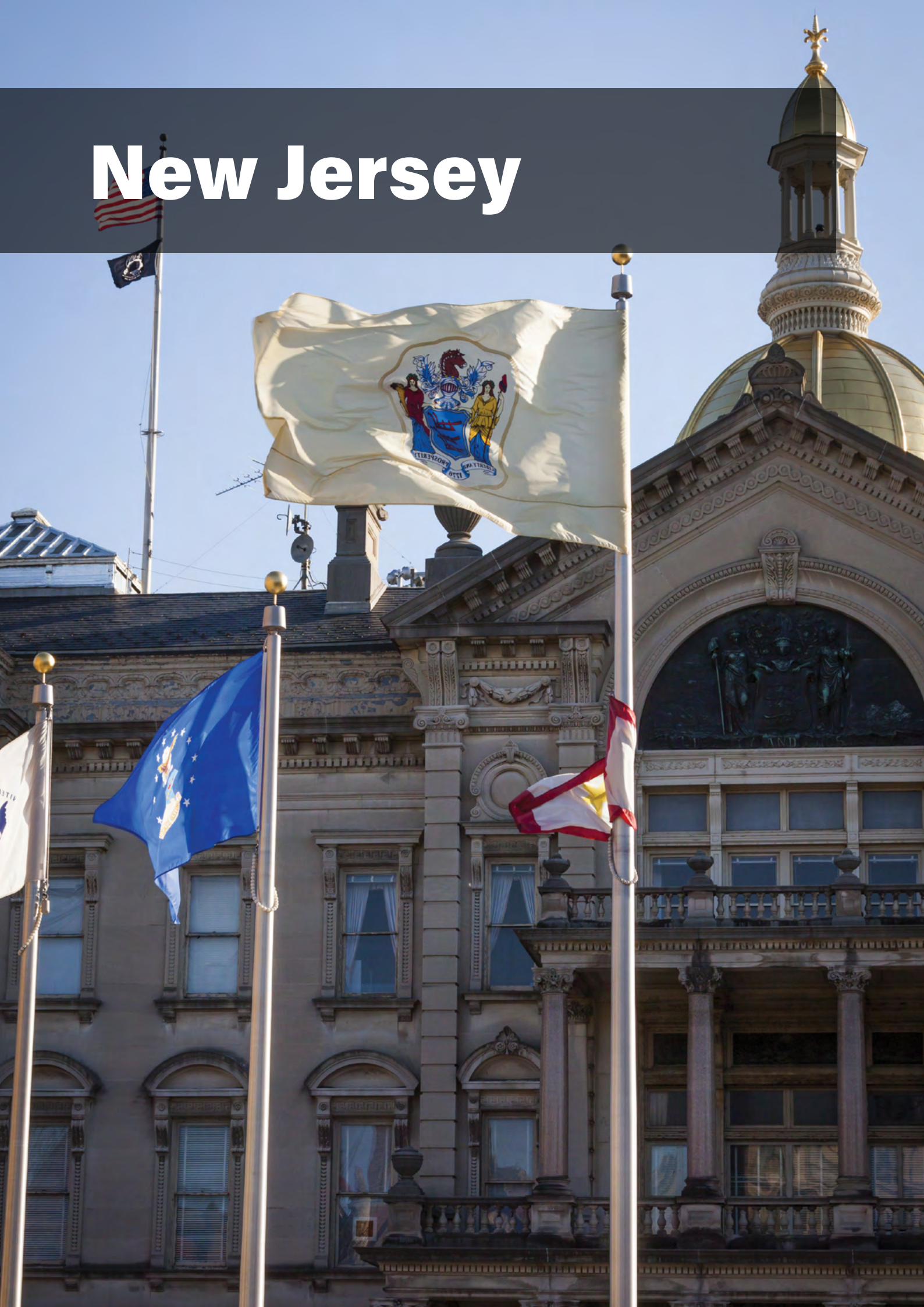
Employee	MA	PA	NY	NJ	Other States, Vendors, Cultural Associations
Tolga Hayali			✓	✓	Apple (Northeast), Concept (Midwest), Horizon (OH)
Osman Oztoprak				✓	Apple (Northeast), Milkyway (NJ) Alliance for Shared Values - Gülenist nonprofit (nationwide)
Nihat Guvercin				✓	Harmony (TX), iLearn Schools (NJ), Private Schools in Turkey
Erhan Ozduran	✓				Harmony (TX)
Harun Celik	✓			✓	
Tarcan Topcuoglu	✓			✓	Putnam – Gülenist private school (CT)
Ahmet Gunay	✓		✓	✓	Charter attempt (DE); Putnam – Gülenist private school (CT)
Huseyin Kara	✓				Horizon (OH); Concept (Midwest); Apple (Northeast)
Barish Icin	✓			✓	
Tansu Cidav		✓			Harmony (TX)
Emrullah Durmaz		✓			Apple (Northeast); Putnam – Gülenist private school (CT)
Levent Kaya		✓	✓		
Isik Durmus		✓	✓	✓	
Bekir Duz		✓		✓	Snowdrop (PA)
Mustafa Coban			✓	✓	iLearn (NJ); Milkyway (NJ)
Ali Riza Gurcanli	✓			✓	Pioneer-private school (NJ)
Ercan Tozan			✓	✓	Peace Islands Institute (NJ); Putnam – Gülenist private school (CT)
Namik Sercan			✓	✓	Terra – Gülenist landlord (NY); Fulton Science (GA)
Fehmet Damkaci	✓		✓		Terra – Gülenist landlord (NY)
Hakki Karaman			✓		Magnolia (CA)
Tevfik Kosar			✓		Pelican (LA)

**This is just a sampling of the employment overlap of the Northeastern Region's Turkish employees.*

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New Jersey



QUICK FACTS ON GÜLEN CHARTER SCHOOLS NEW JERSEY



NUMBER OF SCHOOLS

KNOWN AS

iLearn Schools
Central Jersey College Prep
Thomas Edison EnergySmart Charter School
Paterson Charter School for Science and Tech.

TOTAL ENROLLMENT

4,797

CHARTER VENDOR

iLearn Schools
Apple Educational Services; Ivy Learning

TOTAL 2016 FY REVENUES

$50,500,000

RELATED INSTITUTIONS

MA — Hampden; Pioneer

PA — Young Scholars; Vision Academy

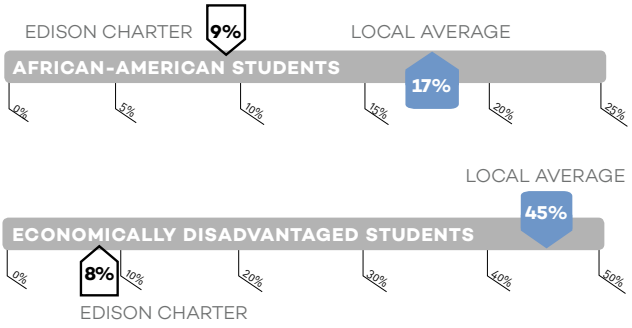
NY — Academy of Science

NJ — Arts & Science; Science & Technology; Central Jersey College Prep Charter School

KEY PEOPLE

Osman Oztoprak, Candemir Toklu, Nihat Guvercin, Deirdre Simon, Leo McGuire

VULNERABLE STUDENT POPULATIONS



HIGH ADMINISTRATIVE COSTS

Bergen
Passaic
Hudson
Patterson

iLearn received an estimated $3.7 million from its four-member schools in 2015-2016.

iLearn Schools Charter Management Operator

EXCESSIVE IMMIGRATION

270

H-1B VISA APPLICATIONS 2001-2016

$18.5k

Amount in unallowable immigration expenses for employees

Total estimated processing cost of visas:
$302,000 — $604,000

HOMOGENOUS PERSONNEL

77%

OF GOVERNANCE and ADMINISTRATION are TURKISH NATIONALS

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Northeast
- School Names (known as):
  - iLearn Schools – Arts and Sciences (formerly North Jersey Arts and Sciences Charter Schools)
    - Bergen Arts and Science Charter School
    - Passaic Arts and Science Charter School
    - Paterson Arts and Science Charter School
    - Hudson Arts and Science Charter School
  - Paterson Charter School for Science and Technology
  - Central Jersey College Prep
  - Thomas Edison EnergySmart Charter School
- Total # of schools in state: 7 schools (12 campuses)
- Total student enrollment 2015-16: 4,797
- Charter Holder/Governing Board(s):
  - Each school has its own corporate Board of Directors and is a tax-exempt nonprofit organization with a 501 (c)(3) IRS status filed under the same name as each school
- Charter Management Services Vendor(s): Apple Educational Services/Ivy Learning; iLearn Schools - Arts and Sciences schools
- Regional Gülen Organization Oversight Entity: Apple Educational Services
- Regional Sister Networks: Hampden (MA); Pioneer (MA); Academy of Science (NY); Arts and Science (NJ); Science and Technology (NJ); Central Jersey College Prep Charter School (NJ); Young Scholars (PA); Vision Academy (PA).
- Total Revenues for FY 2016[1]: $50.5 million
- Network Founders:
  - Osman Oztoprak: Founder, Bergen Arts and Science (NJ); CEO, Pioneer Academy, private Gülen-affiliated school (NJ) (Milkyway Education Center as parent organization); Principal, Teacher, Pioneer Academy (NJ); Director (paid), Alliance for Shared Values (NY), the umbrella organization for other Gülen-affiliated nonprofits that is openly aligned with Fethullah Gülen; Program Director, Apple Education Services (NJ).[2]
  - Candemir Toklu: Founder, Paterson Science and Technology (NJ); Founder, Thomas Edison EnergySmart (NJ); Area Director, Interfaith Dialog Center/Peace Islands Institute - Gülenist cultural organization (NJ).[3]
  - Nihat Guvercin: CEO, iLearn Schools – Gülenist vendor (NJ); Founder and School Leader of four of the five Arts

[1] Total revenue for each school from annual comprehensive financial report - June 30, 2016, available at: http://tinyurl.com/y96o4h6t (last checked 6/16/2017).

[2] Information taken from: Biographical information included in original Bergen Arts and Science Charter School charter application, received from NJ Department of Education through a 2017 FOIA request; LinkedIn profile, available at: http://tinyurl.com/ya97mjry (last checked 6/16/2017); IRS Form 990 for Alliance for Shared Values, available at: http://tinyurl.com/y7as3hhd (last checked 6/16/2017); History of the Gülen Movement from Alliance for Shared Values, available at: http://tinyurl.com/yaqlsx28 (last checked 6/16/2017); Campaign Finance Report for Holt Victory Fund, available at: http://tinyurl.com/y8f5pnvk (last checked 6/16/2017).

[3] Information taken from: Charter applications for Paterson Arts and Science Charter School and Thomas Edison EnergySmart Charter School charter applications, received from NJ Department of Education through a 2017 FOIA request; Documents from NJ Department of Treasury, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/16/2017); The Record/NorthJersey.com article, available at: http://tinyurl.com/lsny9ys (last checked 6/16/2017).

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and Sciences/iLearn Charter Schools (including one to be opened) (NJ); Principal, Science Teacher, Harmony Public Schools (TX); School Director, Teacher, Researcher, Gulistan Education Institutions (Albania); Student, Middle Eastern Technical University (Turkey).[4]

- Deirdre Simon: Founder, Passaic Arts and Science Charter School (NJ); Founder, Paterson Arts and Science School (NJ); Founder, Hudson Arts and Science Charter School (NJ); Founder, Union Arts and Science Charter School (opening 2017) (NJ); Paid Consultant, iLearn Schools (NJ); Public School Administrator (NJ).[5]
- Leo McGuire: Founder, Arts and Sciences/iLearn charter schools (NJ); Paid Security Consultant, Arts and Sciences/iLearn charter schools (NJ); Sherrif, Bergen County (NJ); took Gülen-sponsored trip to Turkey in 2010 (NJ).[6]

Overview

As of the 2016-2017 school year, New Jersey has 7 charter schools with 12 campuses currently in operation within the Gülen Organization, although some of the schools are currently seeking approval for expansion. Like the majority of charter schools within the Gülen Organization, the governing boards of the NJ charter schools are dominated by board members of Turkish national origin at 77% Turkish total, and school administrators of Turkish national origin, also 77%.[7]

The four Arts and Science schools currently in operation, as well as a fifth school slated to open in fall of 2017, are managed by iLearn Schools, formerly known as North Jersey Art and Sciences Charter Schools. Three other Gülen-affiliated schools in New Jersey operate outside the iLearn network: Central Jersey College Prep, Thomas Edison EnergySmart, and Paterson Science and Technology. While these seven schools and their campuses are governed by individual governing boards incorporated as separate non-profit organizations, all seven schools utilize the same regional vendors owned and operated by affiliated Turkish individuals. One of these vendors, Apple Educational Services, is the educational services provider and regional oversight entity responsible for the Northeast region of the Gülen Organization. The NJ network contracts with Apple to provide educational management services for a fee paid from total school revenues.

4 Information taken from: Annual report for each arts and science school; LinkedIn profile, available at: http://tinyurl.com/y7tk8zyc (last checked 6/16/2017).

5 Information taken from: Charter applications for each school received from NJ Department of Education through 2017 FOIA request; Paterson Arts and Science Board Minutes from May 31, 2014; available at: http://tinyurl.com/yd6q5kst (last checked 6/16/2017); State Investigative Report; NJ Department of Education; October 2008; available at: http://tinyurl.com/ya8dcntw (last checked 6/16/2017).

6 Information taken from: Charter applications received from NJ Department of Education through 2017 FOIA request; Bergen Arts and Science Board Minutes from October 15, 2015, available at: http://tinyurl.com/yd872tme (last checked 6/16/2017); Paterson Arts and Science Board Minutes from May, 21 2014, available at: http://tinyurl.com/yd6q5kst (last checked 6/16/2017); Certificate of Formation for LPM Strategies, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/16/2017); The Record/NorthJersey.com article about state officials joining charter, available at: http://tinyurl.com/ycmz89vr (last checked 6/16/2017); EBRU TV interview with McGuire, available at: http://tinyurl.com/yacymamz (last checked6/16/2017).

7 These figures are taken from the IRS 990 tax documentation for each school for available years. The IRS 990 form for Hudson Arts and Sciences is not yet available because it is a new school.

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List of Schools and Charter Applications Denied

School	Operations	Student Demographic Information*	Authorizer	Governing Board
iLearn Schools Nihat Guvercin, CEO and School Leader				
Bergen Arts and Science (3 campuses) Elementary: 30 Madonna Pl Garfield, NJ 07026 Middle: 200 MacArthur Avenue Garfield, NJ 07026 High: 43 Maple Ave Hackensack, NJ 07601 Central Office: 465 Boulevard Elmwood Park, NJ	K-12 Opened: 2007	Enrollment: 1102 04% ELL* 49% FRL** 04% SWD*** 11% African American 38% Caucasian 42% Hispanic 08% Asian	New Jersey State Department of Education	Bergen Arts and Science Charter School
Passaic Arts and Science (3 campuses) Primary (K – 2) 6 Wall St Passaic, NJ 07055 Intermediate (3 – 5) 40 Tulip Dr Passaic, NJ 07055 Middle High (6 – 10) 7 St. Francis Way Passaic, New Jersey 07055	Grades K-10 Opened: 2011	Enrollment: 719 05% ELL 83% FRL 05% SWD 12% African American 04% Caucasian 80% Hispanic 03% Asian	New Jersey State Department of Education	Passaic Arts and Science Charter School
Paterson Arts and Science 151 East 33rd Street Paterson, NJ 07514	Grades K-8 Opened: 2013	Enrollment: 472 03% ELL 81% FRL 05% SWD 35% African American 03% Caucasian 59% Hispanic 03% Asian	New Jersey State Department of Education	Paterson Arts and Science Charter School

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School	Operations	Student Demographic Information*	Authorizer	Governing Board
Hudson Arts and Science 131 Midland Ave, Kearny, NJ	Grades K-5 Opened: 2016	Enrollment: 357 05% ELL 59% FRL 06% SWD (data from 2016-17; Race/ethnicity N/A because no current data available)	New Jersey State Department of Education	Hudson Arts and Science Charter School
Other Gülen-Affiliated Charter Schools				
Central Jersey College Prep 17 Schoolhouse Road Somerset, NJ 08873	Grades K-1 Grades 6-12 Opened 2006	Enrollment: 421 0% ELL 28% FRL: 08% SWD 31% African American 13% Caucasian 19% Hispanic 34% Asian 3% Other	New Jersey State Department of Education	Central Jersey College Prep Charter School
Paterson Charter School for Science and Technology (2 campuses) Elementary: 276 Wabash Avenue Paterson, NJ High School: 196 West Railway Ave Paterson, NJ 07501	Grades K-12 Opened 2003	Enrollment: 974 02% ELL 86% FRL 10% SWD 36% African American 03% Caucasian 60% Hispanic <01% Asian and other	New Jersey State Department of Education	Paterson Charter Schools for Science and Technology
Thomas Edison Energy/ Smart 150 Pierce St Somerset, NJ 08873	Grades K-8 Opened 2011	Enrollment: 340 03% ELL 07% FRL 03% SWD 13% African American 15% Caucasian 03% Hispanic 68% Asian 01.5% Other		Thomas Edison EnergySmart Charter School
New Schools				
Union Arts and Science Charter School 705 Clinton St. Linden, NJ An iLearn campus	Grades K-2 Opening Fall 2017	Projected enrollment K - 2: 240 Phased in K - 5: Enrollment: 480	NJ State Dept of Education	
Passaic Arts and Science 43 Clifton Ave Clifton, NJI	Grades K-2 Opening Fall 2017		NJ State Dept of Education	

School	Operations	Student Demographic Information*	Authorizer	Governing Board
Central Jersey College Prep – New Brunswick campus	Opening 2018			
Charter Petition/Application Denials and Closed Schools				
Bergen Hope Charter Lyndhurst, NJ	2002 Did not open, Did not receive occupancy certificate from city			Osman Oztoprak, school head Feyz Egriboyun, school board trustees Cavik Oncul, school building owner
Camden Charter School of Achievement Camden City, NJ	2009 Denied7			Contact: Riza Ulker
Raritan Arts and Science Charter School Franklin Park, NJ	2009 Denied			Contact: Ms. Eylem Icin
New Century Charter Public School Parsippany – Troy Hills Township	2005 – 1st attempt Denied 2009 – 2nd Denied			Petitioner: Feyzullah Egriboyun Contact: (Mustafa) Kemal Aydin Note: Aydin is currently at Board member for Paterson Science/Technology
Northeastern Arts and Science Charter School	2011 Denied			Petitioners: charter holders of Bergen Arts and Science
Clifton Arts and Science	2011 Denied			Petitioners: charter holders of Bergen/ Passaic Arts and Science
Wayne Science and Technology Charter School Wayne Township, NJ	2009 Denied			Nihat Guvercin, Contract Guvercin is currently the lead for iLearn Schools
Essex Arts and Science Charter School	2015 Denied			
Charter amendment: Paterson Charter School for Science and Technology	2015 Denied			

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School	Operations	Student Demographic Information*	Authorizer	Governing Board
Albert Einstein EnergySmart Old Bridge, NJ	2017 Denied			
Nikola Tesla Energy/ Smart Perth Amboy, NJ	2017 Denied			Petitioner: Raif Rustamov
		Private Schools		
Pioneer Academy (formerly Pioneer Academy of Science – changed name in 2014) 164 Totowa Rd Wayne, NJ	PK - 12 Tuition-based: Domestic $12,900 - $17,900 International $24,900 Boarding: $12,900 Founded 1999	Enrollment: 274 (Boarding: 63)		Principal/Head of School: Tufan Aydin 2014 (Milkyway Education Center DBA Pioneer Science Academy

**ELL – English Language Learner; FRL – students eligible for free and reduced price lunch (economically disadvantages);*
***FRL: Students eligible for Free and Reduced price lunch (economically disadvantaged)*
****SWD – Student with disabilities (special education)*

A History of Strategic Ambiguity and Conflicting Interests

The New Jersey Gülen charter network is one of the oldest in the country, with the first school founded in 1999. Pioneer Academy, formerly known as Pioneer Academy of Science, was established by the Milkyway Education Foundation as a private, tuition-based school in Wayne, New Jersey the same year as Fethullah Gülen moved to the United States. The founders, employees, and board members of Milkyway and Pioneer have gone on to establish and work at other charter schools within the Gülen Organization across the country. Pioneer has applied for a significant number of H-1B visas (89)[8] through its parent organization, the Milkyway Education Center, thereby serving as an important entry way for new Turkish teachers into the United States.

After Pioneer's establishment, the first public charter school established in New Jersey that meets the markers for a Gülen Organization charter school is Paterson Charter School of Science and Technology, which opened in 2003. After that, the New Jersey network expanded significantly, with new charter schools opening and the formation of a Gülenist-controlled charter management organization ("CMO"), iLearn Schools.

Nihat Guvercin, a veteran of the Harmony Public Schools network,[9] a Gülen-affiliated network of 48 schools in Texas, is the current CEO of iLearn Schools. iLearn emerged from the North Jersey Arts and Sciences Charter Schools that Guvercin apparently founded to serve as a base to expand the network and to provide technical support. Following a recommendation

[8] H-1B visas application can be reviewed by employer at MyVisaJobs, available at: http://tinyurl.com/25dq4lj (last checked 6/16/2017).

[9] LinkedIn profile, available at: http://tinyurl.com/y7tk8zyc (last checked 6/16/2017).

from Guvercin and the iLearn Schools Business Administrator to select iLearn as the CMO in 2015, the Board of Directors at each of the now iLearn-managed schools (Bergen, Passaic, Paterson, and Hudson) voted to approve iLearn as the CMO without a competitive bid, stating that the Board "exempted the contract for school management services from the requirements of public bidding as an extraordinary unspecifiable service."[10] iLearn is paid 12% of all public funds received from each member school.[11] It is significant to note that the original charter application for these schools specifically stated that the schools would not use the services of a CMO, and yet when they did, they did so without a bid or a competitive process with built-in accountability to stakeholders.[12]

Documents show that iLearn was paid an estimated $3.7 million from its four member schools in 2015-2016. This total is based on documented payments to iLearn from two of the schools and similar budget line item amounts for the other schools.[13] For example, at Bergen Arts and Sciences, iLearn is paid $1,564,351 annually ($130,363 per month) which equates to $118 per student per month and $1,420 per student per year.[14] These represent extremely high administrative costs, and are discussed further below.

iLearn is responsible for services such as recruitment and marketing for students and staff, securing the school facilities, developing and implementing school curricula, managing human resources, handling regulatory reporting, implementing technology, and other administrative services.[15] Charter renewal applications for these schools describe the model that iLearn promotes at its schools and the "partnership" between the schools. Teachers at the member schools are often transferred in significant numbers to staff new schools so that the model can be replicated. In addition, individuals of Turkish national origin are often hired mid-year to serve as substitute teachers or tutors at these schools: four at Bergen in February 2016; six at Bergen and other schools in October 2016; and six at Paterson Arts and Science in October 2016.[16] According to a Georgia whistleblower who was an administrator in the Fulton Science schools there, the same practice occurred in the Georgia Gülen-affiliated schools and we believe was used as a way to acclimate new H-1B teachers from Turkey to the United States while they learned English and prepared to take paid positions at the schools.[17]

Despite the fact that iLearn only manages four of the currently operating seven Gülen-affiliated charter schools in New Jersey, all seven schools contract with many of the same Turkish-operated vendors, including Apple Educational Services and Technotime Business Solutions. According to whistleblower testimony, Apple Educational Services serves as the regional oversight entity for the Northeast region of the Gülen Organization. As the profiles of this region discuss, Apple contracts with all of the schools throughout the

10 Board vote to approve iLearn as CMO; Board Minutes, Paterson Arts and Science 5.28.15; available at http://tinyurl.com/yd6q5kst (last checked 6/18/2017).

11 Id.

12 Name change from North Jersey Arts and Sciences Charter Schools to iLearn Schools, available at: http://tinyurl.com/yct48nor (last checked 6/16/2017).

13 From Comprehensive Annual Financial Reports for Bergen, Passaic, and Paterson Arts and Science with projected total from Hudson that opened in 2016 so no financial report for prior year; line item; Purchases of Prof/Tech Services under Administration in Expenditures from the General Fund: Bergen ($1,564,351), available at: http://tinyurl.com/yczp2pa3 (last checked 6/16/2017); Patterson ($620,456), available at: http://tinyurl.com/ydh5eajh (last checked 6/16/2017); Passaic ($1,202,275), available at: http://tinyurl.com/y7dzqomh (last checked 6/16/2017); Hudson projected ($403,200).

14 The Comprehensive Annual Financial Report for Bergen Arts and Science shows that iLearn receives 12% of all funds from Bergen ($1,564,351 in 2015-16), available at: http://tinyurl.com/yczp2pa3 (last checked 6/16/2017).

15 Union Arts and Science charter application; Section 2, Page 50; received from the NJ Dept. of Education through a 2017 FOIA request.

16 Bergen board minutes from February 18, 2016, available at: http://tinyurl.com/y8daptax (last checked 6/16/2017); 10.20.16; Paterson Arts and Science from October 20, 2016, available at: http://tinyurl.com/y8b8af65 (last checked 6/17/2017).

17 See Georgia profile and whistleblower testimony accounts in the Appendix I to this report.

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region. In New Jersey specifically, six of the seven Gülen schools also contract with the same person to serve as the non-voting Board Treasurer and School Business Manager, with the exception being Thomas Edison EnergySmart.[18] All seven schools contract with the same auditor,[19] Barre & Company, which also prepares tax returns for Apple Educational Services.

The seven New Jersey schools have almost 5,000 students currently enrolled. The New Jersey schools generally are approved as a primary school and expand by grade level to serve middle and high school students through the amendment process or as part of their charter renewal application. In March 2017, the New Jersey Department of Education approved an expansion of 2,535 new seats at five of these schools:[20]

- Two schools received approval for charter expansion as part of their five-year charter renewal application:
  - Paterson Charter School for Science and Technology: +516 students (1,068 to 1,584)
  - Paterson Arts and Science Charter School: +357 students (540 to 897 to add high school grades)

- Three schools were approved for expansion through the amendment process:
  - Central Jersey College Prep: +840 students (from 480 for K-2 and 6 -12 to 1,320 for grades K-12) – including a new campus in New Brunswick
  - Hudson Arts and Science: +661 students (from 360 for K-5 to 1,021 for K-8)
  - Passaic Arts and Science: +161 students (from capacity of 860 for K – 10 to 1,021 for K – 12)

The significant expansions will give a green light for some schools to add a campus, including Paterson Science and Technology school.

The New Jersey network has made a very aggressive move to expand new schools rapidly. They have filed at least 12 applications for new schools in the last 15 years that were denied by the New Jersey Department of Education (see chart above). Many of these applications faced stiff opposition from local school districts and community members. Two of these community efforts to oppose the Gülen-affiliated schools are described in this report, including reported evidence of fraud on the part of iLearn in gathering signatures on a petition in support of the proposed new iLearn school.[21]

Founders are Paid Employees and Contractors of iLearn Schools

Three people are the same founding Board members for four of the five iLearn schools in New Jersey (including the 5th school to open in fall 2017). In addition, all three are paid employees or contractors of iLearn and stand to benefit financially if additional schools are approved. Leo McGuire has been listed as a founding member of two recent iLearn schools that were approved (Hudson and Union) while at the same time he is listed as the District Safety Coordinator for the Paterson Arts and Science Board Meeting minutes and his company has a security contract with at least one iLearn school.[22]

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18 Example of school contract with Treasurer, Paterson Arts and Science Board Minutes; 5.21.14; available at http://tinyurl.com/yd6q5kst; LinkedIn profile, available at: http://tinyurl.com/ycsfmjfg (last checked 6/16/2017); Auditor's Management Reports, available at: http://tinyurl.com/ycdp39wy (last checked 6/16/2017).

19 Auditor's Management Reports, available at: http://tinyurl.com/ycdp39wy (last checked 6/16/2017).

20 Patterson Times article on charter expansion, available at: http://tinyurl.com/ycxugmc3 (last checked 6/16/2017).

21 The Record/NorthJersey.com article about alleged fraud in school applications, available at: http://tinyurl.com/lxtd23b (last checked 6/16/2017).

22 Paterson Arts and Science Board minutes 5.21.14; retrieved from http://tinyurl.com/yd6q5kst.

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Dierdre Simon is listed as a founder of four iLearn schools (Passaic, Paterson, Hudson, and Union). She has a consulting contract with at least one iLearn school for curriculum services totaling $25,000/year.[23] Simon did not disclose this contract on the Information Form she completed as part of the application process for the Hudson school. She answered "no" to the question whether she was "otherwise associated' with an organization that is partnering with the Hudson Arts and Science Charter School. The Hudson charter application clearly states that the school is "born of a partnership between Bergen, Passaic, and Paterson Arts & Science charter schools (section 1, page 1).[24] In addition, Simon was the subject of an investigative report by the New Jersey Department of Education in 2008 which found that she had violated regulations by accepting payment as a consultant for an iLearn school while still employed with a local school district.[25]

Financial Issues and Educational Compliance Concerns

Payment of Immigration Costs by Schools is Illegal

The Special Investigative Unit of the Office of Fiscal Accountability and Compliance at the New Jersey Department of Education conducted a limited review of immigration and employment issues at the Central Jersey College Prep Charter School in May 2010. A red flag was raised from the Office of Charter Schools when 21 staff members were terminated or resigned from the school after the 2008-2009 school year. The employees did not come forward with complaints regarding wrongful termination, however, so that concern was not pursued. The department did find that the school regularly made payments to the U.S. Citizenship and Immigration Service for legal expenses related to immigration, totaling $18,500 over three years. The Department found this practice to be unallowable, and in the course of the investigation, the employees of the schools whose immigration fees and legal expenses had been paid by the school reimbursed the school for these expenses. The Department found that the school should not be using public funds to pay immigration fees and associated legal costs for its employees.[26]

The use of public funds to pay immigration fees and related legal services has been discovered at other Gülen-affiliated schools across the United States who also hire many foreign teachers, primarily of Turkish national origin. There should be further investigation into this practice in New Jersey to determine whether other Gülen-affiliated schools in the state also paid for these immigration-related expenses since it appears to be a standard practice across the Gülen Organization. If the schools did pay for these immigration costs, then it should be investigated to see whether this practice continues and if reimbursement was made to the state after the Department ruled it illegal. Public documents show that the seven Gülen-affiliated schools in New Jersey have submitted 150 H1-B visa requests from 2002 – 2016[27] with an estimated cost of $450,000 to process.

[23] Paterson Arts and Science Board minutes on 5.21.14; retrieved from http://tinyurl.com/yd6q5kst.

[24] Hudson Arts and Science charter application; received from NJ Dept of Education through a FOIA request 2017; partnership statement in section 1, page 1; Simon Information Form completed by Simon – Exhibit 1A,

[25] Fraudulent Timekeeping by Employee, OFAC Case #1606, available at: http://tinyurl.com/ya8dcntw (last checked 6/16/2017).

[26] Immigration and Employment Issues. Central Jersey College Prep; OFAC Case #INV-112-09; New Jersey Department of Education; May 2010; received through FOIA request 2017.

[27] H-1B visas application can be reviewed by employer at MyVisaJobs, available at: http://tinyurl.com/6ajwfey (last checked 6/16/2017).

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State monitoring reports – Special Education and Title I

Monitoring reports conducted by the New Jersey Department of Education at four schools documented concerns about the use of federal Title I and IDEA special education funds.[28] Title I funds provide additional support for economically disadvantaged students, and IDEA funds support students with special needs. The documented misuse of federal Title I funds by these schools included:

- Using funds to pay for inappropriate staff positions;
- Using funds to pay for a program that requires students to pay a participation fee;
- Failure to inform parents about Title I opportunities for their children or to involve them in planning for how the funds will be used, as required by federal law;
- Failure to expend program funds at all, thereby not providing services to students in need; and
- Failure to provide information to parents in languages other than English, even in a school where parents speak at least five different languages.

The findings regarding use of IDEA (Special Education) funds were of particular concern because we believe they demonstrate serious systematic problems with the way services are delivered to students with disabilities. The monitoring reports documented that services were not provided in a timely manner; all stakeholders at the school were not involved in the student's education plan, and services were not coordinated.

Although a complete review of all prior NJDOE audits at every school was not conducted as part of this research, a random sample of audits revealed that similar issues related to special education services were identified as early as 2009 – 2010 by the New Jersey Department of Education at these schools, but actions required to correct the problems were not routinely taken or continued.

Findings - Special Education:

- Failure to respond to a request for student evaluation for services within the prescribed time frame (20 days). Note: Twenty days is a full month of instructional time in which students who may need services to ensure academic progress remain unserved.
- Failure to coordinate with the student's classroom teacher;
- Failure to inform and involve all required participants in meetings regarding students eligible or referred for special education services;
- Failure to document the impact on students and the classroom when students are removed from the general education setting; and
- Failure to provide students eligible for special graduation with notice of required components.

In addition, it is significant to note that the monitoring reports also included findings that schools were not issuing a purchase order prior to goods being purchased or services rendered. These concerns regarding violations of standard purchasing procedures are common to other Gülen-affiliated schools where audits have documented that they lead to abuses that favor a limited number of preferred vendors.

[28] Monitoring Reports from Bergen Arts and Science, available at: http://tinyurl.com/mn7tdyx (last checked 6/16/2017); Monitoring Reports from Passaic Arts and Science, available at: http://tinyurl.com/myypsku (last checked 6/16/2017); Monitoring Reports from Paterson Science and Technology, available at: http://tinyurl.com/mkudfut (last checked 6/16/2017).

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Financial Statements

Annual Financial Statements are prepared by external auditors and submitted to the New Jersey Department of Education. A review of the 2016 audit for each of the seven Gülen-affiliated schools revealed concerning financial issues. For example, the 2016 annual audit for two schools showed significant annual deficits – with expenditures exceeding revenue by millions of dollars. The Bergen Arts and Science Charter School, the lead school in the iLearn Schools charter network, showed a combined net position of -$3,481,336 for 2016 and -$2,166,484 for 2015, with a decrease in the school's fund balance of $890,649 in 2016 and $174,362 in 2015.[29]

Furthermore, in July 2016, the Board of the Bergen Arts and Science Charter School accepted a no-interest loan from iLearn Schools, its paid CMO vendor, to "cover short-term debts or transactions in need bases"[30] for the arts and sciences schools in the iLearn network. There was no information about the total amount of the loan, the need for the loan, or the dates of repayment. Loans from paid vendors to their customer charter schools is common to other Gülen schools around the country, and raises serious concerns about conflicts of interest and the independence of the Boards. This type of financial arrangement with vendors clearly compromises the independence of the Board as it makes contracting decisions with the CMO. Given the high fees paid annually to the CMO, a review of the iLearn charter management organization is relevant.

In addition, the Paterson Charter School for Science and Technology had a combined net position of -$1,905,122 for 2016, -$1,567,254 for 2015, and a $500,530 decrease in its fund balance in 2016.[31]

Instructional vs. administrative expenses

An additional area of concern for these schools is the percent of all funds spent on instruction vs. administration. Paterson Science and Technology spent less than 40 percent on instruction and 26 percent on administration in 2016. Passaic Arts and Science spent 41 percent on instruction and 33.5 percent on administration; and Bergen spent 41 percent on instruction and 35 percent on administration.[32] With high fees paid, totalling an estimated $3.7 million paid annually to the CMO, a more thorough review of how funds are being expended is in order.

Gift to iLearn CEO

Nihat Guvercin, the CEO of iLearn and paid school leader for the four iLearn schools, reported a gift or item of value from Adem Kalac, a "friend," on his 2014 Personal Disclosure Statement submitted to the School Ethics Commission of the New Jersey Department of Education.[33] The department requires disclosure of any "fee/honorarium or gift/reimbursement or prepaid expenses having an aggregate amount exceeding $250 from any single source excluding relatives." The value and description of the item received from Kalac are unknown. Kalac is currently linked to a company called Mediapex, Inc[34], and previously, he was the President of

29 Bergen 2016 Annual Financial Report, available at: http://tinyurl.com/ydgc9u3c (last checked 6/16/2017).

30 Minutes from the Bergen Arts and Science Board meeting from May 19, 2016, available at: http://tinyurl.com/y8daptax (last checked 6/16/2017).

31 Patterson 2016 Annual Financial Report, available at: http://tinyurl.com/y9kg2g8o (last checked 6/16/2017).

32 2016 Annual Financial Reports for: Passaic Arts and Science, available at: http://tinyurl.com/y7dzqomh (last checked 6/16/2017); Paterson Science and Technology, available at: http://tinyurl.com/y9kg2g8o (last checked 6/16/2017); Bergen Arts and Science, available at: http://tinyurl.com/ydgc9u3c (last checked 6/16/2017).

33 2014 Personal Disclosure Statement for Nihat Guvercin, available at: http://tinyurl.com/ybe4wqrd (last checked (6/16/2017).

34 Adem Kalac linked to Mediapex, available at: http://tinyurl.com/yb7k8b6x (last checked 6/16/2017).

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EBRU-TV,[35] which is affiliated with the Gülen movement.[36] Kalac and his companies should be reviewed to see whether they receive paid business from Guvercin or the iLearn schools. Regardless of the potential for conflict of interest, this gift indicates yet another affiliation between the New Jersey charter network with the Gülen Organization.

Bond Financing

Apple Educational Services, acting through its wholly-owned subsidiary Railway Avenue Properties, borrowed a total of $30 million in 2012 through bonds issued by the New Jersey Economic Development Authority[37] to purchase two facilities that were leased to the Paterson Charter School for Science and Technology:[38]

- Bond 1: $18,055,000 for West Railway Ave. (High School)
- Bond 2: $11,945,000 for 276 Wabash (Elementary School)

Over the life of the bond, Paterson will repay $12 million to Railway Avenue Properties in excess of the bond debt.[39] This pattern of a third party real estate arm of a Gülen-affiliated organization charging excessive rent is described in the Real Estate section.

Standard and Poor's (S & P) Ratings downgraded its outlook on these two bond issues from stable to negative in 2016 because of a decline in cash on hand which violated the terms of the bond and required the hiring of an external management consultant, possible expansion plans which could result in additional debt or lease expenses, as well as a "complicated debt structure involving a third-party borrower." [40]

In addition, according to an in-depth report from the Record/NorthJersey.com., Milkyway Education Center received an aid package from the New Jersey Economic Development in 2006 for renovations associated with a building it purchased in 2005 and rented to the Paterson Charter School for Science and Technology.

Real Estate

An insider real estate deal that involved Apple Educational Services, a contractor for Gülen-affiliated schools in New Jersey, and the Milkyway Education Center/Pioneer Academy, the landlord for the Paterson Charter School for Science and Technology, is typical of real estate transactions conducted by Gülen schools in other states that create affiliated but separate real estate organizations to purchase property and rent to the schools at excessive fees.

In these deals, a third-party organization is created by individuals affiliated with the schools or the schools' CMO, which then purchases a property that it rents to the charter school. The purchase of the property is often done through the issuance of a bond secured by the schools' public revenues. The third-party organization pays the bond debt

35 Kalac quote in Cision/PR Newswire, available at: http://tinyurl.com/y9txh8u2 (last checked 6/16/2017);
Also – Kalac sponsored H-1B visa applications as President of EBRU, available at: http://tinyurl.com/yd95kfxy (last checked 6/16/2017).

36 Gülen Movement website; available at: http://tinyurl.com/y7zg5p3l (last checked 6/16/2017).

37 New Jersey Economic Development Authority 2012 Projects, available at: http://tinyurl.com/ycztyaqv (last checked 6/16/2017).

38 2012 Bond Official Statements, available at: http://tinyurl.com/yavwlk94 (last checked 6/16/2017).

39 Id, (p. 20).

40 Standard & Poor's Ratings Credit Profile, available at: http://tinyurl.com/y8o7g3en (last checked 6/16/2017).

with the schools' public funds, thereby financing the organization's private acquisition of publicly financed property. What is particularly concerning is that the organization, despite its affiliation with the school, charges rent that is significantly higher than the actual bond debt or mortgage payment.[41] Even when the mortgage or the bonds are repaid in full, the schools still do not own the school building – so they must continue to pay rent using public funds, and often paying for the school building many times over. This arrangement provides a steady revenue stream to these third-party organizations. Many of these lease arrangements are "triple net leases" in which the charter schools also pay the full cost of all real estate taxes, building insurance, and maintenance on the property (the three "nets") as well as any normal fees such as utilities. Audits conducted in Oklahoma and New York by state agencies have been critical of these real estate transactions, raising concerns that they were not conducted at "arms' length" and that there was no legitimate reason to continue paying rent to an affiliated entity once the property cost was fully paid.[42]

The Record/NorthJersey.com conducted an in-depth investigative report on similar real estate transactions in New Jersey orchestrated by Apple Educational Services and its subsidiary Railway Avenue Properties.[43] Railway borrowed $28,500,000 in bonds through the New Jersey Economic Development Authority in 2012 for the purchase of properties that house the Paterson Charter School for Science and Technology at two different locations (elementary school and high school).[44] Railway/Apple now serves as the landlord for Paterson and receives annual rental payments that are over $400,000 more than the debt service.[45] Over the 30-year bond, taxpayers will repay the bond debt plus an additional $12 million to Railway/Apple, but despite this extensive investment of public funds, the school properties will always be privately owned.

In addition to being the school's landlord, Apple is also a vendor for the Patterson Charter School for Science and Technology with on-going contracts for technology services.[46] Because the school is leasing a building from its vendor, it raises questions about the independence of Board decision-making on these contracts, and whether the Board is selecting vendors that are in the public interest.

Furthermore, the real estate transactions concerning the Paterson properties demonstrate financial connections between the private Pioneer Academy and its governing entity, Milkyway Education Foundation and Railway/Apple. Railway/Apple purchased the Paterson buildings in 2012 from the Milkyway Education Center. From 2005-2012, Milkyway served as Paterson's landlord.[47] According to reports in The Record/NorthJersey.com, Milky Way made a net gain of $4.7 million on its sale of the property to Railway, as reported on its tax return in 2013.[48] Thus, Milkyway received significant rents paid for with public funds from Paterson before making a $4.7 million profit that was then paid for, again, with public funds through the bond issuances Paterson is now covering.

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41 The Record/NorthJersey.com article, available at: http://tinyurl.com/mkoky53 (last checked 6/16/2017).

42 Oklahoma State Auditor Investigative Report on Dove Science Academy, available at: http://tinyurl.com/kv3ade4 (last checked 6/16//2017); Buffalo Academy of Science Audit, available at: http://tinyurl.com/ybx7s4ev (last checked 6/16/2017).

43 The Record/NorthJersey.com article, available at: http://tinyurl.com/mkoky53 (last checked 6/16/2017).

44 Bond Official Statements (2) (p. 1), available at: http://tinyurl.com/y85c3dd9 (last checked 6/16/2017), Search: New Jersey Economic Development Authority (Railway bonds on second to last page)

45 Id, (p. 20 – compare rent paid for Wabash property to bond debt service).

46 Paterson Science and Technology Board Minutes from May 29, 2016, available at: http://tinyurl.com/ybttsmx8 (last checked 6/16/2017).

47 Board approval of lease with Milkyway; Board minutes; Paterson Science and Technology; January 31, 2004; http://tinyurl.com/yd6q5kst (last checked 6/18/2017).

48 IRS Form 990 for Milkyway Education Center, available at: http://tinyurl.com/nm7vfgk (last checked 6/16/2017); The Record/NorthJersey.com article, available at: http://tinyurl.com/mkoky53 (last checked 6/16/2017).

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The Record/NorthJersey.com article summarized this real estate transition as follows:

- 2005 – Milkyway Education Center purchased a building in Paterson on Lehigh Avenue for $2.5 million to be used by the Paterson charter school.
- 2006 – New Jersey Economic Development Authority issued $5.4 million in tax-free bonds to renovate the Lehigh property for Paterson.[49]
- Milkyway served as the landlord for the Paterson school at a cost of $1 million annually.
- 2012 – Milkyway sold the Lehigh property to Apple Educational Services for $10.5 million – part of larger deal financed by the state that included $30 million in bonds to Railway.
- Milkyway reported a net gain of $4.7 million on its tax return in 2013.
- 2012 – present – Paterson now leases the same property from Apple/Railway, plus the property on Wabash, paying $2.4 million in rental payments annually.
- Paterson will pay Apple/Railway $400,000 more in excessive rental payments than the cost of the bonds every year, a total of $12 million more over the life of the bond.
- Paterson will not own the building once the bonds are repaid.
- 2014 – Milkyway moved the private Pioneer Academy from Clifton to Wayne using funds acquired from the sale of the Lehigh campus.
- At the end of its lease with Milkyway, and when the Railway bonds are repaid, the Paterson charter school will still not own its school buildings.

iLearn school properties

A records search of other school properties in New Jersey shows that the iLearn schools are often leased from former Catholic church schools.[50]

Excessive Use of H1-B Visa Program

The seven Gülen-affiliated charter schools in New Jersey and their affiliated nonprofit organizations (Apple, Milkyway, Pioneer) have applied for 279 H1-B visas since the early 2000s, including 94 in the last five years alone.[51] The schools accounted for 150 visa applications, with 129 applications made by their affiliated nonprofits. At a conservative cost estimate of $3,000 for each visa request, the charter schools paid an estimated $450,000 in costs associated with the H-1B visas. As described in the Financial Abuse section, an investigative report from the NJ State Department of Education required Central Jersey College Prep to repay over $18,000 for visa expenses from 2007 – 2009, but there is no record that other schools repaid the costs of visas.

Although the schools state that the rationale for these visa applications is that they cannot find qualified teachers within New Jersey to teach its STEM curriculum, the H-1B applications were actually filed not only for math and science teachers, but also for positions such as science project coordinators, Turkish

[49] New Jersey Economic Development Authority, available at: http://tinyurl.com/yb72sqj2 (last checked 6/16/2017); Paterson Tax Assessor, available at: http://tinyurl.com/yc78gclj (last checked 6/16/2017); Official Statement, available at: http://tinyurl.com/yavwlk94 (last checked 6/16/2017).

[50] Assessment Records Search, available at: http://tinyurl.com/y96q5nfb (last checked 6/16/2017).

[51] H-1B visas application can be reviewed by employer at MyVisaJobs, available at: http://tinyurl.com/6ajwfey (last checked 6/16/2017).

language teachers, IT systems administrators, business/financial analysts, instructional technology coordinators, elementary special education teachers, and computer science teachers.

Both the charter schools and the nonprofit organizations use the same small group of immigration attorneys to file the H-1B visa applications that are used by other Gülen-affiliated entities across the United States, further demonstrating the existence of a network.

- **Remzi Kulen:** The New Jersey network used Kulen, a New York-based attorney, to file numerous H-1B applications.[52] Kulen also filed applications for:
  - Hampden/Pioneer (MA)
  - Apple Educational Services, Inc. (Northeast)
  - Technotime Business Solutions, LLC (NJ)
  - Ace It Education (MA)
  - Boston Dialogue Foundation, Inc (MA)
  - Wellspring Cultural and Educational Foundation, Inc. (CT)
  - Maryland American Turkish Inhabitants, Inc. (MD)
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Horizon Science (OH, IL)
  - Noble Academy (OH)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Lehigh Dialogue Center (PA)
  - Red Rose Intercultural and Educational Foundation (PA)
  - Young Scholars (PA)
  - Truebright (PA)
  - Golden Generation Worship & Retreat Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Brooklyn Amity School (NY)
  - Peace Islands Institute (NY)
  - Rochester Academy Charter School (NY)
  - Arts and Science, Bergen, Passaic (NJ)
  - Central Jersey College Prep Charter School (NY)
  - Milkyway Education Center, Inc. (NJ)
  - Beehive (UT)

- **Seth Leech:** The New Jersey schools used Leech, a New York-based attorney, to file numerous H-1B applications.[53] Leech also filed applications for:
  - Little Scholars (AR)
  - Hampden/Pioneer (MA)
  - Wellspring Cultural & Educational Foundation, Inc. (CT)
  - Pioneer (MA)
  - Hampden (MA)
  - Academy of Science, Syracuse, Buffalo, Utica (NY)
  - Rochester Academy Charter School (NY)
  - Central Jersey College Prep charter School (NJ)
  - Paterson Science and Technology; Central Jersey College Prep Charter School (NJ)
  - Arts and Science, Passaic (NJ)
  - Truebright (PA)
  - Young Scholars (PA)

- **Leonard D'arrigo:** The New Jersey schools used D'arrigo, a New York-based attorney, to file numerous H-1B applications.[54] D'arrigo also filed applications for:
  - Little Scholars (AR)
  - Cosmos Foundation, Inc. (TX)
  - Hampden/Pioneer (MA)
  - Central Jersey College Prep Charter School (NJ)
  - Millenium Education Foundation (now Frontier) (MO)
  - Hampden (MA)

52 List of entities represented by Remzi Kulen, available at: http://tinyurl.com/gptwx5x (last checked 6/16/2017).

53 List of entities represented by Seth Leech, available at: http://tinyurl.com/zlc7eql (last checked 6/16/2017).

54 List of entities represented by Leonard D'arrigo, available at: http://tinyurl.com/kcb3kjq (last checked 6/16/2017).

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- Academy of Science, Syracuse (NY)
- Rochester Academy Charter School (NY)
- Arts and Science, Bergen (NJ)
- Lehigh Dialogue Center (PA)
- Truebright (PA)
- Young Scholars (PA)

Scandals, Investigations, & Notable Activities

Problems have been identified in the application process for new Gülen-affiliated schools in New Jersey with allegations of fraud at one school.

Old Bridge Albert Einstein EnergySmart Charter

The Thomas Edison EnergySmart Charter School filed an application to open an affiliate school in Old Bridge, NJ called the Albert Einstein EnergySmart Charter School for grades K – 2. Over 200 community members attended a public forum in January 2017 to oppose the new school.[55] District school officials believed that if the state approved the charter, it would "drain millions of dollars from our budget causing Old Bridge to lose many of its programs."[56] The new school projected enrollment of 360 students by 2020 at a cost of $3.6 million to the district.

The officials seeking to open the Albert Einstein charter school cited incorrect performance data in an attempt to demonstrate that the community needed an alternative to the existing traditional public school.[57] However, the Superintendent of the Old Bridge district told the community members that the officials of the proposed school "are trying to establish a need that was either fraudulently or irresponsibly put in there."[58] When questioned about the validity of community support cited for the application, Oguz Yildiz, the lead person for the proposed charter school, stated that "we walked the streets of Old Bridge and spoke to whoever we passed. Those we spoke with were in favor of a charter school."[59]

The NJDOE denied the application for the Albert Einstein school in March 2017.[60]

Linden – Union Arts and Science Charter

The application for the proposed Union Arts and Science Charter School Linden, NJ included a petition with signatures supposedly in support of the new charter school.[61] However, Linden school officials conducted a door-to-door survey of the people whose signatures appeared on the petition and found "that a majority of the signatures were bogus, 'either forged or were completely fictitious.' In many cases, the person who answered the door said that they didn't know the person who had signed the petition."[62] The Record/NorthJersey.com conducted a spot check of the petitions and found "one was signed with the name and address of a women who a widely used commercial database shows died in 2007."[63]

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55 Information about the application for the Albert Einstein EnergySmart Charter School and the community forum, available at: http://tinyurl.com/y6uusras (last checked 6/16/2017).

56 Id.

57 Id.

58 Id.

59 Id.

60 CentralJersey.com article about denial of Albert Einstein EnergySmart Charter, available at: http://tinyurl.com/y7765vmh (last checked 6/16/2017).

61 The Record/NorthJersey.com article on evidence of fraudulent signatures on petition for the Union Arts and Science Charter, available at: http://tinyurl.com/y8deu6ow (last checked 6/16/2017).

62 Id.

63 Id.

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In light of this evidence, Linden officials submitted an affidavit to the New Jersey Department of Education and asked for the charter approval to be rescinded. The Record quoted Linden Superintendent of Schools Danny Robertozzi, "I believe there's a shady business going on with this particular charter school application, and I think that if there's shady business going on here, that there was other shady business going on in their other applications."[64] The apparently fraudulent signatures called the community support for the charter school into question.

In addition, Linden school officials also reported other ethics concerns about the Union Arts and Science application.[65] Three of the five founders of the school are paid employees or contractors of iLearn Schools, the parent organization of the new charter, or by charters operated by iLearn, creating a clear conflict of interest because these founders stand to benefit financially from the expansion of the iLearn schools.[66] One paid operative is a security consultant to iLearn schools; another is a curriculum consultant; and the third is the CEO of iLearn. The Linden school officials cite state law that prohibits representatives of a private entity (iLearn) from constituting a majority of the trustees of the school. The founders are called "founding Board members" in the charter application. In another questionable action, the director of the state charter office who supposedly investigated the letter and affidavit from the Linden school district about the fraudulent petition left the New Jersey Department of Education to work for iLearn as the chief strategy officer shortly after approving the iLearn application.[67]

Federal Civil Rights Complaint Filed

The Latino Coalition of New Jersey and the Franklin Community Advocates Revitalizing our Education System filed a federal civil rights complaint with the U.S. Department of Education and Department of Justice in February 2017 against the Thomas Edison EnergySmart School and the Central Jersey College Prep Charter School. The groups provided documentation that the student enrollment at these two schools are not representative of the local township population with a significantly smaller percent of students with disabilities, English Language Learners, Hispanic students, African American students, and economically disadvantaged students, and a larger percent of Asian American students. These statistics demonstrate that students who face greater academic challenges are disproportionately enrolled in the township schools.[68]

For example:

- The African American population in the township is 26.5 percent, compared to 13% of students at Thomas Edison;
- The Hispanic population is 12.9%, but only 4% at Thomas Edison; Asian-American students represent 67% of students at Thomas Edison, but only 17% in the township schools;
- Only 8% of students at Thomas Edison are economically disadvantaged (qualify for free and reduced price lunch), compared to 45% of students in the township, almost 6 times greater than the Edison school.
- Students with disabilities at the two schools represent 7% as compared to 16% at township schools; and
- Central Jersey did not admit any English Language Learners in 2014-15, compared to 5.6% enrolled in township schools.

64 Id.

65 Id.

66 Id.

67 Id.

68 NJ.com article on civil rights complaint, available at: http://tinyurl.com/y96jul46 (last checked 6/16/2017).

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Notable Turkish Vendors

The inter-connected web among Gülen-affiliated business interests, cultural organizations, and charter schools is complex and ever-changing as individuals move around these organizations over time in mutually beneficial roles. Awarding lucrative contracts from publicly supported charter schools to businesses that are operated by individuals of Turkish national origin who have clearly identified positions with cultural organizations that are aligned with Gülen is a common practice in many states, including New Jersey. It defies logic to think that these individuals, businesses, and organization are not connected and organized through a common, unifying thread, even though they may be legally separate entities.

The contracts between the schools and their affiliated vendors are often difficult to uncover because they are often not identified in any public record, and companies may be operating under an assumed name. Many of the Gülen schools do not post their vendors, contracts, or Board minutes that document when contracts are approved on their web site, so there is little transparency regarding these transactions. In addition, research into Gülen-affiliated schools has shown that the process for awarding contracts is often a closed-loop decision making process, with approvals made by committees, including the Board, composed of a majority of individuals with Gülen ties.

An example of how this connected web can work to benefit the Gülen organization are the financial transactions with the company Technotime Business Solutions that has numerous contracts with Gülen-affiliated schools in New Jersey. The company's leadership is directly connected to other Gülen-affiliated organizations and businesses including Peace Islands Institute, Apple Educational Services, the Council of Turkic American Associations, and the Milkyway Education Center/Pioneer Academy. The Technotime contracts were identified in the minutes of school board meetings, but that search was limited because two of the New Jersey Gülen schools do not make their board minutes publicly available.

Technotime Business Solutions

Technotime was awarded at least five contracts with three Gülen-affiliated New Jersey schools between 2014 – 2016.[69] The amounts for all the contracts were not revealed in the school Board meeting minutes, but three contracts were documented for $125,069, $82,272, and $447,941 – a total of $655,282 - for school supply purchases and a security camera system and data voice cabling. At least one contract for services under the E-Rate federal program was bid competitively, and Technotime was the low bidder and awarded the contract.[70] One of these contracts went to ProAcademy, a company that provides school and office furniture and operates as an assumed name for Technotime.

M. Mural Kaval is one of the original founders of Technotime,[71] a role he filled at the same time that he served as the CEO of the Peace Islands Institute,[72] an openly Gülenist organization. Kaval's affiliations don't end there—he

[69] Minutes from meetings of the Boards of Directors: Central New Jersey College Prep from July 14, 2016, available at: http://tinyurl.com/y9tpu3s3 (last checked 6/17/2017); Bergen Arts and Science from July 24, 2014 and October 15, 2015, available at: http://tinyurl.com/y8daptax (last checked 6/17/2017); Paterson Arts and Science from August 18, 2017 and May 28, 2015, available at: http://tinyurl.com/ydzahpzq (last checked 6/17/2017).

[70] Board minutes from Bergen Arts and Sciences announcing bidders for E-Rate contract from April 17, 2014, available at: http://tinyurl.com/y8daptax (last checked 6/17/2017).

[71] Technotime Certificate of Formation, NJ Department of Treasury business entity search, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/17/2017).

[72] LinkedIn profile, available at: http://tinyurl.com/ydgd6pxm (last checked 6/17/2017).

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previously worked in public relations for Apple Educational Services, as well. Similarly, Mehmet Yasa became an owner of Technotime in 2011[73] and was a director of the Milkyway Education Center[74] d.b.a. Pioneer Academy. Yasa presented at a Peace Islands Institute conference as a representative of the Council of Turkic American Associations (CTAA).[75] As discussed previously, Milkyway was the landlord for Paterson Science and Technology and later sold the property to Apple Educational Services at a hefty profit (see real estate section). Both Kaval and Yasa exited Technotime in 2012.

Other assumed names for Technotime include ProAcademy, ProAcademy Furniture, Vestell (electronic hardware, phone system), and Inspire (school uniforms).

Apple Educational Services

Apple Educational Services plays a key role in the Gülen organization in the Northeast through its lucrative contracts with Gülen-affiliated schools in New Jersey, New York, Pennsylvania, and Massachusetts. Apple has three distinct business lines: 1) as a third-party real estate arm and landlord (often through one of its wholly-owned subsidiaries), 2) as an IT services provider, and 3) as an after-school program provider through its wholly-owned subsidiary Ivy Learning.[76] Apple's leadership is directly connected to other Gülen-affiliated organizations. For example, Apple founder Faruk Apaydin is also a founder of the Peace Islands Institute (formerly the Interfaith Dialog Center), an organization openly aligned with Gülen.[77]

In New Jersey, Apple and its subsidiary Ivy Learning have had at least eight vendor contracts with four Gülen schools between 2014 – 2016, which appear to be on-going contracts that are renewed annually.[78] These contracts are for services that include school proprietary software to manage student records, SAT/PSAT preparation, and tutoring services by Ivy Learning. Many of the public records do not include the total amount of the contracts, but in three instances, the contracts show Apple is paid $35,000 annually at one school and $70,000 at another,[79] and at one school, Ivy is paid $45,000 to prep 30 students for a four-week session. It is not always clear whether one contract will cover more than one school since the iLearn schools appear to share some contracted services, but it is likely that all Gülen-affiliated schools in New Jersey have contracts with Apple. Concerns have been raised about the management of confidential student records by an external contractor that is not directly managed by charter school personnel. In addition, Apple is the landlord for the Paterson Charter School for Science and Technology as discussed in the real estate

73 Technotime Certificate of Amendment on NJ Department of Treasury business entity search, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/17/2017).

74 LinkedIn profile, available at: http://tinyurl.com/y7thycef (last checked 6/17/2017).

75 Peace Islands Institute 2013 Workshop Agenda, available at: http://tinyurl.com/ya9hvd4b (last checked 6/17/2017).

76 Apple Education Services Certificate of Formation, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/17/2017).

77 Peace Island Institute/Interfaith Dialog Center IRS Form 990 from 2004, available at: http://tinyurl.com/y7zjo8vk (last checked 6/17/2017).

78 Minutes from Board meetings: Central Jersey College Prep from September 29, 2016 and July 14, 2016, available at: http://tinyurl.com/y9tpu3s3 (last checked 6/17/2017); Bergen Arts and Science from August 15, 2016, July 23, 2015, and July 24, 2014, available at: http://tinyurl.com/y8daptax (last checked 6/17/2017); Paterson Arts and Science from July 24, 2014 and June 29, 2016, available at: http://tinyurl.com/ydzahpzq (last checked 6/17/2017); Paterson Science and Technology from June 29, 2016, available at: http://tinyurl.com/ybttsmx8 (last checked 6/17/2017).

79 Payment of $70,000 from Bergen budget submitted to NJ Department of Education as part of 2015-16 charter renewal application; received with documents from 2017 FOIA request; Approval for the Apple contract in board minutes for Bergen Arts and Sciences from July 24, 2014, available at: http://tinyurl.com/yblr2vcn (last checked 6/17/2017); Paterson Arts and Sciences from July 24, 2014, available at: http://tinyurl.com/ybn3a6td (last checked 6/17/2017); Paterson Science and Technology from June 29, 2016, available at: http://tinyurl.com/ybttsmx8 (last checked 6/17/2017).

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section of this report. Finally, Apple has submitted 31 H1B visas over the last ten years to bring in foreign workers, primarily from Turkey.[80]

Gülenist Cultural and Business Organizations Active in New Jersey

- Peace Islands Institute (formerly Interfaith Dialog Center): Gülen-affiliated cultural organizations such as the Peace Islands Institute exist throughout the United States under different names. The organizations sponsor trips to Turkey for elected officials and community leaders, organize events, awards dinners, and interfaith forums. The people who receive awards from the organizations are often in positions that could be extremely beneficial to the Gülen charter schools, as noted by the awards given in the New Jersey example below. The organizations also serve as an employer for key Gülen supporters.[81]

  The Peace Islands Institute has affiliated groups in New York, New Jersey, Massachusetts, Pennsylvania, and Connecticut. It is a member organization of the Alliance for Shared Values, the umbrella organization for several Gülen groups, and openly supports the Gülen Movement and features Gülen on its website.[82] The executive director of the Alliance, Ercan Tozan, is also a spokesperson for Fethullah Gülen. The Peace Island Institute sponsored or participated in New Jersey events such as:
  - Annual awards dinner in Morristown, NJ (date unknown)[83] that honored former NJ Governor James Florio, Clifton Mayor James Anzaldi (Gülen schools submitted applications for schools in Clifton), David Hespe, NJ Commissioner of Education (charter school authorizer), Richard Thigpen, VP of PSEG, and Hidayet Karaca, the president of Samanyolu Broadcasting Group of Turkey (a known Gülen corporation).[84]
  - Annual Awards dinner in Hasbrouck Heights (June 2, date unknown – 9th annual) honoring Dr. Chris Rodriguez, Director of New Jersey Office of Homeland Security and Preparedness; Dr. Angus Kress Gillespie, Director of New Jersey Folk Festival; Dr. Paul Winkler, Executive Director of NJ Commission on Holocaust Education; Michele Siekerka, Presidents of New Jersey Business and Industry Association, with keynote by Assemblywoman Holly Schepisi.
  - Law Enforcement Appreciation Awards in Morristown[85] (12.10.15) that honored Michael E. Campion, the Assistant U.S. Attorney, the District of New Jersey (who stated "Peace Island agenda consistent with the civil rights work we do at the U.S. Attorney's office").
  - Law Enforcement Luncheon Series (5.26.15): speaker – Col. Joseph R.

[80] H-1B visas application can be reviewed by employer at MyVisaJobs, available at: http://tinyurl.com/6ajwfey (last checked 6/17/2017).

[81] Peace Island Institute website, available at: http://tinyurl.com/p7g8sue (last checked 6/17/2017).

[82] Alliance for Shared Values website; available at: http://tinyurl.com/ybe5nddg (last checked 6/17/2017).

[83] Event details from awards dinner, available at: http://tinyurl.com/ya4qqnjj (last checked 6/17/2017).

[84] New Yorker article on Turkish coup mentions Semanyolu TV, available at: http://tinyurl.com/jq7u9t3 (last checked 6/17/2017).

[85] Law Enforcement Appreciation Awards video, available at: http://tinyurl.com/ydhsn482 (last checked 6/17/2017).

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Fuentes, superintendent of the NJ State Police[86]
- ▷ MLK event (1.15.16) with speaker Assemblyman Gordon M. Johnson, Deputy Speaker of the New Jersey Assembly[87]
- ▷ Donation to Toni's Kitchen in conjunction with New Jersey Assemblyman Thomas P. Giblin as part of Muslim festival of Eid[88]
- ▷ Ambassador Series[89] featuring different countries – focus on Africa on 6.11.15
- ▷ Annual awards dinner (June 18, 2014) honored Mike Schneider, NJTV News; local Sheriff Richard Berdnik; Assemblywoman Annette Quijano; Chief Academic Officer Tracey Severns, New Jersey Department of Education; Executive Director Rev. Robert Moore, Coalition for Peace Action and Peace Action Education Fund; and President Jeffrey Vega of New Brunswick Tomorrow, with closing comments from Assemblywoman Sheila Y. Oliver on the work of the Peace Island Institute.[90]

- ► Turkish Cultural Center of New Jersey: The Center is another Gülen-affiliated cultural organization that sponsored trips to Turkey and offers cultural classes.[91]
  - ▷ Turkish American groups were recognized by NJ assembly, including Peace Islands, Turkish Cultural Center, Turkish American Business Development and Improvement, and Pioneer Academy (see more information in next section).[92]

- ► North East Turkish American Scholars, Inc.: The current president of the Board is Ehat Ercanli[93] who was also the founder of the Syracuse Academy of Science in New York and the Horizon Education Center in Ohio, the parent organization of the Horizon charter network, which are all Gülen-affiliated schools.

- ► Hudson Turkish American Cultural Association: This association received over $1 million in contributions and program service revenue.[94]

- ► Federation of Turkish American Associations (Perth Amboy): iLearn staged an unsuccessful attempt to locate a new school in Perth Amboy[95]

86 Event details for Law Enforcement Luncheon Series, available at: http://tinyurl.com/yatcrdx4 (last checked 6/17/2017).

87 Daily Voice article about MLK even, available at: http://tinyurl.com/ybmvgz7m (last checked 6/17/2017).

88 Toni's Kitchen donation information, available at: http://tinyurl.com/ybva8j5b (last checked 6/17/2017).

89 Peace Island ambassador series event details, available at: http://tinyurl.com/yc99pkrp (last checked 6/17/2017).

90 Hizmet Movement News Portal article about awards dinner, available at: http://tinyurl.com/y83rbc4u (last checked 6/17/2017).

91 Turkish Cultural Center New Jersey in Bergen County information, available at: http://tinyurl.com/ybe5nddg (last checked 6/17/2017).

92 Hizmet Movement News Portal article about New Jerseylegislative recognition of Peace Islands, available at: http://tinyurl.com/y9o7op42 (last checked 6/17/2017).

93 NE Scholars 2004 IRS Form 990, available at: http://tinyurl.com/y9o7op42 (last checked 6/17/2017).

94 Hudson 2014 IRS Form 990, available at: http://tinyurl.com/y7y58uhr (last checked 6/17/2017).

95 Federation of Turkic American Organization IRS Form 990, available at: http://tinyurl.com/y9jlwt4d (last checked 6/17/2017).

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Friends of Gülen Spotlight

- State elected officials took Gülen-sponsored trips to Turkey in 2011, including Sen. Loretta Weinberg and Assemblyman Gordon Johnson.[96] The legislators reported that they paid for airfare, but the remaining costs were paid by the Peace Islands Institute. Johnson took a second trip in 2014 paid for by the Council of Turkic American Associations.[97]

- Cong. Leonard Lance (R-NJ) was part of an all-expense paid 10-member Congressional trip in 2013 to Baku, Azerbaijan that was later investigated by the Office of Congressional Ethics when it was revealed that the trip had been secretly paid for by SOCAR, the state-owned oil company of Azerbaijan. The members of Congress were not aware that SOCAR had funded the trip and had sought trip approval from the House Ethics Committee. Lance also took an extended trip to Turkey. The Washington Post reported that during the previous year, "SOCAR and several large energy companies sought exemptions for a $28 billion natural gas pipeline project in the Caspian Sea from U.S. economic sanctions being imposed on Iran."[98]

- Members of the New Jersey General Assembly and Senate recognized the Peace Island Institute, the Turkish Cultural Center, the Pioneer Academy of Science (private Gülen school in New Jersey (parent organization is the Milkyway Education Center); and the Turkish American Business Development and Improvement through a resolution on 1.22.13. Elected officials who joined in the recognition included: Assembly members Holly Schepisi, Gordon Johnson; Alberto Coutinho, Troy Singleton, and Thomas Giblin; and Senators Loretta Weinberg, Anthony Bucco, Theresa Ruiz, Diane Allen, and Tom Kean, Jr.[99]

- New Jersey Governor Chris Christie visited three of the New Jersey Gülen schools in 2016.[100]

- In law enforcement circles, former Bergen County sheriff, Leo McGuire serves as a paid consultant to the iLearn Schools. He and his family took a sponsored trip to Turkey in 2010 just before he retired.[101]

Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H-1B visa employees, both teachers and administrators, from school to school and state to state in very different types of jobs. The individuals listed below are examples of the overlap of employees among schools, further demonstrating the interconnections and affiliation between the networks.

96 Center for Public Integrity report, available at: http://tinyurl.com/lzd8zsl (last checked 6/17/2017).

97 The Record/NorthJersey.com article about alleged state legislator links to Gülen, available at: http://tinyurl.com/lsny9ys (last checked 6/17/2017).

98 Washington Post article about 10-member congressional trip, available at: http://tinyurl.com/yc7lk4la (last checked 6/17/2017).

99 New Jersey Legislative recognition of Peace Islands, available at: http://tinyurl.com/y84q7z3t (last checked 6/17/2017).

100 Information on Gov. Christie visits: Thomas Edison EnergySmart Charter available at: http://tinyurl.com/y77gkkn2 (last checked 6/17/2017); Bergen from May 24, 2016, available at: http://tinyurl.com/yawgeyvn (last checked 6/17/2017).

101 EBRU TV interview with McGuire about trip to Turkey, available at: http://tinyurl.com/yacymamz (last checked 6/17/2017).

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In a lecture at Rice University, Joshua Hendricks, a professor at the University of Oregon who published a book about the Gülen movement, stated, "What is mind-boggling to some and infuriating to others is why do the leaders deny affiliation when affiliation is clear?"[102]

- Osman Oztoprak: Founder, Bergen Arts and Science (NJ); CEO, Principal and Teacher, Pioneer Academy (NJ); Director, Alliance for Shared Values (NY); the umbrella organization for other Gülen-affiliated nonprofits that is openly aligned with Fethullah Gülen; Program Director, Apple Education Services (NJ).[103]

- Faruk Apaydin; Founder and Board member, Apple Education Services (NJ); Vendor to iLearn Schools (NJ); Landlord to Paterson School of Science and Technology through Apple Education Services/Railway Avenue Partners.[104]

- Furkan Kosar: President, Council of Turkic American Associations (NY)(funded trips to Turkey and Azerbaijan for members of Congress); Head, Paterson Science and Technology School (NJ); Founding Board Member, Milkyway Education Center/ Pioneer Academy (NJ).[105]

- Nihat Guvercin: CEO, iLearn Schools (NJ); Founder of four of the five Arts and Sciences/ iLearn charter schools (NJ); School Leader for four of the five Arts and Sciences/iLearn charter schools (NJ); Principal, Science Teacher, Harmony Public Schools (TX) in Texas, the largest Gülen-affiliated charter network in the United States; Director, Teacher, Researcher at Gülistan Education Institutions (Albania); B.S., Middle Eastern Technical University (Ankara, Turkey).[106]

- Mustafa Coban: Chief Operations Officer, iLearn (NJ); Reports income from Apple Educational Services on his 2016 School Ethics Commission Personal Disclosure Statement and reports income for his wife from Milkyway Education Center; married to Patricia Ann Coban, Founder and Operations Manager of the Syracuse Academy of Science (NY) and Founder of Utica Academy of Science (NY).[107]

- Ali Riza Gurcanli: Lead Person, Paterson Charter School for Science and Technology (NJ); Head Principal, Pioneer Academy of Science (NJ); Principal, Superintendent, Pioneer Charter School of Science (MA); B.S., Middle East Technical University (Gaziantep, Turkey).[108]

[102] The Oklahoman/NewsOK.com article containing quote, available at: http://tinyurl.com/y97tud7x (last checked 6/17/2017).

[103] Bergen Arts and Science charter application received from NJ Dept of Education through a 2017 FOIA request; LinkedIn profile, available at: http://tinyurl.com/ybroxfyh (last checked 6/17/2017); Campaign Finance Report for Holt Victory Fund, available at: http://tinyurl.com/y8f5pnvk (last checked 6/17/2017); 2015 IRS Form 990 for Alliance for Shared Values, available at: http://tinyurl.com/y7as3hhd (last checked 6/17/2017); Web site for the Alliance for Shared Values available at: http://tinyurl.com/yaqlsx28 (last checked 6/17/2017).

[104] Minutes from Central Jersey College Prep board meetings from September 29, 2016 and July 14, 2016, available at: http://tinyurl.com/y9tpu3s3 (last checked 6/17/2017); Minutes from Bergen Arts and Sciences board meetings from September 15, 2016 and July 23, 2015, available at: http://tinyurl.com/y8daptax (last checked 6/17/2017); Apple Education Services2015 IRS Form 990, available at: http://tinyurl.com/yclwxbwj (last checked 6/17/2017);
New Jersey Dept of Treasury business entities, available at: http://tinyurl.com/ydc8tcf6 (last checked 6/17/2017); The Record/NorthJersey.com article, available at: http://tinyurl.com/mkoky53 (last checked 6/17/2017).

[105] Information taken from: Roll Call article, available at: http://tinyurl.com/mvawss8 (last checked 6/17/2017); Milkyway 2001 IRS From 990, available at: http://tinyurl.com/mdknvzx (last checked 6/17/2017); NJ Department of Education letter to Kosar, available at: http://tinyurl.com/y824stg8 (last checked 6/17/2017).

[106] Information taken from: Annual reports for each Arts and Science school; LinkedIn profile, available at: http://tinyurl.com/yd4ap3dr (last checked 6/17/2017).

[107] Information taken from: Charter applications received from the New York Department of Education through 2017 FOIA request; School Ethics Commission Disclosure, available at: http://tinyurl.com/ybhw7exe (last checked 6/17/2017); 2010-2011 public school employee pay records, available at: http://tinyurl.com/yah8fmtq (last checked 6/17/2017).

[108] Information taken from: Resume for Ali Riza Gurcanli from Paterson Science and Technology, received from 2017 FOIA request; LinkedIn profile, available at: http://tinyurl.com/ybedsxo5 (last checked 6/17/2017).

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- Tarkan Topcuoglu: Chief Education Officer, Central Jersey College Prep Charter School (NJ); Director, Dean of Academics, Hampden Charter School of Science (MA); Vice Principal, Program Coordinator, Computer Science Teacher, Putnam Science Academy,(CT); Fatih Private School (Istanbul, Turkey); B.S,. Marmara University (Turkey).[109]

- Ufuk Zini: High School Director, Bergen Arts and Science (NJ); Testing Coordinator, School Operations, Building Coordinator, Paterson Charter School for Science and Technology (NJ) at time Apple Educational Services bought the building from Milkyway; Program Coordinator, Ivy Learning (NJ); Apple Educational Services (Apple's third business – after-school care); Science teacher, Pioneer Academy of Science (NJ); Teacher, Vice Principal, Anafen Learning Center (Istanbul, Turkey); B.S., Middle East Technical University (Ankara, Turkey).[110]

- Harun Celik: Director, Passaic Arts and Science Charter School (NJ); Executive Director, Hampden Charter School of Science (MA); Project Coordinator, Bergen Arts and Science Charter School (NJ); B.A., Kazan State Pedagogical University (Tatarsan, Russia).[111]

- Ercan Tozan: Executive Director, Peace Islands Institute (NJ); Director, Rochester Academy Charter School (NY); Administrator, Putnam Science Academy, (CT); Director, Peace Islands Institute (NY); Board of Trustees, FBI Citizens Academies (NJ).[112]

- Lynne Ozgur: Grants Manager, State Reporter, Central Jersey College Prep (NJ); married to Kemal Ozgur, a micro-biologist who is reported to be the person who invited Fethullah Gülen to Pennsylvania and is described as an "aide" to Gülen.[113]

- Namik Sercan; Chief Education Officer, Central Jersey College Prep (NJ); Executive Director, Terra Foundation for Science and Education (NY) (Gülenist landlord); Principal, Fulton Science Academy High School in Atlanta when the charter was revoked(GA); Author of 2008 article in The Fountain Magazine, a Gülenist publication; B.S., Uludag University (Bursa, Turkey).[114]

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109 All references are from resume included in charter amendment dated December 1, 2016 and submitted to the NJ Department of Education; received through 2017 FOIA request.

110 Information taken from: Resume received in documents as part of 2017 FOIA request; Board Minutesfrom Bergen Arts and Science, available at: http://tinyurl.com/yd8xnsl2 (last checked 6/17/2017).

111 LinkedIn profile, available at: http://tinyurl.com/hyo2htt (last checked 6/17/2017).

112 Information taken from: FBI Citizen Academies Alumni Association New Jersey, available at: http://tinyurl.com/y7l6upgm (last checked 6/17/2017); LinkedIn profile, available at: http://tinyurl.com/y9na3396 (last checked 6/17/2017); NJ.com article on Peace Island Institute, available at: http://tinyurl.com/y74mre5g (last checked 6/17/2017).

113 Desert News profile of Gülen, available at: http://tinyurl.com/y9eszw5l (last checked 6/17/2017); Central Jersey College Prep Board Minutes from July 14, 2016, available at: http://tinyurl.com/y9t2s9zw (last checked 6/17/2017); RPNPS blog, available at: http://tinyurl.com/ybajh69n (last checked 6/17/2017); Pocono Record article, available at: http://tinyurl.com/ydzdtlan (last checked 6/17/2017); Philly.com article, available at: http://tinyurl.com/y9pqhvqp (last checked 6/17/2017).

114 Atlanta WSB-TV report on revoking Science Academy charter, available at: http://tinyurl.com/ybylox6x (last checked 6/17/2017); LinkedIn profile, available at: http://tinyurl.com/yc3ersfs (last checked 6/17/2017); Article on expanding Central Jersey College Prep charter, available at: http://tinyurl.com/mfrp6ckNamik (last checked 6/17/2017); Dissertation curriculum vitae from 2016, available at: http://tinyurl.com/y7nrt8na (last checked 6/17/2017); The Fountain Issue 63, available at: http://tinyurl.com/k3kch2l (last checked 6/17/2017).

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Notable Press Coverage and Research Regarding the New Jersey Gülenist Network

Rimbach, Jean; Pillets, Jeff; Adely, Hannan, *Investigation: Charter School leaders, founders linked to controversial Turkish cleric; Turks create big footprint in New Jersey Charter Schools;* The Record/NorthJersey.com, February 15, 2017. Available at: http://tinyurl.com/lsny9ys (last checked 6/16/2017).

Filkins, Dexter, *Turkey's Thirty-Year Coup*; New Yorker, October 17, 2016. Available at: http://tinyurl.com/jq7u9t3 (last checked 6/16/2017).

Rimbach, Jean, *Sale of charter school property boosts private academy*, THE RECORD/NORTHJERSEY.COM, Febrauary 16, 2017. Available at: http://tinyurl.com/yb3dhcof (last checked 6/16/2017).

Rimbach, Jean, *District alleges fraud in charter school application*, The Record/NorthJersey.com, March 19, 2017. Available at: http://tinyurl.com/lxtd23b (last checked 6/16/2017).

Rimbach, Jean, *Charter school founders face scrutiny from local officials*, The Record/NorthJersey.com, March 19, 2017. Available at: http://tinyurl.com/y8deu6ow (last checked 6/16/2017).

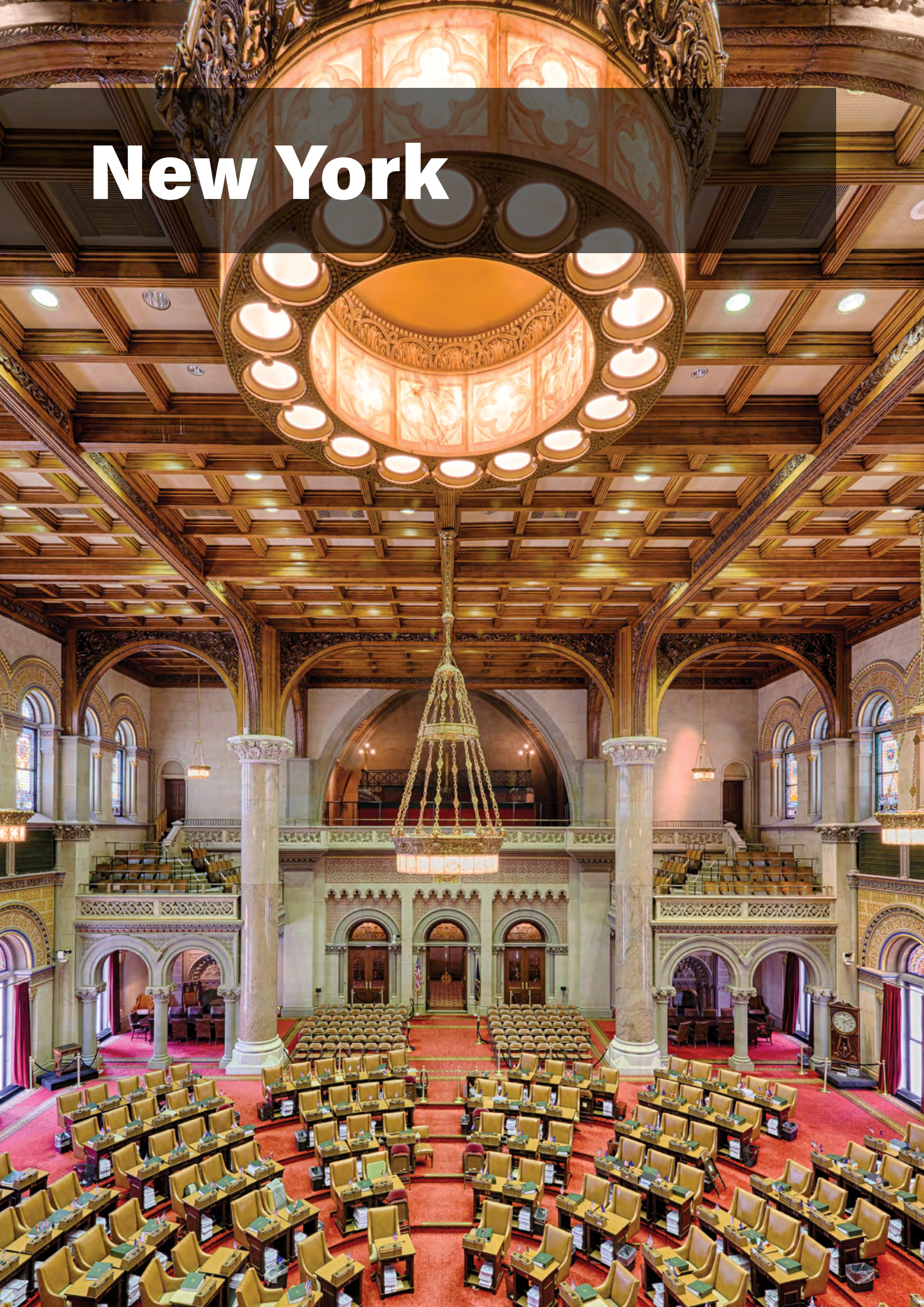
Rahman, Jayed. *State approves expansion for four Paterson charter schools*. Patterson Times, March 1, 2017; Available at: http://tinyurl.com/ycxugmc3 (last checked 6/16/2017)

Hutchison, Dave. 2 charter school in this town accused of segregation. NJ Advance Media for NJ.com, February 10, 2017. Available at: http://tinyurl.com/y8uq6plb (last checked 6/16/2017).

Spencer Kent. *New charter would 'drain millions' from district, Old Bridge officials war.* NJ Advance Media for NJ.com, February 7, 2017. Available at: http://tinyurl.com/y6uusras (last checked 6/16/2017).

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New York

QUICK FACTS ON GÜLEN CHARTER SCHOOLS NEW YORK



NUMBER OF SCHOOLS	**5**
KNOWN AS	**Rochester Academy** **Utica Academy of Science** **Buffalo Academy of Science** **Syracuse Academy of Science**
TOTAL ENROLLMENT	**1,924**
CHARTER VENDOR	**Terra Science and Education; Apple Educational Services**
TOTAL REVENUES	**$25,501,185**

RELATED INSTITUTIONS



Hampden; Pioneer



Young Scholars; Vision Academy



Arts & Sciences; Science & Technology; Central Jersey College Prep Charter School

KEY PEOPLE



Ehat Ercanli



Bulent Cetinkaya



7 more

FORCED CONTRIBUTIONS

A former Utica Academy of Science teacher testified that he was **forced to pay thousands of dollars** to the Gulen movement. Mr. Konkur provided a copy of a check, as well as documents that show the school kept a **separate set of books for its Turkish teachers**.

Mr. Konkur testified that if he refused to make the payments, his visa would be withdrawn and he would **lose his immigration status** in the U.S.

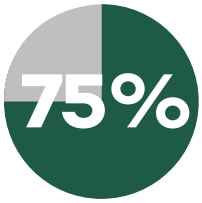


POOR RECORD KEEPING



Syracuse Academy of Science

Unable to verify more than

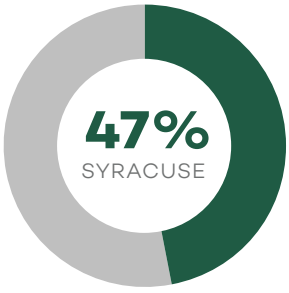


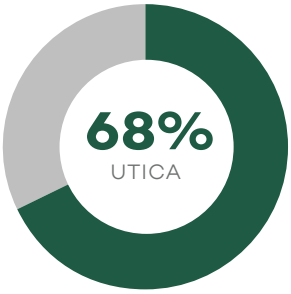
of student address records in an audit.

As a result, the school could not bill the correct school districts for per pupil funding, resulting in **tens of thousands in incorrect billings.**

EXCESSIVE TEACHER ATTRITION

Percent of teachers who did not return from the previous school year. 2015—2016





IMPROPER INVOICING

Rochester Academy Charter School shows numerous instances in which invoices were split so that payment did not hit the $5,000 threshold that would require Board approval for the purchase.

For example, three invoices for school uniforms were all issued on the same date, and each invoice was from slightly less than $5,000.



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Northeast

- School Names (known as):
  - Buffalo Academy of Science Charter School
  - Syracuse Academy of Science Charter School
  - Utica Academy of Science Charter School
  - Rochester Academy Charter School

- Total number of schools in state: 4 charter schools, 8 campuses; 1 private school

- (one new school will open in 2017 – 18: Syracuse Academy of Science and Citizenship)

- Total student enrollment 2015-16: 1,924

- Charter Holder/Governing Board(s):
  - Each school has its own corporate Board of Directors and is a tax-exempt nonprofit organization with a 501(c)(3) IRS status filed under the same name as each school

- Charter Management Services Vendor: Terra Science and Education ("Terra") and Apple Educational Services ("Apple")

- Regional Gülen Organization Oversight Entity: Terra Science and Education and Apple Educational Services

- Regional Sister Networks: Young Scholars (PA); Vision (PA); Hampden (MA); Pioneer (MA); Arts and Sciences/ iLearn (NJ); Science and Technology (NJ); Central Jersey College Prep Charter School (NJ).

- Total Revenues for FY 2016[1]: $25,501,185

- Network Founders:
  - Ehat Ercanli: Founder and original Board member, Syracuse Academy of Science; at time of founding, Ercanli was Assistant Prof Elec Engineering/Computer Science, Syracuse University; founder of Horizon Education Center in 1998, the parent organization of Horizon Academy Charter Schools; Gülen-affiliated charter network in Ohio; B.S. Istanbul Technical University (Istanbul, Turkey)[2]
  - Bulent Cetinkaya: Founder and original Board member, Syracuse Academy of Science; at time of founding, PhD student in Math Ed from Syracuse University; Math teacher/ Math Olympiads Coordinator, PSM High School, Turkey; B.S. Middle Eastern Technical University (Turkey)[3]
  - Patricia Coban: Founder, Syracuse and Utica Academies of Science[4]; currently teacher, Paterson Charter School or Arts and Science[5] where her husband is the Chief Operations Officer for iLearn Schools (the charter management organization for Paterson Arts and Science and other

1 Financial Statement; NY Department of Education; http://www.p12.nysed.gov/psc/csdirectory/CSLaunchPage.html

2 Ehat Ercanli biographical information taken from Syracuse Academy of Science Charter Application (Dec. 2, 2002), available through open records request to the New York State Education Department, (last checked 5/19/2017).

3 Bulent Cetinkaya biographical information taken from the Syracuse Academy of Science Charter Application (Dec. 2, 2002), available through open records request to the New York State Education Department, (last checked 5/19/2017).

4 Founders – charter applications for Utica and Syracuse; received from 2017 FOIA request

5 Patricia Coban; LinkedIn available from https://www.linkedin.com/in/patricia-coban-15071824/

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Gülenist schools in New Jersey); teacher, Pioneer Academy (private Gülen school in New Jersey)[6]; teacher, Syracuse Academy of Science (after founding date)[7]

- Selami Tezcan: Founder and original Board member, Syracuse Academy of Science; at time of founding, PhD student Civil/Enviro Engineering Syracuse University; B.S. Robert College (Istanbul, Turkey).[8]
- Yunus Kumek: Founder and initial Board Member of the Buffalo Academy of Science; at time of founding, PhD student Physics, University of Buffalo, founded Yuksel Education Center (Istanbul, Turkey) which prepares students for college entrance exams and for Math/Science Olympiads; undergrad at Bogazici University (Istanbul, Turkey).[9]
- Levent Kaya: Founder and Buffalo Academy of Science; at time of founding, PhD candidate Economics, University of Buffalo; math teacher at private high school in Albania; B.S. Fatih University (Istanbul, Turkey).[10]
- Fehmi Damkaci: Founder of Utica Academy of Science;[11] President of the Board of the Syracuse Science Academy[12]; Board President[13]of Terra Science and Education (2010 – present) that leases buildings to the Syracuse and Utica Science Academies and the Rochester Academy; Founding Board Member of Pioneer Charter School of Science in Boston, MA (2006)[14]; President, Turkish Cultural Center of Syracuse[15]; Teacher, Yamanlar High School, Izmir, Turkey; B.S. Ege University;[16] Associate Professor Chemistry, State University of NY at Oswego[17]
- Muris Hadsic: Founder and Initial Board Member of Utica Academy of Science; at the time of founding, teaching and research assistant, Syracuse University School of Management; Doctorate in Business Administration planned 2014 from Syracuse University School of Management; B.A. from Bogazici University (Turkey), former Intern Kuveytturk Bank (Turkey); Interpreter TUSKON Foreign Trade Bride (Turkey); Auditing Intern Respekt D.O.O (Tuzla, Bosnia and Herzegovina)[18]

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6 Ibid.

7 Ibid.

8 Selami Tezcan biographical information taken from the Syracuse Academy of Science Charter Application (Dec. 2, 2002), available through open records request to the New York State Education Department, (last checked 5/19/2017).

9 Yunus Kumek biographical information taken from the Buffalo Academy of Science Charter Application (Nov. 2003), available through open records request to the New York State Education Department, (last checked 5/19/2017).

10 Levent Kaya biographical information taken from the Buffalo Academy of Science Charter Application (Nov. 2003), available through open records request to the New York State Education Department, (last checked 5/19/2017).

11 Fehmi Damkaci; Utica Academy charter application; received through 2017 FOIA request from NY State Department of Education

12 Fehmi Damkaci; Syracuse Academy website; available at https://www.sascs.org/index.php?option=com_content&view=article&id=5&Itemid=188 (last checked 5.30.17)

13 Terra: IRS 990 2013; available from https://projects.propublica.org/nonprofits/organizations/273215060

14 Fehmi Damkaci; Letter of Intent 2015; NY Dept of Education; available from http://www.p12.nysed.gov/psc/2015Rd1LoICnR/Syracuse1CnR.pdf

15 Fehmi Damkaci; Turkish Digest; available from http://turkishdigest.blogspot.com/2009/02/turkish-theatre-trip.html

16 Fehmi Damkaci; Utica Academy charter application – biographical information; received through 2017 FOIA request from New York State Department of Education

17 Fehmi Damkaci: LinkedIn available from https://www.linkedin.com/in/fehmi-damkaci-b9296438/

18 Muris Hadsic biographical information taken from the Utica Academy of Science Charter Application (July 31, 2012) available through open records request to the New York State Education Department, (last checked 5/19/2017).

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- Ahmet Ay: Founder and original Board Member, Utica Academy of Science; at the time of founding, Assistant Professor Department of Biology and Mathematics, Colgate University; Board Member (2012-present) Syracuse Academy of Science; Ph.D., Mathematics and Quantitative Biology, Michigan State University; Bilikent University (Turkey);Yavuz Selim High School (Turkey); Member (2009-2010), Niagara Foundation, key Gülen-affiliated organization that is member of the Alliance for Shared Values; Board Member (2007-2009) Great Lakes Society of Friendship and Culture[19]

Overview

There are four schools with eight campuses in total that meet the markers for Gülen Organization charter schools in New York (hereinafter referred to the "New York network").[20] Each school was founded as a separate organization with its own nonprofit governing board. A new school called the Syracuse Academy of Science and Citizenship will open in the 2017 – 2018 school year. In June 2017, the New York Department of Education Board of Regents approved a merger of the Syracuse Academy of Science, the Syracuse Academy of Science and Citizenship, and the Utica Academy of Science under the charter for the Syracuse Academy of Science creating a new network to be called the Science Academies of New York Charter Schools effective July 1, 2017.[21] Terra Education and Science in Syracuse, a 501(c)(3) nonprofit corporation operating as the Terra Foundation ("Terra"), is a support organization for the Gülenist schools in New York. Terra not only serves as the landlord for schools in Syracuse, Utica, and Rochester, it also sponsors programs including: the GENIUS regional and international Olympiad; regional science fairs (Terra Northeast Regional Science & Engineering Fair); GENIUS summer programs for students in ESL, SAT, art, and basketball; student college scholarships; college access assistance (Terra Futures); a teacher conference series; professional development; an education journal; placement of U.S. teachers in fellowships at international universities; and an international conference on education.[22] In addition, Terra sponsors a STEM fellowship for eight international college graduates to attend graduate school in return for a commitment to teach for two years at a "high needs U.S. urban school district" for every year of funding from the fellowship. Paid expenses include: tuition and fees at LeMoyne College; living expenses and transportation expenses; academic English language courses; and book allowance up to $400/semester.[23] It appears that Terra generates additional revenue income from these activities, reporting $132,321 in program service revenue for educational services in 2014.[24]

Notably, the New Jersey-based iLearn

[19] Ahmet Ay biographical information taken from the Utica Academy of Science Charter Application (July 31, 2012) available through open records request to the New York State Education Department, (last checked 5/19/2017).

[20] There was already an existing charter school in Rochester called the Rochester Academy of Science, so the new Gülen school is called the Rochester Academy

[21] Board minutes for New York Department of Education Board of Regents; June 12017; available at https://www.regents.nysed.gov/common/regents/files/717bra2.pdf (last checked 9.11.2017).

[22] Programs offered by Terra are described on its website (***https://www.terraed.org/***); available from https://www.terraed.org/ *(*last checked 5.31.17); also *see* Terra's Facebook page; available from https://www.facebook.com/terraedsci/ (last checked 6.15.17).

[23] Ibid.

[24] Terra IRS Form 990 for 2014; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 6.15.2017).

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Schools[25] made an unsuccessful bid to open a school in the Bronx in 2014.[26] iLearn acts as a charter management organization for four "arts and sciences" schools in New Jersey, all of which meet the markers for a Gülen Organization network. In 2016 iLearn hired Harold Lee, New Jersey's top charter official, as its chief strategy officer with duties that include efforts to expand iLearn to New York.[27] iLearn submitted another charter application in 2016 to SUNY that was ultimately withdrawn[28] and published a letter of intent in 2017,[29] but it was apparently not formally submitted.[30]

While the New York network is governed by individual governing boards incorporated as separate non-profit organizations, all the schools utilize the same regional vendors owned and operated by affiliated Turkish individuals believed to be within the Gülen Organization. One of these vendors, Apple Educational Services, is the educational services provider and regional oversight entity responsible for the Northeast region of the Gülen Organization. The New York network contracts with Apple to provide educational management services for a fee paid from total school revenues.

School	Operation	Student Demographic Information 2015-2016[32] *	Authorizer	Governing Board
Buffalo Academy of Science Charter School 190 Franklin St, Buffalo, NY 14202	Grades 7 – 12 2004 - present	391 Enrolled 9% ELL 88% FRL 11% SWD ELL: 17% Anglo 67% Af Amer 12% Asian-Hawaiian-PI** 3% Hispanic	New York State Education Department Board of Regents	Buffalo Academy of Science Charter School
Rochester Academy Charter School High School 1757 Latta Road Greece, NY 14612 Middle 841 Genesee St. Rochester NY 14611	Grades 7 - 12 2008 - present	372 Enrolled 6% ELL 94% FRL 10% SWD 23% Anglo 65% Af Amer: 1% Asian-Hawaiian-PI 11% Hispanic	New York State Education Department Board of Regents	Rochester Academy Charter School

25 iLearn Schools are not to be confused with the iLearnNYC online course-management system developed by NYC Department of Education.

26 Kring-Schreifels, Jacob; *De Blasio Era Doesn't Discourage Bronx Charter School Applicant*; New York Times; (18 March 2014); available at http://citylimits.org/2014/03/18/de-blasio-era-doesnt-discourage-bronx-charter-school-applicant/ (last checked 5.21.17).

27 Rimbach, Jean; Pillets, Jeff; Adely, Hannan; *State charter school official joins iLearn*; The Record/NorthJersey.com; (17 February 2017); available at https://www.usatoday.com/story/news/watchdog/2017/02/17/state-charter-school-official-joins-ilearn/97952662/ (last checked 6.15.17).

28 iLearn 2016 application to State University of New York (SUNY) - withdrawn; list of schools and status available at https://www.suny.edu/about/leadership/board-of-trustees/meetings/webcastdocs/IIIA1_ProposalsPublicList.pdf (March 2016) (last checked 5.21.17)

29 2017 Letter of Intent; Bronx Arts and Science; http://www.p12.nysed.gov/psc/startcharter/lois/brxartssciloi3217.pdf (last checked 5.21.17) Also - iLearn web site describing plans to open school in New York: http://thebronxcharter.org/why-the-bronx-ascs/ (last checked 5.21.17).

30 SUNY Charter School Institute – Approved Letter of Intent 2017; available at http://www.newyorkcharters.org/wp-content/uploads/Public-List-July-2015.pdf (last checked 5.21.17) Confirmed in telephone conversation with SUNY (2017).

31 New York State Department of Education; 2015-2016 School Report Card; available at https://data.nysed.gov/lists.php?type=school (last checked 6.15.2017).

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School	Operation	Student Demographic Information 2015-2016[32] *	Authorizer	Governing Board
Syracuse Academy of Science Charter School High 1001 Park Ave. Syracuse, NY 13204 Middle 200 West High Terrace Syracuse, NY 13219 Elementary 4837 S. Salina St. Syracuse, NY 13205	Grades K - 12 2003 - present	874 Enrolled 5% ELL 72% FRL 7% SWD 24% Anglo 51% Af Amer 4% Asian/ Hawaiian/PI 12% Hispanic: 9% Native Amer/ Multi-racial	New York State Education Department Board of Regents	Syracuse Academy of Science Charter School
Utica Academy of Science Charter School Middle 1214 Lincoln Ave. Utica, NY 13502 High 160 School Lane, Frankfort, NY 13340	Grades 6 – 11 2013 - present	338 Enrolled 11% ELL 75% FRL 7% SWD 4% Native Am. 54% Anglo 16% Af Amer. 12% Asian/ Hawaiian/ PI 6% Hispanic 8% Multiracial	New York State Education Department Board of Regents	Utica Academy of Science Charter School (merged with Syracuse schools under one charter as of 7.1.17)
New Schools				
Syracuse Academy of Science and Citizenship[33] (sister school to Syracuse Academy of Science)	Approved November 2016 Opening Fall 2017		New York State Education Department Board of Regents	
Charter Petition Denials				
Binghamton Academy of Science Charter School[34]	*2009 application withdrawn*[35]			*Petitioners: Galymahan Kirbassov, Birol Kanik*
Brentwood Academy of Science Charter School	*2009 application withdrawn*[36]			*Lead Petitioners: Kerim Gulyuz, Muzaffer Ozcelik, Recep Ornek, Cem Kuscu*
Bronx Arts and Science Charter School[37]	*2014*[38] *application withdrawn*			*Lead Petitioners: Nihat Guvercin, Tahir/Tair Azirov*
Capital Academy Charter School	*2004* *School is not on NY list of charter schools*			*Petitioner: Murat Yuksel*

[32] Article in Syracuse.com; 11.15.16; available from http://www.syracuse.com/schools/index.ssf/2016/11/syracuse_charter_school_gets_ok_from_state_to_open_a_second_location.html

[33] http://www.p12.nysed.gov/psc/documents/BinghamtonProspectus8.16.10.pdf

[34] http://www.p12.nysed.gov/psc/documents/PostedBinghamtonAcademyofScienceCS.pdf

[35] www.p12.nysed.gov/psc/documents/Applications2009-10updated1-13-10.doc

[36] http://thebronxcharter.org/, plans to open August 2018

[37] http://www.newyorkcharters.org/create/request-for-proposals/january-2014-suny-request-for-proposals-round-1/the-bronx-arts-and-sciences-charter-school

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School	Operation	Student Demographic Information 2015-2016[32] *	Authorizer	Governing Board
City Academy of Science	*2009 application withdrawn*[39]			*Petitioners: Furkan Kosar, Sinan Asa, Hakan Baydere, Ercan Sevkat,, Mehmet Ozbilgin*
Digital Arts and Technology Charter School (DigiTech K-12)	*2011 application denied*[40]			*Petitioners: Tevfik Kosar, Mikail Kar, Yunus Kumek*
Global Sciences Charter School[41]	*2011 application denied*[42]			*Petitioner: Kevin Donovan*
The Heights Charter School[43]	*2012 School is not on NY list of charter schools*			*Charter Corporation: Apple Educational Services Petitioners: Walter Marin, Sinan Asa*
Inspire Math NYC Charter School	*2012 application withdrawn*[44]			*Petitioners: Aras Konjhodzic, Hayro Kadribeg*
Staten Island Fusion Charter School[45]	*2011 School is not on NY list of charter schools*			*Charter Corporation: Apple Educational Services Petitioners: Zafer Akin*
Westchester Academy of Science	*2009 application withdrawn*[46]			*Lead Petitioner: Mehmet Ozhabes*
Private Schools				
Brooklyn Amity School[47]	*Grades: PK - 12 1999 - present Tuition: $9,900 - $14,900 Boarding students: $29,900 Plus fees*	*Enrollment: 256*		

**ELL – English Language Learner; FRL – students eligible for free and reduced price lunch (economically disadvantages); SWD – Student with disabilities (special education)*

***The NY Dept of Education aggregates enrollment data for Asian, Hawaiian, Pacific Islanders*

38 www.p12.nysed.gov/psc/documents/Applications2009-10updated1-13-10.doc

39 http://webcache.googleusercontent.com/search?q=cache:QMd5uepqt_gJ:www.p12.nysed.gov/psc/documents/ProspectusReviewSummaryBrief3.1.11.xls+&cd=8&hl=en&ct=clnk&gl=us

40 http://www.p12.nysed.gov/psc/documents/PostedGlobalSciencesCSPro.pdf

41 http://webcache.googleusercontent.com/search?q=cache:QMd5uepqt_gJ:www.p12.nysed.gov/psc/documents/ProspectusReviewSummaryBrief3.1.11.xls+&cd=8&hl=en&ct=clnk&gl=us

42 https://www.suny.edu/about/leadership/board-of-trustees/meetings/webcastdocs/RFPNewSchoolProposalsList.txt

43 https://www.suny.edu/about/leadership/board-of-trustees/meetings/webcastdocs/8ProposalReviewProcessOverviewAndLOIPublicList.pdf

44 http://www.americantowns.com/ny/statenisland/organization/fusion-charter-school

45 www.p12.nysed.gov/psc/documents/Applications2009-10updated1-13-10.doc

46 Website for Amity School available at http://amityschool.org/wp-content/uploads/2017/02/Brooklyn-Amity-School-School-Profile-2016-2017.pdf (last checked 5.27.17)

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A History of Strategic Ambiguity and Conflicting Interests

Like its regional sister network New Jersey, the New York network of the Gülen Organization began in 1999 with the opening of a private tuition-based school, Brooklyn Amity, the same year as Fethullah Gülen relocated to the United States. The New York network's public charter schools proceeded to open on almost the exact same timeline as the New Jersey network's public charter schools did, with the first school opening in 2003. After that year, the New York network grew steadily along with the creation of Terra, which serves as an affiliated charter management organization and landlord for three of the four NY schools. Also like its sister network in New Jersey, the New York network has had several public scandals, and our own research has been heavily supplemented and corroborated by extensive whistleblower testimony from current and former employees of the New York network. Despite these scandals, each New York school has expanded grades and added campuses through the state renewal process. The Syracuse school will open a sister school in Fall 2017 called the Syracuse Academy of Science and Citizenship. The Board of Regents approved the school even after a contentious hearing in which many parents of students who had attended the school told critical stories about their personal experiences at the Syracuse school.

Like the founders of other Gülenist charter schools throughout the country, many of the founders of the New York network are university professors and graduate students in STEM fields with undergraduate degrees from the same slate of Turkish universities. Ehat Ercanli, the lead founder of the Syracuse Academy of Science, was also the founder of the Horizon schools, the Gülen Organization charter network in Ohio. The Presidents of the Rochester, Syracuse, and Buffalo Academies Boards of Directors have also served on the Board of the CMO/landlord Terra Science and Education,[47] which serves as the landlord for schools in Syracuse, Rochester, and Utica, putting the schools' Board Presidents on both sides of these material financial transactions. The President of the Syracuse school remains the Board President of Terra. This dual position is disclosed on the Syracuse IRS Form 990 (2014) and in the annual report, but it is not consistently referenced in Board minutes when lease arrangements are discussed, such as the meeting when the Board considered a lease with Terra in January 2017 for the new school that will open in the 2017-2018 school year.[48]

With few exceptions, the Board minutes for all four Gülen schools in New York over the last 24 months lack transparency about vendor contracts and real estate transactions. Vendor names, contract amounts, and other bids are rarely disclosed. Real estate transactions usually do not include purchase price, seller names, or information on potential bond issues, and may not be referenced at all. At one school, any mention of vendor contracts is almost entirely absent from Board minutes.[49] The Syracuse Academy does not reference vendors in the minutes available on the school website, but this information is included in the minutes for the same date published in the annual report on the State Department of Education website. For example: the Apple Educational Services contract is not referenced on the minutes available on the website, but it is referenced on the state report.[50] Omitting these important financial details in the

[47] Terra Board members listed on IRS Form 990 for 2010 and 2011; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 5.26.17)

[48] Syracuse Academy Board minutes from January 10, 2017; available from https://sites.google.com/a/sascs.org/board-minutes-public/ (last checked 5.29.17.

[49] Rochester Academy – Board Minutes; available from https://app2.boardontrack.com/public/ywOAFX/meetingsList (last checked 5.29.17)

[50] Annual Report and Financial Statement 2015-16 – New York State Department of Education; Syracuse Board minutes for July 14, 2015; available at http://www.p12.nysed.gov/psc/csdirectory/SyracuseAcademyOfScienceCharterSchool/

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minutes available on the school website reinforces concerns that the schools do not follow procurement policies in order to select preferred Gülen Organization vendors and keep their selections private. In fact, these practices were called out by in-depth audits by the New York State Comptroller in 2013.[51]

For example, the agenda from the July 12, 2016 Syracuse Board meeting lists "approval of cleaning services contract", but there is not any reference in the minutes to the Board vote on the contract, other bidders, the name of the selected vendor, or the contract amount.[52] Likewise, the agenda for the November 8, 2016 Syracuse Board lists "approval of working with a consultant to submit ERATE application for 2017-18," but there is no reference to this contract/vendor in the minutes; and the agenda for the May 10, 2016 Syracuse Board meeting lists "approval of Student Uniform Vendor for 2016-2017 school year" but there is no further reference in the Board minutes.[53] In another concerning example, several Board minutes from 2015 reference purchase of the school building in Buffalo through a bond issue, but the purchase price is never referenced, nor is the seller named (Apple Educational Services).[54]

This continued lack of transparency by the schools, particularly after the state comptroller noted it as problematic, appears to be intentional and comports with what our research reveals is the Gülen Organization's model of strategic ambiguity to hide its nepotistic vendor selection.

Financial Issues

Financial audits conducted in 2013 by the New York State Comptroller document improper financial practices by Gülen charter schools in Rochester[55] and Syracuse[56] and find that the restrictive practices at these two schools "undermine the intent of true competition." These types of practices are consistent with findings in other states that show similar patterns of suspect financial dealings by Gülen charter schools that often fail to disclose transactions with preferred vendors whose owners are connected to Gülen-affiliated organizations. Both Rochester and Syracuse were required to submit corrective action plans. A follow-up site visit to Syracuse from the Comptroller's office is planned for spring 2017. A Comptroller audit of purchasing practices at the Utica Academy of Science in 2015 found that the school was following its purchasing policies.[57]

Syracuse Academy of Science: The audit issued in 2013 by the New York Comptroller

SASCSAR1516.pdf (last checked 5.29.17).

51 New York State Comptroller; *Rochester Academy Purchasing*; (July 2013); available at https://www.osc.state.ny.us/localgov/audits/schools/2013/rochesteracademycharter.pdf (last checked 5.15.2017). also NY State Comptroller; Syracuse Academy of Science – Selected Vendors, Enrollment, and Billing; (July 2013); available at https://www.osc.state.ny.us/localgov/audits/schools/2013/syracusecharter.pdf (last checked 8.11.2017).

52 Syracuse Academy of Science – Board Minutes – available from http://www.sascs.org/index.php?option=com_content&view=article&id=5&Itemid=176 (last checked 5.27.17).

53 Syracuse Academy of Science – Board Minutes – available from http://www.sascs.org/index.php?option=com_content&view=article&id=5&Itemid=176 (last checked 5.27.17).

54 Buffalo Academy of Science – Board Minutes; available from http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516604 (last checked 5.29.17).

55 New York State Comptroller; *Rochester Academy Purchasing*; July 2013; available at https://www.osc.state.ny.us/localgov/audits/schools/2013/rochesteracademycharter.pdf (last checked 5.29.17).

56 New York State Comptroller; Syracuse Academy of Science Charter School Purchases from Selected Vendors Enrollment and Billing; July 2013; available at https://www.osc.state.ny.us/localgov/audits/schools/2013/syracusecharter.pdf (last checked 5.29.17).

57 New York State Comptroller; *Utica Academy of Science Purchasing*; (June 2015); available at https://www.osc.state.ny.us/localgov/audits/schools/2015/uticacharter.pdf (last checked 8.9.2017).

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examined purchasing practices from selected vendors, student enrollment and billing at the Syracuse Academy of Science. The audit found that "the restrictive purchasing practices did not serve the purpose of honest competitive bidding to ensure that the school obtained the best goods and services at the lowest possible price. Unless school officials obtain timely quotes from qualified non-affiliated vendors, they are undermining the quote process and placing the school at ongoing risk of paying more than necessary."[58] The audit also found that the school had not taken adequate measures to obtain reasonable competition in acquiring goods and services and, therefore, it questioned the economic prudence of the school's purchases from certain vendors which totaled $383,909 in the time frame covered in the audit period. Essentially, the evidence suggests that the school manipulated its own purchasing procedures to ensure that certain vendors were selected for contracts.

Key findings from the audit include:[59]

- School officials routinely purchased school equipment and furnishings from a limited group of four vendors that were affiliated from one another. The total purchases examined totaled $801,190 for technology, school uniforms, and school furniture.

- The required number of quotes was not always obtained and quotes were sometimes dated after the purchase was made – in one case, the other bid quotes were seven months and two years after the Board approved the purchase. The address from the second quote was traced to a residential address for the vendor who had made the first quote.

- In some cases, the required quotes were obtained from businesses that were affiliated with each other and not in the business related to the vendor. In effect the quotes were from the same entity.
  - For example, a vendor whose primary business was home improvement/ remodeling submitted a quote for a furniture purchase.

- School officials often did not document verbal quotes, making it impossible to verify that the lowest quote was used or that the school paid the correct amount.

- School official received quotes for school equipment and furnishings from vendors that did not specialize in such items, and did not attempt to identify more suitable vendors that could have offered competitive prices.

- In one purchase for technology services totaling $308,743, the school deemed the purchase professional services which did not require a competitive bid.

- The school did not accurately record the items purchased in the school's inventory records. Discrepancies were found between inventory records and physical goods, making it difficult to determine if the school received the goods it had paid for.
  - In one example, of 21 computers related to one purchase, only one computer listed on the inventory could be physically traced to the correct room, tag, and model; eight could not be located at all.
  - In another example, the inventory reflected a purchase of 10 projectors while the purchase order was for 17.

- The school also failed to save money by making a purchase online rather than going through a preferred vendor.

[58] New York State Comptroller; *Syracuse Academy of Science Charter School Purchases from Selected Vendors Enrollment and Billing*; (July 2013); available at https://www.osc.state.ny.us/localgov/audits/schools/2013/syracusecharter.pdf (last checked 5.29.2017).

[59] Ibid.

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- ▷ In one example, an "affiliated" vendor purchased items online and marked up the prices before selling to the school. The School could have saved $5,220 from this one purchase alone had it purchased the items itself online or through the state purchasing contract.

- ► The school also could not verify 32 out of 42 of the addresses in the student records that were checked as part of the audit – over 75 percent. As a result, the school could not bill the correct school districts for per pupil funding resulting in tens of thousands of incorrect billings.

Although the audit did not reference the preferred vendors by name, the actual vendor names were received through a public information request submitted to the State Comptroller's office.[60] These vendors have numerous contracts with Gülen schools in the Northeast, and their owners are affiliated with other Gülen affiliated organizations. The vendors include:

- ► Apple Educational Services, which is also the landlord for the Buffalo Academy of Science and the subject of a separate Comptroller audit described in this report (Apple recently sold the property to the Buffalo Science Academy);

- ► Apple Educational Services d/b/a Ivy Learning

- ► Technotime Business Services, which also has contracts with Gülen schools in New Jersey. Other assumed names for Technotime include: ProAcademy, ProAcademy Furniture, Vestell (electronic hardware, phone system), and Inspire (school uniforms);[61]

- ► ProAcademy, which operates under an assumed name for Technotime;

- ► Inspire Uniforms, which operate under an assumed name for Technotime;

- ► Vestell, which operates under an assumed name for Technotime; and

- ► Lotus Media.

In addition, Tolga Hayalik, the Superintendent of the Syracuse school, is a former employee of Apple Educational Services,[62] indicating the insider connections that exist between the schools and their affiliated vendors.

Rochester Academy Charter School: In Rochester, the Comptroller examined purchasing practices at the charter school. Key findings include:[63]

- ► Invoices were paid without documentation that the service was provided. A vendor for supplemental educational services to students

- ► Over 25% of the 76 disbursements that were randomly reviewed (totaling $58,200) did not contain original receipts or did not contain sufficient supporting documentation for the service provided.
  - ▷ For example, a vendor that provided supplemental student educational services did not maintain sufficient attendance logs to document the number of students served.

60 Vendor names that were referenced in the 2013 Syracuse audit conducted by the State Comptroller; received through 2017 FOIA request to the Comptroller's office via email 6.1.17.

61 State of New Jersey Department of the Treasury – Business Entities; available from http://www.state.nj.us/treasury/revenue/searchfile.shtml

62 Tolga Hayali: LinkedIn available from https://www.linkedin.com/in/tolgahayali/ (last checked 5.29.2017).

63 New York State Comptroller; *Rochester Academy Purchasing*; (July 2013); available at https://www.osc.state.ny.us/localgov/audits/schools/2013/rochesteracademycharter.pdf (last checked 5.29.17).

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- Invoices were paid before the services were completed.
- Contract terms were not fulfilled, such as paying for tutoring services for 40 students when sign-in sheets showed that in most sessions only 2 – 9 students attended.
- Numerous instances in which invoices were split so that payment did not hit the $5,000 threshold that would require Board approval for the purchase.
  - For example, three invoices for school uniforms were all issued on the same date, and each invoice was from slightly less than $5,000.
- Invoices paid to a company with no history of providing certain products. For example, invoices were paid to a company for tables and chairs with no evidence on the company's website that it sells anything but school uniforms.
- Payments to different companies that were actually owned by the same individual and had the same addresses on its W-9 (a tax document required for doing business).

The vendors are not named in the audit, but it is likely that the specific vendors referenced generically in the audit are Gülen-affiliated businesses because it is known that they have contracts with other Gülen charter schools in New York and New Jersey. (Example: Ivy Learning, a subsidiary of Apple Educational Services provides tutoring services to schools in New Jersey).

Bond Financing

The Buffalo Academy of Science borrowed $3,250,000 from the Buffalo and Erie County Industrial Land Development Corporation through a 2016 bond issue. The bond funds will be used to purchase the school building at 190 Franklin St. in Buffalo, a building owned by Apple Educational Services, which was the subject of an audit by the New York State Comptroller.[64]

Real Estate

The Buffalo Academy of Science, the Syracuse Academy of Science, the Utica Academy of Science, and the Rochester Academy have conducted insider real estate deals with affiliated Gülenist landlords that fit the pattern of many other Gülen schools in the United States. In these deals, the schools create a third-party organization to purchase property and rent to the school, or they sign lease agreements with an external affiliated organization. The rental payments in these agreements are paid with public funds, and the rent is often significantly more than the monthly mortgage payments. Even when the mortgage is repaid in full, the schools still do not own the school building, so they must continue to pay rent using public funds, often paying for the school building many times over. Many of these lease arrangements are "triple net leases" in which the charter schools also pay the full cost of all real estate taxes, building insurance, and maintenance on the property (the three "nets"), as well as any normal fees such as utilities. We believe this arrangement provides a steady revenue stream to the affiliated third-party organizations to purchase additional property, conduct promotional activities, and build a larger, more complex organization at public expense.

[64] Annual Report and Financial Statement 2015-2016 – New York State Department of Education; Buffalo bond issue; available http://www.p12.nysed.gov/psc/csdirectory/BuffaloAcademyOfScienceCharterSchool/BASCSAR1516.pdf (last checked 5.29.17).

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Importantly, because the schools and the related landlords are both affiliated with the Gülen Organization, their Board members usually have connections with other Gülen schools, businesses, and organizations, and may even share some of the same Board members, as in New York. These connections raise questions about whether real estate transactions are conducted at arm's length and in the public interest.

Similar real estate deals involving Gülen Organization charter schools and their related landlords have been identified in states such as Ohio, Illinois, New Jersey, Texas, Oklahoma, Pennsylvania, Florida, Georgia, South Carolina, Maryland, and Arkansas involving hundreds of millions of dollars in public funds.

Buffalo Academy of Science – Apple Educational Services: An audit conducted by the New York State Comptroller 2013[65] examined the school building lease at the Buffalo Academy of Science. The audit found that the school's Board of Directors entered into a lease agreement for the school building without exercising due diligence in selecting the rental property and that the lessor stood to profit $4.4 million over its costs because of a favorable lease agreement with the school. The lessor was Apple Educational Services, the regional oversight entity for the Northeast region of the Gülen Organization with numerous contracts with the other Gülen Organization charter schools in the Northeast.[66] As with many of the lease agreements entered into by Gülen schools with their related landlords, the school will not own the building at the end of the lease, despite paying $4.4 million more than the lessor's cost. The audit not only called for corrective action, it also recommended that the Board "establish the appropriate fiscal environment, or tone at the top, by promoting a theme of fiscal responsibility and ethical conduct among all Board members."[67]

Specifically, the audit found:

- The Board did not ensure that it appropriately identified and evaluated available options before deciding to lease a building.
- The process used to select a firm to acquire and renovate a building on the Board's behalf was not transparent, and the audit questioned whether it was an arm's length transaction.
- The Board selected an unlikely firm, a nonprofit educational services corporation from New York-New Jersey that did not have any apparent real estate experience and with limited financial resources (the lessor's 2007 IRS Form 990 showed the organization was in a deficit position for 2006 – the year of the purchase).[68]
- Although school officials deny knowing the lessor (Apple) previously, the audit raises questions about why an organization from another state would buy the building without prior communication with school officials and without some form of commitment from the school to enter into a lease agreement, throwing the issue of an arm's length transaction into question.
- The terms of the lease benefited the lessor more than the school, with lease payments that could exceed the lessor's costs by more than $4.4 million.

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65 New York State Comptroller; *Buffalo Academy of Science Charter School – School Building Lease; July 2013;* available at https://www.osc.state.ny.us/localgov/audits/schools/2013/buffaloacademycharter.pdf *(last checked 5.29.17).*

66 The audit does not specifically name the lessor, but a search of the Erie County Real Property Tax Record shows that Apple Education Services owns the property at 190 Franklin Buffalo; available at http://www2.erie.gov/ecrpts/index.php?q=real-property-parcel-search (last checked 5.28.17).

67 Id.

68 IRS Form 990 for Apple Educational Services - 2007; available from https://projects.propublica.org/nonprofits/organizations/203736009 (last checked 5.15.2017).

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- The school signed a 15-year lease requiring the school to pay rent and other costs including utilities, general maintenance, and repairs. The lease required the school to make an annual payment of $442,000 for the first three years (pro-rated for two years due to on-going construction), following by subsequent increases until the annual rent reached $497,475. The audit estimates that costs to the lessor (Apple) over the length of the lease would be $1.9 million, but it would receive $6.3 million in lease payments, a net rental income of more than $4.4 million, a 200 percent return on investment.

- The school had other vendor contracts with Apple at this time that totaled $274,600.

Buffalo Academy of Science – Sale of Property to Apple Educational Services - Follow-Up to the 2013 Comptroller Audit: In August 2015, the Buffalo Academy of Science entered into an agreement to purchase the building at 190 Franklin in Buffalo that it leased from Apple for the asking price of $4,150,000.[69] In connection to the purchase agreement, the school secured funds for a bond issue in October 2015 from the Buffalo and Erie County Industrial Land Development Corporation for $3,250,000 to purchase the building and repay the bond over seven and a half years.[70]

Minutes from the Board of Director's meetings during this time-period never reference a purchase price or name the owner of the property.[71] In addition, Board minutes do not include the amount of the funds borrowed through the bond issue.[72] Given the available information from the Comptroller's audit, Buffalo's IRS Form 990s, and Buffalo's Annual Reports, it appears that Apple will clear an estimated $6 million from the lease and sale of the Franklin property to the Buffalo Academy, even more than the projections made by the Comptroller in the 2013 audit. From 2006 to September 2015, Buffalo Academy's rental payments to Apple totaled a minimum of $3,372,556.[73] Given the purchase price of $4,150,000 for the sale of the building, Buffalo has paid Apple a minimum of $8,002,377 between the years 2006 and 2015 in lease payments and purchase price. Apple's cost was $1.9 million for its original purchase price of the building, initial building renovation, and interest on the mortgage.[74] Note that the Buffalo Academy paid

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69 Buffalo Academy Annual Reports and Financial Statement 2014-2015; NY Department of Education; available from http://www.p12.nysed.gov/psc/csdirectory/BuffaloAcademyOfScienceCharterSchool/home.html (last checked 5.29.17)

70 Ibid.

71 Minutes from the Buffalo Academy; available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516604 (last checked 5.30.17)
October 29, 2015 - "approval to finalize the closing process for the building purchase"- no mention of purchase price; the Board also approved the 2014-2015 annual report that references the closing price of $4.1 million;
October 22, 2015: "approve purchase of property at 190 Franklin Street, which currently houses the Buffalo Academy…"; under "Tax Exempt Bond section – "resolution for acquisition of property at 190 Franklin St." – no reference to amount of the bond;
September 17, 2015 – Vote to "move forward with pursuing the tax-exempt bond to purchase the property at 190 Franklin St" – no mention of bond amount;
July 29, 2015 – update on status of purchase progress but no mention of purchase price;
June 22, 1015 – approval to "offer the property owner of 190 Franklin Street the asking price, inclusive of the 10% discount of rents paid to-date, for the building;" – no mention of asking price;
June 10, 2015 – under a section in the minutes titled "Pool Area: Digital Library & Study Field" – Board President authorized "to negotiate the building acquisition process with the property landlord/owner."
May 26, 2015 – approval "to express interest to purchase facility at 190 Franklin St. and submit to landlord the appraisal as the initial offer."

72 Ibid.

73 The Comptroller audit stated that the rental payments in 2006 – 2008 were pro-rated given on-going construction; however, the Buffalo Academy 990 Forms shows full payment was made during those years. This estimate used the more conservative payment total provided by the Comptroller, but the total could be $861,193 higher if the full rental payments listed on the Form 990 are correct.

74 New York State Comptroller; *Buffalo Academy of Science Charter School – School Building Lease; July 2013; available*

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all the maintenance and repairs costs for the building ($1,288,140) plus all insurance costs ($479,821) during the time it leased the building from Apple.[75]

In addition, Apple founder Faruk Apaydin donated $50,150 in 2006 and 2007 to the Milkyway Education Center, the New Jersey-based Gülen-affiliated organization that is the parent organization for Pioneer Academy, a private Gülen school.[76] Donations from 2009 – present are not disclosed on Milkyway's IRS document so additional donations from Apaydin to Milkyway or other Gülen-affiliated organizations are unknown. Apaydin was also a founder of the New York-based Peace Islands Institute which is aligned with Fethullah Gülen and a member organization of the Alliance for Shared Values.

Syracuse, Utica, and Rochester academies – Leases with Terra Science and Education: The Board of Directors of the Syracuse Academy of Science, the Utica Academy of Science, and the Rochester Academy signed lease agreements with Terra Science and Education (Terra) even though the Board Presidents for two of these schools also served on the Board of Terra. Terra is a 501(c)(3) nonprofit organization created in 2010 and registered with the New York Secretary of State.[77] Terra's first Board of Directors in 2010 (through 2011) included Fehmi Damkaci, President of the Board of Syracuse Academy (also involved with the Massachussetts Gülen charter network); Murat Demirbas, President of the Board of the Buffalo Academy of Science, and Mahmut Gedemenli, President of the Board of the Rochester Academy.[78] Damkaci continues to serve as the President of the Board of both the Syracuse Academy of Science and Terra Science and Education, so he is on both sides of the real estate transactions between the schools and Terra.

With revenue of only $13,560 in 2010 and net assets of only $6,705[79], the source of funding for Terra's real estate purchases in 2011 is unknown. By 2011, Terra had total revenue of $429,940 and total assets of $2,891,065[80] following its first purchases of property for the Syracuse Academy elementary school at 4845 S. Salina and the high school at 1001 Park.[81] A later property purchase made by Terra includes the middle school building for the Syracuse Academy at 200 West High Terrace (2014).[82] Most recently, minutes from a Syracuse Academy Board meeting indicate that Terra will likely be the landlord for the new Syracuse school set to open in fall 2017.[83] Terra also purchased foundation office space in Syracuse at 1409 W. Genesee (2015).[84]

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at https://www.osc.state.ny.us/localgov/audits/schools/2013/buffaloacademycharter.pdf *(last checked 5.29.17)*

75 Buffalo Academy IRS Form 990; Foundation Center – 2014; available at http://990finder.foundationcenter.org/990results.aspx?990_type=&fn=buffalo+academy+of+science&st=NY&zp=&ei=&fy=&action=Find (last checked 5.29.17)
Pro Publica 2006 – 2013; available at https://projects.propublica.org/nonprofits/organizations/200723492 (last checked 5.29.17)

76 Milkyway IRS Form 990 – 2006 and 2007; available from https://projects.propublica.org/nonprofits/organizations/223261282 (last checked 5.29.17)

77 Registration for Terra: NY Secretary of State; available at https://www.dos.ny.gov/corps/bus_entity_search.html (last checked 5.21.17)

78 Terra, Buffalo, Syracuse, and Rochester IRS Form 990 for 2010 and 2011; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 5.21.17)

79 Terra IRS Forms 990 for 2010 and 2011; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 5.27.17)

80 Ibid.

81 Document Search – search "Terra"; Onondaga County Clerk; available at http://psi2.ongov.net/PublicClerk/Search/Name.jsp (last checked 5.21.17)

82 See property records; Onondaga County Clerk (search "Terra"); available at http://psi2.ongov.net/PublicClerk/Search/Name.jsp (last checked 5.21.17)

83 Discussion re: rental of existing property from Terra for site of new school opening Fall 2017; minutes from Board of Directors meetings: January 10, 2017 and March 21, 2017; available from https://sites.google.com/a/sascs.org/board-minutes-public/sascs-july-2016--june-2017-board-minutes (last checked 6.15.17).

84 See property records; Onondaga County Clerk (search "Terra"); available at http://psi2.ongov.net/PublicClerk/Search/Name.jsp (last checked 5.21.17)

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In addition, Terra purchased two properties in Rochester for the Rochester Academy high school on Latta Road and the new Rochester school at 5000 Mount Read Blvd in Greece in 2016.[85] In April 2015, Terra purchased property at 160 School Lane in Frankfort, NY[86] and leased it to the Utica Academy of Science. An article in the Albany Times Union states that Terra purchased the Utica property for $425,000 and charges the Utica school $222,000 in annual rent.[87] Based on this information, in just two years, Terra will recoup the purchase price of the school property. The school lease runs another thirteen years through 2030, and at a minimum, it appears that Terra will clear a minimum profit of $2.8 million in rental income. At the end of the lease agreement, the school will still not own the property, even though it will have paid rent using public funds that is equivalent to almost eight times the purchase price. Similar to leases with the other Gülen schools in New York, the Utica Academy, not the landlord, will be responsible for all costs associated with utilities, maintenance, and real property taxes.[88]

As another example of how profitable these real estate deals can be to the landlord, it appears that Terra will clear an estimated $1.2 million in profit from the sale of its property on Latta Road to the Rochester Academy (closing planned for late April 2017), based on available information. In January 2017, the Board of the Rochester Academy voted to purchase the high school buildings on Latta Road from Terra for $2.5 million.[89] Terra's costs over the short time that Rochester rented the building from Terra totaled $1.6 million, including the building purchase price of $700,000[90] and a $900,000 loan probably for renovation of the building as discussed in Board minutes.[91] Revenue to Terra from the Rochester Academy total $2,799,160, including the $2.5 million purchase price and rental payments of $299,160 (the Rochester Academy paid $29,916 in monthly rent to Terra for approximately 10 months from August 2016 to May 2017).[92] With Terra's costs totaling $1.6 million, and revenue to Terra for rent and the purchase price totaling $2,799,160 – it appears that Terra will clear an estimated $1.2 million on the property it acquired less than a year ago.

Terra and the Syracuse have other connections in addition to the rental agreement. Up to 2014, Terra still used the Syracuse Academy address at 1001 Park as its address on IRS Forms. In addition, Mustafa Coban is listed as the keeper of Terra's financial records on its IRS Form 990 in 2010 while he was also the Operations Manager for the Syracuse Academy of Science.[93]

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85 Document Search ("Terra Science and Education"); Monroe County Clerk; available from https://gov.propertyinfo.com/NY-Monroe/ (last checked 6.16.17). Note: document search requires registration

86 Herkimer County Clerk property records; Terra ownership of school property confirmed in telephone conversation on 8.9.2017.

87 Bragg, Chris, *New York schools with Turkish ties draw notice*; (02 July 2017); Albany Times Union; available at http://www.timesunion.com/tuplus-sample/article/New-York-schools-with-Turkish-ties-draw-notice-11259297.php (last checked 8.9.20170)

88 Ibid.

89 Rochester Academy minutes from Board of Directors – January 20, 2017; available at https://app2.boardontrack.com/public/ywOAFX/meetingsList (last checked 5.29.17)

90 Terra's Purchase price for school property on 1757 Latta Road in Rochester: Sold for $700,000; Receipt of Deed from Office of the Monroe County Clerk; 5.25.16; purchase from the Church of the Mother of Sorrows of Greece; received document via email 6.2.17.

91 Mortgage and Security Agreement between Terra and Pathfinder Bank for $900,000 included in General Assignment of Leases and Rents document; Monroe County Clerk; July 28, 2016; received document via email 6.2.17. Discussion about rental of Latta Road property and $900,000 renovation project in Rochester Academy Board minutes from 9.18.15; 2.19.16; 4.15.16; and 8.19.16; available from https://app2.boardontrack.com/public/ywOAFX/home (last checked 5.20.17).

92 The rental payments that the Rochester Academy paid to Terra are included in Board minutes from August 19, 2017; available from https://app2.boardontrack.com/public/ywOAFX/home (last checked 5.20.17).

93 Terra IRS Forms 990 for 2010; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 5.27.17)

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Excessive Use of the H1-B Visa Program

The four Gülen-affiliated charter schools in New York applied for 118 H-1B visas since the early 2000s.[94] At a conservative cost estimate of $3,000 for each visa request, the charter schools paid an estimated $354,000. Although the Gülen organization commonly states that the rationale for these visa applications is that they cannot find qualified teachers within New York to teach its STEM curriculum, the H-1B applications were actually filed not only for math and science teachers, but also for but also positions such as: physical education teachers, college advisor, school guidance counselor, principal, financial analyst, computer science teacher, IT administrators, instructional technology coordinators, directors, curriculum coordinator, project development coordinators, and network engineers.[95]

Questions have been raised about the use of H-1B visas for positions that could be filled locally. For example, an associate professor at a local university in Syracuse who has taught physical education for 11 years stated that although she receives numerous calls from area high schools seeking to hire PE teachers, she has never been contacted by anyone at the Syracuse Academy.[96] Yet, the Syracuse Academy filed an H-1B application for a physical education teacher rather than recruiting locally. In addition, local school administrators at districts in the Syracuse stated that "they had never needed to import teachers from abroad, even in STEM areas."

Both the charter schools and the nonprofit organizations use the same small group of immigration attorneys to file their H1-B visa requests that are used by other Gülen-affiliated entities around the United States in Texas, Ohio, New Jersey, Massachusetts, and other states, further evidencing the existence of an overall network.

- Remzi Kulen: The Buffalo and Syracuse Academies of Science used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Horizon Science (OH, IL)
  - Noble Academy (OH)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Golden Generation Worship & Retreat Center (PA)
  - Blue Ocean Construction (FL)
  - Arts and Science, Bergen, Passaic (NJ)
  - Beehive (UT)[97]

- Seth Leech: The Syracuse, Buffalo, and Utica Academies of Science used Leech, a New York-based attorney, to file numerous H-1B applications. Leech also filed applications for:
  - Little Scholars (AR)
  - Pioneer (MA)
  - Hampden (MA)
  - Paterson Science and Technology; Central Jersey College Prep Charter School (NJ)[98]

- Leonard D'Arrigo: The Syracuse Academy of Science also used D'Arrigo, a New York-based attorney, to file numerous H-1B applications. D'Arrigo also filed

[94] The New York charter schools' H-1B applications from 2001-2016 are available at: http://tinyurl.com/y8f6fz7q (Buffalo Academy of Science Charter School) (39); http://tinyurl.com/y8obm3fc (Rochester Academy Charter School) (23); http://tinyurl.com/y96rvcll (Syracuse Academy of Charter School) (48); http://tinyurl.com/y8kzpmnb (Utica Academy of Science Charter School) (8) (last checked 7/16/2017).

[95] H-1B visa positions listed on Jobs in Tech, available at: http://tinyurl.com/ybwwncxh (last checked 6/19/2017).

[96] Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017). Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)

[97] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 4/14/2017).

[98] List of entities represented by Seth Leech, available at http://tinyurl.com/zlc7eql (last checked 4/14/2017).

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applications for:

- ▷ Cosmos Foundation, Inc. (TX)
- ▷ Central Jersey College Prep Charter School (NJ)
- ▷ Millenium Education Foundation (now Frontier) (MO)
- ▷ Hampden (MA)
- ▷ Arts and Science, Bergen (NJ)[99]

- ► Joseph Yoo: The Rochester Academy used Yoo, a New York-based attorney, to file H-1B applications. Yoo also filed H-1B applications for:
  - ▷ Milkyway Education Center, Inc. (NJ)
  - ▷ American Turkish Friendship Association (VA)
  - ▷ Hampden Charter School Of Science (MA)
  - ▷ Wellspring Cultural & Educational Foundation, Inc. (CT)
  - ▷ Turkish Cultural Center (NY)
  - ▷ Bergen Arts And Science Charter School (NJ)
  - ▷ Zaman Ltd. (NY)
  - ▷ Metropolitan Education and Consulting Services LLC (NY)[100]

Scandals, Investigations, & Notable Activities

Whistleblower Testimony: Eight individuals have provided testimony to Amsterdam & Partners about their experience with the Gülen schools in New York, primarily the Syracuse Academy of Science, but also the Utica Academy of Science and the Rochester Academy. These individuals include teachers, administrators, parents, and clerical staff who worked at the schools or had children at the schools for many years. Their stories are consistent with each other, and many are reported by more than one person. They relate incidents that raise serious concerns about the health and safety of children, the potential misuse of public funds, falsification of student records, and on-going purchasing practices that favor selected vendors. Overall, the testimony documents a very different narrative than what the administration portrays as the public face of the schools.

Ersin Konkur, a former teacher at the Utica Academy of Science, testified that he was forced to pay thousands of dollars of his school salary to the Gülen movement. Mr. Konkur provided a copy of a check he had written to High Way Education in Rochester as part of the payments he was required to make, as well as documents that show the school kept a separate set of books for its Turkish teachers.[101] Mr. Konkur testified that if he refused to make the payments, his visa would be withdrawn and he would lose his immigration status in the United States. This testimony is consistent with testimony from other Turkish teachers in two states who have testified that they had to kickback from as much as 15-40% of their salary to the Gülen movement.

Public documents show that High Way Education is located at the same address in Rochester as the Turkish Cultural Center (692 Dewey Ave).[102] High Way is a 501(c)(3) nonprofit organization operating as a private school with 34 – 55 students, depending on the year.[103] It was registered with the New York Secretary of State on June 25, 2003[104] and indicates on its IRS 990 form that it has local chapters, branches, or affiliates. High Way may be a tutoring organization, but there is not an active organization website,

99 List of entities represented by Leonard D'arrigo, available at http://tinyurl.com/kcb3kjq (last checked 4/14/2017).

100 List of entities represented by Joseph Yoo, available at: http://tinyurl.com/k8ux2el (last checked 4/28/2017)

101 Interview with WHEC TV Rochester news; available at http://www.whec.com/news/charter-school-rochester-academy-connections-questioned/4494759/ (last checked 5.27.17)

102 Rochester yellow pages available at https://www.yellowpages.com/rochester-ny/mip/highway-education-497630073 (last checked 5.27.17)

103 High Way Education IRS 990 Forms available at https://tinyurl.com/yaa76oas (last checked 5/26/2017)

104 New York Secretary of State Entity Database available at https://appext20.dos.ny.gov/corp_public/CORPSEARCH.ENTITY_SEARCH_ENTRY (last checked 5.27.17)

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and High Way is not listed on the New York State Department of Education list of nonpublic schools in New York.[105] High Way is connected to other Gülenist schools and other organizations through key individuals. For example, from 2004 – 2007, Mahmut Gedemenli maintained the financial records for the High Way;[106] Mr. Gedemenli became the President of the Board of the Rochester Academy in 2008. In addition, the records for High Way were maintained by Murat Gunes from 2010 – 2013;[107] Mr. Gunes was the Treasurer and Secretary of the Turkish Cultural Center Update New York in 2013.[108] Reported revenues for High Way range from $124,744 in 2010 to $178,137 in 2015.[109]

In addition, testimony from a former staff member at the Rochester Academy stated that Turkish staff at the school made monthly trips to the Gülen Golden Generation compound in Pennsylvania.

Testimony from parents, teachers, and administrators about the Syracuse Academy of Science includes the following statements:

- Graduation credits were falsified and failing grades were changed to ensure that students could graduate on time even when they hadn't take the class or passed the course. One teacher had 10 students with failing grades but somehow all students graduated;
- The school only hired Turkish staff as counselors so that they could falsify student records more easily. In addition, recently arrived Turkish staff were not familiar with state graduation requirements – and did have prior experience as counselors;
- The school scheduled "bogus" classes with a school secretary assigned as the teachers so that students could get a needed graduation credit;
- A staff person was instructed to falsify or remove documents from student records including dates and disciplinary records;
- State tests were taken in pencil and went to an administrator for "review" before being submitted for scoring. A former student at Syracuse told an American teacher he had been hired by the Syracuse Academy for part-time work during a break from his Army service and was asked to change test scores, which he refused to do.
- No action was taken against a teacher who stabbed a student in the hand. The teacher was sent on sabbatical but was reinstated the next school year;
- Another teacher taped the mouths of children shut because the teacher did not have any training in classroom management and could not control the class;
- Turkish teachers and Turkish undergraduate students from Syracuse University take selected students on overnight "study sessions" and weekend trips to their apartments or to a rented out-of-town "lake house or cabin". One parent stated that there were not background checks on Syracuse University students or security measures in place to ensure the safety of students. The out-of-town trips were not publicized to the entire school, American teachers were not included, and there were no parent

[105] List of public and nonpublic schools and administrators in New York; available at http://www.p12.nysed.gov/irs/schoolDirectory/ (last checked 5.27.17)

[106] High Way Education IRS 990 Forms; available at https://tinyurl.com/yaa76oas (last checked 5/26/2017)

[107] Ibid.

[108] Turkish Cultural Center Update; available at https://tinyurl.com/yb2ebgho (last checked 5/26/2017)

[109] High Way Education IRS 990 Forms; available at https://tinyurl.com/yaa76oas (last checked 5/26/2017)

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chaperones. The students were usually those who did not have parents actively involved in the school. The trips were secret and only known through word-of-mouth or through student's social media. One parent believes that the purpose of the trips was to indoctrinate a small group of students they had taken under their wing. Students told one teachers it was boring, and they just did math and science work. The same group of students were taken on trips to Canada and New York.

- Only male students could participate in the Robotics Club. One female student was insistent about joining but she was given only clean-up jobs to do. When the club went on a trip, the Turkish teacher told the male students not to inform her about the trip, but she found out through social media;

- Private meetings were held with the parents of prospective Turkish students, and these students somehow always got into the school. Parents questioned whether the lottery was bypassed for these students;

- The school administered aptitude tests to groups of students in the application process before the lottery to ascertain which students were advanced and which ones they wanted in the schools;

- Over-age male basketball players (called "super seniors"), believed to be in their mid-20's, were brought over from Turkey and enrolled as students for the basketball season only (October to April), didn't attend classes, and then returned to Turkey before state tests were given. One student had a wife and two children.

- Parents said that their children graduated from Syracuse but were extremely unprepared when they left the school. One student was so ill-prepared for college after graduation from Syracuse that her parents had to hire tutors and pay tuition for remedial classes. The students never received any computer classes despite budget items showing funds spent for IT equipment that parents never saw being used. The push was to get students "out the door" so that Syracuse could publicize its graduation rate.

- Women were treated terribly by the Turkish men in the administration, and women were almost never placed in a leadership position. Female parents were ignored by the school administration in meetings and had to bring their husbands to meetings if they wanted the principal to listen to them;

- African American students were much more likely to be suspended or expelled;

- There was confirmation that two American staff members were asked to write papers for the superintendent's Master's and PhD dissertation;

- Turkish teachers complained that they needed a raise because they had to give so much money back to the Turkish Cultural Center from their regular salary;

- One Turkish teacher was very open about the Gülen Movement and the orders he received to send as much money as he could to the movement. He charged students for extra pieces of paper and to use the pencil sharpener and maintained a notebook of what students owed him;

- Turkish teachers were often paid more than American teachers so that they could afford to give more to the Gülen movement;

- New Turkish teachers with little or no teaching experience were often paid

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more than qualified American teachers with more experience;

- Turkish teachers were never actually fired or "let go" from the schools. If there was a serious incident where there might be backlash, the teacher would be transferred to Gülen school in another state;

- Turkish teachers just showed up in the Human Resources department and HR administrators were told to process them as employees even though they hadn't filled an application form or been interviewed, they often weren't fingerprinted, and most did not have teaching experience or credentials. American teachers had a difficult application process with multiple interviews, requirements to provide their diploma, and required fingerprinting;

- The school intentionally recruited teachers who were recent graduates from local universities with no experience so that they could manipulate teachers who had no other teaching experience;

- It was common practice to fire or demote American teachers and replace them with new Turkish teachers who had just arrived in the United States and had fewer credentials. A specific example was given with names and positions.

- Pay discrimination between Turkish and American teachers was an "open secret."

- Turkish teachers usually taught fewer classes with fewer students than the American teachers. American teachers were expected to take on extra duties and "keep the place running." Example: a Turkish teacher who taught fewer students than the American teacher (40 students vs. 100), but received marginally higher pay and hired former students to grade tests and review homework.

- In 2014, upwards of 50 percent of the American teachers left at the same time ("parents called it the "great purge of 2014"). The administration didn't have an adequate number of staff to fill the positions so multiple classes were left without teachers. The classes weren't cancelled, and students sat in classes without a teacher. The office secretaries would run up to check on the class twenty minutes to make sure students were there.

- NOTE: Records from the NY State Department of Education confirm that teacher attrition between the 2013-2014 and 2014-2015 school years was 56 percent.[110]

- One staff person was hired and promoted because of his position in the community even though he had multiple aliases and criminal convictions;

- A part-time retired administrator is making upwards of $100,000 a year, and the belief is that the school needs her credentials because the Turkish staff does not have the proper credentials;

- The majority of Turkish teachers have very limited English skills, and students have a very hard time understanding them. One of the parent's children had a teacher who had an interpreter because his English was so poor. One Turkish teacher would give students demerits for speaking up about the difficulty understanding him.

- Turkish teachers often couldn't produce their passport as part of the HR process, stating that it was "lost" or "stolen"; conjecture is that the Turkish administrators

[110] New York State Department of Education; 2014-2015 School Report Card; https://data.nysed.gov/lists.php?type=school

had possession of passports;

- School vans were used to pick up teachers and their spouses from the airport when they arrived from Turkey and to help them get social security cards, move into apartments etc. Paid staff performed these duties on school time during work hours;

- There was confirmation about a locked prayer room on the third floor of the school (also called a "secretive room"). One teacher gained access and video-taped prayer rugs and books by Gülen. Access to the room was limited to Turkish men some of whom were not known to parents. If a teacher quit or was let go, the school would assign the class to one of these men who "seemed to come out of nowhere."

- American teachers were worried about saying the wrong thing and being fired. There were cameras in every room that tracked their activities.

- The principal coached staff about what to say about Fethullah Gülen and scripted their message; staff received presentations about Gülen and his teachings during one professional development weekend session, which they found to be very strange;

- The school overstated the results of its charity drives. For example, a fundraiser to raise money for Turkey after the earthquake was promoted as raising $10,000 from students, but given the income level of most school families, the actual amount was closer to $200 from students with the rest coming from another source. Another parent asked for an account of school fundraising drives and stated the money went into a "black hole;"

- Children did not receive the special education services they needed, specific requirements were ignored, and the school tried to push out these students, often suspending or threatening expulsion if the parents asked questions;

- The school did not take bids on contracts even when staff questioned it, and prices paid were very high;

- Purchase orders for new IT equipment were issued but the equipment never arrived. The contracts for purchase were all signed with the New Jersey based company, Apple Education Services; Note – the State Comptroller's audit confirmed that the location of IT equipment could not be verified.

- Students were required to buy every clothing item from the school except pants;

- Almost everything at the school was delivered in boxes marked "made in Turkey" – uniforms, desks, chairs, tables, windows, and IT equipment;

- At one point, the windows in the hall were broken for a long time, but when the staff asked the contractor why it was taking so long for repair, he replied that the windows had to be ordered from this company in New Jersey (Apple Education) and that the principal and superintendent had ordered the wrong windows, so they were left broken.

- Parents who tried to report these concerns to the press were told by the Syracuse Academy leadership that the school "owned" a media outlet and would know if a negative story was reported to them.

- Parents, teachers, and students were invited to take expense-paid trips to Turkey.

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- One teacher stated: "I try to tell people what's going on here right under our noses, but they say it sounds too far-fetched."

Contractor conviction in federal court: A contractor for the Syracuse Academy of Science was convicted on criminal charges in federal court for the illegal removal and disposal of asbestos as part of the renovation of the Syracuse Academy's elementary campus in 2011 at the site of the former St. James School (4837 South Salina Street, Syracuse).[111] This case is important because it demonstrates that the health and safety of students was put at risk by insider contracting deals that used inexperienced contractors. It also highlights the problems that can result when the President of the Board of Syracuse has a conflicting interest in his dual role as President of both the Syracuse Board and of the vendor organization leasing the building to the school (Terra).

The Syracuse New Times, a local publication, reported on this incident in a 2014 article and found that Apple Educational Services, a nonprofit organization based in New Jersey with numerous contracts with Gülen-affiliated schools, was the general contractor for the renovation project.[112] Fehmi Damkaci, the President of the Syracuse Academy Board, told New Times that "he felt the need to use known contractors in the rush to get the building finished in time for the first day of school."[113] Note that the Syracuse Academy Superintendent, Tolga Hayali, worked as a Vice President for Apple Educational Services just before he was hired by Syracuse in 2008. New Times also reports that Husayin Kara, a resident of New Jersey at the time, managed the project for Apple, "though he says he has little construction experience."[114] In fact, Kara was the President and CEO of Concept Schools in Ohio, another Gülen charter network, and served as the Executive Director of Apple Educational Services at the time of the renovation project. Kara later went on to serve as the Chief Development Officer for the Pioneer Charter School of Science in Everett, MA, another Gülen charter school.[115]

According to the criminal complaint, Cihan Zorlouglu was a citizen of Turkey working for C & C Design Build Construction LLC, a New Jersey company owned by Coskun Celik. Note that there is no listing for this company with the New Jersey Department of Treasury or the New York Secretary of State, and no known website or listing in yellow pages online. Coskun Celik and Celik Brothers Construction made donations totaling $32,150 in 2008 to the Milkyway Education Center, which is the New Jersey-based nonprofit affiliated with Gülen and the parent organization of Pioneer Academy, a private Gülen school.[116] Donations for subsequent years are not disclosed on Milkyway's IRS documents.

Zorlouglu pleaded guilty to the charge, and he received two years of probation plus community service. New Times also reported that the prosecutor in the case stated that the Syracuse job was apparently one of Zorlouglu's very first job of this type. No one involved in the school renovation took responsibility for hiring Zorlouglu, an inexperienced contractor. It should

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111 The press release from the US Attorney's Office announcing the arrest; available at https://www.justice.gov/archive/usao/nyn/news/1413-2779-1792663936.pdf
The criminal complaint (7.12.11) and the judgment (3.6.12) are available from federal courts records via the PACER system; available at https://www.pacer.gov/

112 Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017). Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)

113 Ibid.

114 Ibid.

115 Huseyin Kara; LinkedIn available from https://www.linkedin.com/in/huseyin-kara-84578964/ (last checked 5.29.17)

116 Milkyway IRS Form 990 – 2008; available from https://projects.propublica.org/nonprofits/organizations/223261282 (last checked 5.29.17)

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be noted that New Times documented that there were 41 asbestos removal contractors in the Syracuse area,[117] raising serious question about why Syracuse/Terra/Apple hired an out-of-state contractor at all. New Times reports that eventually a central New York contractor was hired to decontaminate the building before the renovation was complete.

In a twist that is typical of how individuals move from one Gülen organization to another, Zorlouglu reported in a telephone interview with New Times that he was working for the Pioneer Charter School of Science in Everett, Massachusetts,[118] the school founded by the Fehmi Damkaci, the President of the Syracuse Academy of Science Board, and the school where Huseyin Kara serves as Chief Development Officer.

Teacher attrition: In recent years, teacher attrition is remarkably high for three of the four Gülen schools in New York demonstrating there must be conditions at the schools that cause teachers to leave (attrition is the percent of teachers who do not return from the previous school year):

- Syracuse 2015-2016: 47 percent
- Utica 2015-2016: 68 percent
- Rochester 2015-2016: 33 percent
- Syracuse 2014-2015: 56 percent[119]

Student suspensions: In addition, an astonishing 99 percent of students were suspended at the Buffalo Academy during the 2014-2015 school year.[120]

Notable Turkish Vendors

Terra Science and Education: The Board of Directors of the Syracuse Academy of Science, the Utica Academy of Science, and the Rochester Academy signed lease agreements with Terra for a total of six school properties even though the President of the Board of two schools also served on the Board of Terra, and the Board President of the Syracuse Academy continues to serve as the Board President of Terra. Terra is a 501(c)(3) nonprofit organization created in 2010 and registered with the New York Secretary of State.[121] A full description of these real estate deals is included in another section of this report.

Apple Educational Services: The New York State Comptroller conducted an audit of the purchasing practices at the Syracuse Academy and found improper practices that favored affiliated vendors, including Apple Educational Services.[122] A full report is provided in a previous section of this report. Although the actual vendor names were not referenced in the Comptroller's report, they were received via a public information request from the State Comptroller.

Another audit from the New York Comptroller found that the Buffalo Academy's Board of Directors entered into a lease agreement for the

117 Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017). Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)

118 Ibid.

119 New York State Department of Education; 2015-2016 and 2014-2015 School Report Card; https://data.nysed.gov/lists.php?type=school (last checked 8.11.2017).

120 Ibid.

121 Corporate registration for Terra: NY Secretary of State; available at https://www.dos.ny.gov/corps/bus_entity_search.html (last checked 5.21.17)

122 New York State Comptroller; Syracuse Academy of Science Charter School; *Purchases from Selected Vendors Enrollment and Billing*; July 2013; available at https://www.osc.state.ny.us/localgov/audits/schools/2013/syracusecharter.pdf

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school building that was not conducted at arm's length and resulted in a potential profit of $4.4 million for the lessor over its costs because of a favorable lease agreement with the school.[123] Apple was identified as lessor through real estate records.[124] In 2015, the Buffalo Academy purchased the school building from Apple for a $4.1 million purchase price. Based on available information, research suggests that Apple cleared more than $6 million over than its costs. It received $8 million in rental payments and the sale of the building to Buffalo Academy, while its costs were $1.9 million for the original purchase of the building, renovation, and interest.

In addition, the Comptroller's audit reported that Apple also had three vendor contracts with the Buffalo Academy in addition to the lease agreement: $37,600 for maintenance services (for one school year); $170,000 for student database management and assessment system and student testing (for 2008-2009 through 2013); and staff training and development services for $67,000 (total: $274,600).[125]

Apple was also the general contractor for a renovation project at the Syracuse Academy of Science in which an Apple sub-contractor was convicted of removing and disposing of asbestos illegally.[126] Apple was selected for the job despite statements from the Apple staff that he did not have appropriate experience. In addition, a former Syracuse administrator testified that IT purchase orders submitted to Apple by the Syracuse Academy were never received, and that she was told by a contractor that all window replacements in the school building had to be ordered from Apple.

Apple had a $34,586 contract with the Syracuse Academy for a student database for the 2016 school year that was not disclosed on the Board minutes posted on the school website. The contract details were only available on the annual audit document from the New York State Department of Education.[127]

Apple Education Services plays a key role in the Gülen organization in the Northeast through its lucrative contracts with Gülen schools in New Jersey, New York, Pennsylvania, and Massachusetts and extensive connections throughout many Gülen organizations. Apple has three distinct business lines: it serves as a third-party real estate arm and landlord (often through a third party, wholly-owned subsidiary), provides IT services, and offers after-school programs through its wholly-owned subsidiary Ivy Learning.[128] Apple's leadership is directly connected to other Gülen-affiliated organizations. For example, Apple founder Faruk Apaydin, is also a founder of the Peace Islands Institute (formerly the Interfaith Dialog Center) which is an organization openly aligned with Gülen.[129] In addition, he donated $50,150 in 2006 and 2007 to the Milkyway Education Center, the New Jersey-based Gülen-affiliated organization that is the parent organization for Pioneer Academy,

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123 New York State Comptroller; *Buffalo Academy of Science Charter School – School Building Lease;* July 2013; available at https://www.osc.state.ny.us/localgov/audits/schools/2013/buffaloacademycharter.pdf *(last checked 5.29.17)*

124 The audit does not specifically name the lessor, but a search of the Erie County Real Property Tax Record shows that Apple Education Services owns the property at 190 Franklin Buffalo; available at http://www2.erie.gov/ecrpts/index.php?q=real-property-parcel-search

125 New York State Comptroller; *Buffalo Academy of Science Charter School – School Building Lease; July 2013; available at* https://www.osc.state.ny.us/localgov/audits/schools/2013/buffaloacademycharter.pdf *(last checked 5.29.17)*

126 Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017); Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)

127 Annual Report and Financial Statement - NY State Department of Education- 2016; available at http://www.p12.nysed.gov/psc/csdirectory/SyracuseAcademyOfScienceCharterSchool/SASCSAR1516.pdf (last checked 5.29.17)

128 Apple Education Services Certificate of Formation; NJ Dept of Treasury; available at http://www.state.nj.us/treasury/revenue/searchfile.shtml

129 Peace Island Institute/Interfaith Dialog Center; IRS Form 990 – 2004; available at https://projects.propublica.org/nonprofits/organizations/550826499

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a private Gülen school.[130] Donations from 2009 – present are not disclosed on Milkyway's IRS document.

In New Jersey, Apple (and its subsidiary Ivy Learning) has had at least eight vendor contracts with four Gülen schools between 2014 – 2016, which appear to be on-going contracts that are renewed annually.[131]

Technotime Business Solutions: Technotime is another vendor identified in the New York Comptroller report that criticized purchasing procedures at the Syracuse Academy. The company has contracts in other Northeastern states as well, including $655,282 for known contracts in New Jersey for school supply purchases, a security camera system, data voice cabling as well as an E-Rate contract.[132]

M. Murat Kaval is one of the original founders of Technotime[133], at the same time that he served as the CEO of the Peace Islands Institute,[134] an organization that is openly Gülen-connected. Kaval previously worked in public relations for Apple Education Services, and in 2013 he was the CEO of the Turkish Cultural Centers that have affiliates in eight northeastern states.

Other assumed names for Technotime include ProAcademy, ProAcademy Furniture, Vestell (electronic hardware, phone systems), and Inspire (school uniforms).[135]

ProAcademy: ProAcademy is another vendor identified in the New York Comptroller report regarding purchasing practices at the Syracuse Academy. ProAcademy provides school and office furniture and operates as an assumed name for Technotime. It was awarded a contract with the Buffalo Academy of Science in June 2016 but the contract amount was not disclosed.[136] ProAcademy has also received contracts from other Gülen schools in New Jersey.

Gülenist Cultural and Business Organizations Active in State

Turkish cultural organizations play a central role in the Gülen landscape, serving as the external face to the community that obscures the true activities of the organization. Our research indicates that they exist in every region of the United States under different names and are generally nonprofit organizations with governing boards composed mostly of individuals of Turkish national origin. The organizations provide a platform for community involvement, hosting events where local leaders are honored, sponsoring cultural activities and classes, and convening forums and conferences. They also sponsor expense-paid trips to Turkey for elected officials and community leaders that promote the Gülen movement. In addition, we believe that funds collected through the various Gülen charter school schemes – vendor contracts, excessive rents, and teacher kickbacks – can be channeled through these organizations to

130 Milkyway IRS Form 990 – 2006 and 2007; available from https://projects.propublica.org/nonprofits/organizations/223261282 (last checked 5.29.17)

131 Minutes from Board meetings; Central Jersey College Prep: 9.29.16, 7.14.16; Bergen Arts and Sciences: 9.15.16; 7.23.15; 7.24.14; Paterson Arts and Science 7.24.14; 6.29.16; Paterson Science and Technology 6.29.16

132 Bidders for E-Rate contract announced; Board minutes; Bergen Arts and Sciences 4.17.14; available at http://bergencharter.org/index.php/board-minutes/

133 Technotime Certificate of Formation, 12.10.09; available at NJ Department of Treasury business entity search http://www.state.nj.us/treasury/revenue/searchfile.shtml

134 M. Mural Keval; LinkedIn available at https://www.linkedin.com/in/m-murat-kaval-84921644/

135 State of New Jersey Department of the Treasury – Business Entities; available from http://www.state.nj.us/treasury/revenue/searchfile.shtml

136 Minutes from Buffalo Academy – June 23, 2016; available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516604 (last checked 5.30.17)

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support programs that will enhance the façade of legitimacy. Our investigation reveals that the organizations also serve as an employer for key Gülen supporters.

Peace Islands Institute Upstate New York (formerly Interfaith Dialog Center):[137] The Peace Island Institute (PII) has affiliated groups in New York, New Jersey, Massachusetts, Pennsylvania, and Connecticut. It presents programs and events through five centers within the organization that include the Centers for Global Affairs, Social Affairs, Education, Media, and Interfaith Affairs. It is a member organization of the Alliance for Shared Values (Alliance), the umbrella organization for six Gülen groups in the United States that are openly aligned with the Gülen Movement.[138] Fethullah Gülen is the honorary President of PII and his background and teachings are included on both organization websites. Ercan Tozan, the Director of the Peace Islands Institute in New Jersey, formerly served as the Director of the Rochester Academy Charter School and as the Principal Administrator for the Putnam Science Academy in Connecticut, both Gülen-affiliated schools.[139]

PII has chapters in Upstate New York (Syracuse, Rochester, and Buffalo) and sponsors or participates in events throughout the state, such as:

- In collaboration with the Turkish Cultural Center of Syracuse, PII sponsored a Public Service Awards dinner in 2015 to honor members of local public service departments. Representatives from the Syracuse FBI Office, Police Department, Fire Department, District Attorney's office, and OCC Campus Security attended. Frank Fowler, the CEO of Syracuse Police Department, received the public service award.[140]

- In collaboration with the Turkish Cultural Center of Buffalo, PII hosted the Friendship Dinner and Award Ceremony in 2015 to promote "diversity, unity, and peace." Attending were U.S. Attorney William Hochul and Erie County Comptroller Stefan Mychajliw. Robert Bennett, a member of the New York State Board of Regents (which approves charter school applications, renewals, and expansions) was honored for 20 years of service on the Board.[141]

- In collaboration with the Turkish Cultural Center of Syracuse and the Turkish Student Association, PII held it's 10th Annual Friendship Dinner at Syracuse University. Opening remarks were made by Murat Kaval, the CEO of PII (also a founder of Technotime, which has numerous vendor contracts with Gülen schools). Awards were presented to leaders of various refugee groups in Syracuse including Catholic Charities.[142]

- In partnership with the State University of NY (SUNY) Geneso, PII in Rochester organized a "Fountain Talks Series" on the subject of combatting extremism. The presentation was made by Hakan Yesilova, the chief editor of Fountain Magazine which is a Gülenist publication.[143]

- PII and the Journalists & Writers Foundation organized a United Nations Interfaith Conference in 2016 on the role of interfaith education to prevent conflict. Following the conference, PII hosted the first Iftar Dinner in 2016 which was

137 Peace Island Institute website available at http://www.peaceislands.org/ (last checked 8.11.2017).

138 Alliance for Shared Values available at http://afsv.org/ (last checked 8.11.2017).

139 Ercan Tozan; LinkedIn; available from https://www.linkedin.com/in/ercan-tozan-3a011b48/ (last checked 8.11.2017).

140 Peace Island Institute website (see programs and centers; available at http://www.peaceislands.org/upstate-new-york/ and http://www.peaceislands.org/pii_new-york/ (last checked 5.29.17)

141 Ibid.

142 Ibid.

143 Ibid.

attended by member states and civil society organizations from seven countries.[144]

PII and the New York Interfaith Center organized an Iftar at Columbia University in New York that was attended by the daughter of former Vice President Al Gore, a New York State Assemblyman, and diplomats from the United Nations.[145]

Turkish Cultural Centers: Turkish Cultural Centers (TCC) are organized in many regions of the United States under different names (i.e., Raindrop Turkish Houses in the Southwest). In New York, the TCC has branches in Manhattan, Brooklyn, Queens, Long Island, Staten Island, and Westchester, and affiliated organizations in Syracuse, Buffalo, Rochester, and Albany.[146] The centers offer a variety of programs, including cultural fairs, Turkish language classes, cooking classes, lunches and forums.[147] The activities of the Peace Islands Institute and the TCC are closely aligned, and they co-sponsor many community events. In Rochester, the TCC and PII co-locate at the same address. Importantly, the TCCs sponsor expense-paid trips to Turkey for elected officials and community leaders. The TCCs often share postings from the Alliance for Shared Values on their website of Facebook page.[148]

Alliance for Shared Values: The New York City-based Alliance for Shared Values (Alliance)[149] is the umbrella organization for six Gülen groups organized in each region of the United States that correspond to the Gülen charter school regions: Peace Islands Institute, Pacifica Institute; Dialogue Institute of the Southwest, Rumi Forum, Niagara Foundation, and the Atlantic Institute. The Executive Director of the Alliance, Yuksel Alp Aslandogan, visits Fethullah Gülen once a week according to press reports, and he often serves as a spokesperson for Fethullah Gülen at the Golden Generation compound in Pennsylvania.[150] Aslandogan is a former secretary for the Gülen Institute;[151] former President of the Dialogue Institute of the Southwest;[152] founded the Wisconsin Career Academy, a Gülen-affiliated charter school;[153] and was involved in real estate transactions with Gülen schools in Oklahoma and Texas. One of the members of the Alliance Board of Directors was a founder of Harmony Public Schools in Texas, the largest Gülen-affiliated charter school network in the United States that will have 54 schools in 2017-2018. The Alliance promotes Hizmet and the teachings Fethullah Gülen on its website and posts Gülen's writings.[154]

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144 Ibid.

145 Ibid.

146 Turkish Cultural Centers website; available at http://www.turkishculturalcenter.org/ (last checked 5.29.17)

147 Turkish Cultural Center annual report 2013; available at http://www.turkishculturalcenter.org/TCCNEW_US/wp-includes/media/TurkishCulturalCenter_Vol03.pdf (last checked 5.29.17).
See additional events at http://turkicamericanalliance.org/annual-friendship-dinners-held-east-coast/ (last checked 5.29.17).
Also Turkish Cultural Center annual report 2011; available at file:///C:/Users/Patti/Documents/Harmony%20National%20Report_New%20York/TurkishCulturalCenter_Vol01_annual%20report%202011.pdf (last checked 5.29.17).

148 Example of TCC Facebook page with story about Fethullah Gülen; available at https://www.facebook.com/tccrochester/ (last checked 5.29.17).

149 Alliance for Shared Values website; available at http://afsv.org/ (last checked 5.29.17).

150 Associated Press; *One of Turkey's most-wanted clerics lives quietly in the Poconos*; New York Post (1 February 2016); available at http://nypost.com/2016/02/01/one-of-turkeys-most-wanted-clerics-lives-quietly-in-the-poconos/ (last checked 5.29.17).

151 Aslandogan at Gülen Institute via their IRS 990 Forms available at https://tinyurl.com/yc5zdrg4 (last checked 5/26/2017).

152 Aslandogan bio via the Huffington Post, available at https://tinyurl.com/l4laf4k (last checked 5/26/2017)

153 Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017).

154 Alliance for Shared Values website; available at http://tccnj.org/category/bergen-county (last checked 5.29.17).

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Friends of Gülen Spotlight

State elected officials participate in expense-paid trips to Turkey and other aligned countries that were organized by Gülen-affiliated organizations. For example:

- U.S. Representatives Yvette D. Clarke (D-NY) and Gregory W. Meeks (D-NY) traveled on an all-expense paid 10-member Congressional trip in 2013 to Baku, Azerbaijan that was later investigated by the Office of Congressional Ethics when it was revealed that the trip had been secretly paid for by SOCAR, the state-owned oil company of Azerbaijan.[155] The members of Congress were not aware that SOCAR had funded the trip and had sought pre-trip approval from the House Ethics Committee. The Washington Post reported that during the previous year, "SOCAR and several large energy companies sought exemptions for a $28 billion natural gas pipeline project in the Caspian Sea from U.S. economic sanctions being imposed on Iran."[156]

- Other New York state officials accepted trips to Turkey at the invitation of the Turkish Cultural Center, including: Majority Leader Ron Canestrari;[157] Assembly member Steven Cymbrowitz (paid by Peace Islands Institute);[158] Assembly member Keven Cahill (Paid by Peace Islands Institute);[159] State Senator Suzi Oppenheimer;[160] Senator Kevin S. Parker (Oct 2011);[161] Assembly member Earlene Hooper (Oct 2011);[162] Assembly member Joseph S. Saladini;[163] and Assembly member Kelly Green.[164]

- Assemblymen Cahill and Cymbrowitz recognized representatives from the Turkish Cultural Centers in New York during a meeting of the State Assembly.[165] Cahill co-hosted the 4th Annual Turkish Night in 2015 at SUNY (New Paltz) with the Turkish Cultural Center of Albany. Cahill's support was called out by Veysel Ucan, the Executive Director of the TCC Albany. Cahill is also a founder of the Turkish People Legislators Association which called on Congress to preserve political freedom in Turkey.[166] Cymbrowitz gave a proclamation to the Turkish Cultural Center honoring Fethullah Gülen at the 4th annual Friendship Dinner in 2011.[167]

155 Higham, Scott; Rich, Steven; Crites, Alice; *10 members of Congress took trip secretly funded by foreign government*; Washington Post; (13 May 2015). Available from https://www.washingtonpost.com/investigations/10-members-of-congress-took-trip-secretly-funded-by-foreign-government/2015/05/13/76b55332-f720-11e4-9030-b4732caefe81_story.html?utm_term=.c8d3eea31ca4 (last checked 5.29.17).

156 Ibid.

157 Whyte, Liz Essley; *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement;* Center for Public Integrity. (9 February 2017). Available at https://www.publicintegrity.org/2017/02/09/20657/scores-state-lawmakers-took-trips-subsidized-controversial-turkish-opposition (last checked 5.29.17).

158 Bredderman, Will; *Globetrotting Lawmakers Blow Campaign Cash on Travel*; Observer; (1 March 2016). Available at http://observer.com/2016/03/globetrotting-lawmakers-blow-campaign-cash-on-travel/ (last checked 5.29.17).

159 Ibid.

160 Turkish Cultural Center annual report 2011 – p. 20; available at http://www.turkishculturalcenter.org/TCCNEW_US/wp-includes/media/TurkishCulturalCenter_Vol01.pdf (last checked 5.29.17)

161 Ibid. page 11

162 Ibid.

163 Ibid.

164 Ibid.

165 Video of State Assembly recognition; (date unknown); available at http://nyassembly.gov/mem/Kevin-A-Cahill/video/1880/ (last checked 5.29.17).

166 Kevin Cahill's website; available at http://nyassembly.gov/mem/Kevin-A-Cahill/story/63995/ (last checked 5.29.17).

167 Rumi forum website; available from http://rumiforum.blogspot.com/2011/04/new-york-assembly-member-cymbrowitz.

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- New York Senator John A. DeFrancisco has been an active supporter of the Syracuse Academy of Science, including participation in events such as: Visit to Syracuse Academy in December 2016 and recognition for his influence in gaining approval for the new Syracuse school to open in fall 2017;[168] visit to Syracuse Academy in March 2015[169]; recognition in the Syracuse Academy promotional brochure 2013; [170] a speech to the Turkish Cultural Center annual friendship dinner in October 2011 and award for public service.[171]

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H-1B visa employees, both teachers and administrators, from school to school and state to state in very different types of jobs. The individuals listed below are examples of the overlap of employees among schools, further demonstrating the interconnections and affiliation between the Gülen charter networks and organizations.

- Ehat Ercanli: Founder and original Board member, Syracuse Academy of Science; at time of founding, Ercanli was Assistant Prof Electrical Engineering/Computer Science, Syracuse University; founder of Horizon Education Center in 1998, the parent organization of Horizon Academy Charter Schools; Gülen-affiliated charter network in Ohio; B.S. Istanbul Technical University (Istanbul, Turkey)[172]

- Yuksel Alp Aslandogan: Current President of the Alliance for Shared Values;[173] former Secretary for the Gülen institute;[174] former President of the Dialogue Institute of the Southwest;[175] founded Wisconsin Career Academy[176]

- Sadri Altinok: President, Turkish Cultural Center New York (2013-present),[177] B.S. Turkish Army Academy; President of Signal Communications (2005-present)[178]

- Fehmi Damkaci: President of the Board of Syracuse Science Academy and of Utica Academy of Science;[179] Board President

html#axzz4ia2Z564Y (last checked 5.30.17).

168 Syracuse Academy website; available from https://www.sascs.org/index.php?option=com_content&view=category&layout=blog&id=20&Itemid=251&limitstart=90 (last checked 5.30.17).

169 Website for Sen. DeFrancisco; available at https://www.nysenate.gov/newsroom/articles/john-defrancisco/senator-defrancisco-visits-syracuse-academy-science-charter (last checked 5.30.17).

170 Syracuse promotional brochure; available at https://issuu.com/syracuseacademy/docs/2013-2014_catalog_sascs_073113_fina (last checked 5.30.17).

171 Turkish Cultural Center annual report 2011; available at http://www.turkishculturalcenter.org/TCCNEW_US/wp-includes/media/TurkishCulturalCenter_Vol01.pdf (last checked 5.30.17).

172 Ehat Ercanli biographical information taken from Syracuse Academy of Science Charter Application (Dec. 2, 2002), available through open records request to the New York State Education Department, (last checked 5/19/2017).

173 Aslandogan via the Alliance for Shared Values IRS 990 Form 2014, available at https://tinyurl.com/ybvmo96o (last checked 5/26/2017), and see the Alliance for Shared Values website available at http://afsv.org/

174 Aslandogan at Gülen Institute via their IRS 990 Forms available at https://tinyurl.com/yc5zdrg4 (last checked 5/26/2017)

175 Aslandogan bio via the Huffington Post, available at https://tinyurl.com/l4laf4k (last checked 5/26/2017)

176 Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017).

177 Sadri Altinok via the Turkish Cultural Center website available at https://tinyurl.com/yb7ngf7g (last checked 5/26/2017)

178 Sadri Altinok via LinkedIn Profile available at http://tinyurl.com/ycnqq4s8 and see his CV from the State University of New York as Oswego available at, http://tinyurl.com/yc6dkzrv (last checked 5/26/2017)

179 Fehmi Damkaci on Utica IRS 990 Form 2014, available at https://tinyurl.com/y9eu2uxa (last checked 5/26/2017) Also Syracuse Academy website; available at https://www.sascs.org/index.php?option=com_

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of Terra Science and Education (2010 – 2014) that leases buildings to the Syracuse and Utica Science Academies and the Rochester Academy;[180] Founding Board Member of Pioneer Charter School of Science in Boston, MA (2006);[181] President, Turkish Cultural Center of Syracuse;[182] Teacher, Yamanlar High School, Izmir, Turkey; B.S. Ege University;[183] Associate Professor Chemistry, State University of NY at Oswego[184]

- Tolga Hayali: Superintendent, Syracuse and Utica Academies of Science charter schools in New York[185]; Director, Syracuse Academy of Science Charter School[186]; Vice President – Group Science Coordinator, Apple Educational Services[187]; Principal, Pioneer Academy, private Gülen School in New Jersey[188]; Founder/Director/Dean of Academics/ Director of College Guidance, Horizon Science Academy in Ohio (Gülen-affiliated school)[189]

- Hakki Karaman: Former Director of Syracuse Academy of Science;[190] Principal, Magnolia Science Academy (San Diego, CA), a Gülen charter network;[191] CEO, Magnolia Educational and Research Foundation (MERF), CMO for Magnolia schools – CA;[192] Director of Education – MERF;[193] MBA Coordinator for Doga Private Schools, Turkey (owned by Turkven – private equity fund);[194] B.A. Bogazici University[195]

- Murat Demirbas: Board Member, Terra Science and Education 2010 & 2011[196]; President of the Board, Buffalo Academy of Science[197]; Associate Professor computer science University of Buffalo SUNY[198]

- Dr. Tevfik Kosar: currently Treasurer of the Board for the Buffalo Academy of

content&view=article&id=5&Itemid=188 (last checked 5.30.17)

180 Terra: IRS 990 2013; available from https://projects.propublica.org/nonprofits/organizations/273215060

181 Fehmi Damcaki Letter of Intent 2015; NY Dept of Education; available from http://www.p12.nysed.gov/psc/2015Rd1LoICnR/Syracuse1CnR.pdf

182 Fehmi Damkaci; Turkish Digest; available from http://turkishdigest.blogspot.com/2009/02/turkish-theatre-trip.html

183 Fehmi Damkaci; charter application for Utica Academy- biographical information; received through 2017 FOIA request from NY State Department of Education

184 Fehmi Damkaci: LinkedIn available from https://www.linkedin.com/in/fehmi-damkaci-b9296438/ (last checked 8.11.2017).

185 Tolga Hayali: LinkedIn available from https://www.linkedin.com/in/tolgahayali/ (last checked 8.11.2017).

186 Ibid.

187 Ibid.

188 Tolga Hayali; reference to 2007 science partnership; available from http://njmetmtl.com/njmet-awards-scholarship-to-local-student-who-excels-in-the-fields-of-science-and-technology/ (last checked 8.11.2017).

189 Tolga Hayali: LinkedIn available from https://www.linkedin.com/in/tolgahayali/ (last checked 8.22.2017).

190 Hakki Karaman::NY State School Report Card; available from https://data.nysed.gov/files/reportcards/archive/2005-06/CIR-2006-421800860854.pdf (last checked 8.11.2017).

191 Hakki Karaman; CA Charter School Assoc list available at http://www.ccsa.org/regional_snapshot-SDUSD-12.pdf (last checked 8.11.2017).

192 Hakki Karaman; Charter School Facilities Program document; available from http://www.treasurer.ca.gov/csfa/meeting/staff/2013/20130814/6.pdf (last checked 8.11.2017).

193 Ibid.

194 Ibid.

195 Ibid.

196 Murat Demirbas; Terra Board - IRS 990 2010 and 2011; available at https://projects.propublica.org/nonprofits/organizations/273215060 (last checked 5.29.17).

197 Murat Demirbas: Buffalo Academy Board available at http://tinyurl.com/y9mj72dn (last checked 5/26/2017) and see Buffalo Academy IRS 990 Forms available at http://tinyurl.com/ydfv3ero

198 Murat Demirbas; academic resume available at http://www.cse.buffalo.edu/~demirbas/ (last checked 8.11.2017).

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Science (NY), a Gülen-affiliated charter in Buffalo, NY[199]; Founding Board member for Abramson and Kenilworth Science and Technology Charter Schools, both Gülenist schools in Louisiana;[200] President, Pelican Educational Foundation from 2005 to 2013[201] (parent organization to the Abramson and Kenilworth schools); currently Associate Professor Computer Science/Engineering at State University of New York at Buffalo;[202] former Professor of Computer Science at Louisiana State University;[203] B.S. Bogazici University (Istanbul, Turkey);[204] Note: while Kosar served on the Pelican Board, Abramson was closed by the State Board of Elementary and Secondary Education based on serious concerns about the health and safety of students, and an affiliated vendor attempted to bribe a state official to ignore the charges against the school[205]

- Mustafa Gokcek: Board Member, Buffalo Academy of Science Charter School[206]; Associate Professor of History, Niagara University;[207] Presentation to Rumi Forum event;[208] Contact for Peace Islands/ Turkish Cultural Center event on new book about Fethullah Gülen (2013);[209] B.A./M.A. Bilkent University (Turkey)[210]

- Mahmut Gedemenli: Board Member, Terra Science and Education 2010 & 2011;[211] Board President, Rochester Science Academy Charter School (2008-present);[212] ESOL teacher at Greece Central School District;[213] Leader of Turkish Cultural Center Rochester (Gülen organization);[214] Formerly in charge of the financial accounting and record-keeping for High Way Education (2004-2007).[215]

- Kadiz Yavuz: Director, Utica Academy of Science; formerly Dean of Elementary,

199 Buffalo Academy of Science; available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516602 (last checked 8.11.2017).

200 Charter applications for Abramson and Kenilworth; Cowan Institute for Public Education Initiatives at Tulane University; available at Charter application for Abramson; http://www.coweninstitute.com/resources/document-archive/charter-school-applications/ (last checked 8.11.2017).

201 Pelican IRS Form 990 from 2006 and 2013; available from https://projects.propublica.org/nonprofits/organizations/363103085 (last checked 5.17.2017).

202 Ibid.

203 Charter applications for Abramson and Kenilworth; Cowan Institute for Public Education Initiatives at Tulane University; available from http://www.coweninstitute.com/resources/document-archive/charter-school-applications/ (last checked 8.11.2017).

204 Ibid.

205 Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface;* New Orleans Time-Picayune; (22 July 2017). available from http://www.nola.com/education/index.ssf/2011/07/abramson_charter_groups_ties_t.html (last checked 5.25.17).

206 Mustafa Gokcek; Buffalo Academy Board available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516602 (last checked 8.11.2017).

207 Ibid.

208 Gokcek presentation; Rumi Forum; available at http://rumiforum.org/qpeaceful-coexistence-in-the-ottoman-timesq-presentation-by-dr-mustafa-gokcek-opened-the-qistanbul-istanbulq-exhibition/ (last checked 5.30.17)

209 Gokcek; Peace Islands event; available at http://news.niagara.edu/turkish-cultural-centers-friendship-dinner-coming-to-niagara-university/ (last checked 5.30.17)

210 Mustafa Gokcek: LinkedIn available at http://tinyurl.com/ycgy3brp (last checked 5/26/2017)

211 Mahmut Gedemenli: Terra Board available at Terra Board - IRS 990 2010 & 2011; available at https://tinyurl.com/y7pj3txc (last checked 5/26/2017)

212 Mahmut Gedemenli; LinkedIn available at http://tinyurl.com/y8g8m3eo (last checked 5/26/2017)

213 Ibid.

214 Mahmut Gedemenli; Turkish Cultural Center Facebook available at https://www.facebook.com/tccrochester/posts/1219061064795254 (last checked 8.11.2017).

215 Mahmut Gedemenli via the High Way Education IRS 990 Forms, available at http://tinyurl.com/yaa76oas (last checked 5/26/2017).

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Syracuse Academy of Science[216]

- Namik Sercan; Chief Education Officer, Central Jersey College Prep;[217] former Executive Director, Terra Foundation for Science and Education, New York (real estate arm of Gülen school in Syracuse);[218] Principal, Fulton Science Academy High School in Atlanta when the charter was revoked;[219] Author of article in The Fountain magazine, 2008, a known Gülenist publication; [220]

- Mucahit Polat: Director, Buffalo Academy of Science;[221] former CIO and Assistant Principal, Buffalo Academy of Science (2011-2015); former Dean of Academics, Brooklyn Amity School, Gülen-affiliated private school; former Math Teacher at Pioneer Academy, Gülen-affiliated private school in New Jersey; Math teacher at Nukus Lisesi (Uzbekistan); B.A Bogazici University (Turkey).[222]

- Mehmet Demirtas: Principal of the Rochester Academy;[223] B.S. Middle East Technical University (Turkey)[224]

- Galip Bak: Director, Syracuse Academy of Science (2014 – present);[225] Biology teacher at Pioneer Academy, private Gülen school in New Jersey;[226]

- Jafer Yasar: President of the Board, High Way Education (2011-present);[227] owner of BestFit Menswear (2009-present),[228] Further research is needed to determine if this individual is the same as the Dr. Imam Jafer Yasar of the Bosnian Mosque in Rochester[229]

- Murat Gunes: In charge of financial records for High Way Education (2010 – 2013);[230] Treasurer and Secretary, Turkish Cultural Center Update New York (2013);[231]

- Murat Kaval: CEO of Peace Islands Institute (2011-present); CEO, Turkish Cultural Center New York (2013), Public Relations for Apple Education Services (NJ) (2009-2011); Founder, Technotime,

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216 Kadiz Yavuz LinkedIn information available at https://www.linkedin.com/in/kadir-yavuz-2670b0a8/ (last checked 5.27.27)

217 Namik Sercan; CEO of Central Jersey College Prep; 3.2.17; article available from https://www.tapinto.net/towns/south-brunswick-cranbury/articles/central-jersey-college-prep-charter-school-is-gra-2

218 Namik Sercan; LinkedIn; https://www.linkedin.com/in/namiksercan/

219 Namik Sercan; Atlanta WSB-TV; 12.4.12; http://www.wsbtv.com/news/local/superintendent-recommends-revoking-science-academy/242203826

220 The Fountain; Issue 63, May-June 2008; https://www.fountainmagazine.com/Issue/detail/Mathematical-Thinking

221 Mucahit Polat via the Buffalo Academy of Science website available at http://tinyurl.com/y94zryhj (last checked 5/26/2017)

222 Mucahit Polat LinkedIn Profile available at https://tinyurl.com/y7ln4q77 (last checked 5/26/2017)

223 Mehmet Demirtas via the Rochester Academy website available at https://tinyurl.com/ycdbeb2x (last checked 5/26/2017)

224 Mehmet Demirtas via his LinkedIn Profile available at https://tinyurl.com/y8vnp5pa (last checked 5/26/3017)

225 Syracuse Academy website; available from https://www.sascs.org/index.php?option=com_content&view=article&id=6&Itemid=189 (last checked 5.30.17)

226 Galip Bak; Rate my teacher website; available at http://www.ratemyteachers.com/galip-bak/1855323-t (last checked 5.30.17)

227 Jafer Yasar via High Way Education IRS 990 Form available at https://tinyurl.com/yaa76oas (last checked 5/26/2017)

228 Jafer Yasar via his LinkedIn Profile, available at https://tinyurl.com/y7xe54u3 (last checked 5/26/2017)

229 Dr. Imam Jafer Yasar via Youtube of a Qur'an recitation night available at https://tinyurl.com/yaa6d9no (last checked 5/26/2017)

230 High Way Education IRS 990 Forms available at https://tinyurl.com/yaa76oas (last checked 5/26/2017)

231 Turkish Cultural Center Update available at https://tinyurl.com/yb2ebgho (last checked 5/26/2017)

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a vendor for numerous Gülen-affiliated charter schools;[232] M.S. Bilkent University (Turkey)[233]

- Patricia Coban: Founder, Syracuse and Utica Academies of Science[234]; currently teacher, Paterson Charter School or Arts and Science[235] where her husband is the Chief Operations Officer for iLearn Schools (iLearn is the charter management organization for Paterson and other Gülenist schools in New Jersey); teacher, Pioneer Academy (private Gülen school in New Jersey);[236] teacher, Syracuse Academy of Science (after founding date)[237]

- Ercan Tozan: Executive Director, Peace Islands Institute – NJ;[238] past positions include Administrator of PSA; Director, Rochester Academy Charter School, a Gülen-affiliated school in New York[239]; Administrator, Putnam Science Academy, a private Gülen-affiliated school in Connecticut[240]; former director of Peace Island Institute in Rochester, NY;[241] Board of Trustees, FBI Citizens Academies New Jersey[242]

- Mustafa Coban: Chief Operations Officer at iLearn[243]; reports income from Apple Educational Services on his 2016 School Ethics Commission Personal Disclosure Statement and income for his wife from Milkyway Education Center;[244] his wife (Patricia Ann Coban) was a founder of the Syracuse and Utica Academies of Science (NY)[245]; former Operations Manager, Syracuse Academy of Science, Gülen school in NY[246]

- Selcuk Acar: Board of Directors, Buffalo Academy of Science;[247] Assistant professor at Buffalo State College;[248] Presenter on religion and science at a Fountain Talks public event at University of Georgia Athens – sponsored by The Fountain, a Gülen-publication based in Istanbul;[249] M.A. Istanbul University[250]

- Recep Ornek: currently CFO at Buffalo Academy of Science, New York; formerly

[232] Technotime Certificate of Formation, 12.10.09; available at NJ Department of Treasury business entity search http://www.state.nj.us/treasury/revenue/searchfile.shtml (last checked 5.1.17)

[233] M. Murat Kavel LinkedIn Profile available at https://tinyurl.com/ydgd6pxm (last checked 5/26/2017)

[234] Founders – charter applications for Utica and Syracuse; received from 2017 FOIA request

[235] Patricia Coban; LinkedIn available from https://www.linkedin.com/in/patricia-coban-15071824/

[236] Ibid.

[237] Ibid.

[238] Ercan Tozan; LinkedIn; available from https://www.linkedin.com/in/ercan-tozan-3a011b48/

[239] Ibid.

[240] Ibid.

[241] Peace Island web site; http://www.nj.com/helpinghands/index.ssf/2012/07/levent_koc_journey_with_pii.html

[242] FBI Citizen Academies Alumni Association New Jersey; http://fbicaaanj.org/

[243] Mustafa Coban; LinkedIn available at https://www.linkedin.com/in/mustafa-coban-522195114/ (last checked 9.11.2017).

[244] School Ethics Commission Disclosure; https://homeroom5.doe.state.nj.us/ethics/discforms.php?c=17;d=6105;s=165244;dl=20160601

[245] Charter applications received from the New York Dept of Education through 2017 FOIA request

[246] Newsday website on public school employee pay; 2010-11; available from http://data.newsday.com/long-island/database/?pid=373&brand=newsday&searchField=Last_name&q=coban

[247] Acar's biography; Buffalo Academy website; available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516602 (last checked 5.25.17).

[248] Ibid.

[249] Acar's 2012 presentation at Fountain Talks; web notice available at https://www.facebook.com/events/377745335628669/ (last checked 5.25.17).

[250] Acar's biography; Buffalo Academy website; available at http://www.bascs.org/apps/pages/index.jsp?uREC_ID=227932&type=d&pREC_ID=516602 (last checked 5.25.17).

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CFO at iLearn Schools in New Jersey (2008 – 2016); Foreign trade executive with FOGA[251]

- Ali Adem Bahar: Board Member, Terra Foundation for Science and Education (2012 – 14);[252] Current Postdoctoral Fellow, Syracuse University.[253]
- Ahmet Sula: Board Member, Terra Foundation for Science and Education (2012 – 2014);[254] RF Engineer at Bosch Security Systems, Masters in Computer Science and Masters of Philosophy in Electrical Engineering from Syracuse, Bachelors in Engineering from Istanbul Technical University.[255]

Notable Press Coverage and Research Regarding the New York Gülenist Network

Office of the New York Comptroller; Audit of Rochester Academy Charter School; *Purchasing Report*; 2013.[256]

Office New York Comptroller; Audit of Syracuse Academy of Science Charter School; *Purchases from Selected Vendors, Enrollment and Billing*; June 2013.[257]

Office of the New York Comptroller; Audit of Buffalo Academy of Science; *School Building Lease*; (July 2013).[258]

Griffin-Nolan, Ed; *Exerting Influence – Moved to Teach*; Syracuse New Times; (25 June 2017).[259]

Griffin-Nolan, Ed; *Charter Flight*; Syracuse New Times; (16 October 2013)[260]

Higgins, Sharon; *The NY Regents approve fourth Gülen charter school*; NYC Public School Parents; (8 November 2012).[261]

McMahon, Julie; *Syracuse to get its 3rd charter school following OK from state*; Syracuse.com. (15 November 2016).[262]

Kring-Schreifels, Jacob; *De Blasio Era Doesn't Discourage Bronx Charter School Applicant;* City Limits; (18 March 2014). [263]

Rimbach, Jean; *State charter school official joins iLearn*; The Record/NorthJersey.com; (17 February 2017).[264]

[251] Recep Ornek; LinkedIn available from https://www.linkedin.com/in/recepornek/ (last checked 5.29.17).

[252] Bahar on Terra Board via IRS 990 Forms available at https://tinyurl.com/y7pj3txc (last checked 5/26/2017).

[253] Bahar LinkedIn Profile available at https://tinyurl.com/y9r2cmwn (last checked 5/26/2017).

[254] Bahar on Terra Board via IRS 990 Forms available at https://tinyurl.com/y7pj3txc (last checked 5/26/2017).

[255] Ahmet Sula education and occupation via LinkedIn profile available at https://tinyurl.com/ydabjpuj (last checked 5/26/2017).

[256] Rochester Audit available from https://www.osc.state.ny.us/localgov/audits/schools/2013/rochesteracademycharter.pdf (last checked 8.11.2017).

[257] Syracuse Audit available from https://www.osc.state.ny.us/localgov/audits/schools/2013/syracusecharter.pdf (last checked 5.17.17).

[258] Buffalo Audit available from https://www.osc.state.ny.us/localgov/audits/schools/2013/buffaloacademycharter.pdf (last checked 5.15.17).

[259] Available from https://www.syracusenewtimes.com/exerting-influence/ (last checked 5.20.17)..

[260] Available from https://www.syracusenewtimes.com/charter-flight-3/ (last checked 5.20.17)

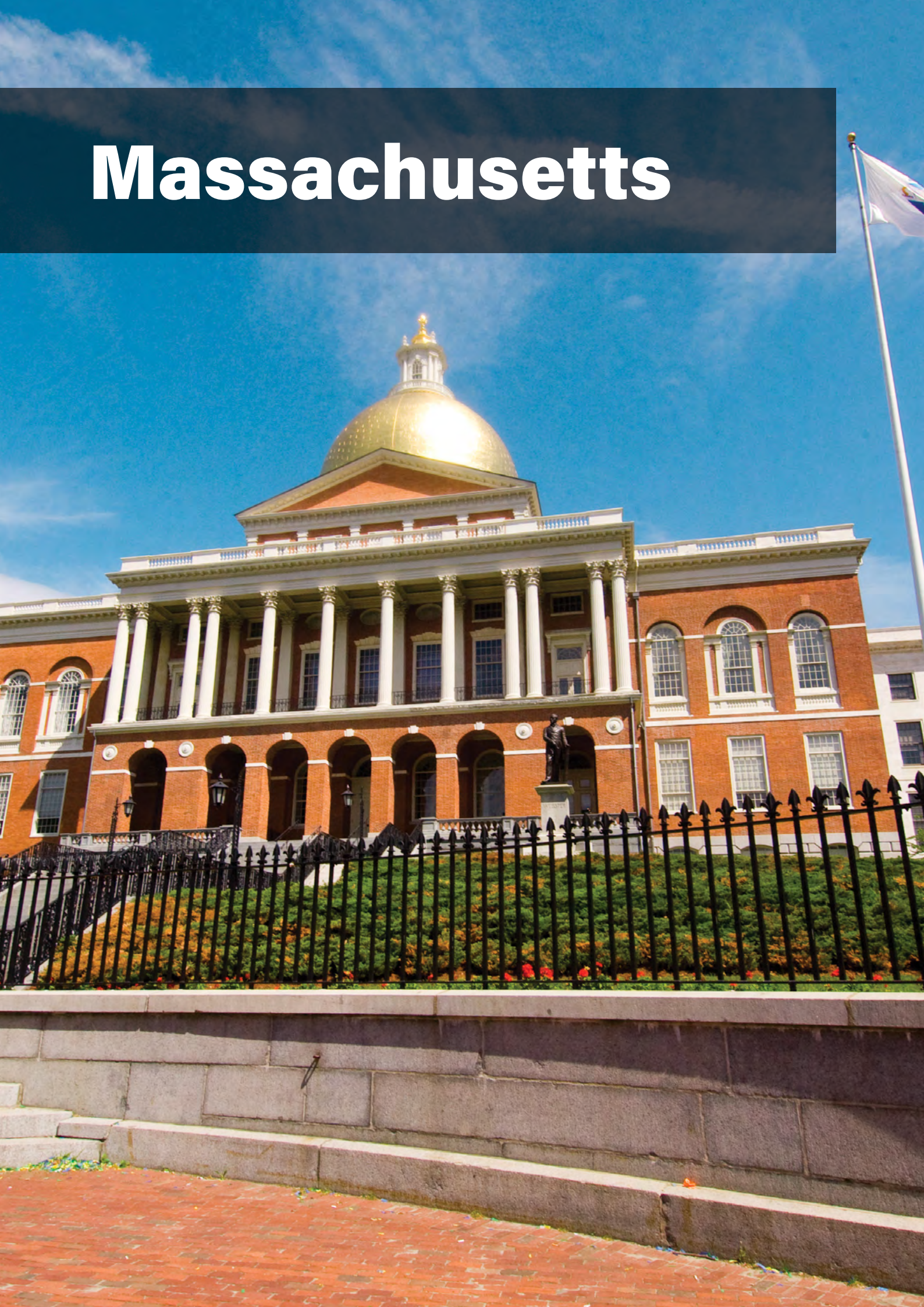
[261] Available from https://nycpublicschoolparents.blogspot.com/2012/11/the-ny-regents-approve-fourth-Gülen.html (last checked 5.15.17).

[262] Available from http://www.syracuse.com/schools/index.ssf/2016/11/syracuse_charter_school_gets_ok_from_state_to_open_a_second_location.html (last checked 5.27.17).

[263] Available from http://citylimits.org/2014/03/18/de-blasio-era-doesnt-discourage-bronx-charter-school-applicant/ (last checked 5.15.17)..

[264] Available from https://www.usatoday.com/story/news/watchdog/2017/02/17/state-charter-school-official-joins-ilearn/97952662/ (last checked 5.20.17).

Massachusetts



QUICK FACTS ON GÜLEN CHARTER SCHOOLS **MASSACHUSETTS**



NUMBER OF SCHOOLS	3  1 planned
KNOWN AS	**Pioneer Charter School of Science** **Hampden Charter School of Science**
TOTAL ENROLLMENT	**1,061**
TOTAL REVENUES	**$16,450,960**

RELATED INSTITUTIONS



Central Jersey College Prep Charter School

Arts & Science

Science & Technology



Chesapeake



Hampden

Pioneer



Academy of Science

KEY PEOPLE



Volkan Yesilyurt



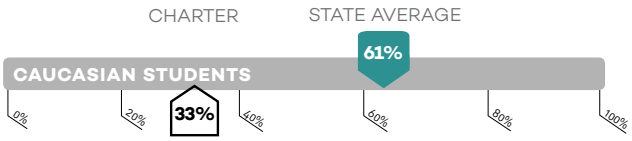
Necmi Atmaca



8 others

VULNERABLE STUDENT POPULATIONS





EXCESSIVE IMMIGRATION

86

H-1B VISA APPLICATIONS 2001-2016

$84K

Amount Pioneer spent on immigration fees for 34 teachers. Only four remained at the school from 2007 to 2013.

Source: Boston Globe, 2-21-13

SCHOOL APPLICATIONS DENIED

2006

College Preparatory School of Springfield

2012

Pioneer Charter School of Science III

2013

Pioneer Charter School of Science IV

FINANCIAL ISSUES

According to the applications of PCSS II and HCSS West, these new schools are supposed to reimburse the flagship schools (PCSS and HCSS) for professional management services. This structure essentially **allows PCSS and HCSS to contract with itself for charter management services and increases the likelihood of overpayments**. Numerous audits have found: Late-filed grant reports; Overstatement of transportation revenue requiring a correction of $105,978; and overstatement of surplus for PCSS and PCSS II by $24,571 and $65,302, respectively—among many other reporting inconsistencies and flaws.

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Northeast
- School Names (known as):
  - Pioneer Charter School of Science
  - Hampden Charter School of Science
- Total # of Schools in State: 3 charter schools open, 1 school scheduled to open in 2018
- Total Student Enrollment 2015-16: 1,061[1]
- Charter Holder/Governing Board(s):
  - Pioneer Charter School of Science
    - Organized as a special-purpose governmental entity
    - Operates 2 charter schools
  - Hampden Charter School of Science
    - Organized as a special-purpose governmental entity
    - Operates 1 charter school (1 future school scheduled to open in 2018)
- Charter Management Services Vendor: Pioneer Charter School of Science (Pioneer network); Hampden Charter School of Science (future Hampden network)
- Regional Gülen Organization Oversight Entity: Apple Educational Services, Inc.
- Regional Sister Networks: Chesapeake (MD); Hampden (MA); Pioneer (MA); Academy of Science (NY); Arts and Science (NJ); Science and Technology (NJ); Central Jersey College Prep Charter School (NJ).
- Total Revenues for the 2015-16 school year: $16,450,960[2]
- Network Founders:
  - Volkan Yesilyurt: Founder, Hampden Charter School of Science ("HCSS");[3] Petitioner, College Preparatory Charter School of Springfield;[4] Research Fellow, Children's Hospital Boston; currently Research Associate, David H. Koch Institute for Integrative Cancer Research at MIT.[5]
  - Necmi Atmaca: Founder, HCSS;[6] Treasurer and Founding President, The Turkish-American Society of Western Massachusetts, Inc.;[7] Corporate Budget Director, National Envelope Company; currently CEO, Atmaca Consulting.[8]
  - Tunzala Eynula: Founder, HCSS;[9] Founder and CEO, Dilaura Naturals; Trained at Azerbaijan State Oil Company (SOCAR).[10] Notably, TCAE, a Gülenist organization operated by Kemal Oksuz (affiliated with Harmony charter network in Texas), was investigated for organizing a trip for U.S. Congress members to Azerbaijan that was illegally paid for by SOCAR.[11]

1 Student enrollment and demographic information available at: http://tinyurl.com/m7dquln (last checked 5/9/2017).

2 Figure includes revenues of Hampden Charter School of Science, Pioneer Charter School of Science I, and Pioneer Charter School of Science II. The figures are taken from audits of these schools available through open records request to the Massachusetts Department of Elementary and Secondary Education (DESE).

3 HCSS Application, available through open records request to the Massachusetts DESE.

4 Martha A. Goldberg, Charter Science School in Final Round, Mass Live (Oct. 8, 2007), available at: http://tinyurl.com/k883qzc (last checked 5/9/2017).

5 Linkedin profile, available at: http://tinyurl.com/m6r7gc5 (last checked 5/9/2017).

6 HCSS Application, available through open records request to the Massachusetts DESE.

7 Corporate documents for this entity are available at: http://tinyurl.com/n2mqpq3 (last checked 5/9/2017).

8 Linkedin profile, available at: http://tinyurl.com/k8ekemt (last checked 5/9/2017).

9 HCSS Application, available through open records request to the Massachusetts DESE.

10 LinkedIn Profile available at: http://tinyurl.com/hwkmmbr (last checked 2/23/2017).

11 Article discussing SOCAR trip and ties to Kemal Oksuz and TCAE available at: http://tinyurl.com/gp47smh (last checked 2/23/2017).

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- Tuncay Bayrak: Founder, HCSS;[12] President, Turkish-American Society of Western Massachusetts, Inc.;[13] currently Professor, Western New England University.[14]
- Nurcan Civelek: Founder, PCSS; Director and Teacher, Ace It Education Center;[15] currently Teacher, Harmony (TX).[16]
- Fehmi Damkaci: Founder, PCSS; President, Syracuse Academy of Science (NY);[17] proposed President, Academy of Science and Citizenship Charter School (NY);[18] President, Terra Science & Education Inc. (NY), which serves as the landlord for Syracuse Academy of Science and engaged in transactions with interested persons due to Damkaci's overlapping roles;[19] currently Associate Professor, SUNY – Oswego.[20]
- Murat Kilic: Founder, PCSS; Founder and President, MNK Construction Consulting Inc.;[21] former President, Ace It Education d/b/a (sold Hampden Charter School of Science property to Apple);[22] Founder, Boston Dialog Foundation;[23] Petitioner, attempted Queen City Academy Charter School (ME);[24] Construction Consultant, Zurich Financial Services; currently Director of Forensic Delay Analysis and DSU Claims, Brashear Construction Consulting.[25] In an interview, Kilic admitted to reading books by Fethullah Gülen but simultaneously deflected questions about his connections in an example of strategic ambiguity.[26]
- Kadir Peker: Founder, PCSS; Vice President, Milkyway Education Center Inc. – Gülenist school vendor (NJ);[27] Former President, Ace It Education – HCSS landlord.[28]
- Carin Yasli: Founder, PCSS; Operations and Public Relations Coordinator, Boston Dialogue Foundation;[29] currently Vice President/Co-Owner, Camme Transportation, Inc.[30]

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12 HCSS Application, available through open records request to the Massachusetts DESE.

13 Corporate documents for this entity are available at: http://tinyurl.com/n2mqpq3 (last checked 5/9/2017).

14 Tuncay Bayrak Curriculum Vitae available at: http://tinyurl.com/l6y3vyx (last checked 5/9/2017).

15 Pioneer Charter School of Science ("PCSS") Application, available through open records request to Massachusetts DESE.

16 LinkedIn Profile available at: http://tinyurl.com/hwkmmbr (last checked 2/23/2017).

17 Syracuse Academy of Science 990s available at: http://tinyurl.com/nxto2sl (last checked 5/9/2017).

18 Matt Jarchow, Proposed Charter School Facing Criticism, Spectrum News (Oct. 11, 2016), available at: http://tinyurl.com/msxlfpg (last checked 5/9/2017).

19 Terra Science & Education Inc. 990s available at: http://tinyurl.com/n3zqvpy last checked 5/9/2017).

20 LinkedIn Profile available at: http://tinyurl.com/md2cn8f (last checked 2/23/2017).

21 Corporate documents for this entity are available at: http://tinyurl.com/lof39pu (last checked 5/9/2017).

22 Corporate documents for this entity are available at: http://tinyurl.com/n22enjc (last checked 5/9/2017); Turkish Cultural Center Boston, Mission and Vision, available at: http://tinyurl.com/n27a6ey (last checked 5/9/2017); see also Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

23 Corporate documents for this entity are available at: http://tinyurl.com/ml28bxv (last checked 5/9/2017).

24 Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

25 LinkedIn Profile available at: http://tinyurl.com/mqnh9uw (last checked 2/23/2017).

26 Colin Woodard, Proposed Bangor Charter School Linked to Turkish Imam, Portland Press Herald (Feb. 17, 2013), available at: http://tinyurl.com/glt9cwx (last checked 5/9/2017).

27 Milkyway Education Center Inc. 2005 990 available at: http://tinyurl.com/mdknvzx (last checked 5/15/2017).

28 Corporate documents for this entity are available at: http://tinyurl.com/n22enjc (last checked 5/9/2017).

29 Boston Dialogue Foundation, 3rd Peace and Dialogue Iftar Dinner (Feb. 18, 2014), available at: http://tinyurl.com/zsovdw5 (last checked 5/9/2017).

30 LinkedIn Profile available at: http://tinyurl.com/m2bv48h (last checked 2/23/2017); Corporate documents for this entity

Overview

As of the 2016-2017 school year, Massachusetts has 3 Gülen Organization charter schools in operation, with an additional school scheduled to open in 2018. These schools are overseen by separate governing boards. Pioneer Charter School of Science opened first in 2007, followed by the Hampden Charter School of Science in 2009, and Pioneer Charter School of Science II in 2014. Hampden Charter School of Science West is scheduled to open 2018. According to the charter applications of Hampden Charter School of Science West and Pioneer Charter School of Science II, they will reimburse the flagship schools for management services. These schools also contract with Apple Educational Services ("Apple"), the corporate entity responsible for the northeast region of the Gülen Organization charter networks. On average, these schools serve 22% English Language Learners vs. 20% state; 37% economically disadvantaged population vs. 30% state; 9% students with disabilities vs. 17% state; 29% African American students vs. 9% state; 33% Caucasian students vs. 61% state; and 28% Hispanic students vs. 19% state. As these numbers indicate, the Massachusetts network serves significantly less than the state average for students with disabilities, a vulnerable student population.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Pioneer Charter School of Science 51-59 Summer Street Everett, MA 01249	7 - 12 2007 - Present	34% ELL 38% Econ. Disadv. 08% SWD 30% African American 29% Caucasian 29% Hispanic	Massachusetts Dept. of Elementary and Secondary Education	Pioneer Charter School of Science
Hampden Charter School of Science 20 Johnson Road Chicopee, MA 01022	6 - 12 2009 - Present	5% ELL 42% Econ. Disadv. 08% SWD 25% African American 39% Caucasian 31% Hispanic	Massachusetts Dept. of Elementary and Secondary Education	Hampden Charter School of Science
Pioneer Charter School of Science II 97 Main Street Saugus, MA 01906	7 - 11 2013 - Present	26% ELL 29% Econ. Disadv. 12% SWD 35% African American 30% Caucasian 21% Hispanic	Massachusetts Dept. of Elementary and Secondary Education	Pioneer Charter School of Science
Hampden Charter School of Science West	6 - 12 Scheduled to open in 2018		Massachusetts Dept. of Elementary and Secondary Education	Hampden Charter School of Science
Closed Schools and/or Attempted Schools				
College Preparatory School of Springfield	*Application denied 2006*		*Massachusetts Dept. of Elementary and Secondary Education*	*Same proposed governing board as Hampden Charter School of Science*

are available at: http://tinyurl.com/k2jqvch (last checked 5/9/2017);

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Pioneer Charter School of Science III	*Application denied 2012*	*Massachusetts Dept. of Elementary and Secondary Education*	*Pioneer Charter School of Science*
Pioneer Charter School of Science IV	*Application denied 2013*	*Massachusetts Dept. of Elementary and Secondary Education*	*Pioneer Charter School of Science*

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "Econ. Disadv." indicates students that are economically disadvantaged, and "SWD" indicates students with disabilities.*[31]

A History of Strategic Ambiguity and Conflicting Interests

The Massachusetts network began with the founding of Pioneer Charter School of Science ("PCSS"), which opened in 2007. The second school, Hampden Charter School of Science ("HCSS"), opened two years later. PCSS expanded in 2013 and opened Pioneer Charter School of Science II ("PCSS II"). These schools are treated as special purpose government entities, unlike most Gülen governing boards that are incorporated as 501(c)(3) entities. A fourth school, Hamden Charter School of Science West ("HCSS West"), is scheduled to open in 2018.

Both schools are also closely connected to Ace It Education, Inc. ("Ace It"), a Gülenist cultural association located in Boston. PCSS's founders and directors significantly overlap with the founders and directors of Ace It, and HCSS rented its facility from Ace It until the end of 2012.[32] The CEO of PCSS, Barish Icin, even wrote a letter of support for the new Hampden campus discussing how Hampden and Pioneer had already collaborated in key areas, including governance structure, culture, and the establishment of a management structure and network office.[33] HCSS's 2009-10 Site Visit Report highlighted these Turkish connections, including connections to PCSS. The majority of school's board, administrators, and teachers were of Turkish descent, and the school offered Turkish as a foreign language. According to HCSS's charter application, the school planned to offer Spanish only, but the school offered Turkish instead without seeking to amend its charter.[34]

According to the applications of PCSS II and HCSS West, these new schools are supposed to reimburse the flagship schools (PCSS and HCSS) for professional management services. This structure essentially allows PCSS and HCSS to contract with itself for charter management services and increases the likelihood of overpayments.

HCSS has also leased its facility from two Gülenist entities since 2009. HCSS first leased its facility from Ace It. Ace It sold the property at the end of 2012 to Johnson Road Properties, Inc., which is controlled by the Northeast region's oversight entity, Apple.[35] By using public funds to acquire property but vesting the title in external, private entities, the Gülen Organization effectively finances its own private acquisition of property at the public's expense. While HCSS's revenues pay rent on its property, the property remains in the hands of Johnson Road Properties, Apple, and the Gülen Organization if the school's charter contract is revoked or non-renewed. In our view, this represents a lost

31 Student enrollment and demographic information available at: http://tinyurl.com/m7dquln (last checked 5/9/2017).

32 See the "*Real Estate*" and "*Gülenist Cultural Foundations*" sections, infra.

33 Hampden West charter application, Attachment II, pg 38.

34 HCSS 2009-10 Site Visit Report, available through open records request to the DESE.

35 Johnson Road Properties, Inc. 990s available at: http://tinyurl.com/nxasokm (last checked 5/12/2017).

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investment opportunity for public funds.

Financial Issues

Massachusetts requires its charter schools to undergo annual audits, which must be requested from the Massachusetts Department of Elementary and Secondary Education. These audits showcase a series of ongoing financial issues at the Pioneer and Hampden charter schools that are endemic to all Gülen Organization charter networks, including the same lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks.

The numerous audit findings occur across multiple years and at multiple schools, including:

- Lack of Compliance with Required Financial Procedures and Accounting Standards:
  - Lack of controls over financial statements preparation, including note disclosures, in accordance with generally accepted principles;
  - Limited adequacy of segregation of duties;
  - Late-filed grant reports;
  - Overstatement of transportation revenue requiring a correction of $105,978;
  - Overstatement of surplus for PCSS and PCSS II by $24,571 and $65,302, respectively;
  - Procurement officer lacked necessary certification;
  - Failure to comply with federal awards program requirements;
  - Failure to timely file federal reports; and
  - Failure to comply with grant requirements by failing to hire highly qualified teachers with grant funds.
- Inappropriate Lending Between Entities:
  - Inter-school lending and borrowing from PCSS to PCSS II for start up costs.[36]

Bond Financing

HCSS and PCSS have not procured any known municipal bonds. News reports state that PCSS II received bond financing related to its relocation to a new facility in 2014.[37] Bond documents for this issuance, however, could be not found. Apple and its affiliated landlord companies, however, have used bond financing for Gülenist charter schools in other states.

Real Estate

HCSS engages in the same type of suspect real estate dealings utilized by the Concept network and its affiliated real estate arm, New Plan Learning, throughout the Midwest; the Harmony network and its affiliated real estate arm, Charter School Solutions, in Texas; and the Dove Science network in Oklahoma. This model of questionable real estate deals depends on a related entity, also controlled by Turkish Gülenists, acquiring land and facilities and leasing it back to the Gülenist charter network at premiums.

HCSS originally leased its facilities from Ace

[36] These findings were taken from a review of school audits available through open records request to the Massachusetts DESE.

[37] John Laidler, *State bond aids charter school's plan for new site*, Boston Globe (Apr. 6, 2014), available at: (http://tinyurl.com/lt4l2oq (last checked 5/12/2017).

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It Education, Inc. (d/b/a Turkish Cultural Center Boston). Several PCSS founders and directors are affiliated with Ace It Education, including Kadir Peker, Mehmet Dogan, and Murat Kilic.[38] Ace It Education purchased the school in 2009 for $1 million. In December 2012, Ace It Education sold the property to Johnson Road Properties, Inc., which is controlled by Apple, for $1.5 million.[39] Between July 1, 2009, and June 30, 2012, HCSS paid approximately $1 million in rent to Ace It Education. In just three years, Ace It Education made a $1.5 million profit from HCSS's property.

HCSS continues to pay rent to Johnson Road Properties. Between July 1, 2012 (approximately six months prior to Johnson Road Properties' acquisition of the property), and June 30, 2016, HCSS paid $1,632,873 in rent. In just four years, HCSS paid more than enough in rent to cover Johnson Road Properties' acquisition of the HCSS property. HCSS is also scheduled to pay an additional $2,134,543 in rent through 2021 and a total of $8,519,892 through 2034. Since HCSS has already paid Johnson Road Properties enough rent to cover the cost of acquiring the property, these figures represent pure profit to Johnson Road Properties and Apple.[40]

This type of purposeful overpayment on leased properties is common throughout the Gülen Organization.[41] In fact, PCSS currently employs Huseyin Kara as its Chief Development Officer, a Gülenist formerly in leadership positions for both Apple and Concept Schools, two entities that have been found to engage in this real estate scheme elsewhere in the country.[42]

PCSS I and PCSS II lease facilities from seemingly unrelated entities.

Excessive use of the H-1B Visa Program

Like other Gülen Organization charter networks, HCSS and PCSS utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. From 2001-2016, these schools have filed 86 H-1B visa applications for foreign workers.[43] Although Barish Icin, then executive director of PCSS, has stated foreign teachers are hired due to a lack of math and science teachers,[44] these applications were filed for such positions as: dean of academics; IT systems administrator; educational, guidance, school, and vocational counselors; school business manager; high school guidance counselor; Turkish language teacher; education administrators; principal; accountant; financial analyst; and Spanish language teachers.[45]

The Massachusetts schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

38 *Compare* PCSS Final Application and Annual Reports available through open records request *with* Ace It Education 990s available at: http://tinyurl.com/mrpa6t8 (last checked 5/11/2017).

39 Johnson Road Properties, Inc. 990s available at: http://tinyurl.com/nxasokm (last checked 5/12/2017).

40 For additional information, see the Hampden Chicopee Property History chart.

41 *See, e.g.*, the Ohio and Illinois State Profiles; Jean Rimback, Jeff Pillets & Hannan Adely, *Sale of Charter School Property Boosts Private Academy*, NorthJersey (Feb. 16, 2017), available at: http://tinyurl.com/mkoky53 (last checked 5/12/2017); *see also* Ed Griffin-Nolan, *Exerting Influence*, Syracuse NewTimes (June 25, 2014), available at: http://tinyurl.com/kxoqryt (last checked 5/12/2017).

42 LinkedIn Profile available at: http://tinyurl.com/kq2o6kt (last checked 2/23/2017).

43 The sum total of all of their organizations is 86, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/kp4xu6a (31); http://tinyurl.com/l9f36bu (42). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (13) (last checked 1/30/2017).

44 Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

45 PCSS and HCSS, Jobs In Tech, available at: http://tinyurl.com/mcz5xgm (PCSS); http://tinyurl.com/k9uonj2 (HCSS) (last checked 5/9/2017).

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- Remzi Kulen: HCSS and PCSS used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Apple Educational Services, Inc. (Northeast)
  - Technotime Business Solutions, LLC (NJ)
  - Ace It Education (MA)
  - Boston Dialogue Foundation, Inc (MA)
  - Wellspring Cultural and Educational Foundation, Inc. (CT)
  - Maryland American Turkish Inhabitants, Inc. (MD)
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Horizon Science (OH, IL)
  - Noble Academy (OH)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Lehigh Dialogue Center (PA)
  - Red Rose Intercultural and Educational Foundation (PA)
  - Young Scholars (PA)
  - Truebright (PA)
  - Golden Generation Worship & Retreat Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Brooklyn Amity School (NY)
  - Peace Islands Institute (NY)
  - Rochester Academy Charter School (NY)
  - Arts and Science, Bergen, Passaic (NJ)
  - Central Jersey College Prep Charter School (NY)
  - Milkyway Education Center, Inc. (NJ)
  - Beehive (UT)[46]

A news report found that PCSS paid Kulen $40,534 for immigration-related services between 2008 and 2013.[47]

- Seth Leech: The Massachusetts schools used Leech, a New York-based attorney, to file numerous H-1B applications. Leech also filed applications for:
  - Little Scholars (AR)
  - Wellspring Cultural & Educational Foundation, Inc. (CT)
  - Pioneer (MA)
  - Hampden (MA)
  - Academy of Science, Syracuse, Buffalo, Utica (NY)
  - Rochester Academy Charter School (NY)
  - Central Jersey College Prep charter School (NJ)
  - Paterson Science and Technology; Central Jersey College Prep Charter School (NJ)
  - Arts and Science, Passaic (NJ)
  - Truebright (PA)
  - Young Scholars (PA)[48]

- Leonard D'arrigo: The Massachusetts schools used D'arrigo, a New York-based attorney, to file numerous H-1B applications. D'arrigo also filed applications for:
  - Little Scholars (AR)
  - Cosmos Foundation, Inc. (TX)
  - Central Jersey College Prep Charter School (NJ)
  - Millenium Education Foundation (now Frontier) (MO)
  - Hampden (MA)
  - Academy of Science, Syracuse (NY)
  - Rochester Academy Charter School (NY)
  - Arts and Science, Bergen (NJ)
  - Lehigh Dialogue Center (PA)

[46] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 4/14/2017).

[47] Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

[48] List of entities represented by Seth Leech, available at http://tinyurl.com/zlc7eql (last checked 4/14/2017).

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- ▷ Truebright (PA)
- ▷ Young Scholars (PA)[49]

- ► Joseph Yoo: The Massachusetts schools used Yoo, a New York-based attorney, to file H-1B applications. Yoo also filed H-1B applications for:
  - ▷ Milkyway Education Center, Inc. (NJ)
  - ▷ Hampden Charter School Of Science (MA)
  - ▷ Wellspring Cultural & Educational Foundation, Inc. (CT)
  - ▷ Michigan Math and Science (MI)
  - ▷ Turkish Cultural Center (NY)
  - ▷ Rochester Academy Charter School (NY)
  - ▷ Bergen Arts And Science Charter School (NJ)
  - ▷ Zaman Ltd. (NY)
  - ▷ American Turkish Friendship Association (VA)[50]

Scandals, Investigations & Notable Activities

Site visit reports prepared by the MA Department of Elementary and Secondary Education ("DESE") for HCSS detail governance and transparency concerns common among Gülen charter schools. HCSS's 2009-10 site visit report discusses teachers' concerns regarding a lack of transparency as to salaries, hiring and evaluation, and a schism between Turkish and non-Turkish teachers. Teachers reported that they were treated differently based on ethnic origin and gender. The governing board met infrequently and lacked a method to evaluate the school or its leader. The DESE also placed conditions on HCSS's charter in 2014. The school lacked processes for evaluating itself or the school's executive director and did not comply with Massachusetts' open meeting law. For these reasons, HCSS had to submit board meeting agendas and minutes to the DESE, its board had to attend web training on the open meeting law, select tools for evaluating its own performance and the school leader's performance, evaluate the school leader, and train on the responsibilities of a charter school board of trustees. The 2014 Summary of Review highlighted similar issues: failure to properly evaluate the school leaders, lack of planning and a lack of training for board members. HCSS's governance fell far below the standard required by its charter. In 2016, HCSS appeared to violate open meeting law in the process of hiring a new school director.[51] In our research, these transparency and governance concerns are common amongst Gülen charter schools and increase the difficulty of ascertaining the true state of the schools.

Concept Schools (the regional oversight entity for the Midwest) is currently involved in an ongoing FBI investigation concerning the collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[52] According to the FBI's search warrant application, Concept executives purportedly violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer allegedly directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work purportedly was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the

[49] List of entities represented by Leonard D'arrigo, available at http://tinyurl.com/kcb3kjq (last checked 4/14/2017).

[50] List of entities represented by Joseph Yoo, available at: http://tinyurl.com/k8ux2el (last checked 4/28/2017).

[51] HCSS 2009-10, 2014, and 2016 Site Visit Reports and 2014 Summary of Review, available through open records request to the MA DESE.

[52] Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

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subcontracts.[53] HCSS listed one of the vendors implicated in this ongoing investigation, The Core Group, as a vendor on a 2010 FCC Form 471 used for E-Rate funding.[54] For this reason, HCSS may have also been used as a vehicle for fraud.

Notable Turkish Vendors

- **Apple Educational Services, Inc. and Subsidiaries (Apple):** PCSS and HCSS have funneled large amounts of money to Apple and its subsidiaries through leases and other agreements.[55] Apple currently offers college entrance exam prep, events and contests, professional development, student database systems, testing, and tutoring services.[56] Apple operates Ivy Learning and Johnson Road Properties.[57] Ivy Learning's web site is currently under construction, but the old website—with significant portions written in Turkish—offered college test prep and counseling services.[58] HCSS uses Apple's student information system,[59] which is particularly alarming since Apple does not have a privacy policy posted on its website.[60]

- **Technotime Business Solutions (Technotime):** PCSS has done business with Technotime Business Solutions and ProAcademy (owned by Technotime).[61] Technotime installs computer networks, phone systems, surveillance equipment, and school bell and clock systems.[62] Technotime and ProAcademy's business dealings with the Syracuse Academy of Science have drawn scrutiny since the school did not comply with procurement procedures.[63] Syracuse Academy of Science applied for E-Rate funds and listed Technotime as the service provider in 2011. The funding request was denied.[64]

- **Lotus Media:** PCSS has done business with Lotus Media.[65] Lotus Media offers printing and advertising services.[66]

- **The Core Group:** HCSS listed The Core Group, Inc. as an E-Rate service provider

53 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

54 FCC Form 471, available at: http://tinyurl.com/mu89gll (last checked 5/15/2017).

55 Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

56 Services, Apple Educational Services, available at: http://tinyurl.com/k2pwes6 (last checked 5/5/2017).

57 Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017); Johnson Road 990s available at: http://tinyurl.com/msd2qy3 (last checked 5/5/2017).

58 Ivy Learning, available at: http://tinyurl.com/mrnd64w (last checked 5/5/2017); About Us, Ivy Learning, available at: http://tinyurl.com/mpovr9l (last checked 5/5/2017); Tutoring, Ivy Learning (written in Turkish), available at: http://tinyurl.com/ka6vytu (last checked 5/5/2017).

59 HCSS Student Information System, available at: http://tinyurl.com/kb4rmet (last checked 5/15/2017).

60 Privacy, Apple Educational Services, available at: http://tinyurl.com/kpcptxg (last checked 5/5/2017).

61 Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

62 Company Profile, Technotime Business Solutions, available at: http://tinyurl.com/mekn529 (last checked 5/12/2017).

63 Ed Griffin-Nolan, *Exerting Influence*, Syracuse NewTimes (June 25, 2014), available at: http://tinyurl.com/kxoqryt (last checked 5/12/2017).

64 E-Rate manager, New E-Rate Funding Decisions Report (2011), available at: http://tinyurl.com/kxa56h5 (last checked 5/12/2017).

65 Steven A. Rosenberg, *Turkish charter schools growing as some question cleric ties*, Boston Globe (Feb. 21, 2013), available at: http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

66 Lotus Media, available at: http://tinyurl.com/lceb7cz (last checked 5/23/2017).

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in a 2010 FCC Form 471.[67] The Core Group is currently under federal investigation as one of the vendors Concept, the regional Gülen oversight entity for the Midwest, purportedly used to defraud the E-Rate program.[68] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[69]

Gülenist Cultural Foundations

- **Ace It Education, Inc. (d/b/a Turkish Cultural Center Boston, Turkish Cultural Center Massachusetts, and Turkish Cultural Center Western Massachusetts) ("Ace It" or "TCC Boston"):** Ace It is considered a supporter of Gülen.[70] It has been listed as a member organization of the Council of Turkic American Associations ("CTAA"),[71] which is in turn a member of the Turkic American Alliance.[72] The Turkic American Alliance features editorials and written pieces by Fethullah Gülen.[73] The CTAA has sponsored Trips for Massachusetts politicians, including Patricia Haddad (Somerset), Ray Khan (Newton), Sarah Peake (Provincetown), and Gailanne Cariddi (North Adams).[74] Ace It hosts friendship dinners and organizes trips to Turkey.[75] It was originally incorporated as Friendship Foundation Inc., and it briefly changed its name to Turkish Cultural Center Boston, Inc. in 2009.[76] Ace It owned the facilities used by HCSS before it sold the property to Johnson Road Properties, a subsidiary of Apple. Many of PCSS's directors and founders have also served with Ace It, including Mehmet Dogan, Kadir Peker, and Murat Kilic.[77] One location, the Turkish Cultural Center Massachusetts, shares an address with the Boston Dialog Foundation—500 Revere St., Revere, Massachusetts.[78]

- **Peace Islands Institute:** The Peace Islands Institute, formerly The Interfaith Dialog Center, is openly Gülenist: Fethullah Gülen is the group's honorary president.[79] It is active throughout the northeast, with locations in Pennsylvania, Connecticut, Massachusetts, New Jersey, and New York.[80] The Peace Islands Institute works

67 FCC Form 471, available at: http://tinyurl.com/mu89gll (last checked 5/15/2017).

68 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

69 *Id.*

70 Laura Crimaldi & Vivian Wang, *News of Turkish Uprising Resonates in Boston*, Boston Globe (July 16, 2016), available at: http://tinyurl.com/n94oqjm (last checked 5/11/2017).

71 The Council of Turkic American Associations ("CTAA") website is currently under construction, but archived pages of CTAA's website list TCC Boston and TCC Western Massachusetts has member organizations, available at: http://tinyurl.com/kvsnhbt (last checked 5/12/2017).

72 Council of Turkic American Associations, Turkish American Association, available at: http://tinyurl.com/lemnjfd (last checked 5/11/2017).

73 Turkic American Alliance

74 Gintautas Dumcius, *Murray, Peake, Both on Junkets Overseas*, Cape Code Today (Sep. 25, 2014), available at: http://tinyurl.com/kkbqv2h (last checked 5/11/2017).

75 TCC Boston, About Us, available at: http://tinyurl.com/n8s9o9q (last checked 5/11/2017).

76 Corporate documents for this entity are available at: http://tinyurl.com/n22enjc (last checked 5/11/2017).

77 *Compare* PCSS Final Application and Annual Reports available through open records request *with* Ace It Education 990s available at: http://tinyurl.com/mrpa6t8 (last checked 5/11/2017).

78 *Compare* Locations, Turkish Cultural Center Boston, available at: http://tinyurl.com/kj758hj (last checked 5/11/2017) *with* Mission and Vision, Boston Dialog Foundation, available at: http://tinyurl.com/m3jsqr2 (last checked 5/11/2017).

79 Honorary President, Peace Islands Institute, http://tinyurl.com/kvkzbsf (last checked 4/17/2017).

80 *Id.*

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closely with other Gülen organizations to advocate with legislators on their behalf and also to coordinate junkets to Turkey.[81]

- **Boston Dialog Foundation:** The Boston Dialog Foundation shares an address with the Turkish Cultural Center Massachusetts, a d/b/a of Ace It.[82] PCSS directors and founders have also served with the Boston Dialog Foundation, including Murat Kilic and Mustafa Ozdemir.[83] The organization sponsors trips to Turkey.[84]

- **Turkish American Business Improvement & Development New England, Inc. ("TABID"):** TABID is a dissolved non-profit corporation created to encourage networking opportunities and professional development for Turkish businessmen. Levent Berksan served as an initial director and officer of TABID and later offered PCSS a start-up donation of $20,000.00.[85] Berksan also served as vice president of World Wireless, Inc., whose president, Mustafa Tolga Akbal, offered PCSS a start-up donation of $15,000.[86] TABID's officers and directors overlap with other Gülenist cultural associations. For example, Burhan Kaya and Huseyin Kocaman also worked with Ace It.[87] Bekir Senates and Okan Tanrisev also served as officers and directors of the Boston Dialog Foundation.[88]

Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Apple. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with these schools' Turkish employees.

- Burhan Kaya: Director Ace It;[89] Secretary, TABID;[90] Outreach Coordinator, Turkish Cultural Center Massachusetts (a d/b/a of Ace It); currently Director, Center for Global Affairs Peace Islands Institute.[91]

- Barish Icin: Executive Director, PCSS;[92] Founder, Thomas Edison EnergySmary Charter School; Founder/Operations

81 Jean Rimbach, Jeff Pillets & Hannan Adely, *Investigation: Charter School Leaders, Founders Linked to Controversial Turkish Cleric*, NorthJersey.com (Feb. 15, 2017) available at: http://tinyurl.com/lsny9ys (last checked 4/14/2017).

82 *Compare* Locations, Turkish Cultural Center Boston, available at: http://tinyurl.com/kj758hj (last checked 5/11/2017) *with* Mission and Vision, Boston Dialog Foundation, available at: http://tinyurl.com/m3jsqr2 (last checked 5/11/2017).

83 *Compare* PCSS Final Application and Annual Reports available through open records request *with* Ace It Education 990s available at: http://tinyurl.com/mrpa6t8 (last checked 5/11/2017).

84 Mary Lahaj, *An Introduction to Istanbul*, Boston Dialog Foundation (May 10, 2007), available at: http://tinyurl.com/kxdrv7t (last checked 5/9/2017), featured on Fethullan Gülen's own website at: http://tinyurl.com/mya2mw6 (last checked 5/9/2017).

85 Corporate documents for this entity are available at: http://tinyurl.com/knwvt3l (last checked 5/11/2017); PCSS Application available through open records request to MA DESE.

86 Corporate documents for this entity are available at: http://tinyurl.com/ky5t99m (last checked 5/11/2017); PCSS Application available through open records request to MA DESE.

87 Corporate documents for these entities are available at: http://tinyurl.com/knwvt3l (TABID) and http://tinyurl.com/n22enjc (Ace It) (last checked 5/12/2017).

88 Corporate documents for these entities are available at: http://tinyurl.com/knwvt3l (TABID) and http://tinyurl.com/ml28bxv (Boston Dialog Foundation) (last checked 5/12/2017).

89 Ace It Education 990s available at: http://tinyurl.com/mrpa6t8 (last checked 5/11/2017).

90 Corporate documents for this entity are available at: http://tinyurl.com/knwvt3l (last checked 5/11/2017).

91 LinkedIn Profile available at: http://tinyurl.com/lzu2uga (last checked 2/23/2017).

92 PCSS Annual Report 2013, available through open records request to MA DESE.

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Manager/Math Teacher, Central Jersey College Prep Charter School (NJ).[93]

- Huseyin Kara: Incorporator, Horizon Science Academy – Lorain, Inc. (OH);[94] incorporator, Horizon Science Academy – Denison Middle School, Inc. (OH);[95] incorporator, Rumi Foundation – Gülenist cultural organization (OH);[96] President/CEO, Concept Schools; Executive Director Apple; Chief Development Officer, PCSS.[97]

- Ahmet Gunay: Applicant, First State Math and Science Application; Founder, Rochester Academy of Science (NY);[98] Director, Hampden (MA);[99] Teacher, Putnam Science Academy (CT); Applicant, Hampden Charter School of Science West (MA);[100] currently Post-Doctoral Fellow, Worcester Polytechnic Institute.[101]

- Volkan Efe: Director, PCSS;[102] Author, The Fountain Magazine – a Gülenist publication;[103] currently Senior Research Engineer, Humatics Corporation.[104]

- Tarcan Topcuoglu: Chief Education Officer, Central Jersey College Prep Charter School (NJ);[105] Vice Principal, Putnam Science Academy (CT);[106] currently Director, HCSS.[107]

- Aziz Aghayev: Business Manager, Truebright Science Academy (PA) (closed due to academic underachievement);[108] CFO, PCSS I and II.[109]

- Harun Celik: Project Coordinator, Bergen Arts and Science Charter School (NJ); Executive Director, HCSS; Director, Passaic Arts and Science Charter School.[110]

- Nuh Gedik: Director, Magnolia (CA);[111] Author, The Fountain Magazine – a Gülenist publication;[112] Director,

93 PCSS II Application available through open records request to MA DESE; Boston College Lynch Leadership Academy, available at: http://tinyurl.com/lrtd5wx (last checked 5/15/2017).

94 Corporate records for this entity are available at: http://tinyurl.com/n7jutsn (last checked 5/15/2017).

95 Corporate records for this entity are available at: http://tinyurl.com/n73qdad (last checked 5/15/2017).

96 Corporate records for this entity are available at: http://tinyurl.com/l6udoxy (last checked 5/15/2017).

97 LinkedIn Profile available at: http://tinyurl.com/kq2o6kt (last checked 2/23/2017).

98 First State Math and Science Academy Charter School Application, available at: http://tinyurl.com/mq2vh6n (last checked 5/4/2017).

99 This information is taken from the 2013-14 Annual Report for the Hampden Charter School of Science, available through open records request.

100 Hampden Charter School of Science West Application (Nov. 1, 2016), available at: http://tinyurl.com/mjea8bb (last checked 5/5/2017).

101 Linkedin profile, available at: http://tinyurl.com/mqehbcp (last checked 4/30/2017).

102 PCSS Annual Reports available through open records request.

103 Volkan Efe, *Hear to Heal: A New Approach to the Healing Power of Sufi Music*, The Fountain Magazine (Aug. 2015), available at: http://tinyurl.com/kb9v2mw (last checked 5/15/2017).

104 LinkedIn Profile available at: http://tinyurl.com/n5op8cu (last checked 5/12/2017).

105 LinkedIn Profile available at: http://tinyurl.com/m38clq3 (last checked 5/12/2017).

106 LinkedIn Profile available at: http://tinyurl.com/msa6tma (last checked 5/12/2017).

107 Welcome Message, Hampden Charter School of Science, available at: http://tinyurl.com/lwx7ubq (last checked 5/12/2017).

108 *See* the Pennsylvania State Profile.

109 LinkedIn Profile available at: http://tinyurl.com/mh728w7 (last checked 5/12/2017).

110 LinkedIn Profile available at: http://tinyurl.com/hyo2htt (last checked 5/12/2017).

111 Dialog Cultural Scientific and Educational Foundation (future Magnolia Educational & Research Foundation) 2007 990 available at: http://tinyurl.com/z33bpsv (last checked 5/15/2017); Magnolia Science Academy Preliminary Recommendation: Approval, Los Angeles Unified School District, available at: http://tinyurl.com/mtjbdej (last checked 5/12/2017).

112 Nuh Gedik, The Fountain available at: http://tinyurl.com/l3buerl (last checked 5/12/2017).

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PCSS;[113] currently Associate Professor, Massachusetts Institute of Technology.[114]

- Yavuz Keskin: Math Teacher, PCSS; Dean of Academics, HCSS; Dean of Academics, PCSS.[115]
- Erhan Ozduran: Business Manager, HCSS;[116] Budget Accountant, Harmony (TX).[117]
- Emrullah Durmaz: Dean of Academics, Truebright Science Academy; Principal, Putnam Science Academy (CT); CEO, Apple (Northeast region);[118] CEO Johnson Road Properties.[119]

Notable Articles regarding the Massachusetts Network

- Fox, Jeremy C. *Charter School Is Approved Despite Claims of Ties to Turkish Cleric*. Boston Globe. 28 February 2017 (discussing the approval of HCSS West in spite of allegations of connections to Fethullah Gülen).[120]
- Laidler, John. *State bond aids charter school's plan for new site*. Boston Globe. 6 April 2014 (discussing PCSS II's facility, including $2.8 million in state financing).[121]
- Icin, Barish. *Everett school serves all and isn't guided by any religious network*. Boston Globe. 25 February 2013 (editorial by PCSS executive director) (denying any connection to Gülen as an example of strategic ambiguity).[122]
- Leighton, Paul. *State approves controversial charter school*. The Salem News. 27 February 2013 (discussing connections to Gülen and approval of PCSS II).[123]
- Rosenberg, Steven A. *Turkish charter schools growing as some question cleric ties*. Boston Globe. 21 February 2013. (discussing expansion of PCSS, citing a PCSS as denying any connections to Gülen; stating PCSS spent $84,215 on immigration fees for 34 teachers, only 4 of whom remained at the school, between 2007 and 2013; stating PCSS paid Apple Educational Services more than $128,600 for consulting work; stating Remzi Kulen received $40,534 in immigration fees; and Turkish-run companies like Ivy Learning (owned by Apple), Technotime Business Solutions, Proacademy (owned by Technotime), and Lotus Media received $218,646 from Pioneer).[124]
- Laidler, John. *Everett school gets OK, but not to grow*. Boston Globe. 5 February 2012 (discussing renewal of PCSS).[125]
- *See also* Woodard, Colin. *Proposed Bangor Charter School Linked to Turkish Imam*,

113 PCSS Annual Reports available through open records request.

114 Nuh Gedik Curriculum Vitae available at: http://tinyurl.com/mve8ypq (last checked 5/12/2017).

115 LinkedIn Profile available at: http://tinyurl.com/kng7qmd (last checked 5/12/2017).

116 FCC Form 471, available at: http://tinyurl.com/mu89gll (last checked 5/15/2017).

117 LinkedIn Profile available at: http://tinyurl.com/kcl6xhj (last checked 5/12/2017).

118 Emrullah Durmaz, LinkedIn, available at: http://tinyurl.com/n9yvzvu (last checked 4/17/2017).

119 Corporate documents for this entity are available at: http://tinyurl.com/jvp5sjw (last checked 5/23/2017).

120 http://tinyurl.com/lt4l2oq (last checked 5/12/2017).

121 http://tinyurl.com/zy9wwrx (last checked 5/12/2017).

122 http://tinyurl.com/z5vhyql (last checked 5/12/2017).

123 http://tinyurl.com/hy64pgz (last checked 5/12/2017).

124 http://tinyurl.com/zgmh8pd (last checked 5/8/2017).

125 http://tinyurl.com/zf9zxxr (last checked 5/8/2017).

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Portland Press Herald. 17 February 2013 (discussing the Queen City Academy Charter School in Maine proposed by Murat Kilic of PCSS discussing the methods and tactics used by Gülenists, including strategic ambiguity).[126]

[126] http://tinyurl.com/glt9cwx (last checked 5/9/2017).

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HAMPDEN CHICOPEE

Property History

Year	Rent Paid	LESSEE: HCSS Board Members	LESSOR: Ace It Education (Board, Officers)	LESSOR: Johnson Road Properties (Inc. 2012)	LESSOR: Apple Educational Services (Inc. in MA in 2012)
On August 18, 2009, Ace It Education purchased the HCSS Chicopee property for $1 million dollars from the Lower Pioneer Valley Education Corporation, an unaffiliated third party. HCSS immediately occupied the building and began renting from Ace It Education, affiliated with several of HCSS's founding board members, as well as Pioneer board members.					
2010	$260,800 paid	Volkan Yesilyurt Nigar Khan Huseyin Oktay Zully Dinc Deirdre Vinyard Pinar Karaaslan Elmira Usmonova	Zafer Sahinoglu Arif Yilmaz Sevda Porikli Servet Tatli Nesrin Tatli Huseyin Kocaman		
2011	$342,520 paid $295,000 anticipated (per HCSS audit)	Volkan Yesilyurt Nigar Khan Huseyin Oktay Zully Dinc Pinar Karaaslan Hasan Arslan Halil Mutlu Lynn Mutlu	Zafer Sahinoglu Arif Yilmaz Nesrin Tatli Huseyin Kocaman Burhan Kaya Murat Mutlu		
2012	$394,114 paid $330,000 anticipated (per HCSS audit)	Volkan Yesilyurt Nigar Khan Huseyin Oktay Zully Dinc Pinar Karaaslan Hasan Arslan Halil Mutlu Lynn Mutlu Bahadir Akcam	Zafer Sahinoglu Arif Yilmaz Nesrin Tatli Huseyin Kocaman Burhan Kaya Murat Mutlu	Mesut Sahin Melih Yildirim Faruk Apaydin (sometimes spelled Paruk Apaydim) Arthur Gallant Andrea Baykir	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Melih Yildirim
December 14, 2012, Ace It Education sold the HCSS property to Johnson Road Properties, a wholly owned subsidiary of Apple Educational Services, for $1.5 million. HCSS began paying rent to Johnson/Apple.					
2013	$431,780 paid $365,000 anticipated (per HCSS audit)	Unavailable	Arif Yilmaz Nesrin Tatli Huseyin Kocaman Burhan Kaya Yusuf Konuk Umit Tapan	Mesut Sahin Melih Yildirim Faruk Apaydin (sometimes spelled Paruk Apaydim) Arthur Gallant Andrea Baykir	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Melih Yildirim

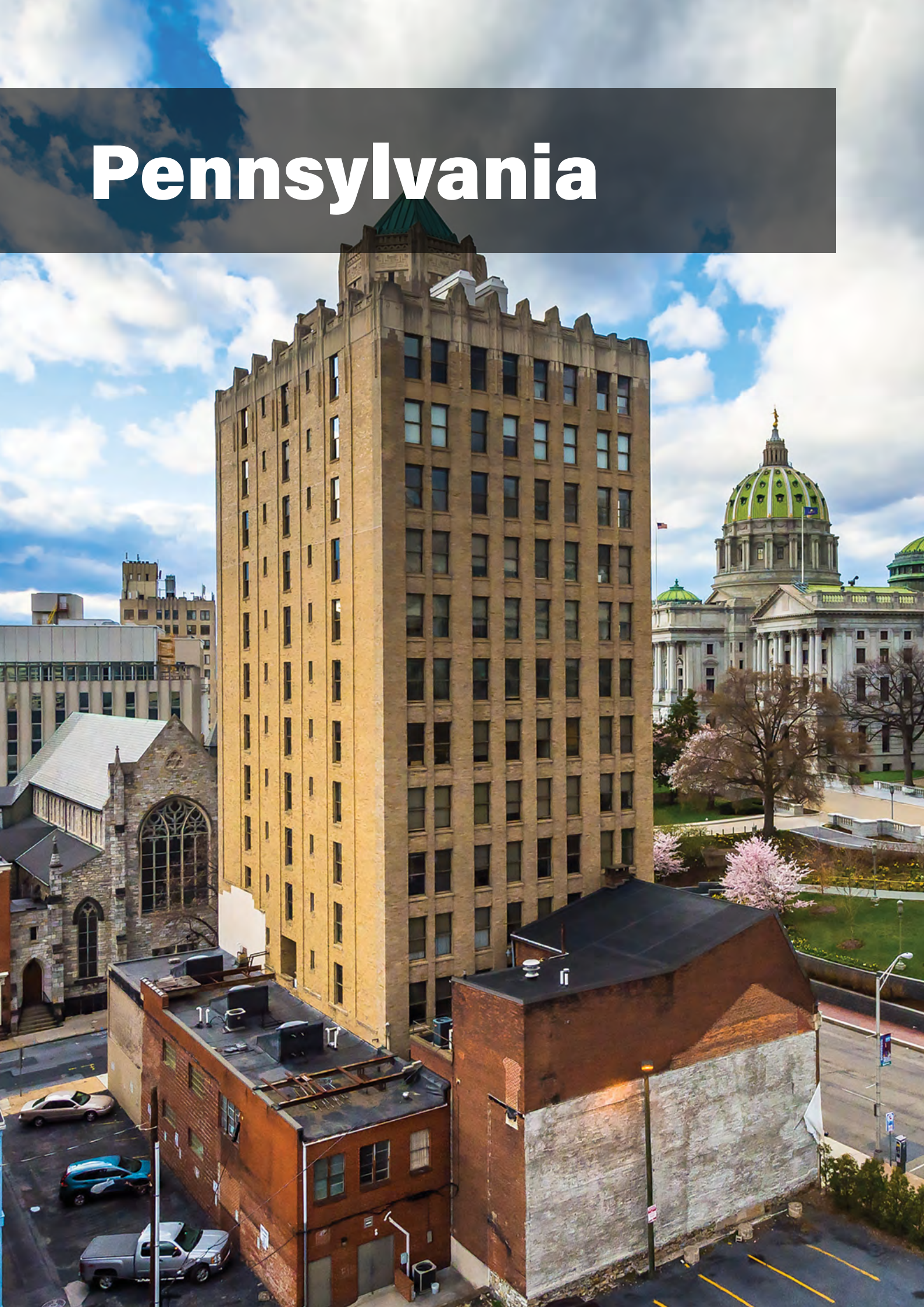
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Year	Rent Paid	LESSEE: HCSS Board Members	LESSOR: Ace It Education (Board, Officers)	LESSOR: Johnson Road Properties (Inc. 2012)	LESSOR: Apple Educational Services (Inc. in MA in 2012)
2014	$431,780 paid, anticipated (per HCSS audit)	Volkan Yesilyurt Nigar Khan Zully Dinc Pinar Karaaslan Bahadir Akcam Ahmet Gunay Diane Hunter	Arif Yilmaz Nesrin Tatli Huseyin Kocaman Burhan Kaya Umit Tapan Alper Corlu	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Arthur Gallant Alper Anil	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Melih Yildirim
2015	$378,972 paid, $375,982 anticipated (per HCSS 2014 audit)	Volkan Yesilyurt Nigar Khan Zully Dinc Pinar Karaaslan Bahadir Akcam Ahmet Gunay Diane Hunter	Erkan Ertosun Arif Yilmaz Huseyin Kocaman Burhan Kaya Umit Tapan	Mesut Sahin Paruk Apaydim Arthur Gallant Alper Anil	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Alper Anil
2016	$390,341 anticipated (per HCSS 2015 audit)	Volkan Yesilyurt Nigar Khan Zully Dinc Pinar Karaaslan Bahadir Akcam Ahmet Gunay Diane Hunter	Erkan Ertosun Huseyin Kocaman Burhan Kaya Alper Corlu	Faruk Apaydin (sometimes spelled Paruk Apaydim) Arthur Gallant Alper Anil Emrullah Durmaz Hasan Erkan	Mesut Sahin Faruk Apaydin (sometimes spelled Paruk Apaydim) Alper Anil

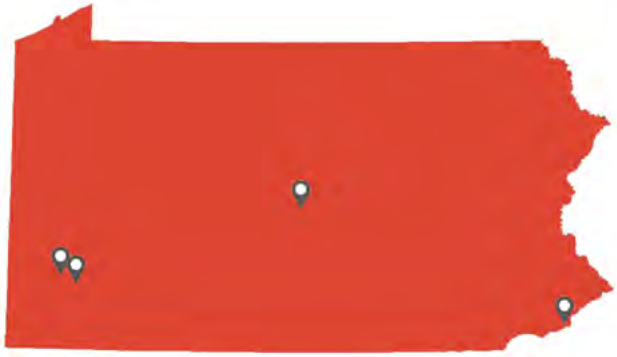
Prospective Rents: Per the HCSS 2015 audit, HCSS will pay Johnson/Apple: 2017 - $402,051; 2018 – $414,112; 2019 - $426,536.

Total Rents: From 2013-2016, HCSS paid Apple over $1.6 million in rent, more than the purchase price of the building. From 2013-2019, HCSS will have paid Apple $2.9 million in rent, with Apple securing $1.4 million profit in just six years' of renting to HCSS. HCSS had already paid its other affiliated landlord, Ace It Education, $1 million in rent. With the sale of the property to Apple at $1.5 million, Ace It Education made a $1.5 million profit off of HCSS.

Pennsylvania



QUICK FACTS ON GÜLEN CHARTER SCHOOLS PENNSYLVANIA



NUMBER OF SCHOOLS	4
KNOWN AS	YOUNG SCHOLARS VISION ACADEMY
TOTAL ENROLLMENT	912
CHARTER VENDOR	APPLE EDUCATIONAL SERVICES, INC.
TOTAL REVENUES	$12,545,382.74

RELATED INSTITUTIONS



Central Jersey College Prep Charter School

Arts and Science

Science and Technology



Chesapeake



Hampden

Pioneer



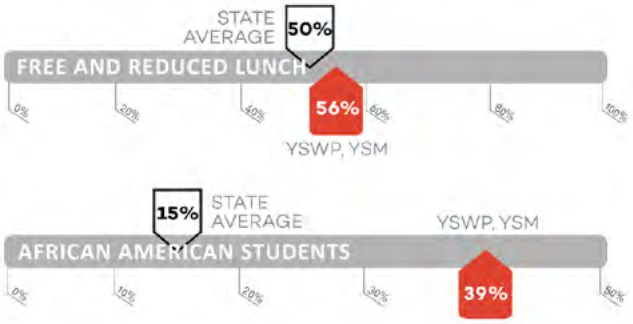
Academy of Science

KEY PEOPLE



Riza Ulker | Bulent Tarman | Adem Oksuz | Ismail Ozgur Zembat | Gulseren Karagoz Akar | Burcin Ogrenir

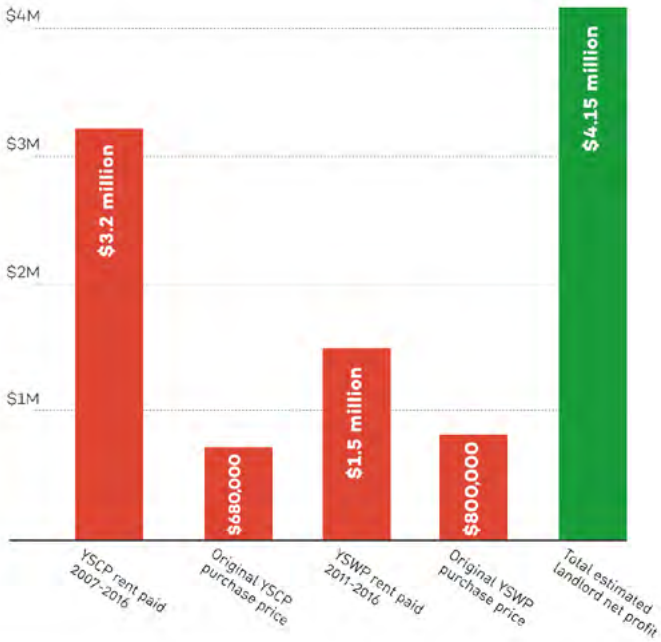
VULNERABLE STUDENT POPULATIONS



APPLICATIONS, REJECTIONS, SUSPECTED FRAUD

Gülen-linked schools have since been rejected twice in Millcreek Township, and five times under three different names in Allentown school district, and three times in Lancaster. The Academy of Business and Entrepreneurship Charter School ("ABECS") has been criticized for re-using the same applications, and suspected fraud and forgery to create the appearance of community support.

PROPERTY SCAMS



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Northeast
- School Names (known as):
  - Young Scholars
  - Vision Academy
- Total # of Schools in State: 4 charter schools open, 1 charter school closed, 1 private school closed
- Total Student Enrollment 2015-16: 912[1]
- Charter Holder/Governing Board(s):
  - Young Scholars of Central Pennsylvania
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school
  - Young Scholars of Western Pennsylvania
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school
  - Young Scholars of McKeesport
    - Operates 1 charter school
  - Vision Academy
    - Operates 1 charter school
- Charter Management Services Vendor: Apple Educational Services, Inc.
- Regional Gülen Organization Oversight Entity: Apple Educational Services, Inc. ("Apple")
- Regional Sister Networks: Chesapeake (MD); Hampden (MA); Pioneer (MA); Academy of Science (NY); Arts and Science (NJ); Science and Technology (NJ); Central Jersey College Prep Charter School (NJ).
- Total Revenues for the 2015-16 school year: $12,545,382.74[2]
- Network Founders:
  - Riza Ulker: Co-authored a paper with fellow PA founder Bulent Tarman while both attended Penn State University;[3] registered the name "Snowdrop School"; Acting director, Snowdrop Elementary School – Gülenist private school (PA);[4] Board member, Young Scholars of Central Pennsylvania (PA);[5] President, Dream Schools, Inc. – Gülenist landlord entity (PA);[6] CEO, Truebright Science Academy (PA);[7] Left Truebright in March 2011 in the midst of turmoil surrounding the school's charter renewal to teach at Zirve University in Turkey;[8] Petitioner,

1 Student enrollment and demographic information available at: http://tinyurl.com/k68mkgj, http://tinyurl.com/ka37232 (last checked 04/11/2017). The Pennsylvania Department of Education provided supplemental information on request.

2 Figure includes revenues of Vision Academy, Young Scholars of Central Pennsylvania, Young Scholars of Western Pennsylvania, and Young Scholars of McKeesport, figures available through open records request (last checked 04/16/2017).

3 Young Scholars of Central Pennsylvania Charter School's application, with founders' biographies, was made available through an open records request to the Pennsylvania Department of Education [YSCP Open Records Request, part 13 at 2-5, 26-30].

4 Pennsylvania Corporate Records, available at: http://tinyurl.com/z6ogbfd; Jacqueline Shoyeb, *Muslim Elementary School Opening Tomorrow in Monroeville*, Pittsburgh Post-Gazette (Sep. 5, 2005) available at: http://tinyurl.com/mxzjebr (last checked 4/12/2017); Mary Niederberger and Rich Lord, *Some Practices Questioned at Baldwin Charter School*, Pittsburgh Post-Gazette (Sep. 4, 2011), available at: http://tinyurl.com/ky9bx7v (last checked 4/12/2017).

5 Young Scholars of Central Pennsylvania 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017).

6 Dream Schools, Inc., 2005-2007 990s, available at: http://tinyurl.com/luskcjd (last checked 4/17/2017).

7 Young Scholars of Central Pennsylvania, 2005-2010 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017); Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017).

8 Compare Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012) (board minutes state Ulker left to address family issues), available at: http://tinyurl.com/nysuuuy (last checked

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Allentown Science Academy (PA);[9] Adjunct professor, Manchester Community College (NH).[10]

- Bulent Tarman: Attended Penn State University and co-authored a paper with fellow PA founder, Riza Ulker;[11] Tarman Founding Vice President and Secretary of Dream Schools, Inc. - Gülenist landlord entity (PA);[12] Board Member, Young Scholars of Central Pennsylvania (PA);[13] Teacher, Selcuk University, Necmettin Erbakan University, and Gazi University (Turkey);[14] Employee, Justice Academy of Turkey, Tubitak (a known Gülenist research institute), the Ministry of Labour and Social Security, the Turkish National Agency;[15] currently Editor in Chief, Journal of Social Studies Education Research in Turkey.[16]
- Adem Oksuz: Founding CEO, Vision Academy (PA); Regional Director, Apple Education Services – Gülenist vendor (Northeast Region)[17]; CEO, Daisy/Sonoran Schools (AZ)[18]; CEO, Accord – Gülenist vendor (Western Region)[19]; Petitioner, failed Mokapu STEM charter school (HI); Petitioner, Lancaster Science Academy proposal (PA);[20] Educational consultant, ABECS charter application (PA).[21]
- Ismail Ozgur Zembat: Attended Penn State University;[22] Teacher, Hacettepe University in Turkey; Teacher, United Arab Emirates University in Abu Dhabi; currently Teacher, Mevlana University in Turkey.[23]
- Gulseren Karagoz Akar: Student, Middle East Technical University - Gülenist university; Student, Pennsylvania State University;[24] currently Teacher, Bogazici University – Gülenist University.[25]
- Burcin Ogrenir: Student, Middle East Technical University – Gülenist university; Student, Pennsylvania State University;[26] Volunteer, West

4/15/2017), with Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017) (Ulker began teaching at Zirve University in March 2011 in Turkey).

9 Steve Esack, *Allentown School Directors Question Charter School Applicant's Ties to Gülen Movement*, The Morning Call (Dec. 16, 2012) available at: http://tinyurl.com/l9fxrbs (last checked 4/15/2017).

10 Riza Ulker, LinkedIn, available at: http://tinyurl.com/jvnkx7b (last checked 4/17/2017).

11 Young Scholars of Central Pennsylvania Charter School's application, with founders' biographies, was made available through an open records request to the Pennsylvania Department of Education [YSCP Open Records Request, part 13 at 2-5, 26-30].

12 Dream Schools, Inc., 2007 990, available at: http://tinyurl.com/nxala87 (last checked 4/17/2017).

13 Young Scholars of Central Pennsylvania, 2005-2011 990s, available at: http://tinyurl.com/lz23php (last checked 4/17/2017).

14 Bulent Tarman, LinkedIn, available at: http://tinyurl.com/mgj4jq5 (last checked 4/17/2017).

15 Id.

16 Id.

17 Oksuz resume available at page196, http://tinyurl.com/hrzqv5r (last checked 1/30/2017).

18 See 2003 Daisy Education 990 tax form, available at: http://tinyurl.com/jjcrxh9 (last checked 2/15/2017).

19 Accord Business profile listing Oksuz as CEO, available at: http://tinyurl.com/hc7v9lm (last checked 2/15/2017).

20 Information taken from: Article discussing petition and Oksuz, available at: http://tinyurl.com/hxsmlvw (last checked 2/15/2017); Application for Grants under the Charter Schools Program (CSP); Grants to Non-SEAs; Planning Program Design, Implementation, U.S. Dep't of Education (Oct. 6, 2015), available at http://tinyurl.com/lhhw3f6 (last checked 4/17/17).

21 Gil Smart, *Academy of Business & Entrepreneurship Charter School Has Eye on Lancaster City*, LancasterOnline (Nov. 4, 2012), available at http://tinyurl.com/hxsmlvw (last checked 4/15/2017).

22 Ismail Ozgur Zembat, Curriculum Vitae, available at: http://tinyurl.com/mewalpj (last checked 4/17/2017).

23 Id.

24 Gulseren Karagoz Akar, Bogazici University, available at: http://tinyurl.com/lagortg (last checked 4/17/2017).

25 Id.

26 Burcin Ogrenir, LinkedIn, available at: http://tinyurl.com/lgk7r3h (last checked 4/17/2017).

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Penn Cultural Center – Operator of Snowdrop School – private Gülenist school (PA);[27] currently Teacher, Bahcesehir University in Istanbul; currently Owner, April Institute in New Jersey.[28]

Overview

As of the 2016-2017 school year, Pennsylvania has four Gülen Organization charter schools in operation. These schools are overseen by four separate governing boards. Young Scholars of Central Pennsylvania ("YSCP") was the first Gülenist charter school in 2005. Two more Gülenist "Young Scholars" schools subsequently spun out off of YSCP: Young Scholars of Western Pennsylvania ("YSWP") and Young Scholars of McKeesport ("YSM"). Gülenists also opened Vision Academy Charter School in 2015 ("Vision Academy"). YSWP, YSM, and Vision all contract with Apple Educational Services, Inc. ("Apple"), the corporate entity responsible for the north-east region of the Gülen Organization charter networks, for their Student Information Systems. On average, these schools serve approximately 5% English Language Learners vs. 3% state average; 56% free and reduced lunch population vs. 50% state; approximately 9% special education vs. 16% state; 39% African American students vs. 15% state; approximately 48% Caucasian students vs. 67% state; and approximately 4% Hispanic students vs. 10% state.[29]

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Young Scholars of Central Pennsylvania 1530 Westerly Parkway, State College, PA 16801	K-8 2005-Present	07% ELL 26% FRL 09% SWD 06% African American 72% Caucasian 04% Hispanic	State College Area School District	Young Scholars of Central Pennsylvania
Young Scholars of Western Pennsylvania 600 Newport Drive Pittsburgh, PA 15234	K-8 2011-Present	05% ELL 61% FRL 15% SWD 27% African American 65% Caucasian 04% Hispanic	Baldwin-Whitehall School District	Young Scholars of Western Pennsylvania
Young Scholars of McKeesport 413 Shaw Ave. McKeesport, PA 15132	K-5 (growing to K-8) 2015-Present	00% ELL 90% FRL ≤13% SWD 84% African American ≤13% Caucasian ≤13% Hispanic	McKeesport Area School District	Young Scholars of McKeesport

[27] YSCP Open Records Request, part 13 at 2-5, 26-30

[28] Id.

[29] Some percentages are approximates due to data masking of low demographic counts by the Pennsylvania Department of Education.

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Vision Academy Charter School 41 E Baltimore Avenue Landsdowne, PA 19050	K-5 (growing to K-8) 2015-Present	≤02% ELL 86% FRL ≤05% SWD 92% African American ≤05% Caucasian ≤05% Hispanic	William Penn School District	Vision Academy Charter School
Closed and/or Attempted Schools				
Truebright Science Academy 407 E Roosevelt Blvd. Philadelphia, PA 19120	7-12 2007-2015 Failure to meet academic requirements		School District of Philadelphia	Truebright Science Academy Charter School
Snowdrop Elementary School 233 Seaman Lane Monroeville, PA 15146	2005-2009 Low enrollment		Private School	Snowdrop School
Academy of Business and Entrepreneurship Charter School	Application denied in 2014 for failure to show school would provide a complete learning experience, insufficient special education planning, develop teachers, lack of community support.		School District of Lancaster	
Erie Biosciences Academy	Application denied in 2013 due to safety concerns with the facility and curriculum concerns.		Millcreek Township School District	
Allentown Engineering Academy Charter School	Application denied in 2012 and 2013 due to low community support, potentially inappropriate admissions policy, and failure to show a comprehensive learning experience.		Allentown School District	
Allentown Science Academy	Application denied in 2011 due to a lack of community support, concerns about teaching staff, academic rigor, and a lack of passion.		Allentown School District	Allentown Science Charter School, Inc.
Lancaster Science Academy	Application denied in 2008 for curriculum issues, underfunding, and inability to meet the needs of special education and ELL students.		School District of Lancaster	

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Capital Academy of Harrisburg	Application denied in 2006 due to a lack of community support, failure to provide a comprehensive learning experience, lack of quality curriculum, an insufficient financial plan, and failure to comply with charter law.		Harrisburg School District	
Lehigh College Prep Charter School	Application denied in 2006 and 2009; denied in 2009 application due to a lack of sustainable support.		Allentown School District	
Erie Biosciences Academy	Application denied in 2013 due to safety concerns with the facility and curriculum concerns.		Millcreek Township School District	
Young Scholars of Central Pennsylvania Bellefonte	Application denied in 2006 due to lack of strategy, lack of facility, and impractical assumptions		Bellefonte Area School District	

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.*[30]

A History of Strategic Ambiguity and Conflicting Interests

Fethullah Gülen moved to Pennsylvania in 1999 and lives at the Golden Generation Worship and Retreat Center in Saylorsburg, Pennsylvania.[31] Although the United States Citizenship and Immigration Service denied Gülen's bid for a visa as an "alien of extraordinary ability in education," Gülen countered by claiming his followers "had established more than 600 educational institutions" worldwide.[32] Gülen eventually earned a greed card and has remained in Pennsylvania since.

Despite Gülen's presence within Pennsylvania since 1999, the first Gülen charter school in Pennsylvania, YSCP, did not open until 2005. Snowdrop Elementary School ("Snowdrop"), a private school operated by the West Penn Cultural Center, also opened in 2005. It closed in 2009, but not before the school and cultural center applied for 26 H-1B visas for Gülenist employees.[33] After Snowdrop closed, YSWP opened in 2011, YSM opened in 2015, and Vision Academy opened in 2015.

30 Student enrollment and demographic information available through open records request responses from the Pennsylvania Department of Education.

31 Abigail Hauslohner, Karen DeYoung & Valeria Strauss, He's 77, Frail and Lives in Pennsylvania. Turkey Says He's a Coup Mastermind, Washington Post (Aug. 3, 2016), available at: http://tinyurl.com/ktrszcp (last checked 5/12/2017).

32 Greg Toppo, Objectives of Charter Schools with Turkish Ties Questioned, USA Today (Aug. 17, 2010), available at: http://tinyurl.com/k9tnyqj (last checked 5/12/2017).

33 Andrew Conte, Imam Who Lives in Rural Pennsylvania Arouses Praise, Concerns, TribLive (Nov. 28, 2010), available at:

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Each charter school is associated with its own corporate entity. This has led to a variety of names for Gülenist schools and charter applications including: Young Scholars, Truebright, Allentown Science Academy, Lancaster Science Academy, and the Academy of Business and Entrepreneurship, among others. As bad press about the schools has spread, the use of multiple names and brands allows for the possibility that applicants can avoid association with the existing schools and prior applications.[34] Notably, three of the schools bear the name of "Young Scholars," a name which is also used by another non-Gülenist network of charter schools in Pennsylvania.[35] We believe these tactics help obscure Gülenist activity and connections within the state.

While the PA network use different names and are governed by separate entities, the interconnections between these schools and governing boards are easily identified by following the trajectory and involvement of certain key Gülenists throughout the state. For example, Riza Ulker started as the Early Childhood Coordinator for YSCP in 2005, but in the same year also registered the name "Snowdrop School," used by a technically separate private Gülenist school in PA.[36] By 2009, Ulker served as the principal for the now closed Truebright Science Academy.[37] In 2011, he filed the application to open the Allentown Science Academy, which was later denied.[38]

Like Ulker, Alpaslan Ozdogan's career spans the Gülenist charter schools within PA. He worked first as the Dean of Academics at YSCP before moving to become the CEO of YSWP, YSCP's "sister school."[39] Despite this reference and the fact that both entities share employees, board members, and the same Gülenist landlord, the board president of YSWP denied the existence of "formal ties" between Turkish-led charter schools in 2011.[40] Alspaslan Ozdogan also claimed his only connection to Fethullah Gülen was that he'd read his books and was inspired by them.[41] Ozdogan would later serve as the spokesperson for YSM's charter application, which was approved.[42] Similarly, Bekir Duz, the CEO of Truebright Science Academy denied any connections with other Gülen charter schools. In arguing that Truebright was an independent school, he downplayed the fact that 10 of the school's 32 administrators and teachers had worked at Gülenist charters across the country.[43] This is the hallmark of strategic ambiguity—denying and attempting to obscure the existence of unambiguous affiliation with each other and Gülen himself.

A review of Gülen charter schools' legal and other filings in Pennsylvania suggest that they are extraordinarily litigious, with several cases stretching out for years and draining limited school district resources. Local school districts initially denied the applications for YSWP, YSM,

http://tinyurl.com/m4xbc68 (last checked 4/30/2017); Snowdrop Elementary School and West Penn Cultural Center visa applications available at: http://tinyurl.com/ldow894, http://tinyurl.com/kedyg4b, http://tinyurl.com/jvo2x9a (last checked 4/17/2017).

34 See "*Notable Articles regarding the Pennsylvania Network*," infra.

35 Young Scholars Charter School available at http://tinyurl.com/lo8rbb9; 2016-2017 Charter Schools available at http://tinyurl.com/mtnlxnp.

36 YSCP 2005 990 available at http://tinyurl.com/l2wgovh; Pennsylvania Department of State records available at http://tinyurl.com/z6ogbfd.

37 Truebright Science Academy 2009 990 available at http://tinyurl.com/kqzadea.

38 Steve Esack, *Allentown School Directs Question Charter School Applicant's Ties to Gülen Movement*, The Morning Call (Dec. 10, 2012) available at: http://tinyurl.com/l9fxrbs (last checked 4/12/2017).

39 Stephanie Hacke, *Charter School Brings Some Controversy to Baldwin Township*, Trib Live (Oct. 13, 2011), available at http://tinyurl.com/lcqcjnu (last checked 4/12/2017); Mary Niederberger and Rich Lord, *Some Practices Questioned at Baldwin Charter School*, Pittsburgh Post-Gazette (Sep. 4, 2011), available at: http://tinyurl.com/ky9bx7v (last checked 4/12/2017).

40 Niederberger, Some Practices Questioned at Baldwin Charter School, supra.

41 Hacke, Charter School Brings Some Controversy to Baldwin Township, supra.

42 Young Scholars of McKeesport Charter School v. McKeesport Area School District, No. 2013-14, at 24 (Charter App. Bd. Mar. 6, 2015), available at: http://tinyurl.com/kkd8qlj (last checked 4/26/2017).

43 Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012), available at http://tinyurl.com/nysuuuy (last checked 4/15/2017).

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and Vision Academy. Each school had to appeal to the Pennsylvania's Charter Appeals Board for permission to open the schools.[44] For example, the McKeesport School District denied YSM's original application in 2012 and revised application in 2013.[45] The district found the school lacked community support, failed to provide a comprehensive learning experience, and would not serve as a model for future schools. The William Penn School District initially denied Vision Academy's application in 2013 for the same reasons. The school district attempted to deny the charter application a second time in 2015 when the school's facility would not be ready in time. Vision secured a temporary facility and again successfully appealed the denial of its application.[46]

Likewise, the School District of Philadelphia had to litigate the closure of Truebright Science Academy from 2012 through 2015.[47] The school district refused to renew the Truebright's charter on the basis of the school's academic performance, the teacher's qualifications, concerns about teacher discrimination, and low enrollment.[48] Prior to the denial of the charter renewal, nine teachers filed hiring complaints against the school in 2011, alleging that the school hired and promoted unqualified Turkish nationals over more-experienced and certified American teachers.[49] With the charter renewal appeal pending, the school purged its staff of American instructors. The teachers released included many of the teachers that previously filed complaints alleging they were paid less than non-certified Turkish employees.[50] During the renewal process, Truebright had Rev. James Wright, Sr., the president of the Truebright PTA read an erroneous statement, claiming that 97% of its first senior class graduated in June 2011. In reality, only 33 of 50 students that started at the school in ninth grade stayed to receive diplomas. Rev. Wright summed up the lack of transparency with Gülen charter schools: "We are in the dark in terms of knowing factual information. Until you get transparency . . . and you get a level playing field with these guys, we are still pulling at straws."[51]

Due to PA's forgiving charter laws and robust appeals process for denied petitioners, school districts ultimately were forced to spend time and resources denying charter applications multiple times. For example, the Millcreek Township School District denied Erie Biosciences Academy's application twice in 2013.[52] The Allentown School District has denied at least five different applications under three different names: Allentown Engineering Academy Charter School in 2012 and 2013; the Allentown Science Academy in 2011; and Lehigh College

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44 In re Young Scholars of Western PA Charter School, No. CAB-2010-03 (Pa. Charter School Appeal Board Oct. 1, 2010), available at: http://tinyurl.com/kfysf3d (last checked 4/17/2017); In re Young Scholars of McKeesport Charter School, No. CAB-2013-14 (Pa. Charter School Appeal Board Mar. 6, 2015), available at: http://tinyurl.com/kkd8qlj (last checked 4/17/2017); In re Vision Academy Charter School, No. CAB-2013-05 (Pa. Charter School Appeal Board Nov. 13, 2014), available at: http://tinyurl.com/k228b5f (last checked 4/17/2017); In re Vision Academy Charter School, No. CAB-2015-03 (Pa. Charter School Appeal Board June 17, 2015), available at: http://tinyurl.com/k3ard2k (last checked 4/17/2017).

45 In re Young Scholars of McKeesport Charter School, No. CAB-2013-14 (Pa. Charter School Appeal Board Mar. 6, 2015), available at: http://tinyurl.com/kkd8qlj (last checked 4/17/2017).

46 In re Vision Academy Charter School, No. CAB-2013-05 (Pa. Charter School Appeal Board Nov. 13, 2014), available at: http://tinyurl.com/k228b5f (last checked 4/17/2017); In re Vision Academy Charter School, No. CAB-2015-03 (Pa. Charter School Appeal Board June 17, 2015), available at: http://tinyurl.com/k3ard2k (last checked 4/17/2017).

47 Martha Woodall, *Appeals Court Orders Truebright Charter to Close*, The Inquirer (May 6, 2015), available at http://tinyurl.com/kx5nf7p (last checked 4/15/2017).

48 School District of Philadelphia Meeting of the School Reform Commission (Oct. 17, 2013), available at: http://tinyurl.com/kjbxnbb (last checked 4/15/2017).

49 Laura Benshoff, *Philly's Truebright Charter Appeals Shutdown Order to Pennsylvania Commonwealth Court*, NewsWorks (Jan. 29, 2015), available at http://tinyurl.com/l9kpslj (last checked 4/15/2017).

50 Martha Woodall, *Days Before Its Charter Hearing, Truebright Fired 8 Teachers*, The Inquirer (July 4, 2012), available at http://tinyurl.com/n3dzcph (last checked 4/15/2017).

51 Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, supra.

52 Erica Erwin, *Charter School's Petition Ruled Invalid*, GoErie.com (Oct. 1, 2014), available at http://tinyurl.com/lo4rzhx (last checked 4/16/2017).

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Prep Charter School in 2006 and 2009.[53] The School District of Lancaster denied the application for Lancaster Science Academy in 2008 and the Academy of Business and Entrepreneurship Charter School ("ABECS") application in 2013 and 2014.[54] The School District of Lancaster openly criticized ABECS for submitting the same application multiple times. The tenacity of the Gülenists in PA may be in part due to Gülen's nearby presence within the state.

Our research has revealed that Gülenist applicants have also used other questionable tactics, including suspected fraud and forgery, to create the appearance of community support. ABECS was caught using form letters, letters from Gülenist founders and family members, letters of support from a previous application, and letters from outside the Lancaster School District to inflate the community support for the school. The Gülenist applicants went door to door and harassed individuals for letters of support. Thirteen businesses—including Loomis Company and Capital BlueCross—rescinded letters of support for ABECS after learning low-level employees signed the letters instead of the businesses' actual owners or decision makers.[55] Hearings on ABECS became heated, with applicant Sait Onal accusing a parent of lying and verbally accosting another parent in 2013.[56]

As discussed below, Gülenist applicants even use some of these suspect tactics in court cases. Pennsylvania courts have found serious issues with the petitions supporting Gülen charter schools. Three cases have found issues such as fraudulent signatures, signatures with common authorship, illegible signatures, signatures from individuals outside the appropriate school district, and duplicate signatures inflated the number of legitimate signatures in support of the schools. In two cases, the courts found the applicants' did not have enough signatures to appeal the charter denials. In the third case, the applicants had enough legitimate signatures to appeal the denial of the charter application. The Charter Appeals Board, however, affirmed the denial of the charter application.[57]

Like its regional sister networks, the PA network uses the Gülenist-controlled Apple Educational Services as a vendor for its student information systems. Apple has come under fire in other states for its abusive property arrangements that systematically exploit Gülenist charter schools by charging exorbitant rates. YSWP, YSM, and Vision all feature student information system log-ins bearing the trademark of Apple Educational Services, Inc.[58] The Apple website was recently re-designed and scrubbed of information linking Apple to Gülenist charter schools in the Northeast. According to archived information from the website, however, the Apple website showed that YSCP was also affiliated with Apple.[59]

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53 Adam Clark, Allentown School Board Again Rejects Science/Technology Charter School, The Morning Call (Feb. 28, 2013), available at http://tinyurl.com/mtseyan (last checked 4/15/2017); In re Allentown Engineering Academy Charter School, No. CAB-2014-01 (Pa. Charter School Appeal Board Oct. 30, 2014), available at: http://tinyurl.com/kzbmtyq (last checked 4/17/2017); Matt Shelosky, Charter School One Step Closer to Approval, WFMZ (Feb. 10, 2011), available at: http://tinyurl.com/k83cj6r (last checked 4/17/2017); Steve Esack, *Allentown School Directors Question Charter School Applicant's Ties to Gülen Movement*, The Morning Call (Dec. 16, 2012) available at: http://tinyurl.com/l9fxrbs (last checked 4/15/2017).

54 Kara Newhouse, School District of Lancaster Rejects Charter School, Approves Preliminary Budget, Lancaster Online (Feb. 18, 2014), available at: http://tinyurl.com/n4cpf5b (last checked 4/17/2017); In re Applicants for Acad. of Bus. & Entrepreneurship Charter Sch., No. CI-14-06095 (Pa. Ct. Common Pleas Dec. 18, 2015), available at http://tinyurl.com/lmdoojk (last checked 4/16/2017).

55 Decision of the Board of School Directors of the School District of Lancaster Denying the Requested Charter of ABECS, available at: http://tinyurl.com/mxor3pa (last checked 4/14/2017).

56 Brian Wallace, *Police Called to Wild School Board Hearing on Charter School Proposal*, LancasterOnline (Feb. 20, 2013), available at http://tinyurl.com/m8znjd8 (last checked 4/15/2017).

57 See Scandals, Investigations & Notable Activities, *infra*.

58 Student Information Log-In, available at: http://tinyurl.com/lxmdt55 (YSWP); http://tinyurl.com/mr23llv (YSM); http://tinyurl.com/ms5bvo6 (Vision).

59 YSCP participated in Apple-hosted math contests in 2010, 2011, and 2012. Apple Educational Services, Events, available at: http://tinyurl.com/m3rf8rp; http://tinyurl.com/myn5jts; http://tinyurl.com/mcy4ecu (last checked 4/28/2017).

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Like Concept Schools and New Plan Learning in the Midwestern region, the PA network leases from a related Gülenist landlord entity, Dream Schools, Inc. and its subsidiary Newport Drive Properties, both established by PA network founders. We believe this allows the Gülen Organization to purchase and hold title to properties financed by public funds siphoned from its captive charter school customer base. Both YSCP and YSWP lease facilities from Dream Schools, Inc. Riza Ulker and Bulent Tarman, two of the PA founders, served as officers of Dream Schools, Inc. while both simultaneously served on the board of YSCP. Melih Demirkan, who has served as the president of YSWP from 2012 to the present, previously served on the board of Dream Schools, Inc. from 2008-2009. Omer Gul served as both treasurer of YSCP and vice-president of Dream Schools, Inc. in 2010.[60] These connections constitute clear conflicts of interest on the part of YSCP, and, as the state auditor of Pennsylvania has found, give the appearance of circular leasing arrangements.[61]

Financial Issues

Pennsylvania requires its charter schools to undergo annual audits. Only a few of the audits—most of them several years old—are publicly posted. The lack of required public disclosure makes it easier for schools like YSCP, YSWP, YSM, and Vision Academy to hide financial and procurement issues with the schools. The available audits showcase a series of ongoing financial issues at the charter schools that are endemic to other Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks. While the PA network does not engage in borrowing and lending between schools, a practice seen in other more developed Gülen charter networks, YSWP did take loans from its Turkish governing board members, which it then had to pay back.[62] The Pennsylvania Auditor General also audited YSCP in 2013 and found certification deficiencies for teachers and possible ethics act violations.

The numerous audit findings occur across multiple years and at multiple schools, including:

- Lack of Compliance with Required Financial Procedures and Accounting Standards:
  - Failure to properly segregate financial duties;
  - Necessity of material adjustments to YSWP's records;
  - Altered check dates by YSWP to move expenses into subsequent fiscal years; and
  - Lack of a fixed asset tagging system.
- Teacher Qualification Issues:
  - Non-compliance with Pennylvania's requirement that 75% of professional staff have state certification;
  - Non-compliance with Pennsylvania's principal certification requirement.
- Possible Ethics Act Violations:
  - Common officers between YSCP and its landlord that did not disclose their overlapping financial interests.
- Inappropriate Lending Between Entities:
  - Loans to YSWP from governing board members.[63]

Additionally, tax returns for YSCP show large

[60] Tax returns for these entities are available at: http://tinyurl.com/lz23php (YSCP); http://tinyurl.com/n5rm35q (YSWP); http://tinyurl.com/luskcjd (Dream Schools); http://tinyurl.com/katm6xo (Newport Drive Properties).

[61] Auditor General of Pennsylvania, March 2013 YSCP Audit, available at http://tinyurl.com/k8xjhtz (last checked 4/14/2017).

[62] YSWP, 2012 990, available at: http://tinyurl.com/n5rm35q (last checked 4/17/2017).

[63] Audits available at: http://tinyurl.com/koo7wzz and http://tinyurl.com/k8xjhtz (last checked 4/13/2017). YSWP and YSCP audits available through public records requests.

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expenses for property and professional services. YSCP paid $440,248 for professional services and $607,431 for property services in 2014-15; $343,195 for professional services and $628,578 for property services in 2013-14; and $320,482 for professional services and $594,202 for property services in 2012-13.[64] These payments warrant further scrutiny to determine if YSCP diverted public funds to related Gülenist vendors like Apple for justifiable expenses.

Bond Financing

As of July 10, 2016, Dream Schools, Inc. was in the process of obtaining bond financing for the construction costs of expanding YSCP.[65] This situation should be monitored as bond financing greatly increases the hold of a Gülenist charter network within a state. As of the publication of this report, no bonds financing Gülen charter schools in Pennsylvania had been finalized.

Real Estate

The Young Scholars network engages in the same type of dubious leasing arrangements utilized by the Concept network and its affiliated real estate arm, New Plan Learning, throughout the Midwest; the Harmony network and its affiliated real estate arm, Charter School Solutions, in Texas; and the Dove Science network in Oklahoma. This model of real estate dealing depends on a related entity, also controlled by Turkish Gülenists, acquiring land and facilities and leasing it back to the Gülenist charter network at unjustified premiums. The Gülenist landlord entity is often included on major bond financing on behalf of the Gülen Organization charter network. Currently, there is no bond financing for any of the Pennsylvania schools. But the affiliated landlord entity of YSCP and YSWP, Dream Schools, Inc., sought bond financing for construction costs at YSCP as recently as July 10, 2016.[66] The schools affected are YSCP and YSWP thus far.

The Pennsylvania Auditor General has already criticized YSCP for this "circular leasing arrangement" and associated conflict of interests.[67] These overlapping interests constituted possible ethics act violations. The Auditor General highlighted that two board members (Bulent Tarman and Riza Ulker) of YSCP did not disclose their roles as president and vice president of Dream Schools, Inc. Bulent Tarman even served as the CEO of YSCP from June 23, 2006, through 2009.[68]

Similar relationships exist with YSWP. The president of the YSWP board, Mehmet Melih Demirkan, served as treasurer of Dream Schools, Inc. in 2008 while he served as president of YSWP from 2008 through the present. During that time, YSWP has leased facilities from Newport Drive Properties, a subsidiary of Dream Schools, Inc.[69]

Both schools have made significant rental payments to Dream Schools and Newport Drive Properties:

64 YSCP 990s available at: http://tinyurl.com/l8aaxgu (last checked 4/17/17).

65 Britney Milazzo, *Young Scholars Expansion Plans Underway*, Centre Daily Times (July 10, 2016), available at http://tinyurl.com/l7dyd7h (last checked 4/12/2017).

66 Id.

67 Auditor General of Pennsylvania, March 2013 YSCP Audit, available at http://tinyurl.com/k8xjhtz (last checked 4/14/2017).

68 Tax returns for these entities are available at: http://tinyurl.com/lz23php (YSCP); http://tinyurl.com/luskcjd (Dream Schools).

69 Tax returns for these entities are available at: http://tinyurl.com/n5rm35q (YSWP); http://tinyurl.com/luskcjd (Dream Schools); http://tinyurl.com/katm6xo (Newport Drive Properties).

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School Year	YSCP Lease Costs (Paid to Dream Schools, Inc.)	YSWP Lease Costs (Paid to Newport Drive Properties)
2015-16	$466,416.00	$401,049.96
2014-15	$453,564.96	$370,200.00
2013-14	$447,085.50	$370,200.00
2012-13	$419,654.93	$268,380.00
2011-12	Unknown	$172,778.00
2010-11	$310,200.00	
2009-10	$310,200.00	
2008-09	$291,566.00	
2007-08	$181,863.00	

Dream Schools purchased the YSCP property in 2007 for $680,000, and from 2007-2016, has collected approximately $3.2 million in rent from the school. This represents a $2.5 million net profit at the school's expense, orchestrated by the school's own founders and leadership overlapping with the landlord. Similarly, Dream Schools via Newport Drive Properties bought the YSWP property for $800,000 in 2011. From 2011-2016, it has already collected $1.5 million. Assuming both these schools paid the same rent for the 2016-17 school year as they did for the prior year, Dream Schools has made a net profit of $4.15 million on the PA network's expense.

YSWP also advanced funds to Newport Drive Properties to allow the landlord to renovate YSWP's parking lot in exchange for rent abatements through 2020. Essentially, YSWP financed the parking lot renovation for its own landlord. If YSWP is able to pay the costs for its facility by itself, the benefits of using a middle-man like Newport Drive Properties to hold title are suspect. The arrangement allows YSWP to fund the costs of the facilities while the improved property remains in the hands of Newport Drive Properties and the Gülen Organization if the school's charter contract is revoked or non-renewed.

In spite of Dream Schools, Inc.'s ongoing role as landlord for YSWP and YSCP, Sait Onal—the corporation's secretary—declared the company "inactive."[70]

The other two Pennsylvania schools, YSM and Vision Academy, lease facilities from apparently unrelated entities.

Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, the PA network utilizes the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. From 2001-2016, these schools have filed 106 H-1B visa applications for foreign workers.[71] Bekir Duz, the CEO of Truebright Science Academy, took offense in 2012 to inquiries about the school's use of H-1B visas. He claimed the inquiries had a racial motivation and disclaimed any knowledge of whether teachers had to pay a percentage

[70] Gil Smart, *Charter School Friends, Foes Air Their Feelings*, LancasterOnline (Mar. 3, 2013), available at http://tinyurl.com/krvpzwm (last checked 4/15/2017).

[71] In another example of strategic ambiguity, the schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of their organizations (including closed schools) is 106, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/lwyp9ov (21); http://tinyurl.com/koqky2z (2); http://tinyurl.com/lly8drk (1); http://tinyurl.com/mlhg4fg (6); http://tinyurl.com/lmwj4b2 (9); http://tinyurl.com/k3jwqgr (1) http://tinyurl.com/l6ugqvd (27); http://tinyurl.com/ldow894 (11); http://tinyurl.com/l7qmmwd (6); http://tinyurl.com/kedyg4b (9). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (last checked 1/30/2017).

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of their income to Gülenist organizations.[72] Although the Gülenists state that these visas are used to attract foreign workers with math, science, and technological backgrounds, these schools filed H-1B applications to fill such positions as: English teachers, principals, business/operations managers, education administrators, instructional/program development coordinators, financial/business analysts, college prep coordinators/counselors, school counselors, middle and elementary school teachers, social and community service managers, and community program directors.

Pennsylvania schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

Remzi Kulen: The PA network used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:

- Concept Schools (OH, IL, MO, IN, MI, MN)
- Horizon Science (OH, IL)
- Noble Academy (OH)
- Gateway (MO)
- Pioneer (MA)
- Niagara Foundation (IL)
- Golden Generation Worship & Retreat Center (PA)
- Blue Ocean Construction (FL)
- Academy of Science, Syracuse, Buffalo (NY)
- Arts and Science, Bergen, Passaic (NJ)
- Beehive (UT)[73]

Seth Leech: The PA network used Leech, a New York-based attorney, to file numerous H-1B applications. Leech also filed applications for:

- Little Scholars (AR)
- Pioneer (MA)
- Hampden (MA)
- Academy of Science, Syracuse, Buffalo, Utica (NY)
- Paterson Science and Technology; Central Jersey College Prep Charter School (NJ)[74]

Leonard D'arrigo: The PA network used D'arrigo, a New York-based attorney, to file numerous H-1B applications. D'arrigo also filed applications for:

- Cosmos Foundation, Inc. (TX)
- Central Jersey College Prep Charter School (NJ)
- Millenium Education Foundation (now Frontier) (MO)
- Hampden (MA)
- Academy of Science, Syracuse (NY)
- Arts and Science, Bergen (NJ)[75]

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72 Martha Woodall, *Allegations raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012), available at http://tinyurl.com/nysuuuy (last checked 4/12/2017).

73 List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 4/14/2017).

74 List of entities represented by Seth Leech, available at http://tinyurl.com/zlc7eql (last checked 4/14/2017).

75 List of entities represented by Leonard D'arrigo, available at http://tinyurl.com/kcb3kjq (last checked 4/14/2017).

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Scandals, Investigations & Notable Activities

Gülen charter schools in Pennsylvania have been involved in numerous lawsuits highlighting these schools' lack of transparency.

Illegitimate Signatures on Community Petitions Supporting Charter School Applications: Under Pennsylvania law, applicants may only appeal a charter denial if they collect signatures of at least 2% of the district's residents or 1,000 residents of the school district, whichever is less.[76] Applicants for the ABECS, Capital Academy of Harrisburg, and Erie Biosciences Academy appealed charter denials using this mechanism. In all three cases courts found significant issues with the collected signatures. For example, signatures on the petitions came from non-residents of the appropriate districts, lacked dates, lacked complete identifying information, or had information completed by a person other than the signer. Signatures were illegible, duplicative, and forged. Individuals that collect these signatures must sign affidavits attesting that they live in the appropriate school district and the collected signatures are valid. ABECS had a person that lived outside the School District of Lancaster collect signatures; one person collecting signatures for Erie Biosciences Academy did not recognize 21 pages of signatures associated with her affidavit. In the ABECS and Erie Biosciences Academy cases, there were not enough legitimate signatures to proceed. Although the Capital Academy of Harrisburg court found enough signatures legitimate for its appeal to proceed, the Charter Appeals Board still affirmed the denial of the application.[77] These cases highlight the drastic lengths Gülen charter applicants will go to open new schools and the costs to authorizers that must scrutinize the applications.[78]

Closure of Truebright Science Academy and Allegations of Discrimination: Truebright Science Academy closed in 2015 due to academic underperformance. In the hearings that led to the non-renewal of the Truebright charter, the school district questioned administrators about erroneous data reporting.[79] Reports emerged that the school was under federal investigation, and staff reported that school officials shredded documents and removed security cameras.[80]

Before the school closed, nine teachers also filed employment complaints, alleging that the school discriminated against certified, American-born teachers and paid higher salaries to non-certified Turkish nationals.[81] With the school's renewal decision pending, the school fired eight teachers, all of whom were U.S. citizens and many of whom had previously filed discrimination complaints.[82] One American teacher kept her job and later filed a lawsuit against Truebright alleging discrimination.[83] At the time of her lawsuit, she alleged that she had six years

76 24 Pa. Stat. § 17-1717-A(i).

77 In re Capital Academy Charter School, No. CAB 2007-02 (Pa. Charter App. Bd. Apr. 14, 2009), available at: http://tinyurl.com/n2kbh3j (last checked 4/14/2017).

78 Capital Acad. Charter Sch. v. Harrisburg Sch. Dist., 934 A.2d 189 (Pa. Commw. Ct. 2007); In re Applicants for Acad. of Bus. & Entrepreneurship Charter Sch., No. 1033 C.D. 2016, 2017 WL 1056403 (Pa. Commw. Ct. Mar. 21, 2017); In re Applicants for Acad. of Bus. & Entrepreneurship Charter Sch., No. CI-14-06095 (Pa. Ct. Common Pleas Dec. 18, 2015), available at http://tinyurl.com/lmdoojk (last checked 4/16/2017); Erica Erwin, *Charter School's Petition Ruled Invalid*, GoErie.com (Oct. 1, 2014), available at http://tinyurl.com/lo4rzhx (last checked 4/16/2017).

79 Oscar Wang, *SRC Votes Not to Renew Three Charters*, NewsWorks (Apr. 19, 2012), available at http://tinyurl.com/lna3po5 (last checked 4/15/2017).

80 Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012), available at http://tinyurl.com/nysuuuy (last checked 4/15/2017).

81 Laura Benshoff, *Philly's Truebright Charter Appeals Shutdown Order to Pennsylvania Commonwealth Court*, NewsWorks (Jan. 29, 2015), available at http://tinyurl.com/l9kpslj (last checked 4/15/2017).

82 Martha Woodall, *Days Before Its Charter Hearing, Truebright Fired 8 Teachers*, The Inquirer (July 4, 2012), available at http://tinyurl.com/n3dzcph (last checked 4/15/2017).

83 Jalon v. Truebright Science Academy Charter School, No. 2: 13-cv-01011-BMS (E.D. Pa. Feb. 25, 2013).

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of experience and earned a salary of $42,000. But Mehmet Yaramis, a Turkish male teacher with only three years of experience, earned a salary of $49,500. She also alleged that the school violated Title IX, the Family Educational Rights and Privacy Act, and less-qualified male Turkish nationals received promotions at her expense.[84] The parties settled the action out of court; the court dismissed it on May 10, 2013.[85]

Charter Renewal for YSCP: In 2010, the State College Area School District conditionally renewed the charter for YSCP due to ongoing concerns about teacher and administrator certification, the experience of lead teachers, and compliance with Pennsylvania's Sunshine Act. During the renewal process, the school had to address issues and concerns common to all Gülen charter schools. For example, the school had to address the following concerns raised during the renewal process:

- teachers and administrators lacked the appropriate certifications;
- the school under-delivered on its promises of providing technology and resources to students, and the school under-delivered on its curriculum and education promises;
- special education was haphazard and the school failed to follow IEPs
- the school lacked procedures to evaluate and develop administrators and teachers
- teachers received fewer benefits than promised in the charter;
- the school failed to involve parents in the school's administration; and
- the school failed to comply with Pennsylvania's Sunshine Act.

Opinions Highlighting Schools' Refusals to Provide Documents under Pennsylvania's Sunshine Act: YSCP, YSWP, and Truebright have all refused to turn over public records under open records requests. The requestors had to appeal to Pennsylvania's Open Records Office to require the schools to disclose the records.[86] These problems are endemic to Gülen charter schools, which are frequently cited for violations of open records and open meetings laws.

Student Bullying and Criticism of YSWP by Baldwin Whitehall School District: In 2017, the Baldwin-Whitehall School District received several complaints about parents regarding bullying at YSWP. According to the complaints received by the school district, YSWP did not adequately respond to parents' concerns, necessitating police involvement and creating the impression that parents did not feel heard by the school. YSWP also failed to respond to the school district's inquiries, and the school district stated it would bring the matter to the attention of the PA Dept. of Education and the local solicitor.

Notable Turkish Vendors

- **Apple Educational Services, Inc. (Apple):** Apple is connected to the Gülen charter schools in Pennsylvania, though ties to the regional oversight entity are more difficult to trace in the northeast than in other regions. YSWP, YSM, and Vision all feature student information system log-ins bearing the

[84] Id.

[85] Jalon v. Truebright Science Academy Charter School, No. 2: 13-cv-01011-BMS (E.D. Pa. May 10, 2013), ECF #10.

[86] In re Penn. School Boards Ass'n v. Truebright Science Academy,, 2015 WL 4395328 (Pa. Off. Open Rec. July 15, 2015); In re Penn. School Boards Ass'n v. Young Scholars of Western Penn. Charter School, 2015 WL 4385425 (Pa. Off. Open Rec. July 13, 2015); In re Lakatosh v. Young Scholars of Central Penn. Charter School, 2010 WL 2128755 (Pa. Off .Open Rec. Feb. 8, 2010); In re Hocker v. Young Scholars of Central Penn. Charter School, 2009 WL 6503941 (Pa. Off. Open Rec. Dec. 17, 2009).

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trademark of Apple Educational Services, Inc.[87] Adem Oksuz, the first CEO of Vision Academy, worked at Apple for over a year in 2012-2013.[88] The Apple website was recently re-designed and scrubbed of information linking Apple to Gülenist charter schools in the northeast. But before the redesign, the Apple website showed that YSCP participated in Apple-hosted math contests in 2010, 2011, and 2012.[89] Tax returns for YSCP show large expenses for property and professional services. YSCP paid $440,248 for professional services and $607,431 for property services in 2014-15; $343,195 for professional services and $628,578 for property services in 2013-14; and $320,482 for professional services and $594,202 for property services in 2012-13.[90] The size and description of these payments mirror payments made to regional oversight entities in the Western and Midwestern regions (Accord and Concept). For that reason, these payments warrant further scrutiny to determine if YSCP diverted public funds to related Gülenist vendors, such as Apple.

- **Dream Schools, Inc.:** As detailed under the section describing real estate transactions, YSCP and YSWP both lease facilities from Dream Schools, Inc. and/or its subsidiary Newport Drive Properties. Board members and employees of the schools have served on the boards of their landlord, raising conflict of interest concerns.

Gülenist Cultural Foundations

- **Peace Islands Institute:** The Peace Islands Institute, formerly The Interfaith Dialog Center, is openly Gülenist: Fethullah Gülen is the group's honorary president.[91] It is active throughout the northeast, with locations in Pennsylvania, Connecticut, Massachusetts, New Jersey, and New York.[92] The Peace Islands Institute works closely with other Gülen organizations to advocate with legislators on their behalf and also to coordinate junkets to Turkey.[93]

- **Lehigh Dialogue Center (formerly Lehigh Mosaica Foundation):** The Lehigh Dialogue Institute is a partner organization with the Turkish Cultural Center Pennsylvania, the Peace Islands Institute, and Embrace Relief.[94] The Lehigh Dialogue Center is openly Gülenist.[95] In 2012, the organization sponsored a $2,650 trip to Turkey for state senator David Argall.[96] Abdulkadir Veziroglu would serve as treasurer, president, and secretary for the center between

87 Student Information Log-In, available at: http://tinyurl.com/lxmdt55 (YSWP); http://tinyurl.com/mr23llv (YSM); http://tinyurl.com/ms5bvo6 (Vision).

88 Application for Grants under the Charter Schools Program (CSP); Grants to Non-SEAs; Planning Program Design, Implementation, U.S. Dep't of Education (Oct. 6, 2015), available at http://tinyurl.com/lhhw3f6 (last checked 4/17/17).

89 Apple Educational Services, Events, available at: http://tinyurl.com/m3rf8rp; http://tinyurl.com/myn5jts; http://tinyurl.com/mcy4ecu (last checked 4/28/2017).

90 YSCP 990s available at: http://tinyurl.com/l8aaxgu (last checked 4/17/17).

91 Honorary President, Peace Islands Institute, http://tinyurl.com/kvkzbsf (last checked 4/17/2017).

92 Id.

93 Jean Rimbach, Jeff Pillets & Hannan Adely, *Investigation: Charter School Leaders, Founders Linked to Controversial Turkish Cleric*, NorthJersey.com (Feb. 15, 2017) available at: http://tinyurl.com/lsny9ys (last checked 4/14/2017).

94 Partner Organizations, Lehigh Dialogue Center, available at: http://tinyurl.com/l9j6u7j (last checked 4/17/2017).

95 Gülen Movement, Lehigh Dialogue Centerhttp://tinyurl.com/kstzb7u (last checked 4/17/2017).

96 Kent Jackson and Robert Swift, *Lawmakers Have Different Takes on Gifts*, Standard-Speaker (Apr. 3, 2014), available at http://tinyurl.com/lnybfog (last checked 4/15/2017).

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2004 through 2011; he would later serve as the lead applicant for the Allentown Engineering Charter School.[97] At a hearing on the Allentown Engineering Charter School, Veziroglu would call the question about ties to the Gülen movement "obscene" and deny such a connection despite his earlier role with the Lehigh Dialogue Center.[98] Numerous board members of the center have contributed to the political campaigns of U.S. Senator Robert Casey and U.S. Representative Matt Cartwright.[99]

- **Red Rose Intercultural and Educational Foundation:** The Red Rose Intercultural and Educational Foundation d.b.a. Turkish Cultural Center Pennsylvania ("TCC Penn") openly features writings and editorials of Fethullah Gülen.[100] It is affiliated with the Turkish Cultural Center, which in turn is affiliated with the Peace Islands Institute, Lotus Media, and Ebru TV.[101] From 2012-2014, the president was Sait Onal, who petitioned to open the Academy of Business and Entrepreneurship Charter School, Lancaster Science Academy, and Capital Academy of Harrisburg.[102] Sait Onal has served as the secretary of Dream Schools Inc. since 2010; he has served as the secretary of Newport Drive Properties since 2012.[103] Suleyman Erdem has served as TCC Penn's treasurer since 2012; he would later attempt to serve on the founding board of the Erie Biosciences Academy.[104] In 2012, TCC Penn gifted Pennsylvania Governor Tom Corbett Turkish robes, towels, a vase, and a plate valued at $275.[105]

- **Golden Generation Worship & Retreat Center, Inc. (formerly Golden Generation Students Association, Inc.) ("Golden Generation"):** Fethullah Gülen lives at the Golden Generation conference center.[106] In spite of this direct connection, the Golden Generation website features only minimal references to Fethullah Gülen.[107] Sezai Sablak, vice president of Golden Generation, inappropriately collected signatures in support of Capital Academy of Harrisburg (PA).[108] Sablak also attempted to found the

97 Lehigh Dialogue Center 990s available at: http://tinyurl.com/k35p6qq (last checked 4/17/2017).

98 Gil Smart, *Charter School Friends, Foes Air Their Feelings*, LancasterOnline (Mar. 3, 2013), available at http://tinyurl.com/krvpzwm (last checked 4/15/2017); Lehigh Dialogue Center, 2004-2011 990s, available at: http://tinyurl.com/k35p6qq (last checked 4/17/2017).

99 For example, Abdulkadir Veziroglu, David Eygorin, and Omer Alici have contributed to Robert Casey and/or Matt Cartwright's campaigns. Federal Election Database, Transaction Query by Individual Contributor, available at: http://tinyurl.com/fgdcj (last checked 4/17/2017).

100 TCC Penn, available at: http://tinyurl.com/lzleahq (last checked 4/17/2017).

101 Turkish Cultural Center, available at: http://tinyurl.com/mesteu6 (last checked 4/17/2017).

102 Red Rose Intercultural and Education Foundation, 2012-2014 990s, available at: http://tinyurl.com/lmspok3 (last checked 4/17/2017).

103 Dream Schools, Inc., 2010-2014 990s, available at: http://tinyurl.com/luskcjd (last checked 4/17/2017); Newport Drive Properties, 2012-2014 990s, available at: http://tinyurl.com/katm6xo (last checked 4/17/2017).

104 Erie Biosciences Academy's application is available through BoardDocs for the Millcreek Township School District, available at: http://tinyurl.com/k57scjk (last checked 4/17/17).

105 Associated Press, *Gov. Corbett Discloses Gifts, Free Travel for 2012*, PennLive (May 1, 2013) available at: http://tinyurl.com/kfba6ju (last checked 4/14/2017).

106 Abigail Hauslohner, Karen DeYoung & Valeria Strauss, He's 77, Frail and Lives in Pennsylvania. Turkey Says He's a Coup Mastermind, Washington Post (Aug. 3, 2016), available at: http://tinyurl.com/ktrszcp (last checked 5/12/2017).

107 Golden Generation Worship and Retreat Center, available at: http://tinyurl.com/k8nxmj3 (last checked 5/15/2017).

108 Capital Acad. Charter Sch. v. Harrisburg Sch. Dist., 934 A.2d 189, 192 (Pa. Commw. Ct. 2007) (finding Sablak did not reside in the Harrisburg School District and was ineligible to attest to signatures); Golden Generation 990s, available at: http://tinyurl.com/m884x5w (last checked 5/15/2017).

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Lancaster Science Academy.[109] Golden Generation exists to provide a worship center for Muslims and to promote interfaith harmony.[110]

- **West Penn Cultural Center, Inc. (inactive):** Bekir Duz, who would later serve as the CEO of Truebright Science Academy, served as a board member of this organization in 2006. He claimed the cultural center followed the teachings of Fethullah Gülen while the cultural center operated the private Snowdrop Elementary School.[111] The center reported no income or assets on its 2013 tax return.[112]

Friends of Gülen Spotlight: Robert Casey, Matt Cartwright, and Mike Brubaker

Robert Casey currently serves as a U.S. Senator from Pennsylvania and used to serve on the Senate's foreign relations committee as the chair Near East and South/Central Asia subpanel;[113] Matt Cartwright is the U.S. representative for the 17th District of Pennsylvania, which includes Fethullah Gülen's residence at the Golden Generation Worship & Retreat Center. Each has received donations from numerous Gülenists: Sezai Sablak (Golden Generation Worship & Retreat Center); Suleyman Eris (Lehigh Dialogue Center, Cosmos Foundation, and Istanbul Center for Culture & Dialogue); Suleyman Erdem (Red Rose Intercultural and Educational Foundation); Abdulkadir Veziroglu (Lehigh Dialogue Center); David Eygoren (Lehigh Dialogue Center); Omer Alici (Lehigh Dialogue Center); Metin Bor (West Penn Cultural Center); and Furkan Kosar (Paterson Charter School for Science and Technology, among other associations).[114]

Perhaps as a result of these contributions, Rep. Cartwright recognized Fethullah Gülen in the House of Representatives on November 19, 2014.[115] Robert Casey has spoken at an annual friendship dinner for the Turkish Cultural Center and Council of Turkic American Associations.[116] During an interview at the friendship dinner, Sen. Casey mentioned the "great support" he received from Turkish-Americans during his senate campaign.[117]

Gülen cultural associations have also attempted to influence local politics in Pennsylvania through state senators—particularly in areas targeted for charter school growth. Mike Brubaker served as a Pennsylvania state senator from the 36th District of Pennsylvania from 2007-2015. His territory covered Lancaster County, an area targeted by Gülenists for expansion. He took a trip to Turkey paid for by the Bogazici Atlantik Kulturel Dostluk Ve Isbirligi

109 Brian Wallace, *Focused on Science: City District Studies Charter School*, LancasterOnline (Jan. 3, 2008), available at http://tinyurl.com/muh8ks2 (last checked 4/15/2017).

110 About Us, Golden Generation Worship & Retreat Center, available at: http://tinyurl.com/kqhe9w9 (last checked 5/12/2017).

111 Jan Ackerman, *Owners Apply to Operate Cultural Center in Recently Acquired South Park Building*, Pittsburgh Post-Gazette (Mar. 9, 2006) available at: http://tinyurl.com/ko5n7lb (last checked 4/14/2017).

112 West Penn Cultural Center Inc., 2011-2013 990s, available at: http://tinyurl.com/kh4gwuo (last checked 4/17/2017).

113 Julian Pecquet, *Markey Replaces Casey on Foreign Relations Panel*, The Hill (July 17, 2013) available at: http://tinyurl.com/mghx5nf (last checked 4/17/2017).

114 Red Rose Intercultural and Education Foundation, 2012-2014 990s, available at: http://tinyurl.com/lmspok3 (last checked 4/17/2017); Lehigh Dialogue Center, 2004-2015 990s, available at: http://tinyurl.com/k35p6qq (last checked 4/17/2017); Federal Election Database, Transaction Query by Individual Contributor, available at: http://tinyurl.com/fgdcj (last checked 4/17/2017).

115 Congressional Record, Extension of Remarks at E1633 (Nov. 19,2014), available at: http://tinyurl.com/kbtx3jt (last checked 4/17/2017).

116 Admin, Friendship Dinner Stirs Excitement, Turkic American Alliance (Mar. 26, 2011), available at: http://tinyurl.com/mewwgha (last checked 4/17/2017).

117 Turkish Cultural Center New York, US Senator Robert P. Casey, Jr. at Turkish Cultural Center's Annual Friendship Dinner, Youtube (Apr. 11, 2011), available at: http://tinyurl.com/kejj7bl (last checked 4/17/2017).

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Dernegi worth $10,900 in 2011 organized by Sait Onal.[118] Sait Onal previously applied to open the Lancaster Science Academy in 2008 and would go on to apply to open ABECS in 2013 and 2014. Although ABECS never opened, it took years of litigation, a court finding that ABECS forged signatures on petitions supporting the school, and the withdrawal of illegitimately obtained letters of support by community businesses. Mike Brubaker's trip to Turkey and the questionable history of the ABECS application underscores the lengths Gülen charter school petitioners will go to create support, legitimate or otherwise, for their applications.

Individuals Caught in the Gülen Organization Web

Our research shows that it is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Apple. This is just a small number of individuals with these overlapping ties throughout the region and other regions, which further demonstrates the region's interconnections. Former Truebright CEO Bekir Duz compared the situation to a Chinese restaurant. He argued that employees of Chinese restaurants know all the other Chinese restaurants and can go work at the other Chinese restaurants.[119] This does not explain, however, why this shuffling only occurs with these schools' Turkish employees.

- **Bekir Duz:** Board member, West Penn Cultural Center, which operated Snowdrop Elementary School (PA);[120] Administrator, Central Jersey College Prep Charter School (NJ); Principal, Truebright Science Academy.[121]

- **Isik Durmus:** Vice principal and Teacher, Pioneer Academy of Science (NJ); Principal, Rochester Academy Charter School (NY);[122] Dean of Academics, Truebright Science Academy;[123] Principal, Vision Academy.[124]

- **Levent Kaya:** Director, Buffalo Academy of Science Charter School (NY); currently CEO/principal, YSCP.[125]

- **Emrullah Durmaz:** Dean of Academics, Truebright Science Academy; Principal, Putnam Science Academy (CT); CEO, Apple (Northeast region);[126] CEO Johnson Road Properties.[127]

- **Tansu Cidav:** Teacher, Assistant Principal, Harmony Science Academy (TX); Assistant Principal, Truebright

[118] Karen Shuey, Sen. Mike Brubaker Says 7 Trips in 2011 Benefited Constituents, Lancaster Online (Mar. 20, 2013), available at: http://tinyurl.com/mvnq66d (last checked 4/17/2017).

[119] Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam*, The Inquirer (Apr. 19, 2012), available at http://tinyurl.com/nysuuuy (last checked 4/12/2017).

[120] Id.

[121] Jan Ackerman, *Owners Apply to Operate Cultural Center in Recently Acquired South Park Building*, Pittsburgh Post-Gazette (Mar. 9, 2006) available at: http://tinyurl.com/ko5n7lb (last checked 4/14/2017).

[122] Application for Grants under the Charter Schools Program (CSP); Grants to Non-SEAs; Planning Program Design, Implementation, U.S. Dep't of Education, at 200 (Oct. 6, 2015), available at: http://tinyurl.com/lhhw3f6 (last checked 4/17/17).

[123] Connie Langland, *School Facing Possible Closure Receives $1.2 Million in Three-Year Grant*, TheNotebook (Nov. 10, 2014) available at: http://tinyurl.com/n8k5qn6 (last checked 4/14/2017).

[124] Nick Tricome, *First Charter School Opens in William Penn School District*, Daily Times News (Sep. 8, 2015) available at: http://tinyurl.com/lu23ere (last checked 4/14/2017).

[125] Levent Kaya, LinkedIn, available at: http://tinyurl.com/l3o83z2 (last checked 4/17/2017).

[126] Emrullah Durmaz, LinkedIn, available at: http://tinyurl.com/n9yvzvu (last checked 4/17/2017).

[127] Corporate documents for this entity are available at: http://tinyurl.com/jvp5sjw (last checked 5/23/2017).

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Science Academy (PA); Assistant Principal, Harmony Science Academy (TX).[128]

- **Sait Onal:** Petitioner, Lancaster Science Academy, Capital Academy Harrisburg, and ABECS;[129] Secretary, Dream Schools, Inc. and Newport Drive Properties;[130] President, Red Rose Intercultural and Education Foundation/TCC Penn;[131] currently sales and marketing account executive at Transamerica Agency Network, Inc.[132]
- **Sezai Sablak:** Inappropriately collected signatures in support of Capital Academy of Harrisburg (PA);[133] Attempted Founder, Lancaster Science Academy;[134] Vice President, Golden Generation Worship & Retreat Center – Gülen's home compound;[135] currently Chief Scientist, Inertial Labs, Inc.[136]
- **Melih Demirkan:** Board president, YSWP;[137] Treasurer, Dream Schools, Inc.;[138] currently Managing Principal, Rizzo Associates.[139]

Notable Articles regarding the Pennsylvania Network

- Martha Woodall, *Appeals Court Orders Truebright Charter to Close*, The Inquirer (May 16, 2015) (discussing tying Truebright Science Academy to Gülen and discussing the school's closure).[140]
- Erica Erwin, *Charter School's Petition Ruled Invalid*, GoErie.com (Oct. 1, 2014) (discussing fraudulent signatures in connection with petitions in support of Erie Biosciences Academy).[141]
- Gil Smart, *Charter School Friends, Foes Air Their Feelings*, LancasterOnline (Mar. 3, 2013) (discussing heated hearings on the application of ABECS, in which Sait Onal accusing opponents of lying, Sait Onal's prior charter applications and ties to cultural foundations, and withdrawal of letters of support due to harassment and questionable tactics).[142]
- Steve Esack, *Allentown School Directors Question Charter School Applicant's Ties*

128 Tansu Cidav, LinkedIn, available at: http://tinyurl.com/nyvhngx (last checked 4/17/2017).

129 Gil Smart, *Charter School Friends, Foes Air Their Feelings*, LancasterOnline (Mar. 3, 2013), available at http://tinyurl.com/krvpzwm (last checked 4/15/2017).

130 Dream Schools, Inc., 990s, available at: http://tinyurl.com/luskcjd (last checked 4/17/2017); Newport Drive Properties, 990s, available at: http://tinyurl.com/katm6xo (last checked 4/17/2017).

131 Red Rose Intercultural and Education Foundation, 2012-2014 990s, available at: http://tinyurl.com/lmspok3 (last checked 4/17/2017)

132 Sait Onal, LinkedIn, available at: http://tinyurl.com/n3df2up (last checked 4/17/2017).

133 Capital Acad. Charter Sch. v. Harrisburg Sch. Dist., 934 A.2d 189, 192 (Pa. Commw. Ct. 2007) (finding Sablak did not reside in the Harrisburg School District and was ineligible to attest to signatures).

134 Brian Wallace, *Focused on Science: City District Studies Charter School*, LancasterOnline (Jan. 3, 2008), available at http://tinyurl.com/muh8ks2 (last checked 4/15/2017).

135 Golden Generation Worship and Retreat Center, 990s, available at: http://tinyurl.com/m884x5w (last checked 4/17/2017).

136 Sezai Sablak, LinkedIn, available at: http://tinyurl.com/mus8o9m (last checked 4/17/2017).

137 YSWP, 990s, available at: http://tinyurl.com/n5rm35q (last checked 4/17/2017).

138 Dream Schools, Inc., 990s, available at: http://tinyurl.com/luskcjd (last checked 4/17/2017).

139 Melih Demirkan, LinkedIn, available at: http://tinyurl.com/k39g5o2 (last checked 4/17/2017).

140 http://tinyurl.com/ko5n7lb (last checked 4/14/2017).

141 http://tinyurl.com/lo4rzhx (last checked 4/16/2017).

142 http://tinyurl.com/krvpzwm (last checked 4/15/2017).

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to Gülen Movement, The Morning Call (Dec. 16, 2012) (discussing attempt to open Allentown Engineering Academy Charter School, applicants' evasive answers to questions about ties to Gülen, and H-1B visa abuse in other states).[143]

- Martha Woodall, *Days Before Its Charter Hearing, Truebright Fired 8 Teachers*, The Inquirer (July 4, 2012) (highlighting that Truebright Science Academy fired U.S. nationals, many of whom filed discrimination complaints against the school, while retaining Turkish nationals).[144]

- Martha Woodall, *Allegations Raised over N. Phila. Charter School Run by Followers of Turkish Imam,* The Inquirer (Apr. 19, 2012) (discussing a potential federal investigation of Truebright Science Academy, teacher allegations of discrimination, complaints by the PTA president about a lack of transparency, the school's effort to stay open, ties to Gülen, use of H-1B visas, and allegations that staff must donate salaries to the Gülen movement).[145]

- Stephanie Hacke, *Charter School Brings Some Controversy to Baldwin Township*, Trib Live (Oct. 13, 2011) (discussing the questionable leasing arrangements of YSCP, YSWP, and Dream Schools, Inc.).[146]

- Mary Niederberger and Rich Lord, *Some Practices Questioned at Baldwin Charter School*, Pittsburgh Post-Gazette (Sep. 4, 2011) (discussing the questionable real estate and renovation contracting practices of YSCP, YSWP, and Dream Schools).[147]

- Martha Woodall and Claudio Gatti, *WikiLeaks Files Detail U.S. Unease over Turks and Charter Schools*, The Inquirer (Apr. 4, 2011) (discussing Truebright's use of H-1B visas, pension records showing salary discrimination against Americans, possible kickbacks to the Gülen movement, and concern from U.S. officials that Gülen schools mold and indoctrinate students to be proselytizers).[148]

- Colin Deppen, *Court Ruling Reignites Lancaster's Surreal Charter School Drama*, PennLive (June 3, 2016) (discussing the School District of Lancaster's $450,000 legal fight against ABECS due to the school's use of forged, illegible, and duplicative signatures on petitions necessary to appeal the school district's denial of the charter application).[149]

143 http://tinyurl.com/l9fxrbs (last checked 4/15/2017).

144 http://tinyurl.com/n3dzcph (last checked 4/14/2017).

145 http://tinyurl.com/nysuuuy (last checked 4/12/2017).

146 http://tinyurl.com/lcqcjnu (last checked 4/12/2017).

147 http://tinyurl.com/ky9bx7v (last checked 4/12/2017).

148 http://tinyurl.com/mb43al8 last checked 4/12/2017).

149 http://tinyurl.com/myb8l6a last checked 4/12/2017).

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Quick Facts

- Total # of Schools in Region: 14, plus one private school. After 2017, 15.

- Total Regional Revenues for the 2015-16 school year: $34,837,068.

- Regional Charter Networks:
  - River City Science (FL) – 4 schools
  - Discovery (FL) – 1 school
  - Science Charter Schools (FL) – 4 schools
  - Broward Math and Science (FL) – 1 school
  - New Springs Schools (FL) – 2 schools
  - School of Math and Science (FL) – 1 school
  - Green (SC) – 1 school (with a second to open in 2017)
  - Fulton Science (GA) (closed) – formerly 3 charter schools, with 1 private school remaining open

- Total Student Enrollment 2015-16: 5,084 students

- Total # of H-1B applications filed from 2000-2016 in region by Southeastern charter networks and Charter Educational Services & Resources: 256 applications at an estimated cost of $512,000 - $1,024,000 in public funds spent to immigrate Turkish Gülenists.[1]

- Regional Vendors:
  - Charter Educational Services & Resources ("CESR"), formerly known as the Grace Institute
  - Blue Ocean Construction
  - The Core Group/Core Design and Production
  - Atlantic Wind Group (a/k/a Atlantic Wind Production)

- Regional Founders and Key Members:
  - Akif Aydin: Founding Board Member, River City Education Services, Inc. (FL); Director, Istanbul Cultural Center of Jacksonville (FL); Director, Amity Turkish Cultural Center (FL); Board Member, Green Charter School (SC); President, Atlantic Institute of South Carolina (SC);[2] Educational Director, Atlantic Foundation of North Florida (2006-2010) (FL);[3] Registered Agent, Green Apple Education (SC).[4]
  - Selim Ozdemir: Principal, Fulton Science Academy Middle school (GA); Bookkeeper, Registered Agent, President, CEO, CFO, Grace Institute (now known as CESR) (GA); Executive Director, Fulton Science Academy High School (GA); Executive Director, Fulton Science Academy High School and Middle School (GA); Registered Agent, Fulton Sunshine Academy (GA); Board member, Grace Institute (now known as CESR) (GA).[5]
  - Ali Ozer: Founding Principal, T.E.A.C.H. (also known as Fulton Science Academy High School) (GA); Executive Director, Fulton Science network (GA); CEO, CFO, President,

1 H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

2 Information taken from: Green charter board minutes, available at: http://tinyurl.com/lp4rppx (last checked 6/16/2017); Green charter petition pg 18, available at: http://tinyurl.com/mb7sjmz (last checked 6/16/2017); Article discussing Aydin and Amity, available at: http://tinyurl.com/y7pql78 (last checked 6/16/2017); Article discussing Aydin and the Atlantic Institute, available at: http://tinyurl.com/menn3mk (last checked 6/16/2017).

3 Aydin at the Atlantic Foundation, Green Charter School application, available at: https://tinyurl.com/mb7sjmz (last checked 6/16/2017).

4 Green Apple Education Corporate Filings, South Carolina Secretary of State, available at: https://tinyurl.com/y9ugzyps (last checked 6/16/2017).

5 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017).

Grace Institute (now known as CESR) (GA); Curriculum Director, Fulton Science Academy Middle school (GA); 2006 Lead Petitioner, Greenville Science Charter School (SC) (denied in 2006 and 2009).[6]

- Avni Cokavci: CEO, CFO, Grace Institute (now known as CESR) (GA); Bookkeeper, Grace Institute (now known as CESR) (GA); Assistant Principal, Bookkeeper, Principal, Fulton Science Academy High School (GA).[7]
- Levent Bulut: CFO, Fulton Science Academy (GA); CFO, Fulton Science Academy High School (GA); CFO, Fulton Sunshine Academy (GA); Board Member, Cosmos Foundation – Harmony Public Schools (TX).[8]
- .Ayhan Korucu: Founding Board Member, Fulton Educational Services, Inc. (GA); CEO, Fulton Science Academy Middle School (GA); CEO, Fulton Science Academy High School (GA); CEO, President, Fulton Sunshine Academy (GA); President, Fulton Science Academy Private School (GA).[9]
- Selcuk Buyukasarac: Incorporator and Founding Board Member, River City Education Services, Inc. (FL); Public Relations Director, River City Science Academy (FL); Chief of Public Affairs and Government Relations, River City Science Academy (FL).[10]
- Dogan Tozoglu: Board President, Stars Education Services (FL); Board member/Consultant Sweetwater Education, Inc. (FL); Founding Board member, Palm Beach Science Academy (FL)(attempt); Petitioner, Capital City Charter Science Academy (FL)(attempt); Executive Director, River City Science Academies (FL).[11]
- Mehmet Taskan: Incorporator, Discovery Education Services, Inc. (FL); Incorporator, Universal Education Services, Inc. (FL); Owner, Blue Ocean Construction (River City-FL and Green Charter-SC construction vendor); Employee, Khatib Development LLC (FL) – Gülenist Landlord entity.[12]
- Yalcin Akin: Founding Board Member, Stars Education Services, Inc. (FL); Board Member, New Springs, Inc. (FL); Board Member, Consultant Sweetwater Education, Inc. (FL); Principal, Orlando Science Middle/ High School (FL); Owner, Discovery Education Operations, LLC (FL); Owner, 2611 Technology LLC, (FL); Owner, Discovery Education

6 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017); Fulton Educational Services 2005 990 form, available at: http://tinyurl.com/zxtjkrm (last checked 6/16/2017).

7 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017); Cosmos/ Harmony 990s, available at: http://tinyurl.com/hu9wqcl (last checked 6/16/2017).

8 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017).

9 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017); FSAPS 990 forms, available at: http://tinyurl.com/kq8yqex (last checked 6/16/2017).

10 Information taken from: LinkedIn profile, available at: http://tinyurl.com/lqyzehu (last checked 6/16/2017).

11 Information taken from: LinkedIn profile, available at: http://tinyurl.com/kn2ykaj (last checked 6/16/2017); Stars Education corporate filings, available at: http://tinyurl.com/lfbv3fv; Palm Beach Science Academy Petition, pg 5 http://tinyurl.com/nx6693g (last checked 6/16/2017); 2013-14 Charter school report, available at: http://tinyurl.com/kd5c6bs (last checked 6/16/2017); Sweetwater 2010 990 form, available at: http://tinyurl.com/goj3zw3 (last checked 6/16/2017).

12 Information taken from: Discovery Education Services Articles of Incorporation, available at: http://tinyurl.com/ml8qjeh (last checked 6/16/2017); Universal Education Services Corporate Information, available at: http://tinyurl.com/kwwpz7p (last checked 6/16/2017); River City Plaza LLC Corporate Information, available at: http://tinyurl.com/mc32ngh (last checked 6/16/2017); Khatib Development Corporate Information, available at: http://tinyurl.com/kczqg5u (last checked 6/16/2017); Blue Ocean Corporate Filings, available at: http://tinyurl.com/lb5e5bs (last checked 6/16/2017).

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Operations at Technology, LLC (FL); Owner, 941 John Young, LLC (FL);[13] Executive Director, Orlando Science Schools (FL).[14]

- ▷ Renat Shaykhutdinov: Board Member, Palm Beach Science, Inc. (FL); Board President, Riverside Science, Inc. (FL); Presenter at multiple Gülen Conferences; Author of articles regarding Gülen and Education; Presenter for The Atlantic Institute.[15]
- ▷ Adem Dokmeci: Principal of GREEN Charter School – Greenville (SC); Registered Agent, GREEN Midlands LLC (SC) (Gülenist landlord entity); Principal, River City Science Academy (FL); Vice Principal, Brooklyn Amity School (NY) (private Gülen school); Teacher in Turkey, Uzbekistan, and Indonesia; B.S., Marmara Universitesi (Istanbul, Turkey).[16]
- ▷ Namik Sercan: Teacher, Fulton Science Academy Middle School (GA); CEO, Registered Agent, Board Secretary, Fulton Sunshine Academy (GA); Bookkeeper, Fulton Science Academy High School/TEACH (GA); Board Secretary, Grace Institute (now known as CESR) (GA); Principal, Registered Agent, Fulton Science Academy High School/TEACH (GA); Author of article in The Fountain Magazine (NJ), 2008, a Gülenist publication; Chief Education Officer, Central Jersey College Prep (NJ); Board Member, Syracuse Science (NY); Executive Director, Terra Foundation – Gülenist landlord entity (NY).[17]
- ▷ Alaaddin Akgul: Teacher, Fulton Science Academy Middle School (GA); Board Member, Fulton Sunshine Academy (GA); Science Coach & Gifted Education Consultant, CESR (Southeastern); Dean, River City Science Academy (FL); Principal, River City Science Elementary (FL); Regional Director, Science Olympiad (FL); Principal, River City Science Mandarin (FL).[18]

- ► Regionally Active Turkish cultural associations: The Atlantic Institute (GA), Istanbul Cultural Center (SC), Amity Turkish Cultural Center (FL).

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13 Information taken from: Discovery Education Services Articles of Incorporation, available at: http://tinyurl.com/ml8qjeh (last checked 6/16/2017); Universal Education Services Corporate Information, available at: http://tinyurl.com/kwwpz7p (last checked 6/16/2017); River City Plaza LLC Corporate Information, available at: http://tinyurl.com/mc32ngh (last checked 6/16/2017); Khatib Development Corporate Information, available at: http://tinyurl.com/kczqg5u (last checked 6/16/2017); Blue Ocean Corporate Filings, available at: http://tinyurl.com/lb5e5bs (last checked 6/16/2017).

14 Information taken from: Discovery Education Solutions Articles of Incorporation, available at: http://tinyurl.com/k44c5wz (last checked 6/16/2017); 2611 Technology corporate filing, available at: http://tinyurl.com/lb3krmn (last checked 6/16/2017); Discovery Education Properties filing, available at: http://tinyurl.com/l9byptv (last checked 6/16/2017); 949 John Young LLC filing, available at: http://tinyurl.com/ko5xomx (last checked 6/16/2017); Article by Yalcin, available at: http://tinyurl.com/kb3cd22 (last checked 6/16/2017); New Springs corporate filings, available at: http://tinyurl.com/krhhtmr (last checked 6/16/2017).

15 Information taken from: the Florida Secretary of State, available at: http://tinyurl.com/mh72fhf (last checked 6/16/2017); 2007 Texas Conference Agenda, available at: http://tinyurl.com/gt2vujs (last checked 6/16/2017); Conference Speaker List, available at: http://tinyurl.com/kj7v882 (last checked 6/16/2017); Conference Presentation, available at: http://tinyurl.com/klxu29d (last checked 6/16/2017); Article Listing, available at: http://tinyurl.com/m5cfaq5 (last checked 6/16/2017).

16 Information taken from: Green Midlands LLC Property Records, available at https://tinyurl.com/n5wvsbt (last checked 6/16/2017); Seth Kugel, Neighborhood Report: Sheepshead Bay; A Small School Run by Turks Takes the Stage, New York Times (March 21, 2004), available at: http://tinyurl.com/ycomlpvo (last checked 6/16/2017); LinkedIn Profile, available at: https://tinyurl.com/lctzf2u (last checked 6/16/2017).

17 Information taken from: FSAMS Audit pg 68-70, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017); LinkedIn Profile, available at: http://tinyurl.com/lc5vxh9 (last checked 6/16/2017); Namik Sercan, CEO of Central Jersey College Prep,

18 Information taken from: Linkedin Profile, available at: http://tinyurl.com/l59zuqz (last checked 6/16/2017); FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017).

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The Origins of the Southeastern Region

When Fethullah Gülen relocated to the United States in 1999, it prompted a wave of charter schools opened by his followers. In the Southeastern region, the first educational foundation formed in 1999 in Georgia. Despite the early formation of the Georgia network, the rest of the Southeastern region remained largely undeveloped for several years. The first Georgia school opened in 2001 and remained the only school in the region through 2005. In that year, the Southeastern region began attempts to aggressively expand.

In Georgia, the Fulton Science network proceeded to open two additional schools in 2005 and 2010. All three of the Georgia charter schools are now closed and are survived by a private school, the Fulton Science Academy Private School. In Florida, Gülenists formed five educational foundations between 2003 and 2006. But the first Gülen charter school in Florida, the River City Science Academy, did not open until 2007. Since then, the Florida charter networks have expanded at a breakneck pace, opening 15 schools after 2007. Two of these schools, the Sweetwater Branch Academy middle and elementary schools, closed in 2013 due to poor academic performance and financial solvency issues. Gülenists proposed an additional six charter schools after 2005 in Florida, though these schools never opened for various reasons. In South Carolina, however, the Gülen charter school network started slowly. Gülenists attempted to open the first school in 2006 but were denied. A reapplication for the school was again denied in 2009. In 2012, Gülenists finally established the Greenville Renewable Energy Charter School ("GREEN Charter School – Greenville") in South Carolina. A second school in the Greenville Renewable Energy Charter School ("Green Charter Schools") network is scheduled to open in 2017.

This expansion in the Southeastern coincides with the foundation of Charter Educational Services & Resources ("CESR"), formerly known as the Grace Institute ("Grace"). Avni Cokavci, a former administrator in the Fulton Science network, founded Grace in 2008, and it signed its first contract with the Fulton Science Academy Middle School just a few months later. In Florida, Avni Cokavci registered CESR in 2012.[19]

Since 2007, the greatest "successes" for the Gülen organization in the Southeastern Region have occurred in Florida. For example, the River City Science Academy participated in a particularly egregious example of suspect real estate dealings common throughout the Gülen organization. In 2010, Yazan Khatib purchased property for the school at a foreclosure auction for $100.00 through his company, River City Plaza LLC, which also employs Mehmet Taskan.[20] Over the next three years, Khatib and Taskan procured numerous building permits for construction and renovation to update the property for River City Science Academy. Khatib spent $1,583,5000 in construction and acquisition costs on the property.[21] Khatib and Taskan often hired Taskan's own company, Blue Ocean Construction, to perform the renovations. In 2014, River City Science Academy took over the payment for the building permits for the property, despite not officially owning it yet. In 2015, River City Science Academy purchased the building from Khatib for $12,509,500 with the proceeds of bond financing. The purchase included neighboring property that Khatib purchased in 2012 for $340,000 and renovated by River City

[19] Florida corporate documents for CESR, available at: http://tinyurl.com/ydx3dbcb (last checked 6/16/2017).

[20] Foreclosure information, available at: http://tinyurl.com/mzxg2u7 (last checked 6/16/2017); Property history, available at: http://tinyurl.com/leqctfa (last checked 6/16/2017); River City Plaza LLC corporate information, available at: http://tinyurl.com/mc32ngh (last checked 6/16/2017); Khatib Development corporate information, available at: http://tinyurl.com/kczqg5u (last checked 6/16/2017).

[21] This figure is the $100 sale price plus the aggregate total of fees listed in the permits, available at: http://tinyurl.com/mv7k7au (last checked 6/16/2017).

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Science Academy, again using Taskan's Blue Ocean Construction.[22] In total, the Gülenist individuals and entities made an estimated profit of nearly $12.5 million after transferring the property to River City Science Academy. Even though River City Science Academy had recently paid nearly $1 million to construct a gym on the property, this amount was not credited against the purchase price.

The Florida networks have also engaged in inter-entity lending practices, a known warning sign for money laundering.[23] In 2015-16, both River City Science Elementary and River City Science Innovation owed River City Science Academy money—$23,726 and $53,834 respectively.[24] All of the River City schools are under the same governing board, meaning the board owes fiduciary duties of care and loyalty to each of its schools. Shuffling funds between schools, particularly when River City Science Academy operated at a deficit net position for the same year, could be indicative of a breach of fiduciary duty to the school.

In South Carolina, the Green Charter Schools network engages in the same type of real estate dealings seen at the River City Science Academy. Unsurprisingly, key leaders of the Green Charter Schools are connected to Florida's River City network: Akif Aydin founded both the Green Charter Schools and River City networks, and Adem Dokmeci has served as principal of both the River City Science Academy and GREEN Charter School – Greenville. Additionally, the GREEN Charter School - Greenville also leases property from a landlord controlled by the same individual, Yazan Khatib, involved in the River City Science Academy real estate windfall. Blue Ocean Construction also managed a construction project for the school.

A second South Carolina school set to open in 2017, the Green Charter School of the Midlands, will also lease its facilities from a landlord we believe to be affiliated with the Gülenists, GREEN Midlands LLC. GREEN Midlands borrowed $5,845,000 through a bond financing to purchase and renovate facilities for the school. The school will pay all expenses, taxes, fees, and costs associated with the facility. Adem Dokmeci serves as the registered agent for GREEN Midlands, LLC. This kind of middleman real estate entity is used throughout the Gülen Organization to purchase property using public funds while securing ownership by private Gülenist entities.

While the Gülen charter school network in Florida prospered, the Fulton Science network in Georgia floundered. The Fulton County School District, the authorizer for the Fulton Science network, learned of significant overlap between the leadership of the Fulton Science network and Grace/CESR, the schools' charter management organization. In light of these serious conflicts of interest, Fulton County Schools required the schools to sever their contracts with Grace, and the overlapping board members and employees separated. But the schools signed new contracts with Grace just a few months later, and the schools' leadership continued to violate the school district's required procurement process. As the issues with the schools mounted, the school district required a forensic audit of the Fulton Science Academy Middle School ("FSAMS").

The external audit revealed an astounding level of fraud. FSAMS leadership obstructed the audit, which revealed numerous conflicts of interest between Fulton Science schools, their employees, board governance, Grace, and other vendors. The schools overpaid Grace and affiliated vendors for dubious services received. As a result, the auditors questioned whether Grace provided any services at all. The audits also revealed:

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[22] Property history, available at: http://tinyurl.com/kusft9s (last checked 6/16/2017). All information regarding the construction costs is available through searching the building permit database, available at: http://tinyurl.com/mv7k7au (last checked 6/16/2017).

[23] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 6/16/2017).

[24] See 2016 audits for each school.

- Improper and excessive use of public funds for H-1B employees, their spouses, and even the employees of other schools;
- Poor financial practices and bookkeeping;
- Failure to maintain criminal background checks for employees;
- Employee with criminal background in position of authority undetected;
- High concentration of H-1B employees;
- High attrition and turnover rate for H-1B employees;
- Excessive relationships between vendors for FSAMS; and
- Failure to adhere to district-required safety protocol for international field trips to Turkey.

As a result of the FSAMS audit, Fulton County Schools declined to renew the school's charter. But before the school closed, it entered into a $19 million bond financing arrangement in 2011. The school hired Noss Construction, a Gülen-affiliated construction vendor, to construct a K-12 campus that would house all three Fulton Science schools. The school, however, never disclosed its ongoing problems with Fulton County Schools at the time of the bond statement, a potential omission of material fact. When Fulton County Schools voted to non-renew FSAMS's charter in light of the forensic audits, the bond financing defaulted, costing investors hundreds of thousands of dollars. The property sold to TruGlobe, Inc., a Gülenist-owned company, for a fraction of its price, and is now operated by Fulton Science Academy Private School ("FSAPS"), the private school incarnation of FSAMS.

Because of these problems, Fulton County Schools initiated audits of the other Fulton Science schools. These audits uncovered similar problems, including:

- Failure to account for bond debt default in financial reporting and records;
- Excessive truancy;
- Overlap between school leadership and paid CMO, Grace;
- Use of school employees for work Grace was paid to provide;
- Excessive use of H-1B program to hire unqualified Turkish individuals with no teaching experience and bad grades;
- Payment for H-1B immigration costs for employees and family members with school funds;
- Use of sporadic Craigslist posts for job openings;
- Failure to inform board of hiring from Turkey or use of school funds to pay for immigration costs;
- Domination of governing board by Turkish school leadership, as reported by non-Turkish parent members;
- Failure to utilize the governing board in hiring decisions;
- Poor board governance, as reported by non-Turkish parent members on governing board;
- Improper use of personal vehicles without insurance to transport students; and
- Failure to adhere to safety protocol for international field trips to Turkey.

As a result of these audits, Fulton County Schools declined to renew the charters of the remaining Fulton Science schools in 2015. The only remaining Gülenist school in Georgia is the private FSAPS.

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After the audits revealed Grace to be a sham corporation, Grace changed its branding to CESR. CESR receives a per-head amount in fees from each of its customer charter schools, allegedly for curricular support, professional development, and student information management systems. Charter schools in Florida and South Carolina and the private Fulton Science Academy continue to contract with CESR. Many of the H-1B employees from the Fulton Science schools ultimately dispersed throughout the Florida Gülen charter schools, although the two networks shared employees prior to that, as well.

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
FL networks			✓	
Green (SC)		✓		
Fulton Science (GA)	✓ (Reached Stage Three Status and created the Grace Institute before being dismantled)			

Of the three state networks in the Southeastern region, Florida has the largest and most developed networks. Both River City Education Services, Inc., operating the River City Science schools, and Discovery Education Services, Inc., operating the Science Charter Schools, operate four schools each. The other Florida networks operate only one or two schools each. If left unchecked, the Florida network could reach "Too Big to Fail" status. The number of different networks might make it more difficult for the Florida charter schools to hit "Too Big to Fail" status, and Florida authorities should monitor the situation in the event that the various networks begin to merge. For example, the

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Arizona charter school network began as separate entities that merged over time, eventually creating a larger and more centralized structure that will be more difficult to challenge. As long as the schools remain legally distinct, authorizers could revoke school charters individually without having to challenge or dismantle the entire network at once. This is in contrast to Harmony (TX), which is the only state network with Stage Four status. The entire Harmony (TX) network is governed by a single board of directors, which also constitutes and runs the charter management organization itself. To take issue with any one of Harmony's charter schools, the state would have to challenge the Harmony board and corporate entity, which is too far entrenched in Texas education and public financing to eliminate without major repercussions to the state of Texas.

The South Carolina network is currently set to expand and will have two schools at the end of 2017. As previously discussed, the authorizer of the Fulton Science network shuttered the Gülen charter school network in Georgia.

The South Carolina and Florida networks have already received bond financing. In 2015, the River City network received $14.4 million in financing for River City Science Academy. In 2016, GREEN Midlands, LLC borrowed $5,845,000 through bonds to renovate the facilities for the Green Charter School of the Midlands, set to open in 2017.

Regional Vendors

The Gülen charter schools in the Southeast contract with Charter Educational Services & Resources ("CESR"), formerly known as the Grace Institute ("Grace"). Avni Cokavci, an administrator in the Fulton Science network, incorporated Grace in 2008. The schools in the Southeastern network use CESR for student information systems, and CESR receives a per-head amount in fees from its customers, allegedly for curricular support, professional development, and student information systems. The overlap between Fulton Science administrators and Grace directors and officers drew the scrutiny of the Fulton Science network's authorizer, which led to forensic audits of the schools and their ultimate termination.

By contracting with Turkish, likely Gülen-affiliated vendors, the networks create a vertical economy that controls both the charter school customers and the vendors that service the schools. With Gülenists on both sides of the transaction, we believe CESR can control pricing and the schools' acceptance of that pricing, no matter how egregious it might be. The forensic audits of the Fulton Science network revealed that the schools overpaid their vendors for dubious services received. In particular, the auditors revealed that Grace employed only two individuals, an IT person and a person to answer the phones. For that reasons, the auditors questioned whether Grace provided any services at all, even though the Fulton Science school leaders hired Grace to provide services for fees between $70,000 and $90,000 per year.

Like the other regional Gülenist charter management organizations Accord (Western region), Apple Educational Services (Northeast region), Harmony Public Schools (Greater Texas region), and Concept Schools (Midwestern region), CESR shares and shuffles its employees and board members with its charter schools, preferred regional vendors, and other charter networks throughout the Gülen Organization.

Blue Ocean Construction fulfills the role of the Gülenist construction company for the Southeastern Region, providing what we believe is an easy cover for the networks' apparently systematic overpayment due to "unforeseen" project costs, delays, materials, and issues that can commonly occur on construction jobs. Blue Ocean has been used for jobs in Florida and South Carolina, and perhaps more that are not publicly listed. Mehmet Taskan, the owner of Blue

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Ocean, even incorporated two Gülenist charter foundations in Florida: Discovery Education Services and Universal Education Services.

Before it closed, the Fulton Science network also contracted with Atlantic Wind Group ("AWG") and the Core Group/Core Design & Production ("Core"). Baybars Bakay, a computer teacher at the Fulton Science Academy Middle School ("FSAMS"), founded AWG. In spite of this connection, the principal of FSAMS claimed he did not know Bakay or that Bakay worked for the school.[25] AWG provided video, advertising, marketing, and website design services to the Fulton Science network.

The Fulton Science network also purchased school uniforms through Core Group, one of the major vendors of the Midwest region of the Gülen Organization. The forensic audit revealed that Core's pricing was high relative to other vendors, and the school kept a large, unused quantity of uniforms in storage at all times that had no bearing on demand. The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept Schools in the Midwest purportedly used to defraud the E-Rate program.[26] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[27] The Florida schools have received E-Rate funding. In light of the E-Rate fraud allegedly committed by Concept Schools and the connection of Core to the Southeastern region, the vendors chosen by the Florida networks should be examined.

Regional Employee/Founder Overlap*

Employee	FL	SC	GA	Other States, Vendors, Cultural Associations
Emre Akbaba	✓		✓	
Ali Gumus	✓			CESR; LISA Academy (AR); Harmony (TX); School of Excellence (TN)
Murat Cetin	✓		✓	
Namik Sercan			✓	Central Jersey College Prep (NJ); Syracuse Science (NY); Terra Foundation (NY)
Adem Dokmeci	✓	✓		Brooklyn Amity School (NY); Registered agent GREEN Midlands, LLC
Avni Cokavki			✓	Grace Institute
Selim Ozdemir			✓	Grace Institute
Levent Bulut			✓	Cosmos Foundation/Harmony (TX)
Alaadin Akgul	✓		✓	CESR
Baybars Bakay			✓	Atlantic Wind Group
Baybars Bakay	✓			Atlantic Institute
Vedat Akgun			✓	Horizon Science (OH); Indiana Life Science (attempt) (IN); Charter Housing Corporation (GA); Istanbul Cultural Center (GA)
Mehmet Taskan			✓	Blue Ocean Construction (FL, SC vendor)

**This is just a sampling of the employment overlap of the Western Region's Turkish employees.*

[25] FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/16/2017).

[26] See Mihalopoulos, Dan. Targeted Firms Still Get Tax Money After Charter Raids, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 6/16/2017).

[27] Id.

Florida



QUICK FACTS ON GÜLEN CHARTER SCHOOLS FLORIDA



NUMBER OF SCHOOLS	12
KNOWN AS	**Science Charter School, River City Science Academy, School of Math & Science, Broward Math and Science School, Discovery Academy of Science, New Springs Schools**
TOTAL ENROLLMENT	**4,525**
CHARTER VENDOR	**Charter Educational Services & Resources**
TOTAL REVENUES	**$29,603,000**
RELATED INSTITUTIONS	SC GREEN; GA Closed Network Fulton Science

KEY PEOPLE



Yalcin Akin · Dogan Ozoglu · Eray Idil · Akif Aydin · Selcuk Buyukasarac · Renat Shaykhutdinov · Mehmet Taskan

REAL ESTATE

In Florida, by far the most egregious example of the Gülen Organization's real estate scheme concerns the acquisition of the River City Science Academy's 7555 and 7605 Beach Boulevard property in Jacksonville, FL. In 2010, Yazan Khatib purchased the 7555 property at a foreclosure auction for **$100.00** through his company, River City Plaza LLC, which also employs Mehmet Taskan. Over the next three years, Khatib and Taskan procured numerous building permits for construction and renovation to update the property for River City Science Academy mentioned by name as early as 2011. Khatib spent $1,583,500 in construction and acquisition costs on the 7555 property. Khatib and Taskan **often hired Taskan's own company, Blue Ocean Construction, to perform the renovations.** In 2014, River City Science Academy took over the payment for the building permits for the property, despite not officially owning it yet. In 2015, River City Science Academy purchased the building from Khatib for **$12,509,500** with the proceeds of bond financing.

2010 - 2015

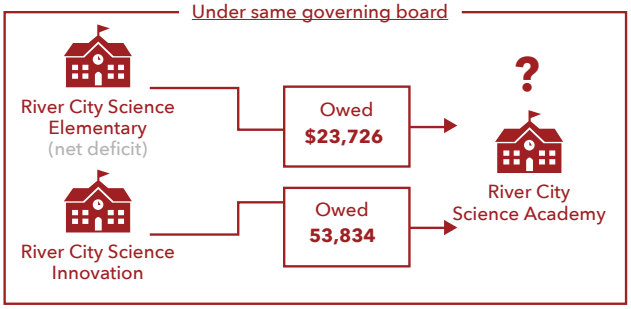
Khatib & Taskan - River City Plaza, LLC; 7605 Beach Boulevard LLC	Taskan - Blue Ocean Construction	River City Science Academy
$1,998,696 spent total	**$1,916,130 profit**	**$1,168,044 spent before owning either building**
$12,509,500 gained		**$13,678,594 spent total**
$10,510,804 net profit		**$29,326,656 ultimate cost due to bond financing**

H-1B VISA APPLICATIONS

195 H-1B **H-1B VISA APPLICATIONS 2001-2016**

INTER-ENTITY LENDING PRACTICES

Investigations suggest that charter schools within the Gülen Organization and their vendors engage in frequent inter-entity lending practices, **a known warning sign for money laundering**.



Shuffling funds between schools, particularly when River City Science Academy operated at a deficit net position for the same year, could be **indicative of a breach of fiduciary duty to the school.**

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Southeast

- School Names (known as):
  - Science Charter School
  - River City Science Academy
  - School of Math & Science
  - Broward Math and Science School
  - Discovery Academy of Science
  - New Springs Schools

- Total # of Schools in State: 12

- Total Student Enrollment 2015-16: 4,525[1]

- Charter Holder/Governing Board(s):
  - Discovery Education Services, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the Science Charter Schools (4 schools)
  - River City Education Services, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the River City Science Academies (4 schools)
  - Stars Education, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees Tallahassee School of Math and Science (1 school)
  - Riverside Science, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees Broward Math and Science School (1 school)
  - Galaxy Education, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees Discovery Academy of Science (1 school)
  - New Springs, Inc.
    - Organized as a non-profit 501(c)(3) organization
    - Oversees New Springs Schools (2 schools)

- Charter Management Services Vendor: Charter Educational Services & Resources

- Regional Gülen Organization Oversight Entity: Charter Educational Services & Resources

- Regional Sister Networks: GREEN (SC); Closed Network Fulton Science (GA).

- Total Revenues for the 2015-16 school year: $29,603,000[2]

- Florida Network Founders:
  - **Yalcin Akin:** Founding Board Member, Stars Education Services, Inc. (FL); Board Member, New Springs, Inc. (FL); Board Member, Consultant, Sweetwater Education, Inc. (FL); Principal, Orlando Science Middle/High School (FL); Owner, Discovery Education Operations, LLC (FL); Owner, 2611 Technology LLC, (FL); Owner, Discovery Education Operations at Technology, LLC (FL); Owner, 941 John Young, LLC (FL); Executive Director, Orlando Science Schools.[3]

[1] Student enrollment and demographic information available at: http://tinyurl.com/mtzdnmw (last checked 4/19/2017).

[2] Figures are taken from Fiscal Year 2016 audits for all schools currently in operation. Audits are available at: http://tinyurl.com/m9ldgth (last checked 6/15/2017).

[3] Information taken from: Discovery Education Solutions Articles of Incorporation, available at http://tinyurl.com/k44c5wz (last checked 6/15/2017); 2611 Technology corporate filing, available at: http://tinyurl.com/lb3krmn (last checked 6/15/2017); Discovery Education Properties filing, available at: http://tinyurl.com/l9byptv (last checked 46/15/2017); 949 John Young LLC filing, available at: http://tinyurl.com/ko5xomx (last checked 6/15/2017); Article by Yalcin, available at: http://tinyurl.com/kb3cd22 (last checked 6/15/2017); New Springs corporate filings, available at: http://tinyurl.com/krhhtmr (last checked 6/15/2017).

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- **Renat Shaykhutdinov:** Board Member, Palm Beach Science, Inc. (FL); Board President, Riverside Science, Inc. (FL); Presenter at multiple Gülen Conferences; Author of articles regarding Gülen and Education; Presenter for The Atlantic Institute.[4]
- **Akif Aydin:** Founding Board Member, River City Education Services, Inc. (FL); Director, Istanbul Cultural Center of Jacksonville (FL); Director, Amity Turkish Cultural Center (FL); Board Member, Green Charter School (SC); President of the Atlantic Institute of South Carolina (SC).[5]
- **Selcuk Buyukasarac:** Incorporator, Founding Board Member, River City Education Services, Inc. (FL); Public Relations Director, River City Science Academy (FL); Chief of Public Affairs and Government Relations, River City Science Academy (FL).[6]
- **Dogan Tozoglu:** Board President, Stars Education Services (FL); Board member, Consultant, Sweetwater Education, Inc. (FL); Founding Board member, Palm Beach Science Academy (FL)(attempt); Petitioner, Capital City Charter Science Academy (FL)(attempt); Executive Director, River City Science Academies (FL).[7]
- **Mehmet Taskan:** Incorporator, Discovery Education Services, Inc. (FL); Incorporator, Universal Education Services, Inc. (FL); Owner, Blue Ocean Construction (FL) (River City construction vendor); Employee, Khatib Development LLC (FL) – Gülenist Landlord entity.[8]

Overview

As of the 2016-2017 school year, Florida has 12 charter schools within the Gülen Organization. Unlike other states, Florida has numerous small Gülen charter networks across the state, ranging from one to four schools in size. While each of these networks is controlled by its own governing board, giving the appearance that these networks are separate, these networks share the same vendors, founders, and charter management corporations and have connections throughout the Southeastern region of the Gülen Organization. Furthermore, based on student enrollment and financial resources controlled, our research indicates that Florida is one of the larger networks in the country.

Charter Educational Services & Resources ("CESR") is the charter management organization

4 Information gathered from the Florida Secretary of State, available at: http://tinyurl.com/mh72fhf (last checked 6/15/2017); Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked 6/15/2017); Conference speaker list, available at: http://tinyurl.com/kj7v882 (last checked 6/15/2017); Conference presentation, available at: http://tinyurl.com/klxu29d (last checked 6/15/2017); Article listing (search name), available at: http://tinyurl.com/m5cfaq5 (last checked 6/15/2017).

5 Information taken from: Green charter board minutes, available at: http://tinyurl.com/lp4rppx (last checked 6/15/2017); Green charter petition pg 18, available at: http://tinyurl.com/mb7sjmz (last checked 6/15/2017); Article discussing Aydin and Amity, available at: http://tinyurl.com/y7pql78 (last checked 6/15/2017); Article discussing Aydin and the Atlantic Institute, available at: http://tinyurl.com/menn3mk (last checked 6/15/2017).

6 Information taken from: Linkedin profile, available at: http://tinyurl.com/lqyzehu (last checked 6/15/2017).

7 Information taken from: Linkedin profile, available at: http://tinyurl.com/kn2ykaj; (last checked 6/15/2017); Stars Education corporate filings, available at: http://tinyurl.com/lfbv3fv (last checked 6/15/2017); Palm Beach Science Academy Petition, pg 5 http://tinyurl.com/nx6693g (last checked 6/15/2017); 2013-14 Charter school report, available at: http://tinyurl.com/kd5c6bs (last checked 6/15/2017); Sweetwater 2010 990 form, available at: http://tinyurl.com/goj3zw3 (last checked 6/15/2017).

8 Information taken from: Discovery Education Services, Articles of Incorporation available at: http://tinyurl.com/ml8qjeh (last checked 6/15/2017); Universal Education Services, corporate information available at: http://tinyurl.com/kwwpz7p (last checked 6/15/2017); River City Plaza LLC corporate information available at: http://tinyurl.com/mc32ngh (last checked 6/15/2017); Khatib Development corporate information available at: http://tinyurl.com/kczqg5u (last checked 6/15/2017); Blue Ocean Corporate filings, available at: http://tinyurl.com/lb5e5bs (last checked 6/15/2017).

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responsible for the Southeastern region of the Gülen Organization charter network. CESR allegedly provides additional educational management services for the charter schools for a percentage fee of total school revenues. On average, the Florida Gülen charter schools serve 41.7% free and reduced lunch population vs. 58.7% state average; 5.8% students with disabilities vs. 13.2% state average; 9.3% English language learners vs. 9.8% state average; 59.5% minority students vs. 60.5% state average; and 40.5% Caucasian students vs. 39.5% state average. As these numbers indicate, the Florida Gülen charter schools serve a significantly smaller percentage of vulnerable student populations, such as economically disadvantaged students and students with disabilities.

School	Operation[7]	Student Demographic Information *	Authorizer	Governing Board
Orlando Science Middle High Charter (0089) 2427 Lynx Lane Orlando, FL 32804	Grades 6-12 2008-Present	1.9% ELL 36% FRL 2.7% SWD 72.8% Minority 27.2% Caucasian	Orange County School Board	Discovery Education Services, Inc.
Orlando Science Elementary Charter (0200) 2611 Technology Drive Orlando, FL 32804	Grades K-5 2012-Present	6.9% ELL 39.2% FRL 3.3% SWD 69.6% Minority 30.4% Caucasian	Orange County School Board	Discovery Education Services, Inc.
Seminole Science Charter School (9236) 3580 N US Highway 17-92 Lake Mary, FL 32746	Grades K-8 2015-Present	2.9% ELL 39.2% FRL 6.6% SWD 54.9% Minority 45.1% Caucasian	Seminole County School Board	Discovery Education Services, Inc.
Osceola Science Charter School (0181) 2880 North Orange Blossom Trail Kissimmee, FL 34741	Grades K-8 2016-Present	29.3% ELL 57.7% FRL 0.9% SWD 79.6% Minority 20.4% Caucasian	Osceola County School Board	Discovery Education Services, Inc.
River City Science Elementary Academy (1291) 7450 Beach Blvd. Jacksonville, FL 32216	Grades K-5 2010-Present	11.6% ELL 0.8% FRL 3.5% SWD 42.2% Minority 57.8% Caucasian	Duval County School Board	River City Education Services, Inc.
River City Science Academy Innovation School (5441) 3251 Newell Blvd. Jacksonville, FL 32216	Grades K-6 2013-Present	6.2% ELL 17.6% FRL 5.3% SWD 50.1% Minority 49.9% Caucasian	Duval County School Board	River City Education Services, Inc.
River City Science Academy (1201) 3266 Southside Blvd Jacksonville, FL 32216	Grades 6-12 2007-Present	6.1% ELL 7.0% FRL** 6.8% SWD 42.4% Minority 57.6% Caucasian	Duval County School Board	River City Education Services, Inc.
River City Science Academy at Mandarin (5601) 10911 Old St. Augustine Rd. Jacksonville, FL	Grades K-8 2016-Present	8.5% ELL 37.6% FRL 9.6% SWD 47.6% Minority 52.4% Caucasian	Duval County School Board	River City Education Services, Inc.

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School	Operation[7]	Student Demographic Information *	Authorizer	Governing Board
Tallahassee School Of Math & Science (1425) Formerly Stars Middle School 3434 N Monroe St Tallahassee, FL 32303	Grades K-8 2015-Present	7.3% ELL 76.5% FRL*** 8.8% SWD 63.4% Minority 36.6% Caucasian	Leon County School Board	Stars Education, Inc.
Broward Math and Science School (5038) 6101 NW 31st Street Margate, FL 33063	Grades K-12 2014-Present	18.7% ELL 67.7% FRL 6.6% SWD 81.3% Minority 19.7% Caucasian	Broward County School Board	Riverside Science, Inc.
Discovery Academy Of Science Charter School (North & South campuses) (7331) 1380 Pinehurst Rd. Dunedin, FL 34698	Grades K-12 2013-Present	0.6% ELL 41.7% FRL 7.7% SWD 26.9% Minority 73.1% Caucasian	Pinellas County School Board	Galaxy Education, Inc.
New Springs Schools (6657) 2410 E Busch Blvd. Tampa, FL 33612	Grades K-8 Elementary 2010-Present Middle 2011-Present	12.1% ELL 79.4% FRL 7.3% SWD 83% Minority 17% Caucasian	Hillsborough County School Board	New Springs, Inc.
Closed Charter Schools and Attempted Charter School Applications				
Riverside Science Academy 8200 South Palm Dr, Deerfield Beach, FL 33035	Denied 2009		Broward County School Board	Riverside Science, Inc.
Sweetwater Branch Academy (Elementary and Middle)	2010-2013 Closed	Elementary closed due to failing grades; middle due to financial insolvency	Alachua County School Board	Neosprings, Inc.
Palm Beach Science School	Approved 2011, Delayed 2013, Never Opened		Palm Beach County School Board	Palm Beach Science, Inc.
Atlantic Science Academy	Authorized 2005, never opened		Miami-Dade Schools	Sweetwater Education, Inc.
Miami-Dade Science Schools	Approved 2010, Delayed 2012, never opened		Miami-Dade Schools	Sweetwater Education, Inc.
Osceola Universal Charter School	Denied 2006		Osceola County School Board	Universal Education Services, Inc.
Capital City Charter Science Academy	Application with-drawn 2013		Leon County School Board	Stars Education Services, Inc.

* Student demographic information was taken from the 2015-2016 school year, with the exception of those schools opened in 2016. «ELL» indicates English Language Learners, «FRL» indicates students receiving free/reduced lunch, and «SWD» indicates students with disabilities.[9]

** River City Science Academy experienced a dramatic decrease in students eligible for free/reduced lunch between 2015-16 to 2016-17, from 48% to 7%. This decline should be investigated.

*** Tallahassee School of Math and science experienced a dramatic decrease in students eligible for free/reduced lunch *between 2015-16 to 2016-17, from 76.5% to 58%. This decline should be investigated.*

9 Student enrollment and demographic information available at: http://tinyurl.com/mtzdnmw (last checked 4/19/2017).

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A History of Strategic Ambiguity and Conflicting Interests

The Florida Gülen charter network consists of several smaller charter networks that appear to be unrelated on their face, but our research indicates that in reality they share the same founding board members, vendors, landlords, and employees. Furthermore, the Florida network shares significant overlap with Gülenists from the failed Georgia network.

The first educational foundation formed in Florida was Sweetwater Education, Inc., in 2003. Dr. Cengiz Alacaci incorporated the governing board, which went on to submit two charter applications for Gülenist charter schools in Miami. Both were approved, but neither opened.[10] Sweetwater Education continues to exist today, though it serves no known purpose at this time. The second foundation to form was Stars Education Services Inc., founded by Yalcin Akin in 2004. Akin is one of the primary founders of the Florida Gülen network as he has been involved in at least four of the ten Gülenist networks (both attempted and established) in Florida, including Tampa, Miami, Tallahassee, and Orlando.

Discovery Education Services was the third foundation to form, incorporated in 2005 by Mehmet Taskan, owner of Blue Construction. Blue Ocean Construction is the Gülenist construction vendor for the Southeastern region of the Gülen Organization.[11] A year later, Taskan formed Universal Education Services in Miami with one of his fellow Discovery board members, Mustafa Ince.[12] River City also formed in 2006 by Selcuk Buyuksarac. Among its founding board members was Akif Abdulbasit Aydin. Aydin has also worked as the director of the Amity Turkish Cultural Center and the Istanbul Cultural Center, both Gülenist cultural associations. Aydin later admitted to being a Gülenist during a radio interview given after the attempted coup in 2016, discussed further below, and stated that teachers and administrators at River City Science Academy were also Gülenists.

While many of the foundations formed from 2003-2006, the first school to successfully open was River City Science Academy in 2007. Orlando Science Charter School opened a year later in 2008, and since then, eleven more schools opened. Only two have closed down so far—Sweetwater Branch Academy Elementary and Middle. The schools shut down due to poor academic performance and bad financial condition, classic markers for Gülen charter schools.

The Florida Gülen charter network is overseen by the regional charter management organization, Charter Educational Services & Resources ("CESR"). CESR was formerly known as the Grace Institute, but the company changed its branding after a series of damaging forensic audits conducted by a Georgia school district revealed it to be a sham corporation. [13] The Fulton Science Academies in Georgia were investigated for periodic insolvency and other financial concerns in the 2012-2013 timeframe. The audits uncovered all the hallmarks of a Gülen charter network, including the use of a sham external charter management organization, the Grace Institute. The audit investigations revealed that Grace only had two employees—one of which was a paid administrator of the Fulton Science schools, and the other a part-time person to answer the phone. Despite the fact that the Fulton Science schools paid Grace significant fees each year, Grace did not in fact provide any services of value and constituted a conflict of interest due to their shared employee, Ali Ozer.

After the Fulton Science (GA) schools were non-renewed due to numerous issues, the

[10] Sweetwater corporate filings, available at: http://tinyurl.com/kjq6hsb (last checked 6/15/2017).

[11] Discovery Education Services, Articles of Incorporation available at: http://tinyurl.com/ml8qjeh (last checked 6/15/2017).

[12] Universal Education Services, corporate information available at: http://tinyurl.com/kwwpz7p (last checked 6/15/2017).

[13] For more information, see the Georgia profile.

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Grace Institute changed its name to CESR and continued to provide "services" to its Florida customers from its Atlanta and Jacksonville offices.[14] CESR was incorporated in Florida by Avni Cokavci, the former principal of Fulton Science Academy High School (formerly TEACH).[15] Many of the H-1B teachers and employees utilized by the Fulton Science (GA) schools were ultimately dispersed throughout the Florida Gülen charter schools, though the two networks shared employees prior to that, as well. For example, Murat Cetin, Principal of the Fulton Science elementary school, is currently Principal of the Osceola Science Charter School.[16]

A Sample of Board Member/Employee Overlap Across the Florida Network[17]

Elvan Aktas	Sweetwater Education 2005-07	River City Education Services 2013-Present		
Mehmet Taskan	Discovery Education Services 2005-12	Universal Education Services 2006-12		
Mustafa Ince	Discovery Education Services 2005-06	Universal Education Services 2006-12		
Yalcin Akin	Stars Education Services Inc. 2004-2014	Employed by Discovery Education Services, Inc. 2007-Present	Sweetwater Education Inc. (non-voting advisor) 2009-10	New Springs Inc. 2014-Present
Dogan Tozoglu	Stars Education Services, Inc. 2006-Present	Sweetwater Education Inc. (non-voting advisor) 2009-10	Palm Beach Science Inc. (only in petition 2010)	Employed by River City Education Services Inc. 2010-Present
Renat Shaykhutdinov	Riverside Science, Inc. 2008-Present	Palm Beach Science Inc. 2010-13		

Inter-Entity Lending Practices

Our investigation would suggest that charter schools within the Gülen Organization and their vendors engage in frequent inter-entity lending practices, ranging from school to school, from employees to the school, board members to the school, and even from vendors to the school, a known warning sign for money laundering.[18] In 2015-16, both River City Science Elementary and River City Science Innovation owed River City Science Academy money—$23,726 and $53,834

[14] For an archived version of the Grace Schools website as of February 2010, listing member schools, see: http://tinyurl.com/n2racps (last checked 6/15/2017).

[15] GA Department of Education report, listing TEACH information, available at: http://tinyurl.com/kgpv22v (last checked 6/15/2017).

[16] Information taken from: Orlando Science listing, available at: http://tinyurl.com/k3ptbng (last checked 6/15/2017); and Linkedin profile, available at: http://tinyurl.com/lp6m7dy (last checked 6/15/2017).

[17] Information gathered from corporate filings for each of the Florida Gülen charter foundation boards.

[18] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 6/15/2017).

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respectively.[19] All of the River City schools are under the same governing board, meaning the board owes fiduciary duties of care and loyalty to each of its schools. Shuffling funds between schools, particularly when River City Science Academy operated at a deficit net position for the same year, could be indicative of a breach of fiduciary duty to the school.

Similarly indicative of the poor financial conditions seen throughout charter networks in the Gülen Organization, Broward Math and Science borrowed $19,500 from its principal Ali Gumus in 2015-16, who earned $60,000 that year in salary, to cover operating costs. The school also borrowed $83,000 from one-to-two unnamed board members in the same year as well as $15,000 from an unnamed individual. This is not the first time Broward Math and Science has taken out loans—its principal loaned it $27,000 the year before, and board member and Florida founder, Renat Shaykhutdinov loaned it $14,800 prior to that.[20]

Tallahassee School of Math and Science also received a significant loan $45,000 from its board member, Zeki Akdemir in 2014.[21]

Real Estate

Our interpretation of the evidence suggests that one of the most significant profit centers for the Gülen Organization is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[22] wrote and presented an article entitled «Gülen Movement and School Financing» at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[23] Gülenists throughout the country attended and presented, including the Greater Texas region's founder Alp Aslandogan,[24] as well as Florida's own Renat Shaykhutdinov, board member for Broward Math and Science and Petitioner for the failed Palm Beach Science School.

Like other vendor relationships, the Gülen Organization profits off of requiring its charter schools to rent or buy property from Gülenists, usually at exorbitant prices. Our research leads to the conclusion that the Gülenists generally provide kickbacks to the overall Gülen Organization in return for the business, all at the expense of the charter school's public funds. The scheme extends to the use of affiliated Gülenist construction companies to renovate the charter schools' properties, who appear to overcharge and underperform with impunity.

In Florida, by far the most egregious example of the Gülen Organization's real estate scheme concerns the acquisition of the River City Science Academy's 7555 and 7605 Beach Boulevard property in Jacksonville, FL. In 2010, Yazan Khatib purchased the 7555 property at a foreclosure auction for $100.00 through his company, River City Plaza LLC, which also employs Mehmet Taskan.[25] Over the next three years, Khatib and Taskan procured numerous building permits for construction

19 See 2016 audits for each school.

20 Information taken from the 2014-15 audit, available at: http://tinyurl.com/jzyfbul (last checked 6/15/2017); and 990 tax documentation.

21 See the 2014 990 form for Stars Education, Inc.

22 See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt (last checked 6/15/2017).

23 Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked 6/15/2017).

24 See Texas profile for more information about Alp Aslandogan.

25 Foreclosure information available at: http://tinyurl.com/mzxg2u7 (last checked 6/15/2017); Property history available at: http://tinyurl.com/leqctfa (last checked 6/15/2017); and River City Plaza LLC corporate information available at: http://tinyurl.com/mc32ngh (last checked 6/15/2017); Khatib Development corporate information available at: http://tinyurl.com/kczqg5u (last checked 6/15/2017).

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and renovation to update the property for River City Science Academy mentioned by name as early as 2011. Khatib spent $1,583,5000 in construction and acquisition costs on the 7555 property.[26] Khatib and Taskan often hired Taskan's own company, Blue Ocean Construction, to perform the renovations. In 2014, River City Science Academy took over the payment for the building permits for the property, despite not officially owning it yet. In 2015, River City Science Academy purchased the building from Khatib for $12,509,500 with the proceeds of bond financing, discussed below.

The $12.5 million purchase also included the 7605 property next door, which Khatib purchased in 2012 for $340,000.[27] From 2012-2014, this property was renovated to include a gym constructed by Blue Ocean Construction.[28] While Khatib technically owned the 7605 property until 2015, River City Science Academy paid for the majority of the construction costs from 2012-14. A brief rundown of the parties' costs and profits regarding the 7555 property ("7555") and the 7605 property ("7605") is as follows:

Year	Khatib & Taskan - River City Plaza, LLC; 7605 Beach Boulevard LLC	Taskan - Blue Ocean Construction	River City Science Academy
2010	- $100 to purchase 7555 building - $115,000 for roof repair		
2011	-$910,000 for "improvements" for 7555 -$73,500 plumbing for 7555 -$15,000 wiring for 7555 -$25,000 electrical for 7555 -$55,000 sprinkler system for 7555 -$50,000 sprinkler system for 7555 -$155,000 duct work for 7555 -$800 tree removal for 7555 -$14,500 fence for 7555 -$8,500 canopies for 7555 -$1,200 fence lighting for 7555	+$910,000 "improvements" paid by Khatib in cash for 7555 +$14,500 fence for 7555 +$8,500 canopies for 7555	-$2,000 for 7555 tree removal
2012	-$340,000 purchase for 7605 -$89,000 electrical for 7555 -$6,000 sprinklers for 7555 -$5,000 electrical for 7555 -$24,500 drains for 7555		
2013	-$8,500 site prep for 7555 -$8,500 site work for 7555	+$8,500 site work for 7555	
2014	-$2,380 demo building for 7605 -$85,500 landscaping for 7605	+ 2,380 demo building for 7605 +$964,595 gym construction for 7605	-$30,949 LED sign for 7555 paid in cash -$98,000 duct work for 7605 -$8,000 security for 7605 -$16,000 sprinkler for 7605 -$9,000 electrical for 7605 -$33,500 drains for 7605 -$6,000 sprinkler for 7605 -$964,595 gym construction for 7605 in cash

[26] This figure is the $100 sale price plus the aggregate total of fees listed in the permits, available at: http://tinyurl.com/mv7k7au (last checked 6/15/2017).

[27] Property history, available at: http://tinyurl.com/kusft9s (last checked 6/15/2017).

[28] All information regarding the construction costs is available through searching the building permit database, available at: http://tinyurl.com/mv7k7au (last checked 6/15/2017).

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Year	Khatib & Taskan - River City Plaza, LLC; 7605 Beach Boulevard LLC	Taskan - Blue Ocean Construction	River City Science Academy
2015	-$2,858 sign for 7605 -$2,858 sign for 7605 +$12,509,500 for sale of 7555 and 7605 to River City Science Academy	+$7655 gym canopy for 7605	-$12,509,500 purchase 7555 and 7605 -$50 LED sign bulbs -$30,949 LED sign for 7555 -$1000 lighting for 7605
Total	= $1,998,696 spent total = $12,509,500 gained = $10,510,804 net profit	=$1,916,130 profit	=$1,168,044 spent before owning either building =$13,678,594 spent total =$29,326,656 ultimate cost due to bond financing

As the chart demonstrates, both Khatib and Taskan profited extensively off of these property transactions with River City Science Academy. Ultimately, River City Science Academy will spend $29.3 million due to the bond debt it incurred to pay Khatib's $12.5 million price. Taskan was listed as both the property owner and the contractor on numerous building permits as he routinely hired his own company Blue Ocean Construction for work on behalf of Khatib and River City Science Academy. Both Khatib and Taskan have connections throughout the Gülen Organization. Khatib sits on the board of directors for the Atlantic Institute of Jacksonville, a Gülenist cultural association which hosts dialogue dinners and trips to Turkey for local politicians. Khatib's company Pelham Oaks Plaza LLC is also the landlord for a Gülenist charter school in South Carolina, GREEN Charter School.[29] Taskan's Blue Ocean Construction is the preferred construction vendor for the Southeastern region of the Gülen Organization. Blue Ocean continues to do numerous jobs for Gülenist charter schools throughout Florida and the Southeastern region. Blue Ocean also uses the same H-1B attorneys as the rest of the Gülen Organization.[30]

Taskan also has other concerning connections to the Florida schools—he served on the founding board of Discovery Education Services, which oversees Orlando Science, Osceola Science, and Seminole Science.[31] He also incorporated Universal Education Services with many of the same individuals from Discovery, which submitted an application for a Gülenist charter school in Osceola that was not approved.[32] As is common with Gülenist vendors, Taskan served first as a school creator that he then later profited as a vendor.

The other schools that are implicated in the Gülen Organization's real estate scheme are Seminole Science and Tallahassee Math and Science. The schools rent their properties from 5M Associates and 3434 Monroe Holdings respectively, both of which are owned by Naeem Haider.[33] Haider sits on the board for the Atlantic Institute alongside Yazan Khatib in Jacksonville. The rent information is only available for the year 2015-2016, which was the first year each school began renting from Haider. Seminole Science paid between $178,000- $215,000 that year, and Tallahassee Math and Science paid $210,000-$240,235.[34] Using Ohio as a comparator, the rent prices should be closely scrutinized for later years as the Gülenist landlord entities in Ohio doubled, tripled, and in one case, quadrupled rent each year.[35]

29 GREEN charter school minutes, available at: http://tinyurl.com/lwuodat (last checked 6/15/2017).

30 Blue Ocean uses Attorney Remzi Kulen, see Abuse of the H-1B Program section.

31 Discovery Education Services Articles of Incorporation, available at: http://tinyurl.com/ml8qjeh (last checked 6/15/2017).

32 Universal Education Services, corporate information available at: http://tinyurl.com/kwwpz7p (last checked 6/15/2017).

33 Corporate information for 5M Associates, available at: http://tinyurl.com/k3a6pt2 (last checked 6/15/2017); 3434 Monroe Holdings, available at: http://tinyurl.com/ld38apf (last checked 6/15/2017).

34 Figures taken from the 2016 audits and 2016 accountability reports for each school, which for some reason, list different amounts for leases paid, available at: http://tinyurl.com/m9ldgth (last checked 6/15/2017).

35 See Ohio profile for more detail.

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Orlando Science also rents an outdoor recreation area from Discovery Education Properties at Technology, LLC, a related party under common control. In 2015-16, it paid itself $78,000 in rent.[36] Executive Director Yalcin Akin is listed as the owner of this related for-profit entity. More information is needed to determine whether this is an appropriate relationship.

Bond Financing

To date, the River City Science Academy governing board is the only Florida network that has secured bond financing. In 2015, the board received three bond issuances in the cumulative amount of $14.4 million from the Capital Trust Agency.[37] The bonds financed the acquisition of the properties owned by River City Plaza, LLC, discussed above in the real estate section. According to the bond statement, the River City board entered into a purchase agreement with Khatib of River City Plaza on October 24, 2014,[38] although the sale was not finalized until 2015. An appraisal conducted in 2015 stated the value of the property as $12 million, but notably, this included the gym, which River City Science Academy had just paid $1 million to renovate. The amounts paid by River City Science Academy were not credited to the purchase price, however, further underscoring the bad deal the schools received compared to the profit of the Gülenist landlord entity.

Excessive use of the H-1B Visa Program

Like other Gülen Organization charter networks, the Florida Gülen charter schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Florida network filed at least 195 H-1B applications from 2001-2016, while CESR itself filed 8 H-1B applications during the same period.[39] While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: principal, curriculum coordinator, business operations specialist, instructional coordinator, business manager, and Science Olympiad coordinators.

Stars Education Services has recently been sued for employment discrimination as of December 2016.[40]

Florida's Gülen charter schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- **Cherie Cookorinis:** the Florida network (including: Discovery, River City, New Springs, Neosprings, Stars Education, Galaxy) used Cookorinis, a Georgia-based

[36] See 2016 audit, available at: available at: http://tinyurl.com/m9ldgth (last checked 6/15/2017).

[37] Bond statements available at: http://tinyurl.com/meh94uv (last checked 6/15/2017).

[38] Bond official statement, pg 10, available at: http://tinyurl.com/k5pb7cf (last checked 6/15/2017).

[39] See MyVisaJobs.com for each governing board's information, 1) Discovery Education Services 61 H-1Bs, available at: http://tinyurl.com/kcf2laf (last checked 6/15/2017); 2) River City Education Services 80 H-1Bs, available at: http://tinyurl.com/lb6kgyk (last checked 6/15/2017); 3) Stars Education Services18 H-1Bs, available at: http://tinyurl.com/m6wme9m (last checked 6/15/2017); 4) Riverside Science 3 H-1Bs, available at: http://tinyurl.com/mc3zfaf (last checked 6/15/2017); 5) Galaxy Education, 5 H-1Bs, available at: http://tinyurl.com/k5q5v44 (last checked 6/15/2017); 6) New Springs Inc. 19 H-1Bs, available at: http://tinyurl.com/kaz429x (last checked 6/15/2017); 7) Sweetwater Education 2 H-1Bs, available at: http://tinyurl.com/n5zdb2n (last checked 6/15/2017); 8) Neosprings, Inc. 12 H-1Bs available at: http://tinyurl.com/ldvrs52 (last checked 6/15/2017) and http://tinyurl.com/kr6w82w (last checked 6/15/2017).

[40] Court docket, available at: http://tinyurl.com/m244vxw (last checked 6/15/2017).

attorney to file numerous H-1B applications.[41] Cookorinis also filed applications for:

- ▷ Fulton Science (GA)
- ▷ Chesapeake Lighthouse Foundation (MD)
- ▷ Triad Math and Science (NC)
- ▷ Charter Educational Services & Resources (GA, FL)
- ▷ Grace Institute (GA, FL)

► **Remzi Kulen:** the Florida network used Kulen, a New York-based attorney, to file numerous H-1B applications.[42] Kulen also filed applications for:

- ▷ Orlando Culture & Dialog Center (FL)
- ▷ Blue Ocean Construction (FL)
- ▷ Fulton Science (GA)
- ▷ Charter Educational Services & Resources (GA, FL)
- ▷ Concept Schools (OH, IL, IN, MI, MN)
- ▷ Pioneer (MA)
- ▷ Niagara Foundation (IL)
- ▷ Young Scholars (PA)
- ▷ Gülen's home, the Golden Generation Workshop Center (PA)
- ▷ Academy of Science, Syracuse, Buffalo (NY)
- ▷ Arts & Science, Bergen, Passaic (NJ)

Scandals and Notable Events

River City Science Academy and Tallahassee Math and Science Academy both received significant media attention in the aftermath of the attempted coup in Turkey in 2016. River City's Executive Director Dogan Tozoglu wrote a letter to Jacksonville's mayor stating that the schools had no direct affiliation with Gülen or involvement with the coup.[43] Also, Akif Aydin, a founding board member of River City Education Services, gave a forty-minute radio interview during which he spoke extensively of the Gülen Movement, Gülen charter schools, and Gülen's suspected role in the attempted coup.[44] Though Aydin was interviewed due to his involvement with River City Science Academy, he spoke openly and on behalf of Gülen charter schools throughout the country. Some of his more interesting comments were as follows:

► Aydin stated that there was "no doubt" that the charter schools often referred to as Gülen charter schools were founded by Turkish individuals inspired by Gülen. He himself is a follower of Gülen.

► If the Turkish teachers on H-1B visas choose to donate their money from their salaries, that's a personal choice, much like donating to a local church.

- ▷ Commentary: What's fascinating about this remark from Aydin was that the interviewer had not brought up the tuzuk payments at all during the interview. Aydin offered this justification apropos of nothing. Whistleblower testimony from several former Gülenist employees makes it clear that these payments are not optional.

► Aydin referred to the concerns against Gülen charter schools around the country for overpayments to Gülenist vendors as "slandering," which had never been proven.

- ▷ Commentary: Again, Aydin was defending Gülen charter schools nationally, rather than discussing his own school River City Science Academy.

► Aydin stated that, to his knowledge, the teachers hired on H-1B visas were only for hard-to-fill math and science positions around the country in schools founded by Turkish individuals inspired by Gülen.

- ▷ Commentary: This is in direct contradiction to the H-1B applications

41 List of entities represented by Cherie Cookorinis, available at: http://tinyurl.com/m4e6cgl (last checked 6/15/2017).

42 List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 6/15/2017).

43 Tozoglu letter, available at: http://tinyurl.com/mtmr65g (last checked 6/15/2017).

44 Aydin interview, available at: http://tinyurl.com/j2a7b8q (last checked 6/15/2017).

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themselves, which demonstrate the positions hired are for positions that help the Gülen Organization maintain financial control and secrecy over the use of school funds, such as accountants, business managers, and administrators.

Notable Turkish Vendors

Charter Educational Services & Resources "CESR", formerly known as Grace Institute: CESR is a smaller-scale charter management organization that oversees the Southeastern region of the Gülen Organization, including the Florida networks and the failed Fulton Science (GA) network. CESR is incorporated by former Fulton Science (GA) administrator, Avni Cokavci, and receives a per-head amount in fees from each of its customer charter schools, allegedly for curricular support, professional development, and student information management systems. In Florida, River City Science schools, Tallahassee School of Math and Science, Orlando Science Schools, Seminole Science, Broward Math and Science, Osceola Science, New Springs Schools, Discovery Academy of Science all use CESR for student information services, as well as Fulton Science private school (GA) and Green Charter School (SC).[45]

Blue Ocean Construction: Blue Ocean Construction is the preferred construction vendor for the Southeastern region. Like its charter customers, Blue Ocean also depends on the H-1B program. Numerous schools throughout the Florida Gülen charter network and the Southeastern region have utilized Blue Ocean for construction work. Mehmet Taskan, the owner of Blue Construction, also incorporated two Gülenist charter boards in Florida, Discovery Education Services and Universal Education Services.[46]

E-Rate Funding: Several of the Florida networks have received federal E-Rate funds, but the information regarding the vendors chosen is unavailable. In light of the alleged E-Rate funding fraud that is under investigation by federal authorities throughout the Gülen Organization, the vendors chosen by the Florida networks should be examined to determine whether they are controlled by related Gülenist parties.

Gülenist Cultural Foundations

The Atlantic Institute: The Atlantic Institute has branches throughout the Southeast region. It promotes Gülen's teachings[47] and inter-faith dialogue, and two of the Florida Network's landlords are currently listed on its governing board, Naeem Haider and Yazan Khatib.[48] Additionally, it hosts dialogue dinners and trips to Turkey for local politicians.

Istanbul Cultural Center: The Istanbul Cultural Center has branches throughout Florida. It hosts Gülenist inter-faith dialogue dinners and trips to Turkey.[49] River City Science founding board member Akif Aydin is the former director of the Center.

[45] All of the following school websites contain the language "Powered by Charter Educational Services & Resources," evidencing the tie between CESR's Gülenist charter school customers, available at: http://tinyurl.com/l54sqwb (last checked 6/15/2017), http://tinyurl.com/mm9s22a (last checked 6/15/2017), http://tinyurl.com/kofnlk4 (last checked 6/15/2017), http://tinyurl.com/krpfzqs (last checked 6/15/2017), http://tinyurl.com/k35qx8y (last checked 6/15/2017), http://tinyurl.com/lke2m4c (last checked 6/15/2017), http://tinyurl.com/m2vxrfu (last checked 6/15/2017), http://tinyurl.com/lv23dcd (last checked 6/15/2017), http://tinyurl.com/kxth73j (last checked 6/15/2017), http://tinyurl.com/l78cvd3 (last checked 6/15/2017).

[46] Discovery Education Services Articles of Incorporation, available at: http://tinyurl.com/ml8qjeh (last checked 6/15/2017); Universal Education Services, corporate information available at: http://tinyurl.com/kwwpz7p (last checked 6/15/2017).

[47] Fethullah Gülen bio on Atlantic Institute's website, available at: http://tinyurl.com/mvjxmo9 (last checked 6/15/2017).

[48] Board of directors, available at: http://tinyurl.com/lxe4vvq (last checked 6/15/2017).

[49] Istanbul Cultural Center website, available at: http://tinyurl.com/jvsrwvn (last checked 6/15/2017).

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Amity Turkish Cultural Center: The Center is a Gülenist cultural center operated by Akif Aydin, founding board member of River City Science Academy. It provides Gülenist cultural outreach, dialogue dinners, and trips to Turkey.[50]

Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- **Emre Akbaba:** Science Teacher, Fulton Science Academy High School/TEACH (GA); River City Science Principal, New Spring Science Elementary and Middle School (FL); Principal, Discovery Academy of Science (FL).[51]

- **Serkan Gunpinar:** Board Member, Minnesota Math and Science Academy (MN); Founding Board President, Sirius Foundation, Inc. - Gülenist cultural association (FL); Board Member, New Springs, Inc. (FL).[52]

- **Yunus Aksu:** Substitute teacher, Noble Academy Cleveland (OH); Principal, Seminole Science Charter School (FL); Principal, New Springs Schools (FL).[53]

- **Murat Cetin:** Principal, Fulton Sunshine Academy (GA); Principal, Osceola Science Charter School (FL).[54]

- **Alaaddin Akgul:** Science Coach & Gifted Education Consultant, CESR (Southeastern); Dean, River City Science Academy (FL); Principal, River City Science Elementary (FL); Regional Director, Science Olympiad (FL); Principal, River City Science Mandarin (FL).[55]

- **Ali Gumus:** Founder and Superintendent, LISA Academy (AR); Principal, Memphis School of Excellence (TN); Presenter, Harmony Public Schools Conference (TX); Principal, Broward Math and Science (FL). [56]

- **Ozan Sipahioglu:** Principal, River City Science Academy (FL); Pacific Technology School Orangeville (Magnolia CA).[57]

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50 Corporate information, available at: http://tinyurl.com/l6dgujm (last checked 6/15/2017).

51 Information taken from: Pinellas charter schools, available at: http://tinyurl.com/m2q4z2l (last checked 6/15/2017); Bio, available at: http://tinyurl.com/m473l24 (last checked 6/15/2017); Newsletter, available at: http://tinyurl.com/lmz6yvs (last checked 6/15/2017).

52 Information taken from: MMSA 990 forms, available at: http://tinyurl.com/kz4nkqg (last checked6/15/2017); Florida Corporate Documents available at: http://tinyurl.com/mmj67c7 (last checked 6/15/2017); Florida Corporate Documents available at: http://tinyurl.com/l56cxns (last checked 6/15/2017).

53 Information taken from: Principal newsletter, available at: http://tinyurl.com/mquljva (last checked 6/15/2017); School listing, available at: http://tinyurl.com/k3ptbng (last checked 6/15/2017); Employee credential search OH, available at: http://tinyurl.com/j7bxyhk (last checked 6/15/2017).

54 Information taken from: Orlando Science listing, available at: http://tinyurl.com/k3ptbng (last checked 6/15/2017); and Linkedin profile, available at: http://tinyurl.com/lp6m7dy (last checked 6/15/2017).

55 Information taken from: Linkedin Profile, available at: http://tinyurl.com/l59zuqz (last checked 6/15/2017).

56 Information taken from: School listing, available at: http://tinyurl.com/jwszpod (last checked 6/15/2017); Linkedin profile, available at: http://tinyurl.com/lm6oldk (last checked 6/15/2017); Harmony schedule, available at: http://tinyurl.com/l5g7p6f (last checked 6/15/2017); LISA Academy information, available at: http://tinyurl.com/jwg9ups (last checked 6/15/2017); Article re: Gumus, Harmony, and Gülen, available at: http://tinyurl.com/k6l7y44 (last checked 6/15/2017).

57 Information taken from: Charter newsletter, available at: http://tinyurl.com/ksox4ns; Bond statement at A-8, available at: http://tinyurl.com/k5pb7cf (last checked 6/15/2017);

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Notable Articles regarding the Florida Network

Saacks, Bradley Joseph. *U.S. schools caught in Turkey's crackdown after attempted coup.* Bloomberg, September 2, 2016. (Discussing whether Florida officials will open a formal probe into River City Science Academy in Jacksonville due to troubling financial connections). Available at: https://tinyurl.com/k7o4dp2 (last checked 6/15/2017).

Micolucci, Vic. *Charter school leaders deny ties to wanted Turkish rebel.* WJXT News4Jax, August 2, 2016. Available at: https://tinyurl.com/n5xtpdw (last checked 6/15/2017).

Brown, Marina. *Attempted coup in Turkey sends shockwaves locally.* Tallahassee Democrat, July 25, 2016. Available at: https://tinyurl.com/lxmj43q (last checked 6/15/2017).

Sokol, Marlene. *Landlord sues North Tampa charter school for back rent.* Tampa Bay Times, July 25, 2016. (Discussing New Springs' failure to pay rent). Available at: https://tinyurl.com/mesbaaw (last checked 6/15/2017).

Aydin, Akif. First Coast Connect. WJCT News, July 19, 2016 (Radio Interview with Aydin discussing Gülen Movement and River City Science Academy). Available at: https://tinyurl.com/j2a7b8q (last checked 6/15/2017).

Benk, Ryan. *Coup attempt highlights Jacksonville connections to Turkey.* WJCT News, July 19, 2016. (Discussing how Founder Aydin would renounce his support of Gülen's philosophy if it was proven he had a hand in the unsuccessful revolution). Available at: https://tinyurl.com/hm2e5j4 (last checked 6/15/2017).

Amos, Denise Smith. *More Florida charter school audits show signs of financial stress.* The Florida Times-Union, July 6, 2016. (Discussing how River City Science Academy Innovation experienced fund balance deficits). Available at: https://tinyurl.com/metddqa (last checked 6/15/2017).

Development today. The Daily Record, June 1, 2016. (Discussing River City's use of Blue Ocean Construction). Available at: https://tinyurl.com/lky6ywe (last checked 6/15/2017).

Dickey, Will. *Istanbul Cultural Center: The Language and Culture Festival.* The Florida Times-Union, May 16, 2015. (Discussing River City students performance of Turkish folk dancing at the festival). Available at: https://tinyurl.com/lv8744k (last checked 6/15/2017).

Sokol, Marlene. *New requirement reveals struggles inside some Hillsborough charter schools.* Tampa Bay Times, October 15, 2014. (Discussing how half the faculty at New Springs are inexperienced, and the school received a "D" rating). Available at: https://tinyurl.com/mqhrwt6 (last checked 6/15/2017).

Strickland, Sandy. Call Box: *Resident wants new grocery store for 'forgotten' Mayport area.* The Florida Times-Union , August 16, 2014. (Discussing details of River City construction job awarded to Blue Ocean Construction). Available at: https://tinyurl.com/mk58jxl (last checked 6/15/2017).

Segal, Sabrina. *Margate charter school jitters.* Margate News, August 11, 2013. (Discussing Broward Math and Science and potential ties to Gülen). Available at: https://tinyurl.com/mmfps87 (last checked 6/15/2017).

Jester, Erin. *3 F's for elementary school force Sweetwater Academy to close.* The Gainesville Sun, August 7, 2013. (Discussing poor school grades and financial trouble). Available at: http://tinyurl.com/zdvl4yr (last checked 6/15/2017).

Georgia

Spotlight on a Failed Network



QUICK FACTS ON GÜLEN CHARTER SCHOOLS GEORGIA



NUMBER OF SCHOOLS — 3 originally **1 currently (private)**

KNOWN AS
- T.E.A.C.H. High School, later known as Fulton Science Academy High School "FSAHS" - Closed
- Fulton Science Academy Middle School "FSAMS" - Closed
- Fulton Sunshine Academy Elementary School "FSAES"- Closed
- **Fulton Science Academy Private School "FSAPS" - Open**

TOTAL ENROLLMENT — **Private**

CHARTER VENDOR — **Charter Educational Services & Resources "CESR" (previously known as "The Grace Institute")**

TOTAL REVENUES — **$2,312,428**

RELATED INSTITUTIONS



River City Science,
Discovery,
Science Schools,
Broward Math and Science,
New Springs Schools,
School of Math and Science



GREEN

KEY PEOPLE


Kemal Gur


Selim Ozdemir


Ali Ozer


Avni Cokavci


Levent Bulut


Vedat Akgun


Ayhan Korucu

FINANCIAL SCANDAL

Fulton Science Academy Middle School	T.E.A.C.H. School	Fulton Sunshine Academy Elementary School
CLOSED	CLOSED	CLOSED
2001-2012	2005-2015	2010-2015

The Fulton Science schools were closed due to the results of forensic audits showing **rampant misuse of public funds**, the use of a sham corporation - Grace/CESR, conflicts of interest, nepotism, failure to follow required procurement processes, and lack of safety procedures for international trips to Turkey.

CONFLICTING INTERESTS

School leaders **hired their own corporation** to provide their schools with services for fees between $70,000 - $90,000 a year–the definition of a conflict of interest.

Service Fees
$70,000 - $90,000

LEGAL & DHS FEE CORRUPTION

FSAMS & FSAHS
$114,482
IN 3 YEARS

Research indicates that these fees were paid for not only their employees, but also the spouses and family members of their H-1B H-1B employees, as well as the H-1B employees of FSAES and FSAHS, for which they were not reimbursed.

H-1B VISA APPLICATIONS

61 H-1B

H-1B VISA APPLICATIONS 2000 to 2016

Of the 19 employees FSAMS paid to immigrate, seven of them left shortly thereafter, which we believe demonstrates the fact that school funds were used to immigrate Gülenists as a primary concern–not recruit teachers.



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Southeast

- School Names (known as):
  - *T.E.A.C.H. High School, later known as Fulton Science Academy High School "FSAHS" - Closed*
  - *Fulton Science Academy Middle School "FSAMS" - Closed*
  - *Fulton Sunshine Academy Elementary School "FSAES"- Closed*
  - Fulton Science Academy Private School "FSAPS" - Open

- Total # of Schools in State: 3 originally, 1 currently (private)

- Charter Holder/Governing Board(s):
  - Cosmos Science Academy, Inc., later known as Fulton Science Academy, Inc.
    - Formed in 1999
    - Organized as a non-profit 501(c)(3)
    - Operated FSAMS
  - Fulton Educational Services, Inc.
    - Formed in 2004
    - Organized as a non-profit 501(c)(3)
    - Operated T.E.A.C.H., FSAHS
  - Fulton Sunshine Academy, Inc.
    - Formed in 2006
    - Organized as a non-profit 501(c)(3)
    - Operated FSAES
  - Fulton Science Academy Private School, Inc.
    - Formed in 2012
    - Organized as a non-profit 501(c)(3)
    - Operates FSAPS
  - Oconee Science Academy, Inc.
    - Formed in 2008
    - Organized as a non-profit 501(c)(3)
    - Submitted petition to open Oconee School of Math and Science, which was denied

- Charter Management Services Vendor: The Grace Institute "Grace," now known as Charter Educational Services & Resources "CESR"

- Regional Gülen Organization Oversight Entity: Grace/CESR

- Regional Sister Networks: River City Science (FL); Discovery (FL); Science Schools (FL); Broward Math and Science (FL); New Springs Schools (FL); School of Math and Science (FL); GREEN (SC).

- Georgia Network Founders:
  - Kemal Gur: Founding Board Member, Cosmos Science Academy (GA); Owner, Westwood Productions (CA) – Gülenist vendor.[1]
  - Selim Ozdemir: Principal, Fulton Science Academy Middle school (GA); Bookkeeper, Registered agent, President, CEO, CFO, Grace Institute (GA); Executive Director, Fulton Science Academy High School (GA); Executive Director, Fulton Science Academy High School and Middle School (GA); Registered Agent, Fulton Sunshine Academy (GA); Board member, Grace Institute (GA).[2]
  - Ali Ozer: Founding Principal, T.E.A.C.H. (GA); Executive Director, Fulton Science network (GA); CEO, CFO, President, Grace Institute (GA); Curriculum Director, Fulton Science Academy Middle school (GA); 2006 Lead Petitioner, GREEN Charter School (SC) (denied in 2006, approved later).[3]
  - Avni Cokavci: CEO, CFO, Grace Institute (GA); Bookkeeper, Grace

[1] Information taken from: Cosmos 990 form 2001, available at: http://tinyurl.com/ky3tu84; Business profile available at: http://tinyurl.com/hjr9jgc (last checked 2/15/2017); See California profile for more information.

[2] Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

[3] Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017); Fulton Educational Services 2005 990 form, available at: http://tinyurl.com/zxtjkrm (last checked 5/4/2017).

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Institute (GA); Assistant Principal, Bookkeeper, Principal, Fulton Science Academy High School (GA).[4]

- Levent Bulut: CFO, Fulton Science Academy (GA); CFO, Fulton Science Academy High School (GA); CFO, Fulton Sunshine Academy (GA); Board Member, Cosmos Foundation – Harmony Public Schools (TX).[5]
- Vedat Akgun: Co-founder, first Horizon Science Academies (OH);[6] Co-Founder, Attempted Indiana Life Sciences Academy (IN);[7] Founder of Concept Schools (Midwest region);[8] Co-founder, Breeze, Inc. and New Plan Learning, believed Gülenist landlord entities (Midwest region);[9] Board Member, Fulton Science (GA);[10] CEO, Charter Housing Corporation (GA) Fulton Science construction vendor;[11] CFO, Global Spectrum Foundation, Inc, D.B.A. Istanbul Center (GA);[12] Board member, Fulton Science Private School (GA);[13] President, Turkic American Federation of Southeast (GA).[14]
- Ayhan Korucu: Founding Board Member, Fulton Educational Services, Inc. (GA); CEO, Fulton Science Academy Middle School (GA); CEO, Fulton Science Academy High School (GA); CEO, President, Fulton Sunshine Academy (GA); President, Fulton Science Academy Private School (GA).[15]

Overview

The Fulton Science (GA) network operated publicly from 2001-2015 and was intended to serve as the hub for the Southeastern region. This is demonstrated by the GA schools' creation of their own CMO, the Grace Institute, now d.b.a. Charter Educational Services & Resources ("CESR"), which is still based in a suburb of Atlanta and provides services throughout the Southeastern region. The Fulton Science schools were closed due to the results of forensic audits showing rampant misuse of public funds, the use of a sham corporation - Grace/CESR, conflicts of interest, nepotism, failure to follow required procurement processes, and lack of safety procedures for international trips to Turkey. When the first of the three public charter schools closed, the Gülenist leadership apparently opened a private school instead, which is still in operation in GA.

4 Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017); Cosmos/Harmony 990s available at: http://tinyurl.com/hu9wqcl.

5 Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

6 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

7 Corporation registration information available at: http://tinyurl.com/kjr6lu4 (last checked 4/19/2017).

8 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

9 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

10 2012 990 tax return, showing Akgun as a board member, available at: http://tinyurl.com/lv8ssnk (last checked 4/19/2017).

11 Georgia Secretary of State business search for Officer Vedat Akgun, available at: http://tinyurl.com/pa73vlw (last checked 4/19/2017).

12 *Id.*

13 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

14 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

15 Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017); FSAPS 990 forms, available at: http://tinyurl.com/kq8yqex (last checked 5/8/2017).

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School	Grades/Dates	Authorizer	Governing Board
Fulton Science Academy Middle School	6-8 2001-2012	Fulton County School District	Fulton Science Academy, Inc.
T.E.A.C.H. School, aka Fulton Science Academy High School	9-12 2005-2015	Fulton County School District	Fulton Educational Services, Inc.
Fulton Sunshine Academy Elementary School	K-5 2010-2015	Fulton County School District	Fulton Sunshine Academy, Inc.
Fulton Science Academy Private School	K-8 2012-Present	Private	Fulton Science Academy Private School, Inc.
	Petition Attempts		
Oconee School of Math and Science	*K-8* *2008 filed petition, denied.*	*Oconee County Schools*	*Oconee Science Academy, Inc.*

A History of Strategic Ambiguity and Conflicting Interests

Like the other regional hubs throughout the country, the Gülenist founders of the Southeastern region filed and created the first education foundation in Georgia in 1999. Cosmos Science Academy, Inc. even had a similar name to the first foundation in Texas, the Cosmos Foundation, which runs the Harmony (TX) network to this day. The Georgia network was developed by notable Gülenists who have appeared in charter networks throughout the country, including: Kemal Gur, prominent vendor for the Western region, Vedat Akgun, founder of Concept Schools and the Midwestern region, and Levent Bulut, founder of Harmony Public Schools and the Greater Texas region.

The first school in the Georgia network, FSAMS, opened in 2001, followed by FSAHS in 2005, an attempted petition that failed in 2008, and FSAES in 2010. The Grace Institute, the regional CMO for the Southeast, was incorporated in Georgia on May 13, 2008 by Avni Cokavci. FSAMS signed its first contract with Grace a few months later, in November of 2008. The contract was signed by Selim Ozdemir on behalf of Grace as one of its board members, even though Ozdemir at the time was the Executive Director for both FSAMS and FSAHS, a paid position. This was not the only overlap, however—Ali Ozer, the curriculum director for FSAMS, was the president of Grace, and Kenan Sener, the principal of FSAMS, was also a board member for Grace. Grace/CESR was in all respects a corporate entity created and run by the leadership of the Fulton Science schools. Furthermore, these same school leaders hired their own corporation to provide their schools with services for fees between $70,000 - $90,000 a year—the definition of a conflict of interest.

These conflicts were noticed by Fulton County School district, the authorizer of the Fulton Science schools, who required the schools to sever their contracts with Grace as a result. The overlapping board members and employees of Grace and the schools separated, and a few months later, the schools signed new contracts with Grace. The schools' leadership still did not adhere to the district-required procurement process for contracts of that dollar amount. However, due to these concerns and other financial mismanagement issues that came to light during the FSAMS' renewal application process, the district commissioned an external forensic audit of FSAMS, which paid specific attention to conflicts of interest, concerns of self-dealing, and improper use of public funds.

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According to the external audit reports which were publicly released, FSAMS' leadership was obstructionist and difficult during the entire auditing process. Furthermore, the audits themselves revealed numerous conflicts of interest between the schools, their employees, board governance, Grace, and other vendors chosen. The schools overpaid their affiliated vendors for dubious services received, and the auditors noted that Grace itself did not have its own employees beyond an IT person and a person who answered the phones. As a result, the auditors questioned whether Grace was in fact providing any services at all.

The audits also revealed:

- Improper and excessive use of public funds for H-1B employees, their spouses, and even the employees of other schools;
- Poor financial practices and bookkeeping;
- Failure to maintain criminal background checks for employees;
- Employee with criminal background in position of authority undetected;
- High concentration of H-1B employees;
- High attrition and turnover rate for H-1B employees;
- Excessive relationships between vendors for FSAMS; and
- Failure to adhere to district-required safety protocol for international field trips to Turkey.

Before FSAMS successfully renewed its charter contract, it entered into a bond agreement for financing for a new K-12 campus to house all three Fulton Science schools in 2011. The schools hired Noss Construction, a Gülen-affiliated construction vendor, for the work. However, FSAMS did not disclose the fact that it had ongoing issues with its authorizer at the time of the bond statement, which could be considered a material omission of fact. As a result of FSAMS' failure to be renewed, the $19 million bond financing ultimately defaulted, costing investors hundreds of thousands of dollars. Wells Fargo, the bond trustee, sued the schools for default. FSAMS closed its doors in 2012 and immediately converted into FSAPS, its private school incarnation, that same year.

The bond property was sold at foreclosure to TruGlobe, Inc., a Georgia corporation run by Selami Kul and Ahmed Vehbi Ugur, for a fraction of its price.[16] It is now owned and used by FSAPS for its school facilities.

After the FSAMS audit and non-renewal, Fulton County Schools initiated audits of FSAHS and FSAES, as well.[17] The FSAHS was released in August of 2012, but the FSAES audit was never completed. The FSAHS audit, however, revealed the following serious issues and concerns:

- Failure to account for bond debt default in financial reporting and records;
- Excessive truancy;
- Overlap between school leadership and paid CMO, Grace;
- Use of school employees for work Grace was paid to provide;
- Excessive use of H-1B program to hire unqualified Turkish individuals with no teaching experience and bad grades;
- Payment for H-1B immigration costs for employees and family members with school funds;
- Use of sporadic Craigslist posts for job openings;
- Failure to inform board of hiring from

[16] Information available at: http://tinyurl.com/kzq4gte (last checked 5/8/2017).

[17] The FSAHS audit is available at: http://tinyurl.com/kkbfpnd (last checked 5/8/2017).

Turkey or use of school funds to pay for immigration costs;

- Domination of governing board by Turkish school leadership, as reported by non-Turkish parent members;
- Failure to utilize the governing board in hiring decisions;
- Poor board governance, as reported by non-Turkish parent members on governing board;
- Improper use of personal vehicles without insurance to transport students; and
- Failure to adhere to safety protocol for international field trips to Turkey.

Due to the findings of the FSAHS audit, Fulton County School district sought to terminate its charter contract. However, the initial hearing to terminate the school was overturned by the Georgia Department of Education due to procedural concerns regarding the process used for the hearing. The school district ultimately non-renewed both FSAHS and FSAES when their charter terms expired in 2015.

Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, the Georgia Gülen charter schools utilized the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Georgia network filed at least 53 H-1B applications from 2001-2016, while CESR itself filed 8 H-1B applications during the same period.[18] While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: principal, curriculum coordinator, business operations specialist, instructional coordinator, business manager, and Science Olympiad coordinators.

Furthermore, according to the GA audits, FSAMS alone incurred $74,846 in legal and Department of Homeland Security fees over a three-year period, and FSAHS incurred $39,636. Our research indicates that these fees were paid for not only their employees, but also the spouses and family members of their H-1B employees, as well as the H-1B employees of FSAES and FSAHS, for which they were not reimbursed. Of the 19 employees FSAMS paid to immigrate, seven of them left shortly thereafter, which we believe demonstrates the fact that school funds were used to immigrate Gülenists as a primary concern—not recruit teachers.[19]

Georgia's Gülen charter schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Cherie Cookorinis: the Georgia network used Cookorinis to file numerous H-1B applications.[20] Cookorinis also filed applications for:
  - Fulton Science (GA)
  - Chesapeake Lighthouse Foundation (MD)
  - Triad Math and Science (NC)
  - Charter Educational Services & Resources (GA, FL)

[18] See MyVisaJobs.com for each governing board's information, 1) FSAPS, including earlier years of H-1Bs from FSAMS, http://tinyurl.com/lsceerb; 2) FSAMS, http://tinyurl.com/kueotzo; 3) FSAHS/TEACH, http://tinyurl.com/mlgof8l 4) FSAES, http://tinyurl.com/k3dk3v5.

[19] *See* FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

[20] List of entities represented by Cherie Cookorinis, available at: http://tinyurl.com/m4e6cgl (last checked 4/27/2017).

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- ▷ Grace Institute (GA, FL)
- ▷ Florida network (including: Discovery, River City, New Springs, Neosprings, Stars Education, Galaxy)

Whistleblower Testimony

A former employee of the Fulton Science network provided our research team with multiple interviews outlining the incidents that they witnessed at the three schools during their employment. Due to the wish for anonymity, the whistleblower will not be named by name, and the pronoun "they" will be used. Highlights of the testimony include:

- ► Charter Housing Corporation, a construction company owned by Fulton Science board member Vedat Akgun, was engaged to do the build-out of Fulton Sunshine Academy in 2010 while Akgun was a board member.

- ► Turkish board members would share housing while some went to Turkey for long trips in order to enroll their students in the school. For example, while Selim Ozdemir was in Turkey, Akgun moved into his house so that his children could enroll in Fulton Sunshine Academy. Akgun's children were allowed to bypass the legally mandated lottery because Akgun "would become" a board member later that year.

- ► Board dynamics on the three schools' governing boards were purposefully manipulated so that the Turkish board members would be in the majority. They voted in a bloc, and non-Turkish board members often reported that they did not know what was going on, who did the hiring of principals (which was supposed to be a board function), or that the schools used the H-1B program to immigrate Turkish teachers in (and paid for the costs) instead of hiring locally.

- ► A Fulton Sunshine parent reported that one of the governing board members provided answers to mandated testing to her and other parents.

- ► The principal in each school did all of the hiring on his own without involving any of the others on the leadership team. At one point, one of the science teachers, Yucel Aktas, was promoted to "Human Resources Director." When the whistleblower asked about why the school created a new Human Resources department at the school, Aktas told them, "No, no, no—I only handle hiring Turkish people, not a real Human Resources director for everybody."

- ► Every semester, between 2-4 Turkish men would show up at the school as "interns from Georgia Tech." These men shadowed various school employees to learn how to teach while they were learning English, however they were not really students at Georgia Tech as there was no education program at that university. They were, however, enrolled in their community English language acquisition program. These Turkish male interns were often hired by the Fulton Science schools the following year and placed in teaching roles. Some went on to become principals shortly after that and to lead other schools in Florida and North Carolina. Some of these interns include:
  - ▷ Namik Sercan, who went on to become principal in the Fulton Science network and is now employed by Terra Science and Education Foundation in New York, a Gülenist landlord entity that we believe charges the NY Gülen charter schools excessive rents.
  - ▷ Murat Cetin, who went on to become a principal in the Fulton Science network.

- Alper Tekin, who went on to work in the North Carolina Gülen Organization charter schools (Triad).
- Gothepi, who went on to work in the Florida Gülen Organization charter schools.

- As shared by other whistleblowers, many of the newly immigrated Turkish male teachers and interns lived together in the same apartment complex, Lexington Apartments in Alpharetta, Georgia.

- Fulton Science Academy Middle School was treated as a model school; anything created by the teachers at the middle school was taken by their CMO vendor Grace Institute and shipped out to other schools throughout the region.

- Turkish leadership and employees in the Fulton Science network often talked about the other "districts," referred to in this report as regions. The whistleblower, though American, was aware of Harmony Public Schools in the Texas district, Magnolia Public Schools in California, Horizon Science in Ohio, and even Putnam Science Academy in Connecticut, one of the few Gülen private schools in the Gülen Organization, because of the Turkish teachers and administrators' talk of these other districts. The whistleblower was also aware of these other districts because of the rapid movement between schools and regions by the Turkish employees.

- The whistleblower confirmed other whistleblowers' reports of intense favoritism shown to select students in the Fulton Science network. The special students would be taken on camping trips, special studying sessions, and given junk food during the school day in front of other students. This testimony corroborates the recruitment of special students by Turkish employees of the schools, documented elsewhere in this report.

- The whistleblower stated that Sercan, one of the interns previously, was a poor teacher who students reported would fall asleep at his desk. Regardless, Sercan was immediately promoted to principal at Fulton Science Academy High School after a very short period of time in the classroom, and he wrote the majority of the Fulton Sunshine charter petition. Sercan would periodically not show up for work, which the whistleblower learned he was given time to write the petition for the elementary school.

Notable Turkish Vendors

- **Charter Educational Services & Resources "CESR", formerly known as Grace Institute:** CESR is a smaller-scale charter management organization that oversees the Southeastern region of the Gülen Organization, including the Florida networks and the failed Fulton Science (GA) network. CESR is incorporated by former Fulton Science (GA) administrator, Avni Cokavci, and receives a per-head amount in fees from each of its customer charter schools, allegedly for curricular support, professional development, and student information management systems. In Florida, River City Science schools, Tallahassee School of Math and Science, Orlando Science Schools, Seminole Science, Broward Math and Science, Osceola Science, New Springs Schools, Discovery Academy of Science all use CESR for student information services, as well as Fulton Science private

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school (GA) and Green Charter School (SC).[21] The GA forensic audits uncovered extensive conflicts of interest between the administrators and board members of the GA charter schools and Grace/CESR, and interviews with the schools' Turkish employees revealed that work Grace/CESR was paid for was actually conducted by the schools' H-1B employees.[22]

- **Atlantic Wind Group, a.k.a Atlantic Wind Production:** Atlantic Wind Group (AWG) is owned and operated by Baybars Bakay and serves the Southeast region of the Gülen Organization. AWG provided video production, advertising, marketing, and website design services to the Fulton Science network. Prior to starting AWG, Bakay was employed at FSAMS as their computer teacher through July 31, 2010. Bakay filed the corporate paperwork to incorporate AWG just a month prior, on June 1, 2010. AWG received its first payment from FSAMS just a few months later, in December of 2010. When GA auditors asked the FSAMS principal about Bakay, he claimed to not know him and was unaware that Bakay had been an employee of his school the year before. AWG's Internet domain was registered to an employee of Grace/CESR and a former FSAHS teacher at the time, and after the audits began, AWG's website removed all mention to Bakay.[23]

- **Core Group/Core Design & Production:** The Fulton Science network purchased school uniform shirts from Core, which is a known Gülenist vendor for the Concept-controlled Midwestern region. The GA auditors revealed that Core's pricing was high relative to other vendors, and that the schools kept a large, unused quantity of the shirts in storage at all times that had no bearing on actual demand for the shirts in the schools. The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept used allegedly to defraud the E-Rate program.[24] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[25]

Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- **Emre Akbaba:** Science Teacher, Fulton Science Academy High School/TEACH (GA); River City Science Principal, New Spring Science Elementary and Middle School (FL); Principal, Discovery Academy of Science (FL).[26]

- **Murat Cetin:** Principal, Fulton Sunshine

[21] All of the following school websites contain the language "Powered by Charter Educational Services & Resources," evidencing the tie between CESR's Gülenist charter school customers, available at: http://tinyurl.com/l54sqwb, http://tinyurl.com/mm9s22a, http://tinyurl.com/kofnlk4, http://tinyurl.com/krpfzqs, http://tinyurl.com/k35qx8y, http://tinyurl.com/lke2m4c, http://tinyurl.com/m2vxrfu, http://tinyurl.com/lv23dcd, http://tinyurl.com/kxth73j, http://tinyurl.com/l78cvd3.

[22] FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

[23] FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

[24] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[25] *Id.*

[26] Information taken from: Pinellas charter schools, available at: http://tinyurl.com/m2q4z2l (last checked 5/2/2017); Bio, available at: http://tinyurl.com/m473l24; Newsletter, available at: http://tinyurl.com/lmz6yvs

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Academy (GA); Teacher, Fulton Science Academy Middle School (GA); Principal, Osceola Science Charter School (FL).[27]

- **Namik Sercan:** Teacher, Fulton Science Academy Middle School (GA); CEO, Registered Agent, Board Secretary, Fulton Sunshine Academy (GA); Bookkeeper, Fulton Science Academy High School/TEACH (GA); Board Secretary, Grace Institute (GA); Principal, Registered Agent, Fulton Science Academy High School/TEACH (GA); Author of article in The Fountain magazine, 2008, a Gülenist publication; Chief Education Officer, Central Jersey College Prep; Board member, Syracuse Science (NY); Executive Director, Terra Foundation – believed Gülenist landlord entity (NY).[28]
- **Alaaddin Akgul:** Teacher, Fulton Science Academy Middle School (GA); Board Member, Fulton Sunshine Academy (GA); Science Coach & Gifted Education Consultant, CESR (Southeastern); Dean, River City Science Academy (FL); Principal, River City Science Elementary (FL); Regional Director, Science Olympiad (FL); Principal, River City Science Mandarin (FL).[29]
- **Baybars Bakay:** Teacher, Fulton Science Academy Middle School (GA); Owner, Atlantic Wind Group – Gülenist vendor for Southeast region.[30]

Notable Articles regarding the Georgia Network

- Copsey, Jonathan. *Fulton Science Academy opens as private school*. Forsyth Herald. 31 August 2015. Available at: https://tinyurl.com/moaxra2 (4 May 2017).
- Fulton Science Academy Private School. *A great day for Fulton Science Academy*. Alpharetta Patch. 29 August 2015. Available at: https://tinyurl.com/k4elc9f (4 May 2017).
- French, Rose. *Fulton County school board votes to end ties with two charter schools*. The Atlanta Journal-Constitution. 21 November 2014. (Discussing non-renewal due to weaknesses with governance and problematic finances). Available at: https://tinyurl.com/kckdmw8 (4 May 2017).
- Bloom, Molly. *Fulton charter schools denied by state, futures in question*. The Atlanta Journal-Constitution. 28 August 2014. Available at: https://tinyurl.com/lk6lbks (4 May 2017).
- Scott, Jeffry. *State gives Fulton Science Academy High a second chance to save its charter*. The Atlanta Journal-Constitution. 21 June 2013. Available at: https://tinyurl.com/jvpsfva (4 May 2017).
- Scott, Jeffry. School's land sold off for $3.2M. The Atlanta Journal-Constitution.

[27] Information taken from: Orlando Science listing, available at: http://tinyurl.com/k3ptbng (last checked 5/1/2017); FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017); and Linkedin profile, available at: http://tinyurl.com/lp6m7dy (last checked 5/1/2017).

[28] Information taken from: FSAMS Audit pg 68-70, available at: http://bit.ly/1TATHiy (last checked 5/8.2017); Linkedin Profile, available at: http://tinyurl.com/lc5vxh9 (last checked 5/8/2017); Namik Sercan; CEO of Central Jersey College Prep; 3.2.17; article available from http://tinyurl.com/mfrp6ck (last checked 5/8/2017); The Fountain; Issue 63, May-June 2008; http://tinyurl.com/k3kch2l.

[29] Information taken from: Linkedin Profile, available at: http://tinyurl.com/l59zuqz (last checked 5/2/2017); FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

[30] Information taken from: FSAMS Audit, available at: http://bit.ly/1TATHiy (last checked 5/8.2017).

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6 February 2013. Available at: https://tinyurl.com/lc3q8xp (4 May 2017).

- Sigo, Shelly. *Wells Fargo files suit against Georgia charter school trio*. The Bond Buyer. 21 December 2012. Available at: https://tinyurl.com/mzre644 (4 May 2017).

- Pepalis, Bob. *Wells Fargo lawsuit against FSA is first step in foreclosure process*. Sandy Springs Patch. 21 December 2012. Available at: https://tinyurl.com/l3ffj8e (4 May 2017).

- Waylock, Candy. *Fulton Science High recommended to close*. North Fulton Herald Newspapers. 5 December 2012. Available at: https://tinyurl.com/koocxfw (4 May 2017).

- Wolfe, Julie. *Fulton Science Academy denies Turkish Imam links, fights audit*. 11Alive. 8 June 2012. Available at: https://tinyurl.com/mkb3kul (4 May 2017).

- Pepalis, Bob. *Fulton Science Academy MS audit reveals many problems*. Roswell Patch. 6 June 2012. Available at: https://tinyurl.com/lerw67k (4 May 2017).

- Leslie, Katie. *Turkish charter schools tied to Gülen movement*. The Atlanta Journal-Constitution. 6 June 2012. Available at: https://tinyurl.com/lbodh63 (4 May 2017).

- Saul, Stephanie. *Audits for 3 Georgia schools tied to Turkish movement*. The New York Times. 5 June 2012. Available at: https://tinyurl.com/gqkmh6s (4 May 2017).

- Pepalis, Bob. *Fulton Science Academy shifts to private*. Johns Creek Patch. 29 May 2012. Available at: https://tinyurl.com/n6ccz4k (4 May 2017).

- Waylock, Candy. *FSA fails to satisfy state about school site permit*. North Fulton Herald Newspapers. 31 January 2012. Available at: https://tinyurl.com/mp3nl7q (4 May 2017).

- Waylock, Candy. *Fulton Science Academy looks to state to keep doors open*. North Fulton Herald Newspapers. 25 January 2012. Available at: https://tinyurl.com/m52bc74 (4 May 2017).

- Oconee County School System. "*Oconee School of Math and Science Charter Application to Oconee County, Georgia, School District*." Letter to Oconee Science Academy. OnlineAthens. (Discussing reasons for denial as: using uncertified teachers, teaching only Spanish and Turkish, and a 1-to-1 laptop initiative without funding information). 4 August 2008. Available at: https://tinyurl.com/ldf776q (4 May 2017).

- *Professors would have major roles in Oconee charter school*. OnlineAthens. 24 April 2008. (Discussing link between school and two metro Atlanta charter schools, the Fulton Science Academy Middle School and the Technology Enriched Accelerated Charter High School, also called TEACH), Available at: https://tinyurl.com/mwttrso (4 May 2017).

South Carolina



QUICK FACTS ON GÜLEN CHARTER SCHOOLS
SOUTH CAROLINA



NUMBER OF SCHOOLS	1
KNOWN AS	Green Charter Schools
TOTAL ENROLLMENT	559
CHARTER VENDOR	Greenville Renewable Energy Charter School
TOTAL REVENUES	$5,234,068
RELATED INSTITUTIONS	Triad, Triangle, Queen City (NC); River City Science, Discovery, Science Schools, Broward Math and Science, New Springs Schools, School of Math and Science (FL); Fulton Science (Closed Network) (GA)

KEY PEOPLE

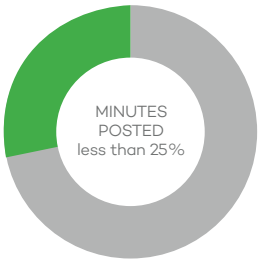


Imtiaz Harque | Amanda Yilmaz | Abdul Kadir Yildirim | Baran Menguloglu | Abdulbasit "Akif" Ayidin

QUESTIONABLE FINANCIAL ACTIVITIES

Numerous issues, including the school's extension of a loan to its landlord, suspect lease and rental payments for school facilities, and **the use of a third-party real estate organization that will own the school facilities even after the mortgage or the bond is repaid with public funds.**

Less than 25% of the minutes from meetings of the Green Board of Directors between 2013 to 2017 are posted on the school website.



The GREEN Charter School also shares an address with six entities that are likely related. **The relationship of these businesses to the school is unclear.**



H-1B VISA APPLICATIONS

195 H-1B

H-1B VISA APPLICATIONS 2001-2016

These applications were filed for such positions as: principal, curriculum coordinator, business operations specialist, instructional coordinator, business-manager, and Science Olympiad coordinators.

CONFLICT OF INTEREST

GREEN Charter School suffers from issues including a lack of transparency and accountability and potential conflicts of interest with affiliated organizations. **These issues paint a picture of the school in contrast to the image promoted by the school.**



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Southeast
- School Names (known as):
  - Green Charter Schools
- Total number of schools in state: 1 (second school opening 2017-2018)
- Total student enrollment 2015-16: 559
- Charter Holder/Governing Board(s):
  - Greenville Renewable Energy Charter School ("Green Charter Schools")
    - Organized as a non-profit 501(c)(3) organization
    - Oversees 1 charter, with a second charter school scheduled to open in 2017
- Charter Management Services Vendor: Charter Educational Services & Resources
- Regional Gülen Organization Oversight Entity: Charter Educational Services & Resources
- Regional Sister Networks: Triad (NC); Triangle (NC); Queen City (NC), River City Science (FL); Discovery (FL); Science Schools (FL); Broward Math and Science (FL); New Springs Schools (FL); School of Math and Science (FL); *Closed Network* Fulton Science (GA)
- Total Revenues for FY 2016: $5,234,068[1]
- South Carolina Network Founders:
  - Imtiaz Haque: Founder, Green Charter School (SC); Professor of Mechanical Engineering, Clemson University (SC).[2]
  - Amanda Yilmaz: Founder, Green Charter School (SC); French Teacher, Mauldin Middle School (SC).[3]
  - Abdul Kadir Yildirim: Founder, Green Charter School (SC); Assistant Professor, Furman University (SC); Research Scholar, Baker Institute for Public Policy (TX).[4]
  - Baran Menguloglu: Founder, Green Charter School (SC); Owner, Mengotorun Trading LLC (SA); QA Engineer, Magna International (Auorora, Canada); Vice President, South Carolina Dialogue Foundation (SC).[5]
  - Abdulbasit "Akif" Aydin: Green Charter School Founder (SC); Founding Board Member, River City Science Academy (FL); Director, Istanbul Cultural Center of Jacksonville (FL); Director, Amity Turkish Cultural Center (FL); President, Atlantic Institute of South Carolina (SC); Educational Director, the Atlantic Foundation of North Florida (2006-2010) (FL); Registered Agent, Green Apple Education (SC).[6]

1 Revenues from Green Charter School Report on Financial Statements 2016, available at: https://tinyurl.com/jwbfp7z (last checked 6/17/2017).

2 LinkedIn profile, available at: https://tinyurl.com/nyzutpy (last checked 6/17/2017).

3 Information taken from: LinkedIn profile, available at: https://tinyurl.com/lotvd36 (last checked 6/17/2017); Green Charter School charter application, available at: https://tinyurl.com/mb7sjmz (last checked 6/17/2017).

4 Information taken from: Rice University's Baker Institute for Public Policy biography, available at: https://tinyurl.com/n55v3bh (last checked 6/18/2017); Green Charter School application, available at: https://tinyurl.com/mb7sjmz (last checked 6/18/2017).

5 Information taken from: Green Charter School application, available at: https://tinyurl.com/mb7sjmz (last checked 6/17/2017); LinkedIn profile, available at: https://tinyurl.com/kzgaayk (last checked 6/17/2017); South Carolina Dialogue Foundation 2014 IRS Form 990, available at: https://tinyurl.com/l3hexw8 (last checked 6/17/2017).

6 Green Charter School application, available at: https://tinyurl.com/mb7sjmz (last checked 6/17/2017); Green Apple Education Corporate Filings, available at: https://tinyurl.com/y9ugzyps (last checked 6/17/2017); WJCT article, available at: https://tinyurl.com/j2a7b8q (last checked 6/17/2017); The Florida Times-Union article, available at: http://tinyurl.com/y7pql78 (last checked 6/17/2017); The Post and Courier article, available at: http://tinyurl.com/menn3mk (last checked 6/17/2017).

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Overview

The Greenville Renewable Energy Education Charter School ("Green Charter Schools") is a new Gülen charter network in the Southeastern United States. It opened its first school, the GREEN Charter School - Greenville, in South Carolina in 2013. A second school, the Green Charter School of the Midlands, is set to open in the fall of 2017 in Irmo, SC. Green Charter Schools may be new to the Gülen Organization, but it shares many founders and vendors with other Gülen networks in the Southeast. For example, Abdulbasit Aydin, a founder of Green Charter Schools, also founded River City Education Services, Inc., a Gülen sister network in Florida with four schools. He currently serves as the President of the Atlantic Institute of South Carolina, which is a member of the Alliance for Shared Values, an umbrella organization for key Gülen cultural organizations. In addition, GREEN Charter School - Greenville's Principal taught at Amity Brooklyn, a private Gülen school in New York, and served as the Principal of the River City Science Academy in Florida.

The GREEN South Carolina network serves a disproportionately low percentage of vulnerable student populations than its district Greenville County Schools. For example, the district serves double the percentage of students with disabilities (15.4% vs. 7.2%); 12 times more English language learners (12% to <1%); and double the percentage of students who are economically disadvantaged (47% vs. 23%).[7] This gives the impression that GREEN Charter School serves a disproportionately privileged group of students.

School	Operation	Student Demographic Information[8]	Authorizer	Governing Board
Greenville Renewable Energy Education Charter School (GREEN Charter School - Greenville) 1440 Pelham Rd. Greenville, SC 29615	Grades K-9 2012-present[9]	Enrollment: 559 54.9% White 11.6% Hispanic 18.1% Asian 13.8% African American 1.6% Other 7.2% SWD 23% FRL 0.9% ELL	South Carolina Department of Education – South Carolina Public Charter School District[10]	Green Charter Schools
New Schools				
Green Charter School of the Midlands 7820 Broad River Rd. Irmo, SC 29063	Opening 2017-2018[12]			Green Charter Schools
New middle and high school campus for GREEN Charter School - Greenville 211 Century Drive Greenville, SC (Pelham Rd. campus will remain an elementary campus)	Opening 2017 - 2018			Green Charter Schools

[7] Student demographic data, available at: http://tinyurl.com/yahlgtao (last checked 6/18/17); *see also* Percentage of economically disadvantaged students, available at: http://tinyurl.com/y79qcbyt (last checked 6/18/17).

[8] Green Charter School Performance Framework Profile 2015-2016, available at: https://tinyurl.com/lua3qbq (last checked 6/18/2017).

[9] Basic information from the Green Charter annual report card 2015-2016, available at: https://tinyurl.com/nxrybmb (last checked 6/18/2017).

[10] *Id.*

[11] About Green Charter School from their official website, available at: https://tinyurl.com/kputht9 (last checked 6/18/2017).

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School	Operation	Student Demographic Information	Authorizer	Governing Board
Charter Petition Denials				
Greenville Palmetto Science Academy (a/k/a Greenville Science Charter School)[12]	*2006 - Denied Reapplied and rejected 2009*[13]			*Petitioners: Ali Ozer, Guven Yucesan, Mevlut Tascan*

*Data taken from 2015 - 2016 school year. *FRL: indicates students eligible for free/reduced price lunch; ELL indicates English language learners; SWD indicate students with disabilities.*

A History of Strategic Ambiguity and Conflicting Interests

GREEN Charter School - Greenville suffers from the same problems endemic to other Gülen charter schools, including a lack of transparency and accountability and potential conflicts of interest with affiliated organizations. These issues paint a picture of the school in contrast to the image promoted by the school.

First, less than 25% of the minutes from meetings of the Green Board of Directors between 2013 to 2017 are posted on the school website,[14] and minutes from the entire years of 2015 and 2016 have been taken down since research began on the school.[15] Board minutes are an important public record documenting decisions regarding the use of public funds. As a result of the failure to post board minutes, information about important contracts, leases, and other Board decisions is largely inaccessible.

Board minutes for the GREEN Charter School - Greenville also show that the school's principal, Adem Dokmeci, interviewed candidates to serve as the principal for the new Green Midlands school and hired Osman Demirel.[16] No information is provided about the principal recruitment process, including requirements and qualifications for the job, the number of applications received, the number of candidates interviewed, or the scoring criteria used to select the principal. Mr. Demirel formerly worked at the now closed Fulton Science Academy in Georgia and River City Science Academy in Florida, other Gülen Organization charter schools, while Mr. Dokmeci served as Principal at the River City Science Academy. The selection of a school principal is one of the most important responsibilities of the Board of Directors, yet little due diligence regarding the selection process is described in the board minutes.

The GREEN Charter School - Greenville, located at 1440 Pelham Road in Greenville, also shares an address with six entities that are likely related. It is unclear, however, whether these entities are affiliated, perform services for the Green Charter School, how they charge for services, and where the payments are reported. These six businesses include:

12 The School District of Greenville County v. Greenville Science Charter School, No. 07-ALJ-30-0162-, available at: https://tinyurl.com/kpazelj (last checked 6/17/2017).

13 Greenville Palmetto Science Academy denial,Greenville County Schools Board Meeting from April 17, 2009, available at: https://tinyurl.com/l2rg7j3 (last checked 6/18/2017).

14 28 of 36 minutes over four years are not posted.

15 Green Charter School Board minutes; available at: http://tinyurl.com/y7pwnwcs (last checked 6/18/17).

16 Green Charter School Board Minutes from February 21, 2017, available at: http://tinyurl.com/y7pwnwcs (last checked 6/18/17).

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- **Blue Ocean Construction:** A FL-based construction company affiliated with the Gülen charter networks previously used the school's address as its business address.[17] Blue Ocean Construction performed construction work on the Green Charter School property, as well as several Gülenist charter schools in Florida. It is owned by Mehmet Taskan, one of the Florida Gülen network founders.[18]

- **Green Apple Child Care:**[19] This childcare center is not registered with the South Carolina Secretary of State. It accepts children ages 1 – 4 and offers before and after school care. It is unknown if Green Apple Childcare is related to Green Apple Education, LLC.

- **Green Apple Education, LLC:**[20] Green Apple Education (formerly Carolina Pizza) is registered with the Secretary of State as of February 2014 using the 1440 Pelham Road (Suite C) address. Abdulbasit "Akif" Aydin, Green Founder and River City Florida Founder, is listed as Green Apple Education's agent. It is unknown whether the Green Apple Childcare Center and Green Apple Education are related entities.

- **Sprinter Learning Center Education, LLC:**[21] This company is registered with the South Carolina Secretary of State at 1440 Pelham Road as of March 2017 by Serkan Sen as its registered agent.

- **Sprinter Education Services, Inc.:** This company is registered with the South Carolina Secretary of State at 1440 Pelham Rd (Suite C) as of September 2013 by Oguz Tekin as its registered agent. Tekin was a principal at New Springs School, a Florida Gülen charter school.

- **Sprinter Learning Center:** This company offers tutoring in Math, Reading/English, SAT/ACT Prep, and college essay preparation at an hourly rate of $49.33. This entity is not registered with the South Carolina Secretary of State. Its relationship with Sprinter Learning Center Education, LLC and Sprinter Education Services, Inc., is unknown.

Additionally, financial reports for the GREEN Charter School – Greenville show $358,956 for "student related" revenue in 2016 but provide no documentation about the source of this income. If the school is profiting from businesses that are located on site or operated by its founders, Board members, or affiliated individuals, those relationships should be disclosed and fully transparent.

The GREEN Charter School – Greenville also leases its property from a Gülenist landlord, Pelham Oaks Plaza LLC, owned by Yazan Khatib.[22] This relationship, especially when coupled with the school's use of Blue Ocean Construction for construction work, raises serious red flags. Khatib and Mehmet Taskan, the owner of Blue Ocean Construction, worked together on other Gülenist charter schools in Florida. They profited extensively from a real estate deal that involved the purchase, renovation, and sale of the River City Science Academy facility in Jacksonville, Florida, where they made millions of dollars in profit at the school's, and the public's, expense. Their connection to the GREEN Charter School – Greenville is unsurprising, however. Adem Dokmeci previously served as the Principal of River City Science Academy and now serves as the Principal at the Green Charter School. Similarly, Abdulbasit Aydin founded both River

17 *See* address for Blue Ocean, AIHIT Data, available at: http://tinyurl.com/y9dcfg6o (last checked 6/17/17).

18 Florida corporation records, available at: http://tinyurl.com/yajp97z7 (last checked 6/18/2017).

19 Address on Green Apple Childcare web site, available at: http://tinyurl.com/y8a9fg7u (last checked 6/18/17).

20 See corporate records from South Carolina Secretary of State, available at: http://tinyurl.com/ya678rmf (last checked 6/18/17).

21 *Id.*

22 Florida Secretary of State Business Entities, available from: http://tinyurl.com/y7agk5od (last checked 6/18/17).

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City Education Services, the entity operating River City Science Academy, and the GREEN Charter School – Greenville.[23] The amount paid by the school for its facility should be closely monitored due to the real estate issues in Florida with these individuals.

Financial Issues

External audits do not find deficiencies or weaknesses in the GREEN Charter School – Greenville's financial statements. However, this report describes other questionable financial activities, including the school's extension of a loan to its landlord, suspect lease and rental payments for school facilities, and the use of a third-party real estate organization that will own the school facilities even after the mortgage or the bond is repaid with public funds.

Bond Financing

GREEN Midlands LLC borrowed $5,845,000 at an interest rate of 5.250% for 97% of the borrowed funds in bonds issued by the South Carolina Job-Economic Development Authority on December 1, 2016. The financing will be used for purchasing, constructing, renovating, and equipping the new Green Charter School of the Midlands in Irmo, SC, scheduled to open in Fall 2017.[24] GREEN Midlands LLC will lease the buildings to the Green Charter School of the Midlands through a triple net lease with the school responsible for paying all expenses, taxes, fees, and operational costs associated with the facility. The original GREEN Charter School – Greenville will not be financially liable for bond repayment. The two schools will be separate legal and financial organizations governed by the same Board of Directors.

Real Estate

The schools operated by Green Charter Schools will be located at three properties in 2017–2018 when the new Green Charter School of the Midlands school opens and the GREEN Charter School – Greenville expands to a new middle and high school campus. These schools are implicated with both Gülenist landlords and construction vendors.

GREEN Charter School – Greenville: The original school property at 1440 Pelham Road is leased from a Gülenist landlord. It's also engaged a construction company for work with owners connected to the Gülen Organization Florida networks and a prior relationship with the founder and principal of the GREEN Charter School – Greenville.

The landlord is Pelham Oaks Plaza LLC, a Florida company owned by Yazan Khatib.[25] Blue Ocean Construction, owned by Mehmet Taskan, managed a construction project for the GREEN charter school.[26] Khatib and Taskan have worked together before on real estate deals involving Gülen charter schools. They profited extensively from a real estate deal involving the River City Science Academy in Jacksonville, Florida, and they made millions of dollars in profit at the

[23] See the Florida State Profile for more information.

[24] Official Statement, Bond for GREEN Midlands LLC, available at: http://tinyurl.com/y7xbec3g (last checked 6/18/2017).

[25] Florida Secretary of State Business Entities, available at: http://tinyurl.com/y7agk5od (last checked 6/1/17).

[26] Greenville County construction permits, available at: http://tinyurl.com/yclmy2en (last checked 6/18/17).

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school's, and the public's, expense.[27] The school officials involved in this Florida deal are also the same as those on the school side in Greenville: Adem Dokmeci was the Principal of the River City Science Academy and now serves as the Principal at the GREEN Charter School – Greenville, and Abdulbasit "Akif" Aydin founded both River City Education Services and Green Charter Schools.

This prior relationship raises questions about whether the Board conducted a thorough search of all available property in Greenville to ensure it was considering the most cost-effective option before leasing property from Pelham Oaks Plaza LLC. Board meeting minutes disclose that the school paid the landlord rent of $44,555 per month through February 2017 ($534,660 annually).[28] Based on this information, the school has paid the landlord an estimated $1,915,865 since it opened in 2013.[29] The purchase price for the Pelham Road property was $2.5 million,[30] so the GREEN Charter School has already come close to paying off the cost of the original purchase price (interest not included). Notably, the school will pay these expensive rents with public funds, thereby subsidizing the purchase and ownership of the building by a Gülenist private landlord.

Both Khatib and Taskan are active in other Gülenist organizations. Khatib is a Board Member of the Atlantic Institute Jacksonville,[31] an organization that is a member of the Alliance for Shared Values, an openly Gülen national organization. Taskan incorporated both Discovery Education Services[32] and Universal Education Services,[33] Gülen charter school networks in Florida. In addition, Taskan's company, Blue Ocean Construction, appears to be the preferred construction vendor for projects at Gülen schools in the Southeast.

The Green Charter School of the Midlands: The Green Charter School of the Midlands will open in Fall 2017. Its real property is owned by GREEN Midlands LLC ("GREEN Midlands"), a separate third-party organization that bought the facilities in December 2016 for $2,850,000.[34] GREEN Midlands borrowed $5,845,000 through bonds issued by the South Carolina Job-Economic Development Authority for the purchase and renovation of the facility.[35] GREEN Midlands will lease the property to the school through a triple net lease with the school responsible for paying all expenses, taxes, fees, and operational costs associated with the facility. The amount of the monthly rent is unknown. Adem Dokmeci, the former principal of the school, serves as the registered agent Green Midlands LLC. This use of a third party middle man entity controlled by other Gülenists allows the Gülen Organization to purchase and hold title to property paid for with public funds. Should the school later be terminated, the Gülen Organization will retain ownership of the publicly financed property.

Excessive Use of the H1-B Visa Program

Although the GREEN Charter School – Greenville has not filed any H1-B visas as of 2016, it has likely hired H-1B visa holders from the Gülen Organization Florida networks due to the overlap of key individuals between the two states' networks. GREEN Charter School

27 See the Florida profile in this report for more information about the real estate deal involving the River City Science Academy.

28 Green Charter School Board minutes from February 21, 2017, available at: http://tinyurl.com/y7pwnwcs (last checked 6/18/2017).

29 August 2013 through February 2017 equals 43 months.

30 Greenville County Register of Deeds, available at: http://tinyurl.com/yaqvvujc (last checked 6/18/2017).

31 Atlantic Institute Jacksonville, available at: http://tinyurl.com/y7hekwmf (last checked 6/18/2017).

32 Discovery Education Services, Articles of Incorporation available at: http://tinyurl.com/ml8qjeh (last checked 6/18/2017).

33 Universal Education Services, corporate information available at: http://tinyurl.com/kwwpz7p (last checked 6/18/2017).

34 Green Midlands LLC property records, available at: https://tinyurl.com/n5wvsbt (last checked 6/18/2017).

35 Official Statement, Bond for GREEN Midlands LLC (December 1, 2016), available at: http://tinyurl.com/y7xbec3g (last checked 6/18/2017).

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– Greenville's principal formerly served as principal at the River City Science Academy and has brought at least one other Turkish employee from that school to the GREEN Charter School – Greenville. GREEN Charter School – Greenville's key founder also founded River City Science Academy. Other Gülen charter schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network.

The Florida network filed at least 195 H-1B applications from 2001-2016, including at least 71 H-1B applications filed by the River City Education Services network.[36] While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: principal, curriculum coordinator, business operations specialist, instructional coordinator, business manager, and Science Olympiad coordinators. Florida's Gülen charter schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Cherie Cookorinis: the Florida network (including: Discovery, River City, New Springs, Neosprings, Stars Education, Galaxy) used Cookorinis, a Georgia-based attorney to file numerous H-1B applications.[37] Cookorinis also filed applications for:
  - Fulton Science (GA)
  - Chesapeake Lighthouse Foundation (MD)
  - Triad Math and Science (NC)
  - Charter Educational Services & Resources (GA, FL)
  - Grace Institute (GA, FL)
- Remzi Kulen: the Florida network used Kulen, a New York-based attorney, to file numerous H-1B applications.[38] Kulen also filed applications for:
  - Orlando Culture and Dialog Center (FL)
  - Blue Ocean Construction (FL)
  - Fulton Science (GA)
  - Charter Educational Services & Resources (GA, FL)
  - Concept Schools (OH, IL, IN, MI, MN)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Gülen's home, the Golden Generation Workshop Center (PA)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)

Notable Turkish Vendors

Blue Ocean Construction, Inc.: Blue Ocean Construction appears to be the preferred construction vendor for Gülenist charter schools throughout the Florida and the Southeastern region. Blue Ocean Construction renovated the GREEN Charter School - Greenville building.[39] Green Charter School's landlord at this site and the owner of Blue Ocean were partners in at least two real estate deals in Florida involving other Gülen schools that resulted in significant profits to the two business partners.[40]

Charter Educational Services & Resources ("CESR") (formerly known as Grace Institute): CESR is a smaller-scale charter management organization that oversees the Southeastern

[36] MyVisaJobs.com for River City Education Services, available at: http://tinyurl.com/lb6kgyk (last checked 6/18/2017).

[37] List of entities represented by Cherie Cookorinis, available at: http://tinyurl.com/m4e6cgl (last checked 6/18/2017).

[38] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 6/18/2017).

[39] Greenville County Building Safety Department Permits, available at: http://tinyurl.com/yclmy2en (last checked 6/18/2017).

[40] See the Florida State Profile for additional information.

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region of the Gülen Organization, including Green Charter Schools, the Florida networks, and the failed Fulton Science (GA) network. CESR is incorporated by a former Fulton Science (GA) administrator, Avni Cokavci, and receives a per-head amount in fees from each of its customer charter schools, allegedly for curricular support, professional development, and student information management systems. The Florida schools and the Green Charter School all use CESR to "power" their online intranet.[41] The Florida schools, and likely the Green Charter School, use CESR to manage their student information systems, a function that Gülen schools appear almost always to contract out to an affiliated private Gülen organization. Because there is little reference to vendor contracts in the GREEN Charter School - Greenville board minutes, and because many board minutes have been removed from the website, it is difficult to confirm the use of CESR for this service. However, the GREEN Charter School - Greenville reported a very large expenditure of almost $1 million for "purchased services" on its 2016 financial statement without any explanation about how these dollars were used.[42] Notably, CESR was formerly known as the Grace Institute, and the series of audits that ultimately resulted in the closure of the Fulton Science (GA) charter schools raised serious concerns that the Grace Institute appeared to be a sham corporation that did not provide any services of value to its charter school customers.[43]

Scandals, Investigations, & Notable Activities

Green Charter Schools voted in March 2014 to take preferential actions related to its landlord for the Pelham Road property that raises questions about whether the board had an arm's length relationship with the landlord. At that time, the board voted to advance rental payments of $100,000 to the landlord for construction costs, essentially extending a loan to the landlord to be repaid in reduced rental payments over time.[44] There was no discussion at the time about the actual terms of the lease and whether the landlord was responsible for those improvements to the school. There was no indication of whether the parties documented this transaction, or whether the landlord paid interest on the loan. Such actions appear to have placed the interests of the Gülenist landlord above the best interests of the school.

In addition, the GREEN Charter School - Greenville stated in its original charter application that the school "shall perform a rigorous facility search with leading real estate agencies in the [sic] Greenville County."[45] Yet, Board minutes do not show whether the Board conducted a thorough search of all available properties to lease in Greenville to ensure it was identifying the most cost effective option for the Green Charter School. In light of the numerous connections between the landlord chosen and the school's leadership, it appears such a search was either not conducted, or was conducted with the plan for a related Gülenist entity to purchase the property on behalf of the school.

41 All of the following school websites contain the language "Powered by Charter Educational Services & Resources," evidencing the tie between CESR's Gülenist charter school customers, available at: http://tinyurl.com/l54sqwb (last checked 6/18/2017), http://tinyurl.com/mm9s22a (last checked 6/18/2017), http://tinyurl.com/kofnlk4 (last checked 6/18/2017), http://tinyurl.com/krpfzqs (last checked 6/18/2017), http://tinyurl.com/k35qx8y (last checked 6/18/2017), http://tinyurl.com/lke2m4c (last checked 6/18/2017), http://tinyurl.com/m2vxrfu (last checked 6/18/2017), http://tinyurl.com/lv23dcd (last checked 6/18/2017), http://tinyurl.com/kxth73j (last checked 6/18/2017), http://tinyurl.com/ybbnaa3r (last checked 6/18/2017).

42 Green Charter School Report on Financial Statements 2016, available at: https://tinyurl.com/jwbfp7z (last checked 6/18/2017).

43 *See* Georgia profile for more information about CESR/Grace Institute.

44 Green Charter School Board minutes from March 11, 2014, available at: http://tinyurl.com/y7pwnwcs (last checked 6/18/2017).

45 Green Charter School 2012 charter application, at p. 214, available at: http://tinyurl.com/mb7sjmz (last checked 6/18/2017).

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Gülenist Cultural and Business Organizations Active in State

We believe Turkish cultural organizations play a central role in the Gülen landscape, serving as the external face to the community that obscures the true activities of the organization. They are generally nonprofit organizations with governing boards often composed largely of individuals of Turkish national origin. The organizations provide a platform for community involvement, hosting events where local leaders who can benefit the organization are honored, convening forums and conferences, and sponsoring trips to Turkey that promote the Gülen Movement. In addition, our research suggests that funds collected through the various Gülen charter school schemes (vendor contracts, excessive rents, and teacher kickbacks) can be channeled through the organizations to pay for programs that will enhance the façade of legitimacy.

Atlantic Institute South Carolina: The Atlantic Institute is a Gülen-affiliated nonprofit organization with regional branches throughout the Southeast in Florida, Georgia, Alabama, Tennessee, and South Carolina.[46] It was formerly called the South Carolina Dialogue Foundation.[47] It promotes Gülen's teachings and interfaith dialogue, hosts awards dinners, forums on various topics, and other community events, and sponsors trips to Turkey for local elected officials and leaders. The Atlantic Institute South Carolina has hosted events in Greenville, Columbia, Charleston, Clemson, and Spartanburg[48] and coordinates activities with the South Carolina Dialogue Foundation.[49] The Atlantic Institute is a member organization of the Alliance for Shared Values (Alliance), the umbrella organization for six Gülen groups around the United States that are openly aligned with the Gülen Movement.[50] Key leaders of the Institute include:

- Turan Kilic: President and CEO of the Atlantic Institute;[51] formerly of the Dialogue Institute of the Southwest.[52]
- Abdulbasit "Akif" Aydin: President of the South Carolina Dialogue Foundation;[53] President of the Atlantic Institute South Carolina;[54] Founder of the GREEN Charter School - Greenville.[55]
- Baran Menguloglu: Former Vice President of the South Carolina Dialogue Foundation;[56] founder of the GREEN Charter School - Greenville.[57]
- Tuncay Kamas: Former Treasurer of the South Carolina Dialogue Foundation.[58]

Examples of community events hosted by the Institute include:

- The Greenville Future Leaders of Dialogue Dinner on November 1,

46 Fethullah Gülen bio on Atlantic Institute's website, available at: https://tinyurl.com/jwbfp7z (last checked 6/18/2017).

47 Tony Bartelme & Rachel Baye, *Capitol Gains: S.C. Politicians Use Office to Pad Pockets*, The Center for Public Integrity (September 25, 2015, updated March 10, 2016), available at: http://tinyurl.com/ybwjvc6g (last checked 6/18/2017).

48 Future Leaders Dialogue Dinners, Atlantic Institute South Carolina, available at: https://tinyurl.com/y6v3otoa (last checked 6/18/2017).

49 South Carolina Dialogue Foundation IRS 990 Form, available at: http://tinyurl.com/yazfqh8y (last checked 6/18/2017).

50 Alliance for Shared Values on Atlantic Institute website, available at: https://tinyurl.com/ybsjmkwr (last checked 6/18/2017).

51 Turan Kilic's bio, The Atlantic Institute, available at: https://tinyurl.com/ltkrsr7 (last checked 6/18/2017).

52 Turan Kilic in Texas, Corporation Wiki, available at: https://tinyurl.com/n2ak53w (last checked 6/18/2017).

53 SC Dialogue Foundation, IRS Form 990 – 2015; available at: http://tinyurl.com/y7egsqhj (last checked 6/18/2017).

54 Atlantic Institute South Carolina, available at: http://tinyurl.com/yayk6sff (last checked 6/18/2017).

55 Board Biographical Information; Green Charter School application (April 30, 2012), available at: https://tinyurl.com/mb7sjmz (last checked6/18/2017).

56 South Carolina Dialogue Foundation IRS 990 2014, available at: http://tinyurl.com/y8sg55lc (last checked 6/18/2017).

57 Green Charter School application, available at: https://tinyurl.com/ltkrsr7 (last checked 6/18/2017).

58 South Carolina Dialogue Foundation IRS 990 2014, available at: http://tinyurl.com/yazfqh8y (last checked 6/18/2017).

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2016, with Pamela Evette, President/ CEO of Quality Business Solutions in Greenville, as keynote speaker.[59]

- ▷ The Charleston Peace and Dialogue Awards Dinner in 2016 honoring State Representative Jenny Horne, and members of the Post and Courier.[60]
- ▷ Columbia Dialogue and Friendship Dinner in 2016 honoring Sheriff Leon Lott, Richland County Sheriff's Department.[61]

Istanbul Cultural Center: Like Turkish cultural centers in other states across the country, the Istanbul Cultural Centers in South Carolina promote Turkish culture through language and cooking classes, festivals, and local events. The Center also sponsors annual "dialogue" trips to Turkey for community members and leaders.[62] The Center is located at the same address as the Atlantic Institute South Carolina. It has multiple branches throughout South Carolina in Clemson, Greenville, Columbia and Charleston.[63]

Friends of Gülen Spotlight

Sixteen South Carolina state-elected officials traveled to Turkey on trips sponsored by Gülen-affiliated organizations, including the Atlantic Foundation and the South Carolina Dialogue Foundation):[64]

- ► Senator Creighton Coleman (2012)[65]
- ► Senator Mike Fair, Senate Education Committee (2012)[66]
- ► Senator Brad Hutto (2012)[67]
- ► Senator John Land, State Senator (2012)[68]
- ► Senator Phil Leventis (2012)[69]
- ► Senator John Matthews (2012)[70]
- ► Representative Mandy Norrell[71]
- ► Senator Mike Rose (2012)[72]
- ► Senator John Scott[73]
- ► Senator Vince Sheheen (2012)[74]
- ► Representative Neal Collins (House Education Committee) (2015)[75]

59 Greenville FLDD at the Atlantic Institute, available at: https://tinyurl.com/ybod2vjr (last checked 6/18/2017).

60 Peace and Dialogue award dinner at the Atlantic Institute, available at: https://tinyurl.com/y9kdc92u (last checked 6/18/2017).

61 Columbia Dialogue and Friendship dinner (2013), available at: https://tinyurl.com/y9dy4fps (last checked 6/18/2017).

62 Istanbul Cultural Center, About Us, available at: https://tinyurl.com/n4msdw5 (last checked 6/18/2017).

63 Istanbul Cultural Center, Greenville Branch, available at: https://tinyurl.com/k6xwwen (last checked 6/18/2017).

64 Center for Public Integrity list of identified lawmakers who took trips to Turkey funded by Gülen-affiliated organizations, available at: https://tinyurl.com/lzd8zsl (last checked 6/18/2017); The Nerve article about trips to Turkey funded by Gülen-affiliated organizations, available at: https://tinyurl.com/mpsym4p (last checked 6/18/2017).

65 List of lawmakers who took trips to Turkey funded by Gülen-affiliated organizations, available at: https://tinyurl.com/lzd8zsl (last checked 6/18/2017).

66 *Id.*

67 *Id.*

68 *Id.*

69 *Id.*

70 *Id.*

71 *Id.*

72 *Id.*

73 *Id.*

74 *Id.*

75 Nathaniel Cary, *SC Legislator trips sponsored by cleric accused in coup attempt*, The State (February 10, 2017), available at: https://tinyurl.com/lepth3z (last checked 6/18/2017).

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- Representative Todd Rutherford (2015)[76]
- Representative John King (2015)[77]
- (Former) Representative Mary Tinkler (2015)[78]
- Representative Cezar McKnight (2015)[79]
- Representative David Weeks (2015)[80]

Additional community members who accepted trips to Turkey include leaders such as:

- Mark Fallaw, Chief of Police for North Town South Carolina; and[81]
- James Alton Cannon, Jr., Sheriff of Charleston County.[82]

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H1-B visa employees, both teachers and administrators, among schools, states, and education management vendors in different types of jobs. The individuals listed below are examples of the overlap of employees among these organizations, further demonstrating the interconnections and affiliation between the networks.

- Adem Dokmeci: Principal, Green Charter School (SC); Registered Agent for GREEN Midlands LLC (SC); [83] Principal, River City Science Academy (FL);[84] Vice Principal, Brooklyn Amity School (NY);[85] Teacher in Turkey, Uzbekistan, and Indonesia;[86] B.S., Marmara Universitesi (Istanbul, Turkey).[87]
- Yavuz Koruk: Board Member, Green Charter School;[88] Petitioner, Asheville Math and Science Academy (NC), a failed charter school in North Carolina;[89] President, Nyte Inc (NC) which has applied for H1-B visas for construction positions.[90]
- Ali Ozer: Founding Principal, T.E.A.C.H. (GA); Executive Director, Fulton Science network (GA); CEO, CFO, President, Grace Institute (GA); Curriculum Director, Fulton Science Academy Middle school (GA); 2006 Lead Petitioner, Greenville Science Charter School (SC) (denied in 2009).[91]

76 *Id.*

77 *Id.*

78 *Id.*

79 *Id.*

80 *Id.*

81 Mark Fallow trip to Turkey, Istanbul Cultural Center, available at: https://tinyurl.com/lbvk79s (last checked 6/18/2017).

82 *Id.*

83 Green Midlands LLC property records, available at https://tinyurl.com/n5wvsbt (last checked 6/18/2017).

84 LinkedIn profile, available at: https://tinyurl.com/lctzf2u (last checked 6/18/2017).

85 Seth Kugel, *Neighborhood Report: Sheepshead Bay; A Small School Run by Turks Takes the Stage*, New York Times (March 21, 2004), available at: http://tinyurl.com/ycomlpvo (last checked 6/18/2017).

86 *Id.*

87 LinkedIn profile, available at: https://tinyurl.com/lctzf2u (last checked 6/18/2017).

88 Green Charter School board meeting minutes, available at: https://tinyurl.com/y8whza82 (last checked 6/18/2017).

89 Petitioner information, Asheville Math and Science Academy initial application (December 6, 2013), available at: https://tinyurl.com/y7tfq738 (last checked 6/18/2017).

90 Nyte Inc. on MyVisaJobs.com, available at: https://tinyurl.com/y9eaf69w (last checked 6/18/2017).

91 Information taken from: FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 6/18/2017); Fulton Educational Services 2005 IRS Form 990, available at: http://tinyurl.com/zxtjkrm (last checked 6/18/2017); Greenville Science Charter School denial, Greenville County Schools Board Meeting from April17, 2009, available at: https://tinyurl.com/l2rg7j3 (last checked 6/18/2017).

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- Zulfikar Berk: Registered Agent, Blue Ocean Construction (SC) (listed at same address as GREEN Charter School in 2014);[92] President, Intercultural Dialogue Student Organization at the University of South Carolina Columbia (SC);[93] Owns the domain for the Atlantic Institute South Carolina;[94] Bachelors, Abnat Izzet Baysal Universitesi (Turkey).[95]

- Oguz Tekin: Registered Agent, Sprinter Education Services (SC) (shares an address with the GREEN Charter School – Greenville);[96] Principal, New Springs School (FL).[97]

- Serkan Sen: Registered Agent, Sprinter Learning Center Education (SC).[98]

- Yazan Khatib: Owner, Pelham Oaks Plaza LLC (SC); Owner, River City Plaza LLC (FL) which owns the River City Science Academy property;[99] President, Khatib Development (FL).[100]

- Mehmet Taskan: Incorporator, Discovery Education Services, Inc. (FL); Incorporator, Universal Education Services, Inc. (FL); Owner, Blue Ocean Construction (FL); Employee, Khatib Development LLC – Gülenist Landlord entity(FL).[101]

Notable Press Coverage and Research Regarding the South Carolina Gülenist Network

- Young, Melinda., *Buildings Purchased for GREEN Charter School*, Greenville Journal, July 6, 2016. Available at: http://tinyurl.com/yag8elag (last checked 6/17/2017).

- Cary, Nathaniel. *SC Legislators Among Those Who Took Turkey Trips*. USA Today, February 9, 2017. Available at: http://tinyurl.com/y8zfmnfq (last checked 6/17/2017).

- Pardue, Doug. *Group blamed for Turkish Coup courted S.C. Leaders Recipients say free travel to Turkey*. The Post and Courier, July 20, 2016. Available at: http://tinyurl.com/menn3mk (last checked 6/18/2017).

- Brundrett, Rick. *S.C. Legislators Say 'No Agenda' on Trip to Turkey*. The Nerve. November 16, 2012. Available at: http://tinyurl.com/mpsym4p (last checked 6/18/2017).

- Cary, Nathaniel. *SC Legislator Trips Sponsored by Cleric Accused in Coup Attempt*. The State, February 10, 2017. Available at: http://tinyurl.com/lepth3z (last checked 6/18/2017).

92 Blue Ocean Construction Corporate Information, available at: https://tinyurl.com/y9lgwoeb (last checked 6/18/2017).

93 Intercultural Dialogue Student Organization information, available at: https://tinyurl.com/y92q94jq (last checked 6/18/2017).

94 Atlantic Institute SC website ownership information, available at: https://tinyurl.com/y9b4frtw (last checked 56/18/2017).

95 LinkedIn profile; available at: https://tinyurl.com/y7hk8hl5 (last checked 6/18/2017).

96 Sprinter Education Services corporate filings, available at: https://tinyurl.com/y7seyk5k (last checked 6/18/2017).

97 Principal available from Hillsborough County Public Schools, available at: https://tinyurl.com/y7shcxvw (last checked 6/18/2017).

98 Secretary of State Corporate filing for Sprinter Learning Center Education, available at: https://tinyurl.com/y9f2ua7m (last checked 6/18/2017).

99 Foreclosure information, available at: http://tinyurl.com/mzxg2u7 (last checked 6/18/2017); property history, available at: http://tinyurl.com/leqctfa (last checked 6/18/2017); River City Plaza LLC corporate information, available at: http://tinyurl.com/mc32ngh (last checked 6/18/2017); Khatib Development corporate information available at: http://tinyurl.com/kczqg5u (last checked 6/18/2017).

100 Khatib Development Corporate filings available at: https://tinyurl.com/kczqg5u (last checked 6/18/2017).

101 Information taken from: Articles of Incorporation for Discovery Education Services, available at: http://tinyurl.com/ml8qjeh (last checked 6/18/2017); Universal Education Services corporate information, available at: http://tinyurl.com/kwwpz7p (last checked 6/18/2017); River City Plaza LLC corporate information, available at: http://tinyurl.com/mc32ngh; Khatib Development corporate information available at: http://tinyurl.com/kczqg5u (last checked 6/18/2017); Blue Ocean Corporate filings, available at: http://tinyurl.com/lb5e5bs (last checked 6/18/2017).


GREATER TEXAS REGION
Sioux Falls
Omaha
Kansas City
Topeka
Lawrence
Salina
Hutchinson
Wichita
Parsons
Goodland
Hays
Garden City
Dodge City
La Junta
Enid
Oklahoma
Tulsa
Oklahoma City
Clinton
McAlester
Lawton
Durant
Amarillo
Raton
Wheeler Pk.
13,161
Las Vegas
Clovis
Roswell
Lubbock
Wichita Falls
Fort Worth
Dallas
Abilene
Waco
Tyler
Paris
Texarkana
Shreveport
Midland
San Angelo
Odessa
Fort Stockton
Austin
Bryan
Lufkin
Houston
Galveston
Beaumont
Las Cruces
Carlsbad
El Paso
Del Rio
San Antonio
Victoria
Corpus Christi
Laredo
Piedras Negras
Nuevo Laredo
McAllen
Brownsville
Matamoros
Reynosa
Monterrey
Monclova
Saltillo
Torreon
Chihuahua
Delicias
Hidalgo del Parral
Ciudad Victoria
Tampico
Ciudad Mante
Concepcion del Oro
Memphis
Jackson
Nashville
Chattanooga
Knoxville
Tupelo
Columbus
Greenville
Meridian
Natchez
Baton Rouge
Lafayette
Morgan City
Bowling Green
Paducah
Owensboro
Evansville
Bloomington
Indianapolis
Muncie
Frankfort
Lexington
Cincinnati
Ohio
Peoria
Rock Island
Davenport
Chicago
Springfield
Cape Girardeau
Poplar Bluff
Jonesboro
Fort Smith
Fayetteville
Bartlesville
Arkansas
Missouri
Mississippi
Red
Rio Grande
Platte
Ozarks
Great Plains
Chihuahuan Desert
Sierra Madre Occidental
Sierra Madre Oriental
Gulf Coastal Plain
Edwards Plateau
United States
Mexico

Quick Facts

- Total # of Schools in Region: 73 schools/ campuses (plus 7 new schools opening in 2017)

- Total Regional Revenues for the 2015-16 school year: $378,056,299

- Regional Charter Networks:
  - Harmony Public Schools (TX): 48 (adding 6 schools in 2017-18)
  - Riverwalk/Schools of Science and Technology (TX): 6 schools (adding 1 new school in 2017-18)
  - Dove Science Academy (OK): 4 schools
  - Little Scholars of Arkansas/LISA (AR): 6 campuses (4 schools)
  - Frontier Schools (MO): 4 schools
  - School of Excellence (TN): 2 campuses (1 school)
  - School of Excellence (NM): 1 school
  - Pelican (LA) 1 school, (1 closed)
  - Harmony D.C. (Washington, D.C.) 1 school

- Total Student Enrollment 2015-16: 38,770
  - Total # of H-1B applications filed from 2000-2016 in region by Greater Texas charter networks: 3,484 applications at an estimated cost of between $6,968,000 - $13,936,000 ($2,000 - $4,000 per application) in public funds spent to immigrate Turkish Gülenists:[1]

- Regional Vendors:
  - Harmony Public Schools
  - Atlas Texas Construction and Trading
  - Brighten Technologies
  - Solidarity Contracting
  - Winport Group, LLC

- Regional Founders and Key Members:
  - Yuksel Alp Aslandogan: Current President, Alliance for Shared Values; former Secretary, Gülen institute; former President, Dialogue Institute of the Southwest; Founder, Wisconsin Career Academy (WI); former President, Texas Gulf Foundation (d/b/a North American College); former Director, Amity Foundation, Inc.[2]
  - Ali Yavuz Zeybek: Founder, Cosmos Foundation/Harmony Public Schools; CEO of schools, Harmony Science Academy (Houston and Austin) – first two schools in Harmony Public Schools charter network (2000) Founder, Sky Foundation, Gülenist charter network founder in Oklahoma[3]
  - Yetkin Yildirim: Founder, Cosmos Foundation/Harmony Public Schools; Board Member, Dialogue Institute of the Southwest; Co-founder, Terra Pave (commercial highway coating producer); Board Member, Alliance for Shared Values.[4]
  - Vahap Uysal: Founder, Cosmos

[1] H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

[2] Alliance for Shared Values IRS 990 Form 2014, available at: https://tinyurl.com/ybvmo96o (last checked 5/26/2017); Alliance for Shared Values, available at: http://tinyurl.com/ycovvhby (last checked 7/9/2017); Gülen Institute IRS 990 Forms, available at: https://tinyurl.com/yc5zdrg4 (last checked 5/26/2017); Yuksel Alp Aslandogan, Huffington Post, available at: https://tinyurl.com/l4laf4k (last checked 5/26/2017); Wisconsin Career Academy Charter School Contract, at p. 13, available at: http://tinyurl.com/n77x7g3 (last checked 4/23/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

[3] Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). *See* list of founders/developers of Harmony Science Academies; Harmony charter applications to Texas Education Agency – p. 1; January 21, 2000; available from http://tinyurl.com/tjj94uz (last checked 6/14/17). *See* list of first directors/founders; Sky Foundation Articles of Incorporation; November 22, 1999; Oklahoma Secretary of State; available from http://tinyurl.com/toc3evf (last checked 6/15/17).

[4] Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at

Foundation/Harmony Public Schools; former Oklahoma Area Representative, Turquoise Council of Americans and Eurasians; current faculty advisor for Turquoise University Club, part of the Turkish American Society, Chicago; board member of Concept Schools, wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[5]

- Suleyman Bahceci: Founder, Cosmos Foundation/Harmony Public Schools; President, Willow Education; Accord founder; Magnolia CEO; Accord CEO; loaned Beehive $30,000; now VP of Student Affairs at Virginia International University, a Gülen-inspired university.[6]
- Coskun Cetinkaya: Founder, Cosmos Foundation/Harmony Public Schools; Former President, Cosmos Foundation; Executive Director, Texas Gulf Foundation (which operates as North American College); Former President, Frontier Public Schools/ Millenium [sic] Education Foundation (MO); Former agent/provost North American College[7]
- Soner Tarim: Soner Tarim: Founder, Harmony Public Schools; Presenter at charter presentation, Albuquerque School of Excellence (NM, 2009); CEO, Harmony Public Schools; former Director, Turkish American Business Council; Applicant, Abramson and Kenilworth Science and Technology schools (LA); former Vice President, Intercontinental Education Consulting; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[8]

http://tinyurl.com/r9gvm2l (last checked 6/15/2017). Board Membership for the Dialogue Institute of the Southwest; available at http://tinyurl.com/n8z7ttd (last checked 6/15/2017). Yildirim at Terra Pave; Zaragoza, Sandra, *Ready for greener roads?* Austin Business Journal (27 July 2012); available at http://tinyurl.com/y8yzk4mm (last checked 6/15/2017). Alliance for Shared Values Board, available at http://tinyurl.com/ya53n3ns (last checked 6/15/2017).

5 Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). Uysal in Oklahoma; Raindrop Turkish House website; 2012; available at http://tinyurl.com/yb2qxojd (last checked 6/15/2017). Uysal advisor to Turquoise Club; available at http://tinyurl.com/y7oolwkv (last checked 6/15/2017). Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

6 Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). *See* Willow 2004 IRS 990 form, available at: http://tinyurl.com/zvl5372 (last checked 2/14/2017). Summary of Bahceci's experience listed in the 2015 California State audit at pg. 40, available at: http://tinyurl.com/zen2cb7 (last checked 2/14/2017). Salt Lake City Tribune article about loans to Beehive charter schools (19 July 2009), available at http://tinyurl.com/zkkb8yy (last checked 3/20/2017). McGahan, Jason. Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly. (1 December 2016). Available at: http://tinyurl.com/jxceqp7 (last checked 7/19/2017).

7 Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). Cetinkaya at TGF; Wichita State University; Final Technical Report; Sustainable Energy Solutions; June 1, 2008 – March 1, 2010; available at http://tinyurl.com/yatravwk (last checked 6/15/2017). Harmony Science Academy Charter Application; January 1, 2000; Texas Education Agency; available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017). Frontier Public Schools; Student Handbook – Board listed; 2011; available at http://tinyurl.com/y95lqmpj (last checked 7/19/2017). Hays County Commissioners' Court Consent to Agenda Item; June 21, 2011; used as reference for Solidarity Contracting; available at http://tinyurl.com/yckdkkzo (last checked 6/15/2017). And see, Board membership; Texas Gulf Foundation IRS 990 Form; 2011; available at (filed under North American University) http://tinyurl.com/yap2gg6k (last checked 6/15/2017).

8 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Transcript of Proceedings, Charter School Public Input Hearing (Aug. 26, 2009), New Mexico Public Education Commission, available at: http://tinyurl.com/y8yy7vd2 (last checked 6/6/17); LinkedIn Profile, available at: https://tinyurl.com/lfadqgq (last checked 5/24/2017); Turkish American Business Council, Best Company Texas, available at: https://tinyurl.com/ldwlfvq (last checked 5/24/2017); Abramson and Kenilworth Charter Applications, Cowan Institute for Public Education Initiatives at Tulane University, available at: http://tinyurl.com/24t7emn (last checked 7/5/2017); Intercontinental Education Consulting, available at: http://tinyurl.com/ycs3ej7c (last checked 7/5/2017);

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- ▷ Gokturk Tunc: Current Director, Charter School Solutions; Former Vice President of Board, Harmony Public Schools; Former President, Rain Drop Foundation;[9]

- ► Regionally Active Turkish Cultural Associations:
  - ▷ Raindrop Turkish House/Rain Drop Foundation
  - ▷ Istanbul Cultural Center
  - ▷ Dialogue Institute of the Southwest
  - ▷ The Niagara Foundation
  - ▷ Turquoise Council of Americans & Eurasians
  - ▷ The Atlantic Institute
  - ▷ Turkish American Chamber of Commerce
  - ▷ Atlas Foundation

The Origins of the Greater Texas Region

The Greater Texas region is one of the oldest and most established regions within the Gülen Organization. When Fethullah Gülen relocated to the United States in 1999, it prompted a wave of charter schools opened by his followers. In the Greater Texas region, the original educational foundations were formed by a group of Gülenists that would go on to develop schools in many more states and regions within the Gülen Organization. The Cosmos Foundation (Harmony Public Schools) and the Sky Foundation (OK) were founded in 1999; Little Scholars of Arkansas in 2002; and the Pelican Education Foundation (LA) and Millennium Education Foundation (MO) in 2005. Later arrivals were the Read Foundation (Memphis School of Excellence) and the Focus Foundation (Albuquerque School of Excellence) both in 2010; and the DC Harmony School in 2014. Our research instructs that the schools in the Greater Texas region share other commonalities: Harmony plays a central role in the management of each charter network; many use at least one of the same regional vendors, and each network displays the other markers common to all Gülen Organization charter networks.

Four of the nine charter networks overseen by Harmony Public Schools in the Greater Texas Region have been the subject of external audits or investigations for lack of transparency, financial impropriety, and/or misuse of public funds. Louisiana, Arkansas, Oklahoma, and Texas have experienced the most scrutiny from state or federal officials. The newer networks have the cleanest record perhaps because the schools have opened more recently; they may have more experienced school leadership who are veterans of other schools in the region; and they have not yet started expanding the organization.

Highlights of these audits and investigations include:

Pelican Educational Foundation (LA):

- ► Louisiana Department of Education investigation of Abramson Science and Technology Charter School: The Louisiana Department of Education conducted an in-depth investigation beginning in July 2011 to determine "if there were legitimate concerns about the safety, health, and welfare of students attending the Abramson Science and Technology Charter School.[10] The initial investigation found evidence that Abramson had failed to comply with

Intercontinental Education Consulting, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), The Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

9 Charter School Solutions - Official Statement from bonds for Harmony Public Schools (pg. A-1 and A-2) (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd (last checked 6/27/2017). Harmony Public Schools IRS Form 990 (2006 and 2007), available at https://tinyurl.com/hu9wqcl (last checked 7/19/2017). Board Membership; Rain Drop Foundation; IRS 990 Form; 2002; available at http://tinyurl.com/y98sqtcf (last checked 6/15/2017).

10 Letter from Acting State Superintendent to President of the President of the Board of Elementary and Secondary Education; 7.28.11; received through 2017 FOIA request

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state law, the Board of Elementary and Secondary Education (BESE) policy, and the Type 5 Charter Contract. Because there was documentation that indicated a threat to the safety, health, and welfare of students, the Acting State Superintendent recommended that BESE immediately terminate and revoke the charter school contract with the Board of Directors of the Pelican Educational Foundation that governed Abramson.[11] As a result, BESE abruptly closed of the school on August 3, 2011.

- FBI Raid - Kenilworth Science and Technology: The FBI raided Kenilworth in 2013 seizing boxes of financial and personnel records and focusing on nine vendors.[12] The investigation ended in 2016, and no charges were filed.[13]

Sky Foundation (OK)

- Investigative Report from the State Auditor: The Oklahoma State Auditor released an audit of the Dove Science Academy and the Discovery Schools of Tulsa in March 2016 that was conducted at the request of the Oklahoma State Department of Education.[14] The audit discloses a financial transaction between the Dove/Discovery schools and Harmony Public Schools in Texas that the auditor called "an apparent violation of both the school's charter and the Oklahoma Constitution."[15] Audit findings reveal that the Sky Foundation made a $175,000 payment to Harmony Public Schools to sponsor a science fair competition that was not attended by any Dove Science Academy students. The audit stated that the payment was "not a legitimate school purpose."[16]

- The audit also focused on improper real estate transactions by the Sky Foundation, the parent organization of the Dove schools.[17] The audit found that the Dove Science Academy OKC paid the Sky Foundation approximately $3,182,000 in lease payments more than the original purchase price of its school property. With the Sky Foundation and the Dove schools operating as the same legal organization, the auditor could find no legitimate purpose for the continued charging of lease payments above and beyond the purchase price of the facility.

- In addition, the audit found that the Sky Foundation collected a total of $1,192,442 more in lease payments from the Dove Charter Schools than was due on the lease agreements between 2012 to 2014.[18] The audit concluded that since Sky and Dove are the same legal entity, the lease agreements are a transfer of funds to themselves, "a redirection of funds from the school bank accounts to the Sky

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11 See recommendation to revoke charter Acting State Superintendent made to BESE on August 3, 2011; document received from LA Department of Education through 2017 FOIA request; Also Vanacore, Andrew. *Abram Charter in eastern New Orleans shut down amid TP investigation into startling misconduct.* New Orleans Times-Picayune. (15 July 2011); available at http://tinyurl.com/y99fzhj8 (last checked 5/1/17).

12 Samuels, Diana. *Kenilworth charter school, subject of apparent FBI inquiry, has ties to Turkish education movement*; New Orleans Times-Picayune; (12 December 2013).; available from http://tinyurl.com/ydz3efez (last checked 5/24/17).

13 Mustian, Jim and Lussier, Charles; *Feds drop criminal probe of Kenilworth charter school in Baton Rouge, no charges filed.* Baton Rouge Advocate; (6 January 2016), available at http://tinyurl.com/y92m6zsa (last checked 5/24/17).

14 Dove Science Academy Investigative Report; the Oklahoma State Auditor and Inspector; March 2016; available at https://tinyurl.com/kv3ade4 (last checked 5/20/2017).

15 *Id.*

16 *Id.*

17 *Id.*

18 *Id.*

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Foundation's bank accounts."[19]

Harmony Public Schools (TX)

- Investigation by the Office of Civil Rights, U.S. Department of Education: In December 2014, the Office of Civil Rights of the U.S. Department of Education (OCR) found that English Language Learners and students with disabilities are significantly underrepresented at Harmony Public Schools compared to their enrollment in public school districts in which these charter schools were located.[20] OCR also found that enrollment policies at Harmony could have a chilling effect that leads to the exclusion of students based on their or their parents' citizenship or immigration status. OCR's investigation also revealed that HPS policies and procedures do not ensure that, once admitted, students will receive adequate educational services, including language development for ELL students and special education and related services for students with disabilities.

- Audit of Federal Title I and IDEA funds by the Texas Education Agency: In 2012, the Texas Education Agency finalized an audit of Harmony's federal program spending that found $186,000 in misspent funds.[21] The findings covered a range of problems such as inadequate documentation of spending, use of Title I funds on campuses that were not Title I, inappropriate use of federal funds for payroll, and questionable qualifications for a third of the Title I expenditures and half of IDEA expenditures. TEA conducted a similar audit of the Riverwalk Education Foundation (Science and Technology Schools) and questioned costs of $80,661.[22]

Little Scholars of Arkansas (AR)

- Financial Deficiencies identified by external CPA firm: Financial Statements prepared by an external CPA firm identified numerous problems with the financial practices at both the LISA Academy and LISA Academy North between 2007 – 2011.[23] Many of the problems continued over four years and were not quickly addressed by LISA. Issues of particular concern were related to expenditures that were not properly accounted for, checks issued without proper documentation, and financial statements that were not correct.

Real Estate and Bond Financing

In the Greater Texas region, Gülenist individuals and organizations have made millions of dollars in profit from real estate transactions with Gülen schools that have been entirely financed with public funds. Research shows that some of the individuals who profited from these deals worked with other Gülen affiliated vendors or organizations that also had contracts with Gülen schools before, during, or after the time of the real estate transactions. Importantly, taxpayer dollars are used to pay rent in these transactions that are significantly more than

[19] *Id.*

[20] See press release from the Office of Civil Rights, U.S. Department of Education; available from http://tinyurl.com/k3ent6w (last checked 6/18/17).

[21] See Harmony audit 2012 TEA, p11. See article in Washington Post (12 November 2013), available at http://tinyurl.com/ycwrmfe5 (last checked 7/18/17).

[22] Riverwalk Education Foundation Financial Statement (June 30, 2013), available in Riverwalk bond issue at http://tinyurl.com/y7yxldc9 (last checked 7/20/2017).

[23] See independent Financial Statements LISA Academy and LISA Academy North 2007 - 2011; Arkansas Legislative Audit; available from http://tinyurl.com/y9q9adfd (last checked 6/16/17).

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the original purchase price of school facilities or more than the bond debt. In the end, the school buildings are owned by a Gülen-affiliated private entity and not by the school. As a result, schools continue to make rental payments that benefit these external entities.

Charter School Solutions

Harmony Public Schools (Texas) created Charter School Solutions (CSS) in 2015 as a private, nonprofit organization to serve as a third-party real estate arm for Gülen schools in the region and to replicate the Harmony model in additional states.[24] CSS will operate in ten states including Arizona, Arkansas, Kansas, New Mexico, Mississippi, Missouri, Louisiana, Oklahoma, Texas, and Tennessee.[25] CSS will develop and finance school properties, serving as the owner/landlord and leasing the properties back to the schools. In 2016 CSS borrowed $51 million in public bonds to finance school projects in Texas and New Mexico, charging schools inflated rents that are significantly higher than the bond service payments and more than the bond reserve fund requirements.[26] These two bond issues alone will provide CSS with $750,000 per year more than the bond repayment, a total of $22.5 million in extra payments over the life of the two bonds. When the bonds are repaid through rent paid by schools using public funds, CSS, not the schools, will own the school facilities. Our research suggests that CSS will use the excess rental payments to fund its own operations and programs and fuel an expansion of the Harmony model to other states.[27] CSS activities should be closely monitored because it is positioned to expand its multi-million-dollar real estate operations into additional states.

The CSS three-member governing Board of Directors[28] includes individuals that are affiliated with Harmony and other Gülenist organizations: Bilal Erturk, the former President of the Sky Foundation (the Gülenist charter organization in Oklahoma that was closed after a critical state audit exposed its real estate transactions with the schools it managed);[29] Harmony's current legal counsel; and Gokturc Tunc, a former Harmony board member who also served as a director of the Raindrop Foundation.[30] Hakan Yagci, formerly the budget director for Harmony, left that position to serve as the founding CEO of CSS in 2015.[31]

Texas

In 2016, CSS borrowed $43,285,000 through its first bond issue to finance the construction/renovation of five Harmony schools in Texas.[32] Under the terms of the bond, CSS will own the schools and serve as their landlord, receiving

[24] *See* Charter School Solutions Certificate of Formation, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

[25] *Id.*

[26] *See* Charter School Solutions - Official Statement from bonds for Harmony Public Schools (Apr. 27, 2016) and Albuquerque School of Excellence (June 8, 2016), available at: Harmony: http://tinyurl.com/y9xs5rdd and http://tinyurl.com/ybjw932j; Albuquerque http://tinyurl.com/y8qbdljt and http://tinyurl.com/yary29pl (last checked 6/27/2017).

[27] *See* Charter School Solutions Certificate of Formation, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

[28] *Id. Also* Charter School Solutions - Official Statement from bonds for Harmony Public Schools (pg. A-1 and A-2) (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd (last checked 6/27/2017).

[29] Sky Foundation IRS Form 990, available at http://tinyurl.com/y96wnshc (last checked 7/18/17).

[30] Harmony Public Schools IRS Form 990 (2006 and 2007), available at https://tinyurl.com/hu9wqcl (last checked 7/19/2017). Rain Drop Foundation IRS 990 Form (2002), available at:http://tinyurl.com/zcvgskm (last checked 6/15/2017).

[31] *See* Charter School Solutions - Official Statement (pg. A-2) (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd (last checked 6/27/2017).

[32] *See* Charter School Solutions - Official Statement from bonds for Harmony Public Schools (Apr. 27, 2016) available at: Harmony: http://tinyurl.com/y9xs5rdd and http://tinyurl.com/ybjw932j (last checked 7/17/2017).

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more than $600,000 annually in excess of the amounts owed for the bond, and $18.1 million more over the life of the bonds.[33]

In other real estate transactions, our research indicates that Yuksel Alp Aslandogan cleared an estimated profit of up to $2 million from the sale of a property to Harmony Public Schools in Austin, Texas in 2010 after renting the facility to the school for eight years.[34] Aslandogan, who has been a leader of many Gülen-affiliated organizations since 1999, currently serves as a spokesman for Fethullah Gülen and is the paid President/Executive Director of the Alliance for Shared Values, an openly Gülenist national organization.[35] In addition, our research indicates that Fercan Kalkan made an estimated profit of up to $3.3 million when he sold a Houston school property to Harmony in 2010 after he (and Cahit Gezgin) rented it to Harmony for nine years.[36] Among his many businesses and affiliations with Gülen organizations, Kalkan became the manager of Target Design and Management in 2014,[37] a company that received a total of $52 million in contracts from Harmony and Riverwalk between 2009 - 2014.[38]

New Mexico

CSS borrowed $8.21 million through a 2016 bond to construct a new facility for the Albuquerque School of Excellence.[39] The Albuquerque school will pay CSS $150,000 more per year than the debt on the bond and $4.4 million more over the life of the bond.[40]

Oklahoma

A 2016 audit conducted by the Oklahoma State Auditor and Inspector focused on improper real estate transactions by the Sky Foundation, the parent organization of the Dove Science and Discovery schools.[41] The audit found that the Dove Science Academy Oklahoma City paid the Sky Foundation approximately $3,182,000 in lease payments more than the original purchase price of its school property. With the Sky Foundation and the Dove schools operating as the same legal organization, the auditor could find no legitimate purpose for the continued charging of lease payments above and beyond the purchase price of the facility.[42] The audit also found that the Sky Foundation collected a total of $1,192,442 more in lease payments from other

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33 *Id.*

34 See description of Aslandogan real estate transaction in Texas report. Calculations made using available public information. See property purchase in 2002 by Aslandogan, available from Travis County Clerk at http://tinyurl.com/y8faq82q (last checked 7/19/2017). See Aslandogan purchase price he quoted in New York Times article (6 June 2011), available from http://tinyurl.com/3ua255n (last checked 7/19/2017). See Q & A from Harmony related to Cosmos purchase price and monthly rent paid to Aslandogan, available from http://tinyurl.com/yb7g629c (last checked 7/19/2017).

35 Alliance for Shared Values IRS 990 Form 2014, available at: https://tinyurl.com/ybvmo96o (last checked 5/26/2017)

36 See description of Kalkan real estate transaction in Texas report. Calculations made using available public information. See general warranty deed to Kalkan in 2002, available from Harris County Clerk (Record No. V807839) at http://tinyurl.com/y9lqud7l (last checked 7/19/2017); see warranty deed with vendor lien 2006 (loan amount for property) from Harris County Clerk (Record No. Z371895) available at http://tinyurl.com/y9lqud7l (last checked 7/19/2017). See Q & A from Harmony related to Cosmos purchase price and monthly rent paid to Kalkan, available from http://tinyurl.com/yb7g629c (last checked 7/19/2017).

37 See TDM Texas Franchise Tax Public Information Report 2014, available from Texas Secretary of State at http://tinyurl.com/7oy8w (last checked 7/19/2017).

38 See contracts with TDM on Harmony IRS Form 990 for 2009 – 2014, available from https://tinyurl.com/hu9wqcl (last checked 7/19/2017) and Riverwalk IRS 990 Form (2014), available at: http://tinyurl.com/ydg4yv8m (last checked 6/15/2017).

39 Charter School Solutions - Official Statement (June 8, 2016), available at: http://tinyurl.com/yary29pl (last checked 6/5/2017).

40 *Id.*

41 Dove Science Academy Investigative Report; the Oklahoma State Auditor and Inspector; March 2016; available at https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

42 The Oklahoman, Randy Ellis, *State Audit questions charter schools' site lease payments* (March 17, 2016) available at https://tinyurl.com/mlazgpf (last checked 5/20/2017).

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Dove schools than what was due on lease agreements between 2012 to 2014[43].

In addition, the Sky Foundation purchased a building in Oklahoma City in 2008 for $780,000 and sold it to Yuksel Alp Aslandogan for $1,025,000 in 2010. The audit states that the funds used to purchase the building and the profit received in the sale of the building "should be satisfactorily accounted for."[44] Aslandogan sold the building to the Raindrop Foundation, a Gülen-affiliated cultural organization, four months later for only $650,000. The difference in purchase and sale prices raises questions about whether the price Mr. Aslandogan paid to the Sky Foundation was intentionally inflated to move money to the Foundation.

Arkansas

Atlas Texas Construction and Trading, a Texas company owned by Yunus Dogan, deeded property to Atlas Barin Properties, another company owned by Dogan. Atlas Barin leases the property to LISA Academy (West)[45] under a non-cancellable lease and has received an estimated $2.4 million in rental payments, more than twice the original purchase price for the property.[46] In a financial transaction that raises questions about conflict of interest, LISA Academy (West) also borrowed $419,283 from Atlas Texas Construction in 2012,[47] the same year that the school paid Atlas Construction $213,690 for a construction project at the school.[48]

The LISA LLC, created by the LISA Foundation,[49] borrowed funds through a bond issue in 2010 for construction of the LISA Academy (West) high school and serves as the school's landlord.[50] Because the school and the landlord are related, these transactions potentially constitute conflicts of interest. Essentially, LISA is paying itself through a third-party LLC organization that is directly controlled by the LISA Foundation.

Tennessee

Atlas Texas Construction and Trading was hired by the Memphis School of Excellence (MSE) to serve as the contractor for an $803,750 construction project at the 4450 S. Mendenhall Road school site in 2010.[51] In July 2011, despite being a paid vendor of MSE, Atlas Texas

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43 *Id.*

44 Dove Science Academy Investigative Report; the Oklahoma State Auditor and Inspector; March 2016; available at https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

45 Pulaski County Tax Assessor business records, available at: http://tinyurl.com/y79h2e86 (last checked 6/17/2017).

46 Monthly and annual rental payments from 2008 – 2015 are included in the independent Financial Statements for LISA Academy and range from $252,000 - $276,000 per year; payments for 2016 and 2017 estimated at same amount as 2015. Arkansas Legislative Audits, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

47 *See* Financial Statement LISA Academy (June 30, 2012), Arkansas Legislative Audit, at p. 9, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

48 LISA Foundation 2012 IRS Form 990, available at: http://tinyurl.com/kcy94qn (last checked 6/16/17).

49 Arkansas Secretary of State (retrieved 2/10/2017) (see archives), available at: http://tinyurl.com/y9j3pgnw (last checked 6/14/17).

50 Financial Statement LISA Academy (2010), at p. 10), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

51 Regarding Atlas contract with MSE for 2010 renovation at 4450 S. Mendenhall Road: See first document: Letter to Inci Akpinar (Atlas Texas Construction & Trading Inc;) from Marcus Denton (lead architect on the MSE project) re: building specifications; (Aug. 30, 2010); attachment on the Application for Mechanical Permit 4450 Mendenhall Road; Memphis and Shelby County Office of Construction Code Enforcement search; available at http://tinyurl.com/y8v3zys6 (last checked 6/8/17). See Second document: Stop Work order issued to Atlas Texas Construction for installing DOA units without permit; from the Memphis and Shelby County Office of Construction Code Enforcement; (Dec. 21, 2010); available at http://tinyurl.com/y8v3zys6 (last checked 6/8/17). See Third document: Application completed by "Owner/customer" – Atlas Texas Construction, for Mechanical Permit issued to Security Fire Protection; (Aug. 11, 2010); Memphis and Shelby County Office of Construction Code Enforcement search; available at http://tinyurl.com/y8v3zys6 (last checked 6/8/17). See fourth document: Total Contract valuation, Contractor: Phoenix Building Group; (21 July 2010); attachment on the Application for Building Permit 4450 S. Mendenhall Road; Memphis and Shelby County Office of Construction Code Enforcement search; available at http://tinyurl.com/y8v3zys6 (last checked 6/8/17).

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Construction extended a $945,820 loan to MSE with monthly payments of $14,800 and a maturation date of December 2017.[52] The reason for the loan is not specified in MSE's Financial Statement. The acceptance of a long-term loan of almost $1 million from a paid vendor incurs an obligation for MSE that raises questions about conflict of interest and whether the selection of a contractor/vendor has been an open and competitive process.

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
Harmony (TX)				✓
Riverwalk (TX)			✓	
LISA (AR)			✓	
Dove Science (OK)			✓	
Memphis School of Excellence (TN)		✓		
Albuquerque School of Excellence (NM)		✓		
Frontier Schools (MO)			✓	
Pelican (LA)		✓		
DC Harmony		✓		

[52] Memphis School of Excellence Financial Statements; (FY 2011); p. 24; Tennessee Comptroller of the Treasury; available from https://tinyurl.com/y9x5v6jp (last checked 5/30/2017).

Regional Vendors

Harmony Public Schools: Harmony plays a central role in the development, management, and expansion of charter networks in its seven-state region plus Washington D.C. Harmony provides a range of administrative and management services to each network through an on-going renewal support services agreement.[53] Harmony was previously paid a percent of all state funds received by each charter network, but it currently bills $80 - $120 per hour for its services for most charter networks. In addition, Harmony now charges a licensing fee for it's intellectual property software of $15,000 - $147,000 per school per year.[54] Our investigation suggests that the fees paid to Harmony through these agreements give Harmony a steady revenue stream from public funds that can be expended without fiscal restrictions, providing resources to expand its model within a state or in other states. Harmony's bond documents show Harmony earned an estimated $10 million between 2011 – 2015 for these support services alone.[55] In addition to the support services agreement which ties the charter networks to Harmony, teachers and administrative staff also move frequently among the Gülen-affiliated schools in the region. We believe this frequent shift of employees among schools creates a ready pool of trusted Turkish administrative staff who will faithfully execute Gülen programs.

Atlas Texas Construction and Trading: Atlas Texas is the preferred construction vendor for the Greater Texas region. Atlas Texas, plus another company under the same ownership, have been active in at least six of the nine charter networks in the region. The company has provided loans to schools, served as a landlord, and managed construction projects.[56] In Texas, Atlas Texas has received more than $12 million in construction contracts.[57]In Louisiana, it was reported that a vice president of Atlas Texas offered a $25000 bribe to a state official involved in an investigation of a Gülen school in New Orleans to influence the outcome of the investigation.[58] The school was closed because it threatened the health and safety of students.[59]

Immigration attorneys: The charter networks all use the four same immigration attorneys to handle their H-1B visa application: Yalcin Karadag, Leonard D'Arrigo, Garrett White, and Tina Nguyen.[60]

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53 See list of charter networks with support services agreements in Harmony bond issues; example - July 2, 2014; Official Statement P. B-3; available at http://tinyurl.com/k3mnqv2 (last checked 5/19/17).

54 Ibid.

55 *See* bond issues for the Cosmos Foundation and Harmony Public Schools for 2011, 2012, 2014, 2015, 2016, and 2017; Official Statements – Appendix B; estimates made for years 2012 and 2013 based on an average of previous years; available at http://tinyurl.com/k3mnqv2 (last checked 6/18/17).

56 *See* Atlas Barin as property owner at 21 Corporate Hill Drive, and LISA Academy as occupying the site; Pulaski County Tax Assessor business records; available from http://tinyurl.com/y7pytpfp (last checked 6/17/2017. *See* owner of Atlas Texas is also owner of Atlas Barin; corporate documents from AR Sec of State; available from http://tinyurl.com/6r2xkbo (last checked 6/18/17). *See* loan from Atlas Texas to LISA Academy; independent Financial Statement LISA Academy June 30, 2012 (p. 9); Arkansas Legislative Audit; available fromhttp://tinyurl.com/yd3c6phj (last checked 6/16/17).

57 Five highest paid Independent Contractors; Harmony Public Schools and Cosmos Foundation IRS 990 Form; 2006-2009; available at http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

58 Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface;* New Orleans Time-Picayune; (22 July 2017). available from http://tinyurl.com/3l2cnxs (last checked 5/25/17).

59 Also Vanacore, Andrew. *Abramson Charter in eastern New Orleans shut down amid TP investigation into startling misconduct.* New Orleans Times-Picayune. (15 July 2011); available from http://tinyurl.com/y99fzhj8 (last checked 5/1/17)

60 For each attorney/charter network, see Jobs in Tech available at https://tinyurl.com/kcb3kjq (last checked 5/24/2017).

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Regional Employee Overlap*

Employee	TX	LA	AR	NM	D.C.	TN	OK	MO	Other States, Vendors, Cultural Associations
Mustafa Guvercin	✓	✓					✓		Mongolia Gülenist School
Erhan Ozduran	✓								Hampden/Pioneer (MA)
Ismail Fidan						✓			Society of Universal Dialogue, Atlantic Institute, Coral (NV)
Muhammet Turkay						✓	✓		
Ali Gumus			✓			✓			
Ahmet Cetinkaya	✓			✓					
Salih Aykac	✓			✓					
Tansu Cidav	✓								(PA)
Ebubekir Orsun	✓			✓					
Cuneyt Dokman	✓	✓							Texas Gulf Institute (TX)
Tevfik Kosar		✓							Buffalo (NY)
Tevfik Eski	✓	✓							
Omer Ozmeral	✓		✓						Chesapeake Lighthouse Foundation (MD)
Nihat Guvercin	✓								i-Learn – Gülenist CMO (NJ);
Nihat Bayhan	✓	✓							Gülenist schools in Turkey & Albania
Mehmet Ulupinar		✓							Rain Drop House (AR)
Niyazi Evren Culha		✓			✓				
Mithat Karabulut	✓		✓				✓		Triad Math & Science (NC)
Atila Akyurek	✓						✓		Queen City STEM (NC) Gülenist schools in Turkey & Macedonia
Tevfik Kosar		✓							Buffalo Academ of Science (NY)

**This is just a sampling of the employment overlap of the Greater Texas Region*

Arkansas



QUICK FACTS ON GÜLEN CHARTER SCHOOLS ARKANSAS



NUMBER OF SCHOOLS	6
KNOWN AS	**LISA Academy West (2 campuses)** **LISA Academy North (3 campuses)** **LISA Academy Chenal**
TOTAL ENROLLMENT	**1,525**
CHARTER VENDOR	**Harmony Public Schools (TX)**
TOTAL REVENUES	**$12,518,590**

KEY PEOPLE

- Sinan Kockara
- Halil Bisgin
- Eric Higgins
- Jane English
- Mehmet Cansizoglu
- Tansel Karabacack
- Emre Ermisoglu

RELATED INSTITUTIONS

- Harmony Public Schools, Riverwalk Education Foundation (TX)
- Harmony D.C. Public School (DC)
- Dove Public Charter School Foundation (OK)
- Read Foundation/Memphis School of Excellence (TN)
- Millenium Education Foundation/ Frontier Schools (MO)
- Albuquerque School of Excellence (NM)
- Pelican Educational Foundation (LA)

QUESTIONABLE FINANCIAL ACTIVITIES

Financial Statements identified numerous problems with the financial practices at both the LISA Academy and LISA Academy North. Issues of particular concern were related to **expenditures that were not properly accounted for, checks issued without proper documentation, and financial statements that were not correct.**

When the LISA Academy West and LISA Academy North merged in 2014, all related party transactions between the two schools were eliminated and all financial records are not reported under the LISA Academy.

H-1B VISA APPLICATIONS

179 H-1B

H-1B VISA APPLICATIONS 2001-2016

The cost of these applications is estimated to be **$3,000 per application**, making the total for Harmony/ Cosmos **$537,000**.

$2.4 million

Rent paid by LISA Academy, **more than twice the original value of the property.**

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as): LISA Academy
- Total number of schools in state: 6 (at 4 campuses)[1]
- Total student enrollment 2015-16: 1,525[2] (does not include LISA Academy Chenal which opened in Fall 2016 with 540 students)
- Charter Holder/Governing Board(s):
  - Little Scholars of Arkansas Foundation
    - Organized as a non-profit 501(c)(3) organization
    - Oversees 6 Charter Schools
- Charter Management Services Vendor: Harmony Public Schools
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Harmony (TX); Schools of Science and Technology (TX); Harmony DC Public School (D.C.); Dove Science (OK) (formerly Sky Foundation); School of Excellence (TN); Frontier (MO); School of Excellence (NM) (formerly Focus Foundation); Kenilworth/Abramson (LA).
- Total Revenues for FY 2016: $12,518,590[3]
- Network Founders:
  - Sinan Kockara: Founding and Current President, LISA Foundation; Associate Professor, University of Central Arkansas; Ph.D. Applied Computing, University of Arkansas Little Rock; B.S. Computer Science/Engineering, Dokuz Eylul Universitesi (2001) (Turkey).[4]
  - Halil Bisgin: Founding and Current Board Secretary, LISA Foundation; Assistant Professor, University of Michigan–Flint; Ph.D. Integrated Computing, University of Arkansas at Little Rock; M.S. Computational Science/Engineering, Istanbul Technical University (2008); Bachelors in Mathematics, Koc University (Turkey) (attended 1998-2003).[5]
  - Mehmet Cansizoglu: Founding Board Treasurer, LISA Foundation; Postdoctoral Researcher, UT Southwestern Medical Center; Ph.D. in Applied Science, University of Arkansas at Little Rock (2007-2012); B.S. Physics, Bilkent University (Turkey) (attended 2000-2004).[6]
  - Emre Ermisoglu: Founding and Current Board Member, LISA Foundation; Applications

1 The six schools have different school numbers and each receives a separate accountability rating. The three LISA Academy North schools are located at the same campus. *See* ESEA School Reports, available at: http://tinyurl.com/y88gbtov (last checked 6/17/2017); 2015-16 reports received from Arkansas Department of Education via 2017 open records request.

2 Student Demographic Data for the 2015-2016 school year, Arkansas Department of Education Data Center Statewide Information System Reports, Enrollment by Race by School, available at: http://tinyurl.com/ybwzg7rg (last checked 5/22/2017).

3 Annual Statistical Report of the Public School of Arkansas 2015-216, Arkansas Department of Education, available at: http://tinyurl.com/y7nnn62b (last checked 6/16/2017).

4 LISA Foundation registration (Nov. 19, 2002), Arkansas Secretary of State, available at: http://tinyurl.com/ybf289e4 (last checked 6/l7/2017); Sinan Kockara, LinkedIn profile, available at: https://tinyurl.com/y7w95t76 (last checked 5/31/2017); Biography at Central Arkansas University, available at: http://tinyurl.com/y8gtek62 (last checked 6/16/2017).

5 LISA Foundation registration (Nov. 19, 2002), Arkansas Secretary of State, available at: http://tinyurl.com/ybf289e4 (last checked 6/l7/2017); Halil Bisgin, LinkedIn Profile, available at: https://tinyurl.com/ya5xy6re (last checked 5/31/2017).

6 LISA Foundation registration (Nov. 19, 2002), Arkansas Secretary of State, available at: http://tinyurl.com/ybf289e4 (last checked 6/l7/2017); Mehmet Canizoglu LinkedIn Profile, available at: https://tinyurl.com/yanug9kj (last checked 5/31/2017).

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Systems Analyst, University of Arkansas Medical Science; Ph.D., Bioinformatics from University of Arkansas Medical Science; Masters Bioinformatics (2015) and Computer Science (2009-2011), University of Arkansas at Little Rock; Bachelors of Computer Science, Sabanci University (Turkey) (attended 2002-2008).[7]

- Tansel Karabacak: Founding Board Member, LISA Foundation; Associate Professor, Applied Science from the University of Arkansas Little Rock; M.S. and Ph.D. in Physics from Rensselaer Polytechnic University (1999-2003); B.S. in Physics, Middle East Technical University (Turkey).[8]
- Serhan Dagtas: Founder, Charter Applicant, Chief Operating Officer, LISA Academy; Professor, University of Arkansas Little Rock; Ph.D. in Electrical/Computer Engineering from Purdue University; B.S. in Electrical Engineering, Bilkent University (Turkey).[9]
- Ibrahim Duyar: Founder, Charter Applicant, LISA Academy; Founding Principal, Wisconsin Career Academy (WI); currently Professor, University of Arkansas Little Rock; BA in Educational Administration/ Planning, Ankara University (Turkey).[10]

Overview

As of the 2016-2017 school year, Arkansas has 6 Gülen Organization charter schools (at 4 campuses) in operation. Each of these schools is overseen by the Little Scholars of Arkansas Foundation ("LISA Foundation"), which contracts with Harmony Public Schools ("Harmony"), the charter management organization responsible for the Greater Texas region of the Gülen Organization charter network. Harmony allegedly provides educational management services for the charter schools and access to intellectual property in exchange for an hourly rate for services and a license fee. In the 2015-16 school year,[11] the LISA schools served on average 68% minority students vs. 38% state average and 32% Caucasian students vs. 62% state average. However, LISA schools serve a disproportionately low number of minority students compared to the neighboring Little Rock School District. The school district has criticized LISA Foundation schools for serving a disproportionately high number of white and high-income students and low numbers of African-American students and students receiving free and reduced lunches.[12]

7 LISA Foundation registration (Nov. 19, 2002), Arkansas Secretary of State, available at: http://tinyurl.com/ybf289e4 (last checked 6/l7/2017); Emre Ermisoglu LinkedIn profile, available at: https://tinyurl.com/ybs7ntk9 (last checked 5/31/2017).

8 LISA Foundation registration (Nov. 19, 2002), Arkansas Secretary of State, available at: http://tinyurl.com/ybf289e4 (last checked 6/l7/2017); Tansel Karabacak, Applied Science Graduate Program at the University of Arkansas Little Rock, available at: http://tinyurl.com/ydz8nukf (last checked 5/31/2017).

9 Application for Approval of the Open-Enrollment Charter School LISA Academy (Aug. 8, 2003), received from Arkansas Department of Education via 2017 open records request; Serhan Dagtas LinkedIn Profile, available at: https://tinyurl.com/yad63ad8 (last checked 5/31/2017).

10 Jennifer Barnett Reed & Max Brantley, *What's the Point – The LISA Academy Succeeds with Students. But Does it Succeed in Meeting the Terms of State Charter School Law*, Arkansas Times (Jan. 25, 2007), available at: http://tinyurl.com/lt5ukvn (last checked 4/23/2017); Research Brief, Public Policy Form at 6 (Dec. 22, 2000), available at: http://tinyurl.com/kby7qak (last checked 4/23/2017); Faculty biography, available at: http://tinyurl.com/n25sfca (last checked 6/16/2017).

11 These numbers exclude LISA Academy Chenal campus, which opened in 2016-2017.

12 Max Brantley, *LISA Academy Recruiting Mail Omits Heavily Minority Neighborhoods*, Arkansas Times (May 10, 2016), available at: http://tinyurl.com/y78uoyg9 (last checked 6/29/2017).

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School	Operation[13]	Student Demographic Information[14]*	Authorizer	Governing Board
LISA Academy (West) High School 23 Corporate Hill Little Rock, AR 72205	9-12 2005-present[15]	Enrollment: 341 <01% LEP 40% FRL 06% Eligible for Special Education 47.2% African American 13.5% Hispanic 10% Asian 26.4% Caucasian 0.3% American Indian/Alaskan 2.6% Two or more races	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation
LISA Academy (West) Middle School 21 Corporate Hill Little Rock, AR 72205	6-8 2004-present[16]	Enrollment: 484 02% LEP 40% FRL 04% Eligible for Special Education 36.8% African American 15.5% Hispanic 20.7% Asian 23.1% Caucasian 0.2% American Indian/Alaskan 1.0% Hawaiian/Pac Islander 2.7% Two or more races	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation
LISA Academy Chenal 12200 Westhaven Dr. Little Rock, AR 72211	K-6[17] 2016 - present	Enrollment: 540[18] 12% LEP 57% FRL 04% Eligible for Special Education 49.3% African American 20.7% Hispanic 13.1% Asian 13.5% Caucasian 0.4% American Indian/Alaskan 0.4% Hawaiian/Pac Islander 2.6% Two or more races	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation
LISA Academy North -Elementary 5410 Landers Rd. Sherwood, AR 72117	K-5 2008-present[19]	Enrollment: 356 08% LEP 51% FRL 09% Eligible for special education 33.1% African American 19.4% Hispanic 6.5% Asian 39.9% Caucasian 1.1% American Indian/Alaskan	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation

[13] School operation, Arkansas Department of Education Data Center, District/School Reports (school year 2015), available at: https://tinyurl.com/mgq3d69 (last checked 5/22/2017).

[14] Student Demographic Data for the 2015-2016 school year, Arkansas Department of Education Data Center; School Performance Report Cards; available https://adesrc.arkansas.gov/ (last checked 7.21.17).

[15] LISA Academy High School Profile (2012-2013), available at: https://tinyurl.com/kqyvwop (last checked 5/22/2017).

[16] Arkansas Department of Education Charter Authorizing Panel Agenda (Sep. 17, 2014), at p. 21, available at: https://tinyurl.com/lhhwod3 (last checked 5/22/2017).

[17] LISA Academy Chenal, available at: https://tinyurl.com/l8hkfwe (last checked 5/22/2017).

[18] LISA Academy Chenal enrollment is only available for 2016-2017, its first year of operation. Arkansas Department of Education Data Center (My School Info), available at http://tinyurl.com/y7j34nat (last checked 7.21.2017).

[19] Arkansas Department of Education Charter Authorizing Panel Agenda (Sep. 17, 2014), at p. 21, available at: https://tinyurl.com/lhhwod3 (last checked 5/22/2017).

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School	Operation[13]	Student Demographic Information[14]*	Authorizer	Governing Board
LISA Academy North - High 5410 Landers Rd. Sherwood, AR 72117	9-12 2008-present[20]	Enrollment: 118 02% LEP 35% Low income 06% Eligible for Special Education 9.3% Asian 28.8% African American 14.4% Hispanic 9.3% Asian 46.6% Caucasian 0.8% American Indian/Alaskan	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation
LISA Academy North - Middle 5410 Landers Rd. Sherwood, AR 72117	6-8 2008-present[21]	Enrollment: 226 03% LEP 49% FRL 08% Eligible for Special Education 31.4% African American 17.7% Hispanic 8% Asian 39.8% Caucasian 0.9% Hawaiian/ Pacific Islander 2.2% American Indian/Alaskan	Charter Authorizing Panel (Arkansas Department of Education) Subject to review by the State Board of Education	LISA Foundation
Charter Petition Denials				
Dove School of Excellence Springdale, AR	*Denied 2009[22]*			*Petitioners: Bilal Erturk, Kaan Camuz – Sky Foundation (OK)*

**Student demographic information was taken from the 2015-2016 school year, with the exception of LISA Academy Chenal, which uses the 2016-2017 school year. "LEP" indicates limited English proficient students, "FRL" indicates students eligible for free or reduced lunch, and "Eligible for Special Education" indicates students eligible for special education.*[23]

[20] Arkansas Department of Education Charter Authorizing Panel Agenda (Sep. 17, 2014), at p. 21, available at: https://tinyurl.com/lhhwod3 (last checked 5/22/2017).

[21] *Id.*

[22] Brett Bennett, *State Board Denies Request for Dove School*, Northwest Arkansas Democrat Gazette (Nov. 10, 2009), available at: https://tinyurl.com/nxdmnmo (last checked 5/22/2017).

[23] Student Demographic Data for the 2015-2016 school year, Arkansas Department of Education Data Center, School Performance Report Cards; available at: http://tinyurl.com/y8g65gok (last checked 7/10/2017); Statewide Information System Reports, Enrollment by Race by School, available at: https://tinyurl.com/nyb5c47 (last checked 5/22/2017); FRL Data, Arkansas Department of Education Data Center, Statewide Information System Report Cycle 2 (2015-2016), available at: http://tinyurl.com/ybthfkzh (last checked 7/11/2017); LISA Academy Chenal, Arkansas Department of Education Data Center, Statewide Information System Report Cycle 2 (2015-2016), available at: https://tinyurl.com/y8jomxe8 (last checked 7/10/2017); LISA Academy Chenal, Enrollment by Race by School, available at: https://tinyurl.com/nyb5c47 (last checked 5/22/2017).

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A History of Strategic Ambiguity and Conflicting Interests

The Little Scholars of Arkansas Foundation ("LISA Foundation"), created in 2002, is a non-profit tax-exempt organization that serves as the parent organization for the six schools in the LISA Academies charter network (together, "LISA"). Like most Gülenist charter schools, the LISA Foundation board is composed almost entirely of individuals of Turkish national origin.[24] At the time of the LISA Foundation's registration, three founders were apparently undergraduates at Turkish universities.[25] This circumstance, when combined with the LISA schools' use of the H-1B visa program, highlights Gülenists' use of American charter schools as a means to import like-minded individuals from Turkey and the surrounding countries.

The first Gülen charter school in Arkansas, LISA Academy (West), opened in 2004[26] and expanded to include high school grade levels in 2005. LISA Academy (North) opened in 2008 as a separate entity under the LISA Foundation with elementary, middle, and high schools.[27] LISA Academy Chenal opened in 2016, although the Arkansas Department of Education faced criticism for the decision.[28]

The LISA Academy (West) and LISA Academy (North) merged in 2014 and now report under one entity.[29] The consolidated LISA Academy received a thirteen-year renewal of its school charter in 2017.[30]

The LISA Foundation has close ties to Harmony Public Schools ("Harmony," formerly the Cosmos Foundation), the Gülen-affiliated charter network in Texas that serves as the charter management services vendor and regional oversight entity for the Greater Texas region. Harmony leadership has been involved with LISA from its inception. For example, Soner Tarim, currently the Harmony CEO, spoke at the first organizational meeting for LISA in 2002, where he presented the educational concepts that would form the basis of LISA Academy.[31] Furthermore, individuals in leadership positions at LISA schools frequently transfer into positions at Harmony. For example, Cuneyt Akdemir, the former assistant superintendent of LISA, would later serve as a superintendent for Harmony, and currently serves as Harmony's Director of Leadership Development.[32] He also served as an IT manager and computer science teacher at the Dove Science Academy, a Gülenist charter school in Oklahoma.[33] Harmony also includes LISA in many of its purchasing bids for various services.[34]

The LISA Foundation pays Harmony to

[24] LISA Foundation IRS Form 990, available at: http://tinyurl.com/kcy94qn (last checked 6/16/17).

[25] *See* the LISA Foundation founder biographies, *supra*.

[26] LISA Academy opening date, Arkansas Department of Education Charter Authorizing Panel Agenda (Sep. 17, 2014), at p. 21, available at: https://tinyurl.com/lhhwod3 (last checked 5/22/2017).

[27] *See* "Our History" from LISA Academy, received from Arkansas Department of Education via 2017 open records request.

[28] Testimony from public hearing on Board approval of LISA Chenal; *See* Hardy, Benjamin; *Live blogging on the Little Rock charter school decision*; Arkansas Times; (31 March 2016); available from http://tinyurl.com/yacoe83o (last checked 6.20.17).

[29] 2014 and 2015 Financial Statements LISA Academy at p. 13, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

[30] Arkansas Department of Education, State Board of Education Meeting Minutes (1/12/2017), at p. 9, available at: http://tinyurl.com/yar7ljvc (last checked 6/29/2017).

[31] *See An Application for Approval of the Open-Enrollment Charter School LISA Academy* at p. 3, received from Arkansas Department of Education through 2017 open records request.

[32] Cuneyt Akdemir, LinkedIn profile, available at: https://tinyurl.com/kgo8qgh (last checked 5/20/2017).

[33] Cuneyt Akdemir, LinkedIn profile, available at: https://tinyurl.com/kgo8qgh (last checked 5/20/2017).

[34] *See* Harmony Request for Sealed Proposals (2015 – 2016), at p. 34, available at: http://tinyurl.com/jje2mqd (last checked 6/29/2017) (listing LISA Academy as a delivery site).

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provide a range of management and administrative services through a long-term, on-going support services agreement and purchases intellection property from Harmony.[35] Beginning in 2010, LISA paid Harmony three percent of all its state education funding for Harmony's services. Harmony subsequently changed its billing structure and currently bills for its services at the rate of $80 - $120 per hour. Additionally, Harmony now charges a licensing fee for use of its intellectual property.[36] In 2013, the LISA Foundation approved a contract with Harmony to provide intellectual property for LISA Academy (West) and LISA Academy (North) at a cost of $24,000 per district per year.[37] Harmony has similar support services agreements and licensing fees in place with seven other Gülenist charter school networks in its region that are described in Harmony's bond documents.[38] Frequently, these transactions are not transparently presented. As a result, there is little accountability regarding the use of the funds and the services provided. Because of these overlapping relationships, the business transactions between Harmony and LISA should be investigated for potential conflicts of interest.

Financial Issues

The LISA Academy (West) and LISA Academy (North) have engaged in inter-entity lending and borrowed funds from board members, staff, and vendors. Our investigation would suggest that charter schools within the Gülen Organization and their vendors engage in frequent inter-entity lending practices, ranging from school to school, from employees to the school, board members to the school, and even from vendors to the school, which is a known warning sign for money laundering.[39]

LISA Academy (West) borrowed $419,283 from Atlas Texas Construction and Trading ("Atlas Construction") in 2012,[40] the same year that the school paid Atlas Construction $213,690 for work at the school.[41] The purpose of the loan was not disclosed, and it was secured by "certain equipment." The loan had a fixed interest rate of five percent.[42] LISA Academy (West) also leases real property from Atlas Barin Properties LLC,[43] whose owner, Yunus Dogan, serves as president of Atlas Construction.[44] Once again,

35 Harmony Bond Issue Official Statement (July 2, 2014), at p. B-3, available at: http://tinyurl.com/ybboyse6 (last checked 6/27/2017).

36 *See* Harmony Bond Issue Official Statement (July 2, 2014), at p. B-3, available at: http://tinyurl.com/ybboyse6 (last checked 6/27/2017).

37 LISA Academy Board Minutes (Feb. 6, 2013), available at: http://tinyurl.com/y89c5g94 (last checked 6/29/2017).

38 *See* Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: http://tinyurl.com/yavbe95f (2012), http://tinyurl.com/ya9wo9ya (2011), and http://tinyurl.com/ydcvya5n (2011); Official Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/ybboyse6 (2014), http://tinyurl.com/y7on943p (2014), http://tinyurl.com/yddvl2lq (2014), http://tinyurl.com/y96ht3fg (2015), http://tinyurl.com/y8ajh2v8 (2016), http://tinyurl.com/y9xs5rdd (2016), http://tinyurl.com/ybjw932j (2016), http://tinyurl.com/y8gduwl7 (2017) (last checked 5/19/17).

39 The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. *See* Guidance at http://tinyurl.com/zb56xel (last checked 6/15/2017).

40 *See* Financial Statement LISA Academy (June 30, 2012), Arkansas Legislative Audit, at p. 9, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

41 LISA Foundation 2012 IRS Form 990, available at: http://tinyurl.com/kcy94qn (last checked 6/16/17).

42 Financial Statement LISA Academy (June 30, 2015), Arkansas Legislative Audit, at p. 10, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

43 Atlas Barin is listed as property owner at 21 Corporate Hill Drive and LISA Academy as occupying the site. Pulaski County Tax Assessor business records, available at: http://tinyurl.com/ycdpdejv (last checked 6/17/2017); *see also* Financial Statements LISA Academy (2008 – 2015), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

44 Atlas Texas Construction, Texas Secretary of State SOSDirect, available at: http://tinyurl.com/r7iw (last checked 5/1/17).

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this demonstrates the numerous overlapping business relationships between LISA and its vendors, which could present illegal conflicts of interest and unfair business dealings.

LISA Academy (North) borrowed $562,500 interest-free from LISA board members and staff for start-up expenses.[45] The individuals lending to the school included the superintendent, principals, and members of the board of directors. LISA Academy (North) also borrowed $355,000 from LISA Academy (West), a related party with common management and directors.[46] The loan was to be used for start-up costs associated with the new LISA Academy (North) school.[47] Importantly, the LISA Academy (West) financial statement for 2010 discloses the loan to the LISA Academy (North), but it does not disclose the amount of the loan ($355,000).[48] Subsequent audits for the LISA Academy in 2010 – 2014 do not disclose full repayment of the $355,000 loan, and the payments against the loan are difficult to track. When the LISA Academy West and LISA Academy North merged in 2014, all related party transactions between the two schools were eliminated and all financial records are not reported under the LISA Academy.[49]

In addition, audits of the LISA Academy (West) and LISA Academy (North) identified numerous problems with the schools' financial practices between 2007-2011.[50] Many of the problems continued for years and were not quickly addressed. Examples of the problems identified in the audits include:[51]

- Inadequate control over financial accounting and cash transactions, including a lack of capable individuals in charge:
  - The use of stamped signatures of the principal and superintendent to authorize checks; and
  - Maintenance of the stamps by the accounts payable accountant, who had full access to the financial records.
- Lack of supporting documentation for disbursements, preventing verification that expenditures were valid or allowable under grant requirements:
  - The only supporting documentation for most expenditures was an invoice or receipt lacking formal authorization for the expense by the superintendent or principal;
- Lack of review and approval for manual journal entries, which similarly lacked supporting documentation;
- Unrecorded invoices resulting in misstated financial statements;
- Failure to properly account for revenue receivable, accounts payable, and interfund transfers;
- Failure to reconcile the general ledger cash balance to the bank cash balance, resulting in cash being materially misstated and improperly reported;

45 Financial Statement LISA Academy North (2009), at p. 8, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

46 *Id.*

47 Financial Statement LISA Academy North (2012), at p. 10, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

48 Financial Statements LISA Academy and LISA Academy North, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

49 Financial Statements LISA Academy and LISA Academy North, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

50 Financial Statements LISA Academy and LISA Academy North, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

51 Financial Statements LISA Academy and LISA Academy North, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

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- Failure to maintain an accurate listing of outstanding checks;
- Comingling federal funds with general funds, which were not properly maintained and resulted in inaccurate records of federal fund expenditures;
- Failure to maintain accurate schedules and inventory of capital assets;
- Incorrectly coding debt, interest, and rental payments for facilities, resulting in misstated financial statements;
- Failure to perform a regular and deliberate review of resulting budget variances.

Bond Financing

The LISA Foundation created The Little Scholars of Arkansas LLC ("LISA LLC") in 2010 as its real estate arm to borrow money through construction bonds on behalf of the LISA Foundation.[52] The LISA Foundation controls LISA LLC,[53] and the two organizations share common management and a Board of Directors.[54] LISA LLC borrowed $7,450,000 in three bond issues in 2010 for construction of the LISA Academy (West) high school and purchase of adjacent property, financed through the Arkansas Development Finance Authority.[55] Harmony guaranteed two of the three bonds totaling $1,950,000,[56] even though Harmony was a vendor with on-going contracts with the LISA Foundation schools.

LISA LLC leases these facilities to the LISA Academy (West); the annual payments on the lease between 2015-2028 range from $343,262 to $773,027.[57] These funds appear to be the only source of revenue for bond repayment.

Real Estate

Two LISA lease arrangements raise questions about whether the LISA schools conduct real estate transactions at arm's length. Gülen charter schools in other states have entered into questionable real estate transactions with related landlords, which is a prime characteristic of the Gülen Organization's model of private profit at public expense.

LISA Academy (West) at 21 Corporate Hill Drive, Little Rock: Atlas Texas Construction and Trading ("Atlas Construction"), owned by Yunus Dogan, originally bought the land used by LISA Academy (West) in 2007,[58] borrowing

[52] *See* LISA LLC, Arkansas Secretary of State (retrieved 2/10/17) (see archives), available at: http://tinyurl.com/y9j3pgnw (last checked 6/14/17).

[53] Schedule R, LISA Foundation IRS Form 990 2010, available at: http://tinyurl.com/kcy94qn (last checked 6/16/17).

[54] Financial Statement LISA Academy (2011), at p. 10, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

[55] Financial Statement LISA Academy (2010), at p. 10, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17). The bonds were not listed on the website of the Electronic Municipal Market Access (EMMA), so little is known about the LISA LLC beyond what is disclosed in the annual audit. S*ee* Electronic Municipal Market Access (EMMA), available at: http://tinyurl.com/ar5swl8 (last checked 6/1/17).

[56] Financial Statement LISA Academy (2010), at p. 10, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

[57] Financial Statements LISA Academy (2010 – 2015), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

[58] All property records and loan information for Atlas Barin and Atlas Texas Construction and Trading are from Pulaski County Clerk Real Estate records, available at: http://tinyurl.com/juxfmve (last checked 4/1/2017).

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$1,140,000 for the purchase.[59] It then deeded the property to Atlas Barin Properties LLC ("Atlas Barin"), also owned by Yunus Dogan, in 2008.[60] Atlas Barin borrowed $1,120,000 for its purchase.[61] In 2013, Atlas Barin paid off its original loan by borrowing $1,160,000.[62]

Atlas Barin leases the property to LISA Academy (West)[63] under a non-cancellable lease for approximately $276,000 per year.[64] Atlas Barin has already received an estimated $2.4 million in rental payments from the LISA Academy (West), more than twice the original purchase price for the property.[65]

LISA Academy (West) at 23 Corporate Hill Drive, Little Rock: In the second real estate transaction, LISA LLC[66] issued bonds in 2010 for construction of the LISA Academy (West) high school at 23 Corporate Hill Drive and serves as the school's landlord.[67] The annual payments on the lease between 2011 and 2015 ranged from $343,262 to $773,027.[68] Because the school and the landlord are related, these transactions potentially constitute conflicts of interest. Essentially, LISA is paying itself through a third-party LLC organization that is directly controlled by the LISA Foundation. Ownership of the school buildings is in question given that the LISA LLC is currently listed as "inactive" on the Arkansas Secretary of State website. When the bonds are paid in full, it appears that LISA LLC, and not the school, will own the facilities—even though the schools' public funds financed the acquisition and construction of the property.[69]

Excessive Use of the H1-B Visa Program

Like other Gülen organization charter networks, the Arkansas Gülen charter schools utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools. Since its inception, the Arkansas network has filed 163 H-1B Visa applications.[70] The cost of these applications is

59 *Id.*

60 *Id.* Atlas Construction and Atlas Barin also shared the same address in Houston during this time-period at 5065 Westheimer, Suite 840, and 4065 Westheimer Road, Suite 840E. Atlas Construction, Better Business Bureau, available at: http://tinyurl.com/yb4vyhdz (last checked 6/17/17); Atlas Barin, Pulaski County Tax Assessor, Parcel 44L0400100700, available at: http://tinyurl.com/y79h2e86 (last checked 6/17/17).

61 All property records and loan information for Atlas Barin and Atlas Construction are from Pulaski County Clerk Real Estate records, available at: http://tinyurl.com/juxfmve (last checked 4/1/2017).

62 All property records, mortgages, and loan information for Atlas Barin and Atlas Construction related to these properties are included in Pulaski County Clerk Real Estate records, available at: http://tinyurl.com/juxfmve (last checked 4/1/2017).

63 Pulaski County Tax Assessor business records, available at: http://tinyurl.com/y79h2e86 (last checked 6/17/2017).

64 Financial Statements for LISA Academy (2008 – 2015), Arkansas Legislative Audits, available at: http://tinyurl.com/yd3c6phj (last checked 6/17/17); Pulaski County Clerk Real Estate records, available at: http://tinyurl.com/juxfmve (last checked 4/1/2017).

65 Monthly and annual rental payments from 2008 – 2015 are included in the independent Financial Statements for LISA Academy and range from $252,000 - $276,000 per year; payments for 2016 and 2017 estimated at same amount as 2015. Arkansas Legislative Audits, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

66 Arkansas Secretary of State (retrieved 2/10/2017) (see archives), available at: http://tinyurl.com/y9j3pgnw (last checked 6/14/17).

67 Financial Statement LISA Academy (2010), at p. 10), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

68 Financial Statements LISA Academy (2011 - 2015), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/17).

69 LISA LLC is currently listed as "inactive" on the Secretary of States website, however, so additional research into the ownership structure of LISA properties is necessary.

70 See MyVisaJobs.com, available at: [1] LISA Foundation, http://tinyurl.com/ydbhrfjp (2); [2] LISA Academy, http://tinyurl.com/y7trjfdh (102); [3] LISA, http://tinyurl.com/y93dw75q (57); [4] LISA Academy-North, http://tinyurl.com/yctmz5qf (2) (last checked 6/27/2017).

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estimated to be between $2,000 - $4,000 per application, making the total amount expended in public funds for immigration by LISA an estimated $326,000 - $652,000. While Gülen charter schools typically stated that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: English language and linguistics teachers, assistant principals, Turkish language teachers, Turkish/history teachers, communication director, world history teacher, Spanish teacher, principals, and budget accountant.[71]

Arkansas's Gülen charter schools use the same limited number of attorneys to file and process their H-1B visa applications as other know Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

- Seth Leech: The Little Scholars of Arkansas used Leech, a New York-based attorney, to file numerous H-1B applications. Leech also filed applications for:
  - Little Scholars (AR)
  - Pioneer (MA)
  - Hampden (MA)
  - Syracuse, Buffalo and Utica Academies of Science (NY)
  - Paterson Science and Technology; Central Jersey College Prep Charter School (NJ)[72]

- Leonard D'Arrigo: the Arkansas network used D'Arrigo, an Albany-based attorney, to file numerous H-1B applications. D'Arrigo also filed applications for:
  - Albuquerque School of Excellence (formerly Focus Foundation) (NM)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Central Jersey College Prep Charter School (NJ)
  - Syracuse Academy of Science Charter School (NY)
  - Millennium Education Foundation (MO)
  - Rochester Academy Charter School (NY)
  - Sky Foundation (OK)
  - Harmony Public Schools/Cosmos Foundation (TX)
  - Bergen Arts and Science Charter School (NY)
  - Read Foundation (TN)
  - Truebright Science Academy Charter School[73]

- Tina Nguyen: The Little Scholars of Arkansas used Nguyen, a Houston-based attorney to file applications. Nguyen's also filed applications for:
  - Pelican Educational Foundation
  - Dove Science Academy
  - Little Scholars of Arkansas
  - Millennium Education Foundation
  - Sky Foundation, Inc.[74]

- Garrett White: the Arkansas network used White, a Houston-based attorney, to file numerous H-1B applications. White also filed applications for:
  - Memphis School of Excellence/ Read Foundation (TN)
  - Dove Science Academy
  - Riverwalk Education Foundation (TX)
  - Pelican Educational Foundation (LA)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Sky Foundation (OK)
  - Millennium Foundation (MO)
  - Texas Gulf Foundation (TX)
  - Helix Design and Production
  - Solidarity Contracting
  - Brighten Technologies
  - Target Design and Management

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71 Jobs in Tech, Little Scholars of Arkansas dba Dove Academy, available at: http://tinyurl.com/ya6aegof (last checked 6/17/17); Jobs in Tech, Little Scholars of Arkansas, available at: http://tinyurl.com/ya98n3gq (last checked 6/29/2017).

72 List of entities represented by Seth Leech, available at: http://tinyurl.com/zlc7eql (last checked 4/14/2017).

73 List of entities represented by Leonard D'Arrigo, available at: https://tinyurl.com/kcb3kjq (last checked 5/24/2017).

74 List of entities represented by Tina Nguyen, available at: http://tinyurl.com/mh29kbe (last checked 5/20/2017).

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- Institute of Interfaith Dialog for World Peace
- Nur International[75]

Notable Turkish Vendors

Harmony Public Schools ("Harmony"): At the same time that Harmony Public Schools guaranteed almost $2 million in bonds for LISA Academy, it was also a paid vendor of LISA Academy providing a range of administrative and management services and receiving licensing fees for its intellectual property. In 2013, LISA Academy (West) and LISA Academy (North) each paid Harmony $24,000 to license intellectual property.[76] Harmony continues to license its intellectual property to LISA Foundation schools other Gülen charter schools in the Greater Texas region.[77] Harmony also receives $80 - $120 per hour for services provided to the Arkansas schools through a support services agreement that includes consulting, educational technology solutions, data network solutions, efficiency analysis, strategic planning, coaching key leadership, and teacher training.[78]

Atlas Texas Construction and Trading, Inc. ("Atlas Construction"): Yunus Dogan is the President of Atlas Construction. Dogan's companies are preferred vendors of Harmony in Texas, receiving over $16 million between 2007 and 2012: Atlas Construction received almost $12 million; Apple Catering received approximately $2 million; and Atlas Food and Beverage received approximately $2.4 million.[79] In Louisiana, Atlas Construction's Vice President apparently attempted to bribe a state official to influence the outcome of an investigation into the Abramson School of Science and Technology.[80] Ultimately, the Louisiana Board of Elementary and Secondary Education closed the school due to concerns for the health, safety, and welfare of students.[81] In 2012, Atlas Construction received $213,690 from the LISA Foundation.[82]

Atlas Barin Properties LLC ("Atlas Barin"): The LISA Academy (West) leases school property from Atlas Barin Properties LLC for approximately $276,000 per year.[83] Yunus Dogan, the owner of Atlas Construction, also owns Atlas Barin.

Little Scholars of Arkansas LLC ("LISA LLC"): The LISA Foundation Board created LISA LLC in November 2010 as its real estate arm to issue construction bonds.[84] In 2010, LISA LLC borrowed $7,450,000 through three bond issuances, financed through the Arkansas Development Finance Authority, for construction

75 List of entities represented by Garrett White, available at: https://tinyurl.com/lg5f2aq (last checked 5/24/2017).

76 LISA Academy Board Minutes (Feb. 6, 2013), available at: http://tinyurl.com/y89c5g94 (last checked 6/29/2017).

77 Harmony Bond Issue Official Statement (May 9, 2017), at pp. B-5 and B-6, available at: http://tinyurl.com/y8gduwl7 (last checked 6/27/2017).

78 Harmony Bond Issue Official Statement (May 9, 2017), at pp. B-5 and B-6, available at: http://tinyurl.com/y8gduwl7 (last checked 6/27/2017).

79 See Harmony Public Schools IRS Forms 990 for 2007 through 2012 for lists of independent contractors that received $100,000 or more, available at: http://tinyurl.com/hu9wqcl (last checked 6/14/2017).

80 Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time-Picayune (22 July 2017), available at: http://tinyurl.com/3l2cnxs (last checked 5/25/2017).

81 *State orders closure of Abramson Charter School*, Louisiana Weekly (Aug. 11, 2011), available at: http://tinyurl.com/y9twuac5 (last checked 6/29/2017).

82 LISA Foundation 2012 IRS Form 990, available at: http://tinyurl.com/kcy94qn (last checked 6/16/2017).

83 Financial Statements for LISA Academy (2008 – 2015), Arkansas Legislative Audits, available at: http://tinyurl.com/yd3c6phj (last checked 6/17/17); Pulaski County Clerk Real Estate records, available at: http://tinyurl.com/juxfmve (last checked 4/1/2017); Pulaski County Tax Assessor business records, available at: http://tinyurl.com/y79h2e86 (last checked 6/17/2017).

84 LISA LLC, Arkansas Secretary of State (retrieved 2/10/17) (see archives), available at: http://tinyurl.com/y9j3pgnw (last checked 6/14/2017).

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of a high school and purchase of adjacent property.[85] LISA LLC leases facilities to LISA Academy (West) for annual rent that varied from $343,262 to $773,027 between 2011 and 2015,[86] which appears to be the only source of revenue for bond repayment.

Scandals, Investigations, & Notable Activities

On September 30, 2011, the Occupational Health and Safety Administration ("OSHA") cited Atlas Construction for 11 "serious" safety violations with proposed penalties of $51,000. A serious violation occurs when there is a substantial probability that death or serious physical harm could result from a hazard about which the employer knew or should have known. OSHA stated that 20 workers were exposed to electrical and fall hazards while constructing LISA Academy (West) on Corporate Hill Drive in Little Rock. Atlas Construction contested the violations, and the matter settled for $17,000.

In May 2016, LISA failed to send a promotional recruitment mailing to low income, heavily African American and Hispanic zip codes in Little Rock area which prompted concerns that LISA was not actively recruiting certain student populations. Compared to the Little Rock School District, the LISA schools serve a disproportionately low number of African-American students and students receiving free and reduced lunches.[87]

Gülenist Cultural and Business Organizations Active in State

- Raindrop Foundation: Raindrop Foundation is a Houston-based organization that sponsors Raindrop Turkish Houses in Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, Tennessee, and New Mexico.[88] One Raindrop Turkish House is located in Little Rock.[89] Like Turkish cultural centers in other states across the county, the Raindrop Foundation promotes Turkish culture through language and cooking classes, festivals and local events with special guests. It also sponsors annual "dialogue" trips to Turkey for community members and leaders.[90]

- The Dialogue Institute of the Southwest: The Houston-based Dialogue Institute of the Southwest hosts forums, conferences, dinners and cultural exchange "dialogue" trips to Turkey.[91] The Dialogue Institute has branches in Little Rock and Fayetteville, as well as in Texas, Kansas, Mississippi, Oklahoma and New Mexico.[92]

85 Financial Statement LISA Academy (2010), at p. 10, Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/2017).

86 Financial Statements LISA Academy (2011 - 2015), Arkansas Legislative Audit, available at: http://tinyurl.com/yd3c6phj (last checked 6/16/2017).

87 Max Brantley, *LISA Academy Recruiting Mail Omits Heavily Minority Neighborhoods*, Arkansas Times (May 10, 2016), available at: http://tinyurl.com/y78uoyg9 (last checked 6/29/2017).

88 About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

89 Raindrop Turkish House Little Rock, available at: http://tinyurl.com/y8tr63uo (last checked 6/13/2017).

90 About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

91 Information about the Dialogue Institute of the Southwest on the Alliance for Shared Values website, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

92 Dialogue Institute of the Southwest Branches, available at: http://tinyurl.com/ycldgejx (last checked 6/13/2017).

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The Dialogue Institute is a member organization of the Alliance for Shared Values, an umbrella organization for Gülenist cultural organizations around the United States that are openly aligned with the Gülen Movement.[93]

Friends of Gülen Spotlight

Numerous elected officials from Arkansas have taken trips to Turkey or Azerbaijan sponsored by Gülen-affiliated organizations. Examples include:

- State Representative Fred Allen,[94] cosponsor of a resolution to recognize Turkey and promote relations with the state of Arkansas;[95]
- State Representative Joan Cash;[96]
- State Representative Steve Harrelson;[97]
- State Representative Karen Hopper,[98] cosponsor of a House Resolution to recognize Turkey and promote relations with the state of Arkansas;[99]
- State Senator Jimmy Jeffress,[100] cosponsor of a Senate Resolution to recognize Turkey and promote relations with the state of Arkansas;[101]
- State Representative Bruce Maloch;[102]
- Former State Representative Mark Martin, now AR Secretary of State;[103]
- State Representative Johnnie Roebuck,[104] vice chair House Education Committee,[105] cosponsor of a House Bill to recognize Turkey and promote relations with the state of Arkansas;[106]
- State Representative Robbie Wills.[107]

93 Dialogue Institute of the Southwest on the Alliance for Shared Values website, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

94 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

95 House Resolution 1033 (March 7, 2011); available at: http://tinyurl.com/y8uzoj7l (last checked 6/13/2017).

96 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

97 *Id.*

98 *Id.*

99 House Resolution 1033 (March 7, 2011), available at: http://tinyurl.com/y8uzoj7l (last checked 6/13/2017).

100 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

101 Senate Resolution 37 (Mar. 28, 2011), available at: http://tinyurl.com/y7nnknxv (last checked 6/13/2017).

102 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

103 *Id.*; Max Brantley, *And Speaking of foreign travel by lawmakers: Good for Whom?*, Arkansas Times (Feb. 10, 2017), available at: http://tinyurl.com/yaxl6bd2 (last checked 6/13/2017).

104 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

105 Johnnie Roebuck committees; Arkansas State legislature website; available at: http://tinyurl.com/yatfz9zs (last checked 6/13/2017).

106 House Resolution 1033 (March 7, 2011); available at: http://tinyurl.com/y8uzoj7l (last checked 6/13/2017).

107 Liz Essley Whyte, *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

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Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Cuneyt Akdemir: Principal/Assistant Superintendent, LISA Academy Schools; former Superintendent, Harmony Public Schools (TX); current Director of Leadership Development/Area Superintendent, Harmony Public Schools (TX); IT Manager/Computer science teacher, Dove Science Academy (OK); B.S., Middle East Technical University.[108]

- Fatih Bogrek: Superintendent/ Principal, LISA Academy (North); former Assistant Principal, Harmony (TX).[109]

- Emin Cavusoglu: Principal/superintendent, LISA Academy Schools; currently CEO/Principal, Harmony Public Schools D.C. (D.C.); Superintendent, Schools of Science and Technology (TX).[110]

- Birol Furat: Superintendent/Principal/ Board Member, LISA Academy (West); Principal, Dove Science (OK); Board Member, Sky Foundation (OK).[111]

- Ali Gumus: Former Principal/ Superintendent, LISA Academy; currently Principal/ Board Member, Memphis School of Excellence (TN).[112]

- Omer Ozmeral: LISA Academy Director/ Superintendent; former Acting CEO, Chesapeake Lighthouse Foundation (MD); Chief Internal Auditor, Harmony (TX).[113]

- Mehmet Uguz: LISA Academy Principal; currently Principal, Harmony (TX); Principal, Harmony (TX).[114]

- Kemal Aydin: Former Board Member, LISA Foundation; currently Associate Professor of Computer Science, North American University.[115]

[108] LISA Foundation IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Cuneyt Akdemir, LinkedIn profile, available at: https://tinyurl.com/kgo8qgh (last checked 5/20/2017).

[109] LISA Foundation IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Harmony Science Academy El Paso Newsletter (Apr. 21, 2010), at p. 9, available at: https://tinyurl.com/msvu385 (last checked 5/22/2017).

[110] LISA Foundation IRS 990 Forms (2007-2011), available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Emin Cavusoglu LinkedIn Profile, available at: https://tinyurl.com/m8q9dc5 (last checked 5/22/2017).

[111] LISA Academy Principal: Buzzfile Information profile available at https://tinyurl.com/mv5ukf4 (last checked 5/20/2017) and see LEA Supervisors by District (Sept. 14, 2004) available at https://tinyurl.com/kcq2afa (last checked 5/20/2017); Dove Principal, Board of Directors Sky Foundation: Sky Foundation IRS 990 Forms; 2002 and 2003; available at; https://tinyurl.com/z7xxxk6 (last checked 5/22/2017).

[112] LISA Foundation IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); LISA Foundation IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Read Foundation IRS 990 Form 2013, available at: https://tinyurl.com/ld6lu3y ; Gumus' LinkedIn Profile, available at: https://tinyurl.com/lm6oldk (last checked 5/22/2017).

[113] LISA Foundation IRS 990 Forms (2006-2007), available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Chesapeake Lighthouse Foundation IRS 990 Form (2013), available at: https://tinyurl.com/kfo3j3b (last checked 5/22/2017); City of Dallas City Commission Public Hearing (Dec. 15, 2011), available at: http://tinyurl.com/mjqw6sq (last checked 5/22/2017).

[114] LISA Foundation IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Mehment Uguz LinkedIn Profile, available at: https://tinyurl.com/m287emk (last checked 5/22/2017); Texas Education Agency Non-Teacher Master File (2014-2015), available at: https://tinyurl.com/7m644he (last checked 5/20/2017).

[115] LISA Foundation IRS Form 990 (2004 - 2009), available at: https://tinyurl.com/kcy94qn (last checked 6/15/2017); Kemal

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- Ramazan Ozgen: Board Member, Little Scholars of Arkansas; President/CEO, Westlake Trading; Managing member, of Apex Investors, LLC.[116]

Notable Press Coverage and Research Regarding the Arkansas Gülenist Network

- Riddle, Brandon. *Little Rock charter expansion proposals on hold pending review*. Arkansas Democrat Gazette Online. 3 March 2016.[117]
- Petrimoulx, Drew. *Charter school apologizes for recruitment mailing*. KTRK-TV4. 2016.[118]
- Brantley, Max. *A call for investigation of charter schools with Turkish ties*. Arkansas Times. 7 March 2016.[119]
- Brantley, Max. *LISA Academy recruiting mail omits heavily minority neighborhoods*. Arkansas Times. 10 May 2016.[120]
- Brantley, Max. *And Speaking of foreign travel by lawmakers: Good for Whom?* Arkansas Times. 10 February 2017.[121]
- Brantley, Max. *The 'best families'*. Arkansas Times. 16 January 2004.[122]

Aydin LinkedIn Profile, available at: http://tinyurl.com/ybse2r2b (last checked 6/15/2017).

116 LISA Foundation IRS 990 Forms; available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Apex Investors LLC, Corporation Wiki, available at: https://tinyurl.com/nyn8pvg (last checked 5/22/2017); Ramazan Ozgen LinkedIn Profile, available at https://tinyurl.com/lca6u5b (last checked 5/20/2017).

117 Available at: http://tinyurl.com/ycjetuh6 (last checked 6/17/2017).

118 Available at: http://tinyurl.com/y9nllz3w (last checked 6/17/2017).

119 Available at: http://tinyurl.com/y7f4oyln (last checked 6/29/2017).

120 Available at: http://tinyurl.com/y78uoyg9 (last checked 6/29/2017).

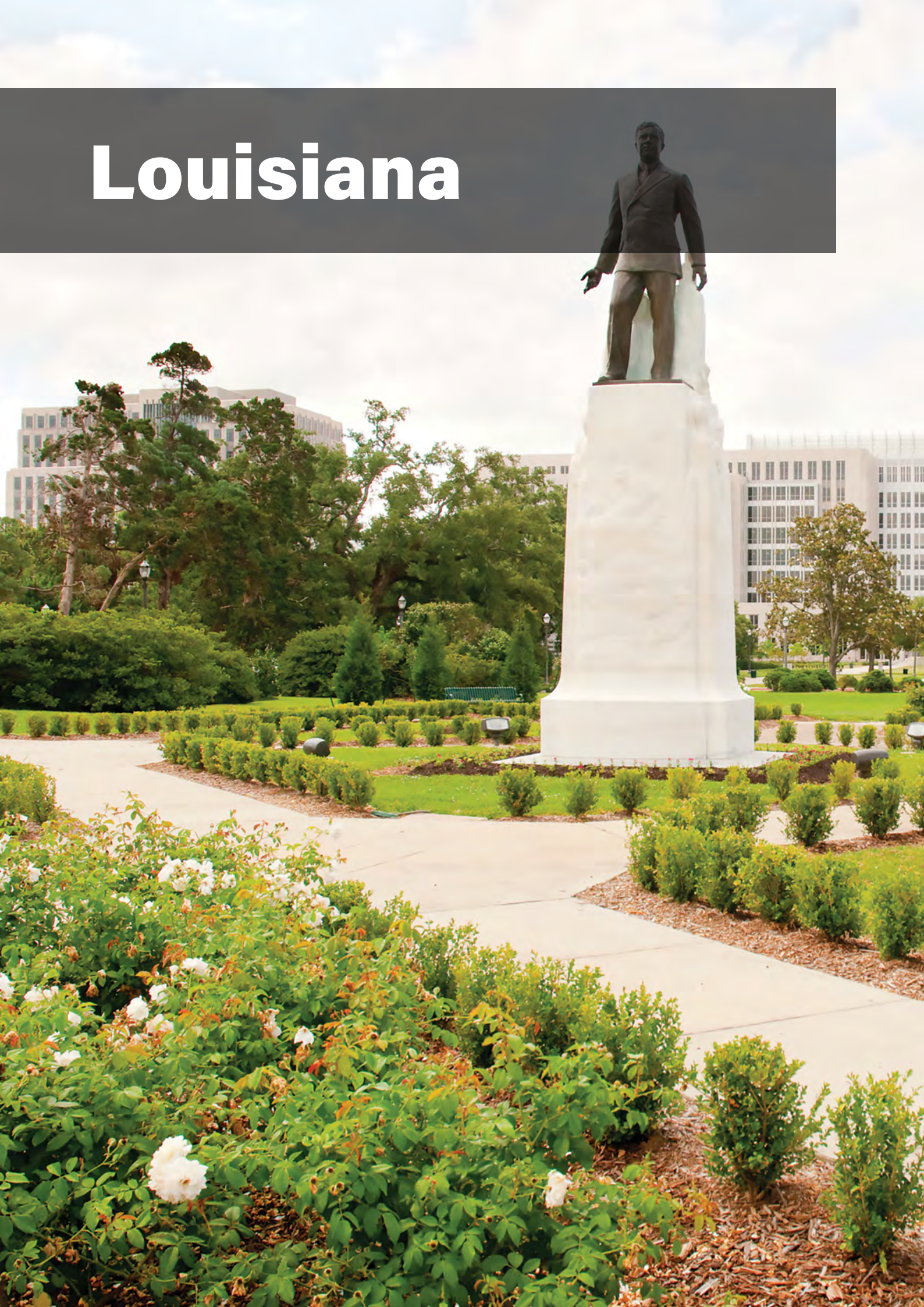
121 Available at: http://tinyurl.com/yaxl6bd2 (last checked 6/13/2017).

122 Available at: http://tinyurl.com/y9y7y6x7 (last checked 6/16/2017).

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Louisiana

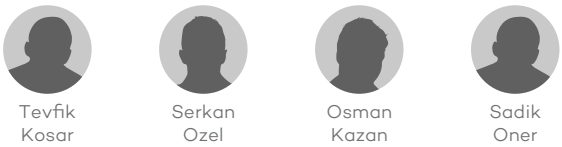


QUICK FACTS ON GÜLEN CHARTER SCHOOLS LOUISIANA

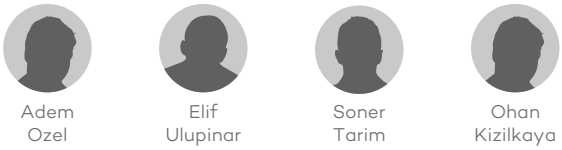


NUMBER OF SCHOOLS	**1**
KNOWN AS	**Kenilworth Science and Technology Charter School**
TOTAL ENROLLMENT	**561**
CHARTER VENDOR	**Harmony Public Schools (TX)** **Educational service provider (ESP)**
TOTAL REVENUES	**$6,653,133**

KEY PEOPLE



Tevfik Kosar | Serkan Ozel | Osman Kazan | Sadik Oner



Adem Ozel | Elif Ulupinar | Soner Tarim | Ohan Kizilkaya

RELATED INSTITUTIONS

- TN — Read Foundation / Memphis Schoolof Excellence
- TX — Harmony Public Schools Riverwalk Education Foundation
- OK — Sky Foundation Dove / Public Charter School Foundation
- D.C. — Harmony D.C. Public School
- NM — Focus Foundation / Albuquerque School of Excellence
- AR — Little Scholars of Arkansas / LISA Academy
- MO — Millennium Education Foundation / Frontier Schools

CHARTER NETWORK

Harmony Public Schools is the charter management organization responsible for the Greater Texas region of the Gülen Organization charter network.

Pelican contracts with Harmony to provide additional educational management services for a fee paid from total school revenues.

The Pelican network serves a large percentage of vulnerable student populations, such as students eligible for free and reduced lunch and minority students.

SUSPECTED FRAUD



As of the 2016-2017 school year, Louisiana has one charter school currently in operation within the Gülen Organization.



The Louisiana network, overseen by the nonprofit Pelican Educational Foundation ("Pelican"), had fallen under major scrutiny for suspected fraud and extremely poor academic performance.

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as):
  - Kenilworth Science and Technology Charter School
- Total number of schools in state: 1
- Total student enrollment 2015-16: 561 [1]
- Charter Holder/Governing Board(s):
  - Pelican Educational Foundation ("Pelican")
    - Organized as a nonprofit 501(c)(3) organization
    - Oversees 1 charter school
- Charter Management Services Vendor: Harmony Public Schools (TX) – Educational service provider (ESP)
  - Until 2011, the Cosmos Foundation was the operating organization "doing business as" Harmony Public Schools. In 2011, Harmony became the primary operating organization.
- Regional Gülen Organization Oversight Entity: Harmony Public Schools (TX)
- Regional Sister Networks:
  - Harmony Public Schools (TX)
  - Riverwalk Education Foundation (TX)
  - Harmony D.C. Public School (Washington, D.C.)
  - Little Scholars of Arkansas/LISA Academy (AR)
  - Sky Foundation/Dove Public Charter School Foundation (OK)
  - Read Foundation/Memphis School of Excellence (TN)
  - Millennium Education Foundation/ Frontier Schools (MO)
  - Focus Foundation/Albuquerque School of Excellence (NM) [2]
- Total Revenues for FY 2016: $6,653,133 [3]
- Network Founders - Founders of Abramson or Kenilworth Science & Technology schools ("Abrahamson" and "Kenilworth"):
  - Tevfik Kosar: Founding Board member, Abramson and Kenilworth (LA); President, Pelican Educational Foundation from 2005 to 2013 (LA); currently Treasurer of the Board, Buffalo Academy of Science (NY), a Gülen-affiliated charter in Buffalo, NY; currently Associate Professor Computer Science/Engineering at State University of New York at Buffalo; former Professor of Computer Science, Louisiana State University; B.S., Bogazici University (Istanbul, Turkey). [4]
  - Serkan Ozel: Board Member, Pelican (LA); at the time of Pelican's founding, an undergraduate student at University of Massachusetts Boston (MA); currently Sr. Manager of Software Engineering, PayPal (CA); Board Member, Kenilworth Science and Technology Charter School for one month (February 2015) (LA). [5]

[1] Louisiana Dept. of Ed. Data Files 2016-17, available at: http://tinyurl.com/ycd9dxmq (last checked 6/9/2017).

[2] The Focus Foundation is no longer active.

[3] Pelican Educational Foundation, Financial Statement 2015, available at: http://tinyurl.com/y8tj8kkn (last checked 6/9/2017).

[4] Information taken from: Charter applications for Abramson and Kenilworth, available at: http://tinyurl.com/24t7emn(last checked 6/9/2017); Pelican IRS Form 990 for 2006 and 2013, available at: http://tinyurl.com/y8hjxtuo (last checked 6/9/2017); Buffalo Academy of Science; available at http://tinyurl.com/y9mj72dn (last checked 6/9/2017).

[5] Serkan Ozel - Louisiana Secretary of State, available at: http://tinyurl.com/mwphcbf (last checked 5/21/17). LinkedIn profile, available at: http://tinyurl.com/y7apz92o (last checked 5/21/17).

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- Osman Kazan: Founding Board Member, Pelican (LA); Assistant Professor, Energy Institute, Tulane University (LA); B.A., Middle East Technical University (Ankara, Turkey).[6]
- Sadik Oner: Founding Board Member, Abramson (LA); Vice President, Pelican Educational Foundation (LA); Postdoctoral Researcher at the Health Science Center, Louisiana State University (LA); M.D. Inonu University (Malataya, Turkey).[7]
- Ohan Kizilkaya: Founding Board Member, Abramson and Kenilworth (LA); Secretary, President, Pelican Educational Foundation (LA); Research Associate, Louisiana State University (LA); Ph. D. in Physics, Louisiana State University (LA); Judge for Gülenist Science Fairs; B.S., Ege University (Izmir, Turkey).[8]
- Adem Ozel: Founding Board Member, Abramson and Kenilworth (LA); Treasurer, Pelican Educational Foundation (LA); B.A., Ege University (Izmir, Turkey).[9]
- Elif Ulupinar: Founding Board Member, Kenilworth (LA); Lawyer, Yuksel Law Office (Istanbul, Turkey) until 2008; Legal Counsel, Pelican Educational Foundation in 2009 (LA); Wife of Mehmet Ulupinar who was involved with Atlas Foundation, Gülenist cultural organization in Baton Rouge, and Raindrop Turkish House in Little Rock, AR.[10]
- Soner Tarim; Key Contact in charter application for Abramson and Kenilworth (LA); CEO, Harmony Public Schools (TX).[11]

Overview

As of the 2016-2017 school year, Louisiana has one charter school currently in operation within the Gülen Organization. The Louisiana network, overseen by the nonprofit Pelican Educational Foundation ("Pelican"), had fallen under major scrutiny for suspected fraud and extremely poor academic performance. While Pelican used to operate a second charter school, its charter contract was revoked, and Pelican has failed to gain approval for any of its subsequent charter applications.

Harmony Public Schools is the charter management organization responsible for the Greater Texas region of the Gülen Organization charter network. Pelican contracts with Harmony to provide additional educational management services for a fee paid from total school revenues. The Pelican network serves a large percentage of vulnerable student populations, such as students eligible for free and reduced lunch and minority students.

6 Osman Kazen - Louisiana Secretary of State, available at: http://tinyurl.com/mwphcbf (last checked 5/21/17) Osman Kazan - Biography from Tulane University, available at: http://tinyurl.com/y83pswzd (last checked 5/21/17).

7 Charter applications for Abramson and Kenilworth, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017).

8 Information taken from: Charter applications for Abramson and Kenilworth, available at http:/tinyurl.com/24t7emn (last checked 6/9/2017); Pelican IRS Form 990 for 2014, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

9 Id.

10 Information taken from: Charter application for Kenilworth, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017); E. Ulupinar – Pelican IRS Form 990 - 2009, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017); M. Ulupinar presentation on Gülen, University of Central Arkansas Philosophy and Religion Facebook, available at http://tinyurl.com/y7uo83cb (last checked 5/25/17);.

11 Information taken from: Charter applications for Abramson and Kenilworth, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017) Harmony Public Schools, available at: http://tinyurl.com/y7ypegdj (last checked 6/9/2017).

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School	Operation	Student Demographic Information[12] *	Authorizer	Governing Board
Kenilworth Science and Technology Charter School 7600 Boone Dr, Baton Rouge, LA 70808	Grades 6 – 8 2009 – present	Enrollment: 561 94% FRL 09% SWD 07% ELL 03% Anglo 85% African American <01% Asian 11% Hispanic 01% 2 or more races	Board of Elementary and Secondary Education (BESE) (Type 5 charter) Baton Rouge Recovery District[13]	Pelican Educational Foundation
Closed/Abandoned Schools				
Abramson Science and Technology Charter School	Charter revoked 2011 Closed by BESE[14]			
Charter Petition Denials				
Banks Elementary (conversion)	Pelican not awarded charter[15]			Pelican Educational Foundation[16] Lead Petitioner: Tevfik Kosar
Crestworth Middle School (conversion)	2009 Pelican not awarded charter[17]			Pelican Educational Foundation[18] Lead Petitioner: Tevfik Kosar
Charter Petition Denials				
Kenilworth Science and Technology High School	2010 HS expansion denied[19]			Pelican Educational Foundation Lead Petitioner: Tevfik Kosar
Kenilworth Science and Technology High School	2017 HS expansion denied[20]			Pelican Educational Foundation
Pelican Excellence Academy (New Orleans)	2010[21] Denied			Pelican Educational Foundation
Pelican Math and Science School[22]	2007 original name for Abramson[23]			

** ELL indicates English language learner; FRL indicates students eligible for free/reduced price lunch; SWD indicates students with disabilities.*

12 Louisiana Department of Education Data Files 2016-2017, available at: http://tinyurl.com/ycd9dxmq (last checked 6/9/2017)

13 Louisiana Department of Education, 2015-16 Charter School Annual Report, available at: http://tinyurl.com/ybwm5898 (last checked 6/9/2017).

14 Vanacore, Andrew. BESE votes to rescind charter for Abramson Science and Technology Charter. New Orleans Times-Picayune. (4 August 2011), available at: http:/tinyurl.com/y8h4y8qv (last checked 6/9/2017).

15 Banks Elementary closed and became JK Haynes Elementary and Middle Charter School operated by JK Haynes Foundation; Charter application available at: http://tinyurl.com/yckxy68g (last checked 5/19/17).

16 See organizations that applied to take over Baton Rouge schools, WFAB TV Baton Rouge, available at: h/ttp://tinyurl.com/y9gpsf5t (last checked 6/9/2017).

17 Crestworth charter awarded to Mt. Pilgrim Baptist Church and later Celerity Educational Group. Lussier, Charles. New middle school to open in Scotlandville in the fall. The Advocate (Baton Rouge) 13 June 2014, available at: http://tinyurl.com/ycg554xl (last checked 6/9/2017).

18 Pelican Educational Foundation role in school take over, WFAB TV, available at: http://tinyurl.com/y8owz2xb (last checked 5/31/17).

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A History of Strategic Ambiguity and Conflicting Interests

Since opening its first school in Louisiana in 2007, Pelican has had a turbulent history with school closings, attempted bribes of state officials, and an FBI raid.

Like the origins of other Gülenist charter networks around the country, many of Pelican's founders were involved in STEM fields as professors, graduate students, or research assistants at Louisiana State University (LSU) or other universities before banding together to form Pelican in 2005.[24] Most of these individuals received their undergraduate degrees at the same handful of Turkish universities, all affiliated with Gülen. One founder was an undergraduate at the University of Massachusetts in Boston when he was listed on Pelican's certificate of incorporation in 2005.[25] The original Pelican staff included veterans of other Gülen Organization charter schools. For example, Mustafa Guvercin served as Pelican's first CEO and later became the first Superintendent of the Abramson Science and Technology Charter School. Guvercin joined Pelican as a veteran of Harmony Public Schools and Dove Science Academy in Oklahoma City, both Gülen Organization charter networks.[26]

Pelican was incorporated in Louisiana in 2005-06 and opened its first school in Louisiana in New Orleans when the city began its move to replace traditional public schools with charter schools after Hurricane Katrina. Abramson Science and Technology Charter School ("Abramson") officially opened in 2007, with Pelican working in partnership with Harmony Public Schools, the Gülen Organization charter network in Texas and regional oversight entity for the Greater Texas region. Abramson was a Type 5 charter school approved by Louisiana Board of Elementary and Secondary Education ("BESE") as a Recovery District School in New Orleans.

Pelican opened its second school, the Kenilworth Science and Technology Charter School, in 2009 as a Type 5 charter school serving grades 6 – 8, also authorized by BESE as a Recovery District school. Kenilworth is a "conversion charter school," as it originally opened in 1973 as a traditional public school and later converted to charter status under Pelican's oversight. For the past three years, Kenilworth has received a "D" rating from the Louisiana Department of Education, scoring 18 points below the state average on state tests in 2015-2016 (15% vs. 33%).[27]

BESE abruptly closed Abramson by revoking

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19 LISA Academy Chenal operation found; their website available at https://tinyurl.com/l8hkfwe (last checked 5/22/2017).

20 LISA Academy Chenal Enrollment only available for 2016-2017, their first year of operation; the Arkansas Department of Education Data Center, Enrollment by Race by School; available at https://tinyurl.com/nyb5c47 (last checked 5/22/2017).

21 Students who receive special education and those with limited English; LISA District Totals; Arkansas Department of Education Data Center; Student Status by District; 2015; available at https://adedata.arkansas.gov/statewide/Districts/StudentStatus.aspx?year=26&search=lisa&pagesize=10 (last checked 6.13.2017).

22 LISA Academy North Opening date; Arkansas Department of Education Charter Authorizing Panel Agenda; Sept. 17, 2014; pg. 21 available at https://tinyurl.com/lhhwod3 (last checked 5/22/2017).

23 Students who receive special education and those with limited English; LISA District Totals; Arkansas Department of Education Data Center; Student Status by District; 2015; available at https://adedata.arkansas.gov/statewide/Districts/StudentStatus.aspx?year=26&search=lisa&pagesize=10 (last checked 6.13.2017).

24 Biographies for Kosar, Kizilkaya, Oner, and Guvercin from Abramson charter application, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017); Osman Kazan biography on website for Tulane University, available at: http://tinyurl.com/y83pswzd (last checked 6/9/2017); Serkan Ozel LinkedIn profile, available at: http://tinyurl.com/y7apz92o (last checked 6/9/2017).

25 Louisiana Secretary of State, available at: http://tinyurl.com/mwphcbf (last checked 5/21/17)

26 See Mustafa Guvercin's biography below.

27 Louisiana Department of Education, School Profiles 2015-16, available at: http://tinyurl.com/ycd9dxmq (last checked 6/9/2017) (Select: Recovery School District – Baton Rouge).

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its charter in August 2011 after Board members learned about the serious incidents that had been documented at the school.[28] Two years later, the FBI raided Kenilworth in 2013, seizing boxes of financial and personnel records and focusing on nine vendors.[29] The investigation ended in 2016, and no charges were filed.[30]

Currently, Kenilworth is the only school Pelican operates. Pelican and Kenilworth recently submitted a Type 1 charter application to the East Baton Rouge Parish Schools (EBR) in spring 2017, however, to create a new high school that would enroll students from the geographic boundaries of the district starting in Fall 2018. A previous request to open a high school was denied in 2010.[31] The external reviewer was concerned that Kenilworth's academic performance had declined significantly since 2012-2013 and that no systematic strategy for achieving improvement was included in the application. The EBR Board hearing was held on May 18, 2017, and the Board denied Kenilworth's expansion application by a unanimous vote.[32] However, Kenilworth can now apply to BESE for a Type 2 charter, which if approved, would allow them to accept students from anywhere in the state.[33]

Harmony served as the educational service provider for both schools when they opened, and it still provides services to Kenilworth. Notably, Pelican selected Harmony as its educational services provider in 2007 without a competitive bid.[34] Both schools used Harmony's commitment of technical support and involvement to win charter approval. Kenilworth's charter application described the important role that the Cosmos Foundation (d/b/a Harmony Public Schools) played at Abramson, stating that Cosmos "has been helping us to operate our Abramson Science and Technology campus in New Orleans. Cosmos Foundation has proven to deliver its services for our [sic] when we establish Abramson campus and will continue to deliver services according to timetable."[35] In another section of the application, it goes on to say: "The Cosmos Foundation and its staff have done a superb job by establishing Abramson Science and Technology Charter School with Pelican Educational Foundation. The Cosmos Foundation is committed to opening quality charter schools and will support Pelican by all means . . . . They are willing to use their resources to set up the school correctly."[36]

Pelican pays Harmony to provide a range of administrative and academic services through a long-term, on-going support services agreement that has been annually renewed. Starting in 2007, Pelican paid Harmony five percent of all the state or federal funds received annually.[37]

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28 See recommendation to revoke charter from Acting State Superintendent made to BESE on August 3, 2011 (document received from LA Department of Education through 2017 FOIA request); see also Vanacore, Andrew. Abramson Charter in eastern New Orleans shut down amid TP investigation into startling misconduct. New Orleans Times-Picayune (15 July 2011), available at: http:/tinyurl.com/y99fzhj8 (last checked 5/1/17).

29 Samuels, Diana. Kenilworth charter school, subject of apparent FBI inquiry, has ties to Turkish education movement. New Orleans Times-Picayune (12 December 2013), available at: http://tinyurl.com/ydz3efez (last checked 5/24/17).

30 Mustian, Jim and Lussier, Charles. Feds drop criminal probe of Kenilworth charter school in Baton Rouge, no charges filed. Baton Rouge Advocate (6 January 2016), available at: http://tinyurl.com/y92m6zsa (last checked 5/24/17).

31 Kenilworth Charter Review 2010, available at: http://tinyurl.com/y7x8n84d (last checked 6/9/2017).

32 Lussier, Charles. Innovation, service to poor among concerns as School Board sorts through charter applications: 2 charters accepted, 5 rejected. The Advocate (Baton Rouge) (17 May 2017), available at: http://tinyurl.com/y9ygzsov (last checked 5/30/17).

33 BESE Policies and Bulletins; Bulletin 126 – Charter Schools, Section 512 (A-3) (C-1), available at: http://tinyurl.com/y7whq3xa (last checked 6/9/2017).

34 See Kenilworth charter application at p. 82, available at: http://tinyurl.com/24t7emn (last checked 5/19/17).

35 Kenilworth charter application, p. 82, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017).

36 Id. at 100.

37 See Pelican IRS Forms 990 for 2007 and 2008, available at: http://tinyurl.com/y8rdjjx9 (last checked 5/18/17); see also Official Statement p. B-2 and 3, Cosmos Foundation bond issue May 1, 2011, available at: http://tinyurl.com/ydcvya5n (last checked 5/19/17).

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Harmony changed its billing structure in 2012-13 and currently bills for its services at the rate of $80 - $120 per hour, which makes it easier for Harmony to absorb Pelican's funds as needed by falsifying work hours. In addition, Harmony now charges a licensing fee for is intellectual property software, which ranges from $15,000 - $147,000 per school per year.[38]

Harmony has similar agreements in place with seven other Gülen Organization charter school networks in the Greater Texas region.[39] The original agreements were also based on a percent of all state funds received and changed to an hourly basis in 2013, as well:

- Riverwalk Education Foundation (TX) (five percent of state funding)
- Millennium Education Foundation (MO) (three percent of state funding)
- Sky Foundation/Dove Public Charter School Foundation (OK) (three percent of state funding)
- Focus Foundation (NM) ($45,000 per year flat fee)
- Read Foundation (TN) (three percent of state funding)
- Little Scholars of Arkansas (LISA) (AR) (three percent of state funding)
- Harmony DC Public Schools (Washington, D.C.) (five percent local funding)

In our view, the fees paid to Harmony through these agreements yield significant benefits to the Gülen Organization. Harmony has created steady revenue from public funds that can be expended without any fiscal restrictions since they are not public funds entrusted to Harmony by the state of Texas. This provides Harmony with funds to expand its model within a state or in other states, which in turn increases overall student enrollment and its annual fees. It is difficult to identify the actual payments made by these charter schools and networks to Harmony through public documents, including the payments made by Pelican. These transactions are not transparent, and, as a result, there is little accountability regarding how the funds are used, whether Harmony fulfilled the stated purposes in the support services agreement, and how well the services are delivered. In addition, individuals in leadership at Pelican are all veterans of Harmony Public School, so there is a legitimate question about whether decisions regarding the continued contracts with Harmony are made at arm's length.[40]

Financial Issues

Pelican's Financial Statements for 2014 and 2015 do not show weaknesses or deficiencies, but the school is rated "not a low-risk auditee" regarding its use of federal funds. The statements are not a performance audit.

[38] See Harmony bond issue July 2, 2014, Official Statement p. B-3, available at: http://tinyurl.com/ybboyse6 (last checked 5/19/17).

[39] See Official Statements – Appendix B: Cosmos Foundation bond issues for 2011 and 2012; Harmony bond issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/k3mnqv2 (last checked 5/19/17).

[40] Pelican's current Superintendent worked for Harmony, as did past CEOs and principals.

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Bond Financing

At the time of publication, no records of Pelican or Kenilworth borrowing funds through a bond issue could be found. This is likely due to the Louisiana networks inability to expand as of yet. Harmony, however, is frequently involved in bond issues, so this situation should be monitored.

Real Estate

Because Kenilworth took over an existing public school building, it leased the building from the East Baton Rouge Parish School Board without any lease payments. [41]

Excessive Use of H-1B Visa Program

Like all Gülen Organization charter networks, the Pelican Education Foundation and Kenilworth utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools. From 2001 to 2016, Pelican, Abramson, and Kenilworth filed a total of 125 H-1B visa applications,[42] an exceptionally high number for a charter network with only two schools during this period. The cost of these applications is estimated to be $3,000 per application, for a total of $321,000 public funds expended to expand the Gülen Organization's Turkish employee base.

Gülen-affiliated schools typically state that the visas are necessary to fill shortages for math and science teachers, but applications are filed for a wide range of positions, including: librarians, computer teachers, budget analysts, IT managers, instructional coordinators, Turkish literature teachers, social studies teachers, English teachers, geography teachers, superintendents, and assistant principals. [43]

Pelican and Kenilworth use the same limited number of attorneys to file and process their H-1B visa applications as other known Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

- Tina Nguyen: the Louisiana network used Nguyen, a Texas-based attorney to file numerous H-1B applications. [44] Nguyen also filed applications for other Gülenist entities, including:
  - Cosmos Foundation, Inc. (TX)
  - Dove Science Academy (OK)
  - Little Scholars of Arkansas (AR)
  - Millennium Education Foundation (MO)
  - Sky Foundation, Inc. (OK)

- Yalcin Karadag: the Louisiana network used Karadag, a Texas-based attorney to file numerous H-1B applications. [45] Karadag also filed applications for other Gülenist entities, including:
  - Cosmos Foundation, Inc. (TX)

41 Financial Statement for Pelican Educational Foundation 2014 and 2013, available at: http://tinyurl.com/y9hffaq3 (last checked 6/9/2017).

42 The Louisiana charter schools filed 125 H-1B applications from 2001-2016, available at: http://tinyurl.com/y8wgvc5n (Pelican Educational Foundation) (117); http://tinyurl.com/y8py8lo8 (Pelican Education Foundation, Inc.) (2); http://tinyurl.com/yaxazul6 (Kenilworth Science and Technology) (6).

43 Jobs In Tech, available at: http://tinyurl.com/yd6nvq8k (last checked 6/9/2017).

44 Nguyen profile listing H-1B clients, available at: http://tinyurl.com/mh29kbe (last checked 5/20/17).

45 Karadag profile listing H-1B clients, available at: http://tinyurl.com/yckgzf2c (last checked 5/20/17).

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- ▷ Dove Science Academy (OK)
- ▷ LISA Academy (AR)
- ▷ Riverwalk Foundation (TX)
- ▷ Sky Foundation (OK)
- ▷ Millennium Education Foundation (MO)

- ► Chia Ching Cheng: the Louisiana network used Cheng, a Texas-based attorney to file numerous H-1B applications.[46] Cheng also filed applications for other Gülenist entities, including:
  - ▷ Cosmos Foundation, Inc. (TX)

Scandals, Investigations, & Notable Activities

Investigation and Closure of Abramson:

The Louisiana Department of Education conducted an in-depth investigation beginning in July 2011 to determine "if there were legitimate concerns about the safety, health, and welfare of students attending Abramson and to determine if Abramson or Pelican or any of their employees violated any provision of state or federal law."[47] The initial investigation found evidence that Abramson had failed to comply with state law, BESE policy, and the Type 5 Charter Contract. Because there was documentation that indicated a threat to the safety, health, and welfare of students, the Acting State Superintendent recommended that BESE immediately terminate and revoke the charter school contract with the Board of Directors of the Pelican Educational Foundation that governed Abramson.[48] As a result, BESE abruptly closed the school on August 3, 2011.

In addition to the allegations of improper actions at Abramson, an employee of the state education department conducting the investigation of Abramson informed law enforcement authorities that Inci Akpinar, Vice President of the Atlas Texas Construction and Trading Company in Houston, Texas, offered him a $25,000 bribe to "help fix the problem" at Abramson.[49] When he responded that it would be a conflict of interest for a state official to accept money from the school, Akpinar told him that he would "only need to advise them."[50] Akpinar participated in a meeting with the state official and representatives of the Cosmos Foundation at Abramson just before she made the bribery offer.

Atlas Construction has many other ties to Gülen-affiliated charter school networks. Between 2007 – 2009, Atlas received almost $12 million in contracts from Harmony Public Schools,[51] the Gülen-affiliated charter network in Texas employed as the Abramson school's education service provider during this time-period. Atlas has also received construction contracts from the Dove Science Academy (Sky Foundation) in Oklahoma and the LISA Academy in Arkansas,[52] both Gülen-affiliated charter networks within the Greater Texas region. The LISA Academy leases a school building from a company owned by the President of Atlas

46 Cheng profile listing H-1B clients, available at: http://tinyurl.com/y9bh9ds8 (last checked 5/20/17).

47 Letter from Acting State Superintendent to President of the President of the Board of Elementary and Secondary Education (July 28, 2011), received through 2017 FOIA request.

48 See recommendation to revoke charter Acting State Superintendent made to BESE on August 3, 2011, received from Louisiana Department of Education through 2017 FOIA request; see also Vanacore, Andrew. Abram Charter in eastern New Orleans shut down amid TP investigation into startling misconduct. New Orleans Times-Picayune (15 July 2011), available at: http://tinyurl.com/y99fzhj8 (last checked 5/1/17).

49 Vanacore, Andrew. Abramson charter group's ties to Gülen movement come to surface. New Orleans Time-Picayune (22 July 2017), available at: http://tinyurl.com/3l2cnxs (last checked 5/25/17).

50 Id.

51 Harmony Public Schools/Cosmos Foundation IRS Form 990 for 2009 – 2011, available at: http://tinyurl.com/hu9wqcl (last checked 6/9/2017).

52 LISA had a $213,690 construction contract with Atlas Texas Construction and Trading in 2012-2013.

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Texas Construction[53] and received a $419,283 loan from Atlas in 2012.[54] The Memphis School of Excellence, another Gülen charter school network affiliated with Harmony, received a $945,820 loan from Atlas Texas Construction in 2012, repaying $14,800 per month until it matures in December 2017.[55]

The 72-page investigative report submitted to BESE in 2011 by the Acting State Superintendent was partially instigated by written records provided by four young teachers who witnessed improper and unethical behavior at Abramson. The teachers grew disturbed that their concerns were not addressed by the school administration.[56] The investigation included site visits and interviews with teachers, students, and parents. Examples of the problems outlined in the report include unsupervised classrooms, testing irregularities, tampering with graduation requirements, bribery, incidents of a sexual nature, and failure to provide services to students with special needs. The school's failure to deliver services to students with special needs is of particular concern and is consistent with similar deficiencies reported at other Gülen-affiliated schools around the country.[57]

Specific incidents that were included in statements submitted by teachers, parents, and students during the investigation include[58]:

- Failure to provide a teacher in a classroom and leaving students unattended for days after the Turkish language teacher abruptly disappeared from the school;
- Failure to provide individualized education plans ("IEPs") that federal law requires for students with special needs;
- IEPs that provided the same services for all students, demonstrating that they were not serving individual needs;
- Failure to provide extra help for students with special needs;
- Inadequate staffing to provide services for students with special needs—a single special education teacher for a 600-student population;
- Science lab equipment unopened after two years despite the school being billed as a science and technology focused curriculum;
- A parent who said her child's science fair project was completed by teachers, and she would not let her daughter participate because the work was not hers;
- Students reporting they received questions on tests that were very close to the actual test questions;
- Concerns that the principal's wife was also a test-prep teacher;[59]

[53] LISA rents a school facility at 21 Corporate Hill Drive (Little Rock) from Atlas Barin Properties. The President of Atlas Barin (Yunus Dogan) is also the President of Atlas Texas Construction and Trading. Property records at Pulaski County Clerk, available at: http://tinyurl.com/y96et5lb (last checked 5/31/17); Corporate records for Atlas, Texas Secretary of State, available at: http://tinyurl.com/r7iw.

[54] LISA Academy Financial Statement, available at: http://tinyurl.com/yd3c6phj (last checked 5/31/17).

[55] Memphis School of Excellence Financial Statements (FY 2011) p. 24, available at: https://tinyurl.com/y9x5v6jp (last checked 5/30/2017).

[56] See letter with attachments from Acting State Superintendent to BESE dated July 28, 2011, received in 2017 from Louisiana Dept. of Education as part of a FOIA request.

[57] Similar issues have arisen in Oklahoma and New Jersey.

[58] See letter with attachments from Acting State Superintendent to BESE dated July 28, 2011, received in 2017 from Louisiana Dept. of Education as part of a FOIA request; see also Vanacore, Andrew. Records show glaring faults at school with ties to Turkish charter network. New Orleans Times-Picayune. (15 July 2011), available at: http://tinyurl.com/6949dbl (last checked 5/26/17).

[59] Tidmore, Christopher; State orders closure of Abramson Charter School. Louisiana Weekly. (8 August 2011), available at: http://tinyurl.com/y9twuac5 (last checked 5/21/17).

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- Request that teachers adjust grades to make them higher, in order to increase college admissions;[60]

- Difficulty communicating with Turkish teachers who were recent immigrants and had limited English skills;

- Unsafe conditions for students when the administration failed to address issues of student violence;[61]

- Poor teaching skills of Turkish teachers;

- Failure to address a report of student sexual abuse reported and written up by a teacher who had observed two separate acts by the same student—the administration told her to log it as a 'minor classroom disturbance';

- Student acceptance to North American University, a Gülen-affiliated university in Houston, despite failing grades in math and English, to improve the schools' college acceptance rate. Principal Cuneyt Dokman accepted a job with North American University within this time period.[62] Dokman currently works for Harmony Public Schools, the education service provider for Abramson; and

- Retaliation against parents and teachers who spoke up about the school's practices. One of the teachers who filed the original complaint was fired by Abramson.

The state education official conducting the investigation had warned state officials about the problems at the school a year before in June 2010. However, the Louisiana Board of Elementary and Secondary Education (BESE), the Abramson charter authorizer, said it did not receive complete information about the seriousness of the allegations or of the attempted bribe at that time. At the recommendation of the Louisiana Department of Education in 2010, the Board voted to give the school a year to improve under a "correction action plan" that would address problems with special education services.[63] The Times Picayune newspaper began in-depth reporting about the serious problems at Abramson in July 2011, which finally triggered the school closure and revocation of the charter on August 3, 2011.

The Times-Picayune also reported that two members of BESE, Linda Johnson and Louella Givens, took trips to Turkey at the invitation of the Pelican Educational Foundation in May and June 2010 just before the BESE voted to take only corrective action in response to the problems reported at Abramson.[64]

Further, Tevfik Eski, Pelican's CEO, denied inviting BESE members on the trip according to the Times Picayune, but a copy of the invitation signed by Eski was obtained by the newspaper.[65] Johnson stated that her trip was partially paid for by the Texas Turkish American Chamber of Commerce, while Givens stated that she paid her own way. Johnson said that the BESE ethics office had cleared the trip because payment for expenses did not come from Pelican or any other organization that BESE regulates.[66] In a

60 Id.

61 Id.

62 Well, Tomas. DOE report reveals numerous problems at Abramson but indicates no prior knowledge despite year-old state audit and bribery attempt report by DOE official subsequently fired. Louisiana Voice. (5 August 2011), available at: http://tinyurl.com/y8jkds43 (last checked 5/15/17).

63 Vanacore, Andrew. Records show glaring faults at school with ties to Turkish charter network. New Orleans Times-Picayune. (15 July 2011), available at: http://tinyurl.com/y99fzhj8 (last checked 5/20/17).

64 Vanacore, Andrew. Abramson Charter in eastern New Orleans shut down amid TP investigation into startling misconduct. New Orleans Time-Picayune. (15 July 2011), available at: http://tinyurl.com/y99fzhj8 (last checked 5/20/17).

65 Id.

66 Id.

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subsequent action, the Louisiana Board of Ethics ruled that Johnson violated state law that precludes a public servant from receiving anything of economic value. Johnson signed a consent agreement in 2013 and paid a fine of $1,000. She did not run for re-election to the Board.[67]

Following these disclosures and the closure of Abramson, the state investigator who reported the bribery attempt and his supervisor were fired from the state department of education.[68]

It is important to note that despite the seriousness of the problems at Abramson that resulted in the immediate school closure, the entire leadership structure of the Pelican Education Foundation at the time of the Abramson closure is still in place:

- Harmony Public Schools is still the paid education service provider for Kenilworth;
- The Superintendent/CEO of Pelican Educational Services, Tevik Eski, is still in the same position; and
- The members of the Pelican Board of Directors are still largely the same.

In addition, leaders at Abramson from this time period now work at Harmony Public Schools:

- The former Superintendent/CEO of Pelican, Nihat Bayhan, is the Chief Internal Auditor at Harmony Public Schools in Texas; and
- Cuneyt Dokman, the Abramson Principal at the time of school closure, is now a college transition counselor for Harmony Public Schools.

FBI Investigation of Kenilworth

The FBI raided Kenilworth on December 13, 2013, and the investigation lasted over two years.[69] The U.S. Attorney announced that the investigation ended on January 6, 2016, without filing criminal charges.[70] News accounts detail nine specific vendor contracts that the FBI investigated, including contracts for busing and cleaning.[71]

Lawsuits and concerns about special education and uncertified teachers: Two employment lawsuits were filed in 2010 – 2011 against Kenilworth Science and Technology. The first lawsuit alleged wrongful termination of three teachers and administrators on the basis of race, gender, national origin, and religion. The second alleged mistreatment of a middle school student who was mistreated and humiliated by Kenilworth teachers.[72]

In addition, concerns were raised in 2011 about the significant number of uncertified teachers employed at Kenilworth.[73] In 2010-11, 36% of teachers were uncertified, and 59% were uncertified in the previous year. These percentages compare to 4-5% respectively for the state. The state department of education also expressed concerns about the treatment of students with special needs.[74] The state told the Kenilworth principal that Kenilworth's two teachers, one

[67] Capitol Bureau. Former BESE member fined. Baton Rouge Advocate. (19 January 2013), available at: http://tinyurl.com/ycxk3v3q (last checked 5/21/17).

[68] Vanacore, Andrew. Abramson charter school whistle-blower has been fired from state job. New Orleans Times-Picayune. (7 July 2011), available at: http://tinyurl.com/3glx7ht (last checked 5/17/17).

[69] Samuels, Diana. Kenilworth charter school, subject of apparent FBI inquiry, has ties to Turkish education movement; New Orleans Times-Picayune. (12 December 2013), available at: http://tinyurl.com/ydz3efez (last checked 5/24/17).

[70] Mustian, Jim and Lussier, Charles. Feds drop criminal probe of Kenilworth charter school in Baton Rouge, no charges filed. Baton Rouge Advocate. (6 January 2016), available at: http://tinyurl.com/y92m6zsa (last checked 5/24/17).

[71] Id.

[72] Gyan Jr., Joe. Kenilworth disputes lawsuit claims. The Advocate (Baton Rouge). (29 July 2011), available at: http://tinyurl.com/y9tkrsyd (last checked 5/25/17).

[73] Sentell, Will. Uncertified teachers cited in state probe of charter school. The Advocate (Baton Rouge). (6 August 2011), available at: http://tinyurl.com/yd5acuj6 (last checked 5/2/17).

[74] Id.

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a para-educator and one a substitute teacher, were not sufficient to meet the needs of students with special needs. The state official stated, "this is not appropriate and hinders the process of meeting individual needs as mandated in the students' individualized education program."[75]

Notable Turkish Vendors

Of the independent contractors listed on Pelican's IRS Form 990s between 2008 and 2015,[76] 28 percent of the contracts went to companies that are owned and operated by individuals of Turkish national origin (three companies had a total of eight contracts out of 29) and 34% of total contract dollars went to these companies, a total of $2,866,347 (exclusive of contracts with Harmony Public Schools). The contractors listed on the 990 forms only represent the five largest contractors for each year with contracts of $100,000 or more.

A review of these three companies raises concerns about insider connections between the companies, the inexperience of the corporate leaders at one company, and multiple contracts awarded to the same individual at different companies in the same year. In 2010 two companies owned by Ufuk Tuncer, Skyline Travel and Transportation and Prestige Commercial Cleaning, both received contracts from Pelican. In addition, a $600,000 contract for transportation was awarded to two individuals who were sophomores at Louisiana State University (LSU) at the time.

The contracts include:

- Gulf Coast Cleaning & Maintenance LLC[77]
  - Ramazan Ozcelik, registered agent and corporate officer
  - Contracts:
    - 2010: $158,418[78]
    - 2011: $260,881[79]
    - *Total: $419,299*
  - The business address listed on Secretary of State records is the residential address (1020 Rue Crozat) for a 4-bedroom home.
  - Ozcelik identified himself as an Administrator for Harmony Public Schools in 2014 when he made a $1,500 campaign contribution to a Texas candidate for the U.S. Congress.[80]
  - There is no company website online.

- Skyline Travel and Transportation LLC[81] (two companies under the same name)
  - First incorporation: Ufuk Tuncer, corporate officer; created November 11, 2010; inactive December 3, 2010. This company remained active less than one month.
  - Second incorporation: Enes Tuncer, Registered Agent and Corporate Officer; Efe Tuncer, Corporate Officer; created March 28, 2011; inactive March 5, 2015.
  - Contracts:
    - 2010: $563,909[82]
    - 2011: $629,906[83]

75 Id.

76 Pelican IRS Forms 990, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

77 Louisiana Secretary of State, searchable at: http://tinyurl.com/mwphcbf.

78 Pelican Educational Foundation IRS 990 Form 2010, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

79 Pelican Educational Foundation IRS 990 Form 2011, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

80 Campaign donations to Filemon Vela, candidate for Congress-Texas, available at: http://tinyurl.com/ycowke9g (last checked 6/9/2017).

81 Louisiana Secretary of State, available at: http://tinyurl.com/mwphcbf.

82 Pelican Educational Foundation IRS 990 Form 2010, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

83 Pelican Educational Foundation IRS 990 Form 2011, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

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- *Total: $1,193,815*

▹ The business address for Skyline Travel and Transportation is 11959 Nicholson Drive, Apt 19203, Baton Rouge. This is the address of an apartment complex called Indigo Parks Apartments. This is also the domicile address for the company manager and registered agent, Enes Tuncer.[84]

▹ Enes Tuncer, the Manager/Corporate Officer and Registered Agent for the company, was a 2014 graduate of LSU in the College of Engineering, making him a sophomore at LSU when Pelican awarded the Skyline contract.[85]

▹ Efe Tuncer, the other Corporate Officer/Registered Agent for the company, is also a 2014 graduate of LSU in civil engineering[86] and currently works for EFETAS Group, an import, export, and construction company based in Turkey.[87]

▹ It appears that Skyline was not incorporated between December 23, 2010 and March 28, 2011, after the first company became inactive and before the incorporation of the second company. Yet there was a contract in place for $563,909 during the 2010 - 2011 school year according to Pelican's 2010 IRS Form 990.

▹ There is no company website online.

▹ Ufuk Tuncer contributed $31,500 to the Milkyway Education Center in 2006 and 2007. Milkyway is a Gülen-affiliated nonprofit organization in New Jersey that is the parent organization for Pioneer Academy, a private Gülen school.[88]

► Prestige Commercial Cleaning & Construction LLC[89]

▹ Ufuk Tuncer, Registered Agent

▹ In 2010, Ufuk Tuncer had two contracts with Pelican: Skyline Travel and Prestige Commercial Cleaning.

▹ Contracts:

- 2008: $116,766[90]
- 2009: $532,717[91]
- 2010: $385,387[92]
- 2011: $218,363[93]
- Total: $1,253,233

▹ Total for all three contractors: $2,866,347

► Harmony Public Schools – Educational Service Provider

▹ From 2007 to 2011 or 2012, Pelican paid Harmony five percent of all revenue, including both state and federal funds received annually. Pelican paid Harmony $238,595 in 2007-2008 (5.4%) and $289,796 (6.5%) in 2008-2009,[94] a total of $528,391 for those two years.

▹ The actual payment totals that Pelican paid to Harmony from 2009 to 2017 are not listed in any public document such as financial statements, IRS Form 990s, or annual reports. However, Harmony bond documents show that Pelican

84 Indigo Parks Apartments, available at: http://tinyurl.com/y7gv36n9 (last checked 6/9/2017).

85 LSU 2014 Graduation, available at: http://tinyurl.com/y8j52q5u (last checked 6/9/2017).

86 LinkedIn profile, available at: http://tinyurl.com/yczkq2tk (last checked 6/9/2017).

87 Id.

88 IRS 990 Form for Milkyway 2006 and 2007, available at: http://tinyurl.com/mdknvzx (last checked 5/29/17).

89 Louisiana Secretary of State, available at: http://tinyurl.com/mwphcbf.

90 Pelican Educational Foundation IRS 990 Form 2008, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

91 Pelican Educational Foundation IRS 990 Form 2009, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

92 Pelican Educational Foundation IRS 990 Form 2010, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

93 Pelican Educational Foundation IRS 990 Form 2011, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017).

94 Harmony IRS Forms 990 from 2007 and 2008, available at: http://tinyurl.com/y8rdjjx9 (last checked 5/19/17).

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continued paying Harmony 5% of the public funds it received through 2011 or 2012 through the support services agreement, an estimated $1,217,437 during this time-period.[95] In total, Pelican paid Harmony an estimated $1,745,828 between 2007 and 2012, representing 5% of its total revenue. Full disclosure from Harmony would ensure that the public funds going to Harmony are fully accountable to taxpayers.

- By June 30, 2013, Harmony changed its billing structure and began billing at an hourly rate of $80 - $120. In addition, Harmony began charging a licensing fee for its software at a cost of $15,000 - $147,000 per school per year.[96] There is no documentation about the payments from Pelican to Pelican from 2013 – 2017, either for the support services agreement or for licensing fees. This lack of transparency means that there is no accountability about how these public funds are used and what Pelican receives for the payments.

Gülenist Cultural and Business Organizations Active in State

Turkish cultural organizations play a central role in the Gülen landscape, serving as the external face to the community that obscures the true activities of the organization. They are generally nonprofit organizations with governing boards composed mostly of individuals of Turkish national origin. The organizations provide a platform for community involvement, hosting events where local leaders who can benefit the organization are honored, convening forums and conferences, and sponsoring expense-paid trips to Turkey that promote the Gülen movement. In addition, the evidence we have interpreted suggests that funds collected through the various Gülen charter school schemes, such vendor contracts, excessive rents, and teacher kickbacks, can be channeled through the organizations to pay for programs that will enhance the façade of legitimacy.

Atlas Foundation (Atlas Interfaith Foundation)

The Atlas Foundation is a nonprofit organization formed in 2002 in Baton, Rouge, Louisiana. The foundation promotes the teachings of Fethullah Gülen on its website.[97] It holds an annual cultural awareness dinner (most recently on May 18, 2017) as well as weekly and monthly events, sponsors trips to Turkey for elected officials and civic leaders,[98] and promotes the work and the mission of the Foundation in the community. Board members include Emrah Ceyhan, Fevri Sarac, Afsin Oktay.[99] Emrah Aktepe served as the Executive Director in 2015 and stated in a 2015 interview that he was familiar with the Hizmet Movement and the ideas of Fethullah Gülen.[100]

One of the community leaders who participated in the 2011 trip to Turkey sponsored by

[95] Federal and state revenue for Pelican is IRS Forms 990, available at: http://tinyurl.com/y8rdjjx9 (last checked 5/17/17).

[96] See Harmony bond issue July 2, 2014, Official Statement p. B-3, available at: http://tinyurl.com/ybboyse6 (last checked 5/19/17).

[97] Atlas Foundation website, available at: http://tinyurl.com/y85z87c5 (last checked 5/26/17).

[98] Richard, Mary. Atlas Foundation of Metairie sponsors cultural tour of Turkey. Times-Picayune (4 October 2010), available at: http://tinyurl.com/ybuggetb (last checked 5/20/17).

[99] See Atlas Foundation IRS 990 Form 2014, available at http://tinyurl.com/y8xqa379 (last checked 6/9/2017).

[100] Braud, Gabrielle. Executive Spotlight Q & A: Emrah Aktepe. Greater Baton Rouge Business Report (16 February 2015), available at: http://tinyurl.com/yb97flwx (last checked 5/20/17).

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the Foundation described the Foundation as "a member of the Fethullah Gülen movement" in his blog about the trip and noted that he had met numerous followers of Gülen movement while in Turkey. He said that the Foundation paid for ground transportation, all hotels and meals, guides, interpreters, as well as admission to historic sites and other fees, while the participants paid for their own airfare. He also reported that the host of an evening event was a "three-decades-long acolyte" of Gülen who had "repeatedly met with Gülen."[101] The following costs associated with trips to Turkey were reported on the Atlas Foundation IRS Form 990:

- 2013: expenses totaling $12,800 for trips;[102]
- 2012: expenses totaling $21,214 for trips;[103]
- 2011: expenses totaling $32,405 for trips; and[104]
- 2010: expenses totaling $37,962 for trips.[105]

Turkish Cultural Centers:[106]

Turkish Cultural Centers are located in New Orleans and Baton Rouge, operated by the Atlas Foundation. They are nonprofit organization established in 2002 by the Turkish-American community and other volunteers. The location in Baton Rouge is co-located with the Atlas Foundation.

Friends of Gülen Spotlight

Various organizations affiliated with the Gülen movement have sponsored trips to Turkey for elected officials and community leaders.

- The Atlas Foundation organized subsidized trips to Turkey for numerous Louisiana elected officials and community leaders. For example:
  - At Atlas's 8th Annual Dialogue and Friendship Dinner on November 17, 2011, several community leaders reported on their trips to Turkey including representatives of Southern University, the Farm Bureau, and a prominent journalist/attorney.[107]
  - Former Baton Rouge Mayor Kip Holden participated in a trip to Turkey in 2009 sponsored by the Atlas Foundation and signed a sister-city agreement with Malatya while he was in the country.[108]
  - Two members of the BESE, Linda Johnson and Louella Givens, accepted trips to Turkey at the invitation of the Pelican Educational Foundation. The Texas Turkish American Chamber of Commerce sponsored the trip, although Givens paid her own way, in 2010 before the BESE voted to give Abramson a year to correct its deficiencies, despite early reports of serious wrongdoing at the school.[109]

[101] Hizmet Movement news site (Sep. 12, 2011), available at: http://tinyurl.com/ydd2z5cx (last checked 5/21/17).

[102] Atlas Foundation IRS 990 Form 2013, available at: http://tinyurl.com/y8xqa379 (last checked 5/20/17).

[103] Atlas Foundation IRS 990 Form 2012, available at: http://tinyurl.com/y8xqa379 (last checked 5/20/17).

[104] Atlas Foundation IRS 990 Form 2011, available at: http://tinyurl.com/y8xqa379 (last checked 5/20/17).

[105] Atlas Foundation IRS 990 Form 2010, available at: http://tinyurl.com/y8xqa379 (last checked 5/20/17).

[106] Turkish Cultural Center in Metairie promotes dialogue, communication, The Times-Picayune (11 May 2011), available at: http://tinyurl.com/yb4qqzhp (last checked 5/30/17).

[107] Atlas Foundation (blog Nov. 17, 2011), available at http://tinyurl.com/yco6nrel (last checked 6/9/2017).

[108] Garland, Greg. Kip's Trips – Mayor Holden has traveled extensively since taking office. The Advocate (Baton Rouge) (4 April 2017), available at http://tinyurl.com/y9neetsa (archived behind paywall) (last checked 5/20/17).

[109] Vanacore, Andrew. Abramson Charter in eastern New Orleans shut down amid TP investigation into startling

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Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H-1B visa employees, both teachers and administrators, among schools, states, and education management vendors in different types of jobs. The individuals listed below are examples of the overlap of employees among these organizations, further demonstrating the interconnections and affiliation between the networks.

Mustafa Guvercin: Superintendent, Abramson Science and Technology Charter School (LA); Principal, COO, Assistant Principal, and Teacher, Dove Science Academy (OK) until 2005; Math Teacher and Assistant Superintendent, Harmony Public Schools (TX); Teacher, FUK Educational Foundation and UB International School (Ulaanbaatar, Mongolia).[110]

Cuneyt Dokman: Principal, Abramson Science and Technology when it closed after scandal in 2011 (LA); Director of Housing, Texas Gulf Institute, parent organization for North American University, a Gülenist institution and Harmony Vendor (TX); College Transition Counselor, Harmony Public Schools (TX).[111]

Soner Tarim: CEO, Harmony Public Schools (TX); Key Contact for both Abramson and Kenilworth schools in their charter applications (LA).[112]

Tevfik Eski: CEO, Pelican Educational Foundation (LA); Principal, Harmony Public Schools (TX).[113]

Nihat Bayhan: Former Director and CEO, Abramson Science and Technology (LA); Teacher, Principal, and Guidance Coordinator, Harmony Public Schools (TX); Area Superintendent, Harmony Public Schools (TX); Chief Internal Auditor, Harmony Public Schools (TX); Teacher and Department Chair, Sisli Ufuk Middle School (private school in Istanbul, Turkey); FEM Education Center (Gülen-run school in Turkey to help students prepare for university exams); B.S., Bogazici University (Istanbul, Turkey).[114]

Mehmet Ulupinar: Atlas Foundation, Gülenist cultural association (LA); Husband of Elif Ulupinar, former Legal Counsel for Pelican and Founder of Kenilworth Science and Technology; currently Coordinator of International Engagement, University of Central Arkansas (AR); Speaker at University of Central Arkansas on the Gülen Movement (AR); Public Policy and Relations Manager, Raindrop Turkish House (AR).[115]

Niyazi Evren Culha: Assistant Principal, Harmony D.C. Public School (Washington, D.C.); Assistant Principal, Kenilworth Science and Technology Charter School (LA).[116]

misconduct. New Orleans Time-Picayune. (15 July 2011), available at: http://tinyurl.com/y99fzhj8 (last checked 5/20/17).

110 Information taken from: Pelican 2007 IRS Form 990 – 2007; available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017); Donna Garner, FBI Raids Turkish Charter School in LA, voicesempower.com (Dec. 12, 2013), available at: http://tinyurl.com/yc4gkj4k (last checked 6/9/2017); IRS 990 Form Harmony Public Schools 2005, available at: http://tinyurl.com/hu9wqcl (last checked 6/9/2017); Abramson Charter Application, available at: http://tinyurl.com/ycybxeeb (last checked 6/9/2017).

111 Information taken from: Pelican IRS 990 Form 2010, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017); Cuneyt Dokman, LinkedIn profile, available at: http://tinyurl.com/y6usueyz (last checked 6/9/2017); Texas TEA Non-Teacher Master File 2014-2015, available from Texas Education Agency through 2016 FOIA request.

112 Information taken from: Harmony IRS Form 990 – 2014, available at http://tinyurl.com/hu9wqcl (last checked 6/9/2017); Charter applications for Abramson and Kenilworth, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017).

113 Information taken from: Pelican Educational Foundation IRS 990 Form 2011, available at: http://tinyurl.com/y8rdjjx9 (last checked 6/9/2017); Texas Public Schools and Charters, Directory (Oct. 2011), available at: http://tinyurl.com/ycdsyols (last checked 5/25/17).

114 Information taken from: LinkedIn profile, available at: http://tinyurl.com/yd3nuk6w (last checked 6/9/2017); Charter applications for Abramson and Kenilworth, available at: http://tinyurl.com/24t7emn (last checked 6/9/2017).

115 Information taken from: University of Central Arkansas website, available at: http://tinyurl.com/y8csyy2b (last checked 5/25/17); M. Ulupinar presentation on Gülen, University of Central Arkansas Philosophy and Religion Facebook, available at: http://tinyurl.com/y7uo83cb (last checked 5/25/17).

116 Information taken from: DC STEM network, available at: http://tinyurl.com/y7ef354f (last checked 5/30/17); Staff list for Kenilworth – 2011, received from LA Department of Education through 2017 FOIA request.

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Notable Press Coverage and Research Regarding the Louisiana Gülenist Network

Vanacore, Andrew. *Records show glaring faults at school with ties to Turkish charter network.* Times Picayune/NOLA.com. Available at: http://tinyurl.com/6949dbl (last checked 6/9/2017).

Hodges, Earl. *Turkish Cultural Center in Metairie promotes dialogue, communication.* Times Picayune. Available at: http://tinyurl.com/yb4qqzhp (last checked 6/9/2017).

Tidmore, Christopher. *State orders closure of Abramson Charter School.* Louisiana Weekly. Available at: http://tinyurl.com/y9twuac5 (last checked 6/9/2017).

Well, Tomas. *DOE report reveals numerous problems at Abramson but indicates no prior knowledge despite year-old state audit & bribery attempt by DOE official subsequently fired.* Louisiana Voice. Available at: http://tinyurl.com/y8jkds43 (last checked 6/9/2017).

Vanacore, Andrew. *Abramson charter in eastern New Orleans shut down amid TP investigation into starting misconduct.* New Orleans Times Picayune/NOLA.com. Available at: http://tinyurl.com/y99fzhj8 (last checked 6/9/2017).

Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time Picayune. 22 July 2011. Available at: http://tinyurl.com/3l2cnxs (last checked 6/9/2017).

Vanacore, Andrew. *Abramson charter school whistle-blower has been fired from state job.* New Orleans Times Picayune. Available at: http://tinyurl.com/3glx7ht (last checked 6/9/2017).

Samuels, Diana. *Kenilworth charter school subject of apparent FBI inquiry, has ties to Turkish education movement.* New Orleans Times-Picayune. Available at: http://tinyurl.com/ydz3efez (last checked 6/9/2017).

Mustian, Jim & Lussier, Charles. *Feds drop criminal probe of Kenilworth charter school in Baton Rouge, no charges filed.* The Advocate (Baton Rouge). Available at: http://tinyurl.com/y92m6zsa (last checked 6/9/2017).

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Southern Missouri



QUICK FACTS ON GÜLEN CHARTER SCHOOLS

SOUTHERN MISSOURI



NUMBER OF SCHOOLS	8
KNOWN AS	**Frontier Gateway Science Academy**
TOTAL ENROLLMENT	**2789**
CHARTER VENDOR	**Frontier Schools, Inc.**
TOTAL REVENUES	**$ 21,272,498**

KEY PEOPLE

- Coskun Cetinkaya
- Fatih Ozcan
- Ismet Sean Isik

RELATED INSTITUTIONS

- TX — Harmony School of Science and Technology
- NM — School of Excellence
- LA — Kenilworth / Abramson (LA)
- AR — LISA
- TN — School of Excellence
- OK — Dove Science

CHARTER NETWORK

MIDWESTERN REGION	GREATER TEXAS REGION
1285 ACADEMIES	**1504** SCHOOLS
Science Academy	School of Excellenc Middle
Science Academy of St. Louis	School of Innovation Upper
Science Academy South	School of Innovation-Middle
STEM High School	School of Innovation-Lower
MANAGED BY CONCEPT SCHOOLS	MANAGED BY HARMONY PUBLIC SCHOOLS

FRONTIER MO SCHOOLS SERVE:

	MO average	District average
English language learner students	30.5%	22%
Free and reduced lunch population	95.6%	100%
Students with disabilities	5.5%	11%
Minority students	93.4%	80.8%
Caucasian students	6.6%	9.2%

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as):
  - Frontier (Greater Texas region)
  - Gateway Science Academy (Midwestern region)
- Total # of Schools in State: 8
- 4 Frontier schools: Overseen by Harmony Public Schools, and included in Greater Texas region
- 4 Gateway Science Academies: Overseen by Concept Schools, and included in Midwestern region
- Total Student Enrollment 2015-16: 2789[1]
  - Frontier schools: 1504
  - Gateway Science Academies: 1285
- Charter Holder/Governing Board(s):
  - Frontier Schools, Inc. (formerly Millenium Education Foundation sic)
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the 4 Frontier campuses
- Gateway Science Academy of St. Louis
  - Organized as a non-profit 501(c)(3) organization
  - Oversees the 4 Gateway Science Academy campuses
  - Charter Management Services Vendor: Harmony Public Schools
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Harmony (TX); School of Science and Technology (TX); LISA (AR); School of Excellence (TN); School of Excellence (NM); Dove Science (OK); Kenilworth/Abramson (LA).
- Total Revenues for the 2015-16 school year: $ 21,272,498[2]
- Frontier MO Network Founders:
  - **Coskun Cetinkaya:** Founding Board Member, Millenium Education Foundation/Frontier Schools Inc. (MO); Board Member, Cosmos Foundation/Harmony (TX); Provost, Professor, VP of Academic Affairs, North American University – Gülenist university & Harmony vendor (TX)[3]
  - **Fatih Ozcan:** Founding Board Member, Millenium Education Foundation/Frontier Schools Inc. (MO); Regional VP, Turquoise Council of Eurasian Americans – Gülenist political association (MS); Jackson MS Turkish Raindrop House – Gülenist cultural association (MS); Executive Director, Institute of Interfaith Dialog – Gülenist Cultural Association.[4]
  - **Ismet Sean Isik:** Board Member, Cosmos Foundation/Harmony (TX); Principal, Harmony Science Academy Houston (TX); Founding Principal, Brookside Frontier Math and Science School (MO); Loaned $70,000 to Brookside Frontier Math and Science School (MO); Superintendent, Frontier Schools (MO).[5]

1 Student enrollment and demographic information available at: http://tinyurl.com/k6mbw3y (last checked 4/19/2017).

2 Figure represents only the Frontier MO schools, taken from the Frontier School of Innovation 2016 audit.

3 Corporate filing available at: http://tinyurl.com/n42eabv (last checked 5/9/2017); Cosmos Foundation 990 forms, available at: http://tinyurl.com/hu9wqcl; Cetinkaya bio available at: http://tinyurl.com/mvd8xrq (last checked 5/10/2017).

4 Information taken from: Staff listing from Dialog Southwest, available at: http://tinyurl.com/n8z7ttd; Frontier 990 forms, available at: http://tinyurl.com/m5kgpv8; Resolution identifying Ozcan, available at: http://tinyurl.com/k6sh54f (last checked 5/20/2017).

5 Information taken from: Frontier Schools Inc. 2008 990 form, available at: http://tinyurl.com/m5kgpv8 (last checked 5/9/2017); Cosmos 990 forms, available at: http://tinyurl.com/hu9wqcl; FCC letter listing Isik, available at: http://tinyurl.com/mzm92z4;

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Overview

As of the 2016-2017 school year, Missouri has eight charter schools within the Gülen Organization. Unlike other states, Missouri is split across two regions of the Gülen Organization. Four of the eight charter schools are operated by Gateway Science Academy of St. Louis and are managed by Concept Schools, which classifies them within the Midwestern region. The other four charter schools are operated by Frontier Schools and are managed by Harmony Public Schools (TX), which classifies them within the Greater Texas region of the Gülen Organization.[6] The information in this profile is limited to the Frontier (MO) network.

Harmony Public Schools is the charter management organization responsible for the Greater Texas region of the Gülen Organization charter network. Harmony allegedly provides additional educational management services for the charter schools for a percentage fee of total school revenues. On average, the Frontier MO schools serve 30.5% English language learner students vs. 22% district average; 95.6% free and reduced lunch population vs. 100% district average; 5.5% students with disabilities vs. 11% district average; 93.4% minority students vs. 80.8% district average; and 6.6% Caucasian students vs. 9.2% district average. As these numbers indicate, the Frontier MO schools serve a large percentage of vulnerable student populations within the city, but not with regards to students with disabilities.

School	Operation[7]	Student Demographic Information *	Authorizer	Governing Board
Frontier School of Excellence Middle and High (South Campus), formerly known as Brookside-Frontier Math and Science School 5605 Troost Ave., Kansas City, MO 64110	Grades 6-8 Grades 9-12 2007-Present	24.7% ELL 92.4% FRL 8.1% SWD 97.4% Minority 2.6% Caucasian	University of Missouri – Kansas City	Frontier Schools, Inc.
Frontier School of Innovation (North Campus) 6700 Corporate Drive, Kansas City, MO 64120	Grades K-5 2009-Present	54.3% ELL 96.7% FRL 5.4% SWD 91.7% Minority 8.3% Caucasian	University of Missouri – Kansas City	Frontier Schools, Inc.
Frontier School of Innovation – Middle 1575 Universal Drive, Kansas City, MO 64120	Grades 6-8 2009-Present	22.7% ELL 96% FRL 4.7% SWD 92.7% Minority 7.3% Caucasian	University of Missouri – Kansas City	Frontier Schools, Inc.
Frontier STEM High School 6455 E. Commerce Ave., Kansas City, MO 64120	Grades 9-12 2013-Present	20.3% ELL 97.2% FRL 3.9% SWD 91.8% Minority 8.2% Caucasian	University of Missouri – Kansas City	Frontier Schools, Inc.

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.*[8]

6 For more information about the Frontier (MO) network, please see the Missouri profile in the Greater Texas region.

7 School open/closure dates available at: http://tinyurl.com/kvakdt4 (last checked 5/9/2018).

8 Student enrollment and demographic information available at: http://tinyurl.com/k6mbw3y (last checked 4/19/2017).

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A History of Strategic Ambiguity and Conflicting Interests

Millenium Education Foundation was founded in 2005. It opened its first school, Brookside-Frontier Math and Science School, in 2007. Two years later, Millenium Education Foundation rebranded under a new charter contract for Frontier School System opened under the same authorizer, University of Missouri at Kansas City. Frontier School of Innovation opened next, both an elementary school campus and a middle school campus, in 2009. In the 2010-11 timeframe, Brookside-Frontier Math and Science School was renamed Frontier School of Excellence.[9] This rebranding was completed in 2013 when Millenium Education Foundation amended their articles of incorporation to become Frontier Schools, Inc.[10]

From the very beginning, the Frontier MO network utilized Harmony Public Schools (TX) as an external CMO, which it paid for both consulting on an hourly basis, as well as the licensing of Harmony's intellectual property in its educational curriculum. Frontier's affiliation with Harmony apparently has led to Frontier's use of Harmony's vendors for both landlord services and federally funded E-Rate work.

Financial Issues

Missouri requires its charter schools to undergo annual audits, which showed that the Frontier Schools:

- Operated at a net deficit in 2016;
- Operated at a significant net deficit in 2015;
- Failed to secure deposits as required by MO law in 2014;
- Failed to document of the school's internal controls and assessment of risks in compliance with the requirement of SAS No. 115;
- Failure to develop and implement a formal fraud risk assessment; and
- Failure to implement controls by using purchase orders or signature approvals on invoices.

[9] Renewal, pg 21.

[10] Corporate documents for Millenium Education Foundation and Frontier Schools Inc. are available at: http://tinyurl.com/kdhey6o (last checked 5/9/2017).

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Real Estate

Our research indicates that one of the most significant profit centers for the Gülen Organization is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[11] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[12] Gülenists throughout the country attended and presented, including Alp Aslandogan, former Harmony Public Schools landlord, CEO of one Harmony's largest vendors, property buyer from Dove Science Academy, and Gülen's official spokesperson in his role as President of the Alliance for Shared Values, a Gülenist cultural organization.[13]

Harmony has had significant influence on the Frontier MO network in its role of regional oversight entity. In fact, the 5605 Troost Avenue building was purchased on Frontier's behalf by several of Harmony's vendors. In 2010, Solidarity Group, LLC, owned and operated at that time by Levent Ulusal, former Harmony business manager, bought the property from an unaffiliated trust.[14] In 2011, Solidarity sold the property to Harmony's main IT vendor, Brighten Technologies.[15] Brighten Technologies is owned by a former Harmony computer teacher, Yusuf Duzgun, and receives the bulk of Harmony's federally funded E-Rate work.[16] Brighten Technologies purchased the 5605 Troost Avenue building for $550,000.[17] While Frontier was renting the building from Brighten, it also filed an E-Rate funding request to use Brighten Technologies for the federally funded IT work.[18] In 2014, Brighten Technologies transferred ownership of the building to another owner/operator of Solidarity, Deniz Cevik, through his company Ark Unity Investment, LLC based in Texas.[19] The sales price of this transaction is unknown, or whether any amount was actually paid. From 2011-2016, Frontier paid $792,588 in rent to Harmony vendors before purchasing the building from them for $1 million in 2016.[20] In five short years, Harmony's vendors made over a million dollars in profit at Frontier's expense.

The remainder of the Frontier MO properties appear to have been purchased or rented from unaffiliated third parties.

Bond Financing

The Frontier MO network has not engaged in bond financing as of the date of this report.

11 See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt.

12 Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

13 See Texas profile for more information about Alp Aslandogan.

14 See Jackson County, MO public records online search.

15 See Jackson County, MO public records online search.

16 See Texas Profile for more information about Brighten and Duzgun.

17 See Jackson County, MO public records online search.

18 E-rate application 2012, available at: http://tinyurl.com/ljosssb (last checked 5/10/2017).

19 See Jackson County, MO public records online search.

20 Rents paid and price paid for Troost building taken from Frontier audits 2011-2016.

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Excessive use of the H-1B Visa Program

Like all Gülen Organization charter networks, the Frontier MO schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Frontier MO network filed at least 53 H-1B applications from 2001-2016.[21] While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: principals, assistant principals, purchasing managers, CFOs, budget analysts, instructional coordinators, and school accountants.

The Frontier MO network use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Leonard D'Arrigo: Frontier MO used D'Arrigo, an Albany, New York-based attorney, to file numerous H-1B applications.[22] D'Arrigo also filed applications for these entities:
  - Cosmos Foundation/Harmony Public Schools (TX)
  - LISA (AR)
  - Raindrop Foundation (TX)
  - Sky Foundation/Dove Science (OK)
  - Central Jersey College Prep Charter School (NJ)
  - Syracuse Academy of Science (NY)
  - Hampden Charter School of Science (MA)
  - Truebright Science (PA)
  - Bergen Arts and Science (NJ)
  - Albuquerque School of Excellence (NM)
  - Read Foundation/Memphis School of Excellence (TN)
  - Young Scholars of Western, Central Pennsylvania (PA)

- Tina Nguyen: Frontier MO used Nguyen, a Houston, Texas-based attorney, to file numerous H-1B applications.[23] Nguyen also filed applications for these entities:
  - Cosmos Foundation/Harmony Public Schools (TX)
  - Sky Foundation/Dove Science (OK)
  - Pelican Educational Foundation (LA)
  - LISA (AR)

Notable Turkish Vendors

Harmony Public Schools: The Frontier MO network contracts with Harmony (TX) in two regards, 1) support service agreements; and 2) intellectual property licensing agreements.[24] The exact nature of services provided by Harmony is described by Frontier board minutes as "consulting fees, training for superintendents and teachers, a STEM education curriculum, as well as other services."[25] The agreement itself includes: operation and business solutions, finance solutions, school personnel solutions, facility solutions, budget preparations, curriculum organization and planning, loan, federal grants application and planning, educational technology solutions, instructional technology services, and guiding public relations, all of which are paid on an hourly basis.[26] Frontier also utilizes Harmony's student information

[21] Millennium Education Foundation filed 53 H-1Bs from 2001-2016, available at: http://tinyurl.com/mljmbt3 and http://tinyurl.com/kkysfsf (last checked 5/9/2017)

[22] D'Arrigo profile available at: http://tinyurl.com/kcb3kjq (last checked 5/9/2017).

[23] Nguyen profile available at: http://tinyurl.com/mh29kbe (last checked 5/9/2017).

[24] See Official Bond Statement, pg A-10, listing Frontier Schools, Inc. as a customer of Harmony (TX), available at: http://tinyurl.com/k676dhq (last checked 5/9/2017).

[25] Frontier renewal, pg 118, available at: http://tinyurl.com/l34gg3x (last checked 5/9/2017).

[26] Frontier renewal, Support Service Agreement draft, pg 220, available at: http://tinyurl.com/l34gg3x (last checked 5/9/2017).

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system database to store individual student data and has done so since 2009.[27] According to the Intellectual Property agreement, Frontier pays $105,000 to Harmony per year in order to use the "Harmony Education Model."[28]

- **Brighten Technologies:** Brighten Technologies, owned and operated by former Harmony computer science teacher Yusuf Duzgun a.k.a. Joseph Duggan, provided Frontier MO schools with E-Rate funded services. Brighten also provides E-Rate funded work to the Harmony network. At the same time as Brighten was engaged to provide E-Rate funded work for Frontier, Frontier was renting its 5605 Troost Avenue facility from Brighten. E-Rate funding is required to be bid out through a competitive bidding process, though Frontier utilized Brighten, its new landlord entity, to provide this work.

Notable Gülenist Organizations

- **Institute for Interfaith Dialog/ Dialogue Institute of Southwest:** This is an openly Gülenist cultural organization whose leadership includes Frontier MO founder Fatih Ozcan, as well as Greater Texas's founder and Gülen's official spokesperson, Alp Aslandogan.[29] The Institute hosts Gülenist dialogue dinners and activities for local and state legislators.

- **The Niagara Foundation:** The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[30] Niagara Educational Services, Inc., oversees the Niagara Foundation, the Science Academy of Chicago, a private Gülenist school, and is very active throughout the Gülen Organization. Niagara provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[31] In Missouri, Niagara assisted the Turkish American Society of Missouri in hosting a dialog dinner for the state legislature.[32] It also paid for several trips to Turkey by Missouri legislators.[33]

27 Frontier renewal, pg 32, pg 160, available at: http://tinyurl.com/l34gg3x (last checked 5/9/2017).

28 Frontier renewal, Intellectual Property agreement, pg 228 available at: http://tinyurl.com/l34gg3x (last checked 5/9/2017).

29 Information taken from: Dialogue website, available at: http://www.thedialoginstitute.org/;

30 See http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

31 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017).

32 See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: http://tinyurl.com/l28269f (last checked 4/25/2017).

33 See article discussing Missouri trips to Turkey, available at: http://tinyurl.com/kl66mvl (last checked 5/10/2017).

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Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

Ugur Demircan: Teacher, Harmony Science Academy Houston (TX); Superintendent, Frontier Schools (MO); Principal, Harmony Science Academy Dallas (TX); Cluster Superintendent, Harmony Public Schools (TX)[34]

Yusuf Kandir: Science teacher, Brookside Frontier Math and Science School (MO); Harmony, Science teacher, Dove Science Academy (OK); Child Nutrition Director, Harmony Public Schools (TX)[35]

Bilgehan Yasar: Employee, Brookside-Frontier Math and Science School (MO); Principal, LISA Academy (OK); Cluster Superintendent, Harmony Public Schools (TX)[36]

Notable Articles regarding the Frontier Missouri Network

Dillard, Megan. *Kansas City mom says students targeted, attacked her daughter because of her skin color.* WDAF-TV. 17 November 2016. Available at: http://tinyurl.com/jsx2zd7 (1 March 2017).

Pepitone, Joe. *Missouri searches for certified teachers to fill jobs.* WDAF-TV. 20 May 2014. Available at: http://tinyurl.com/jlg78ks (1 March 2017).

Police investigate threatening note at KC charter school. KMBC 9 News. 11 February 2016. Available at: http://tinyurl.com/h4scpkd (1 March 2017).

Frontier School System receives charter renewal and approval to expand. Northeast News. 19 February 2014. Available at: http://tinyurl.com/j4949dt (1 March 2017).

[34] Information taken from: Linkedin Profile, available at: http://tinyurl.com/n7vx7gb (last checked 5/10/2017); Frontier newsletter, available at: http://tinyurl.com/mewm5gg (last checked 5/10/2017); Newsletter listing Demircan, available at: http://tinyurl.com/mdvoewn;

[35] Information taken from: Linkedin Profile, available at: http://tinyurl.com/n4efx52 (last checked 5/10/2017); OK credentials, available at: http://tinyurl.com/lmygjyf (last checked 5/10/2017); Educator look up 2007-08 Missouri, Brookside Charter School, available at: http://tinyurl.com/lac6o5h.

[36] Information taken from: Grant listing Yasar, available at: http://tinyurl.com/ln8pz6q; Arkansas Board of Education meeting minutes, listing Yasar for LISA Academy, available at: http://tinyurl.com/k5u93sw; Educator look up 2008-09 Missouri, Brookside Charter School, available at: http://tinyurl.com/lac6o5h (last checked 5/20/2017).

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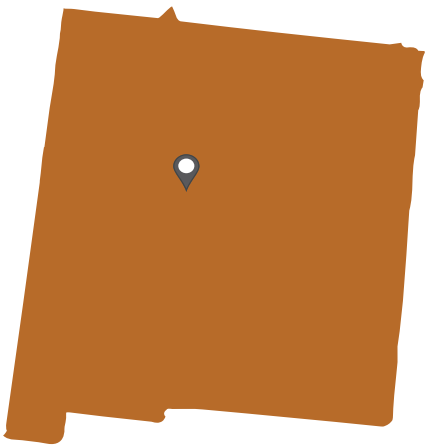
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New Mexico



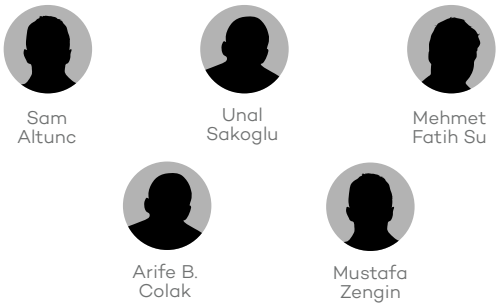
QUICK FACTS ON GÜLEN CHARTER SCHOOLS

NEW MEXICO

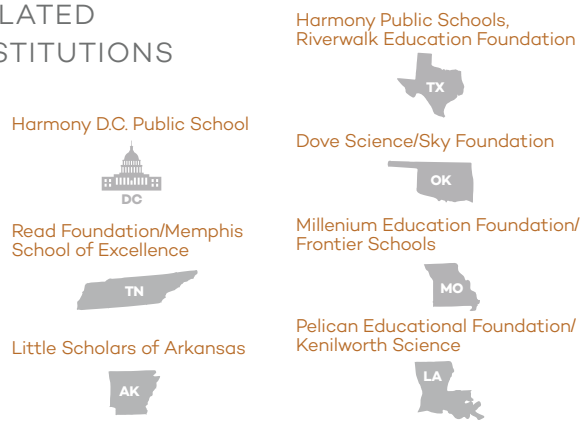


NUMBER OF SCHOOLS	1
KNOWN AS	**Albuquerque School of Excellence**
TOTAL ENROLLMENT	**289**
CHARTER VENDOR	**Harmony Public Schools**
TOTAL REVENUES	**$2,275,242**

KEY PEOPLE



RELATED INSTITUTIONS



QUESTIONABLE FINANCIAL ACTIVITIES

Investigation into financial statements found that ASE did not follow its policies and procedures regarding cash disbursements. **20% of purchase orders tested were created after the expenditure was incurred, mostly for staff reimbursements.**

ENROLLMENT

ASE has not been successful to date with regards to its student enrollment. The school has fallen below projections, with approximately



of the expected enrollment of originally projected for that year.

H-1B VISA APPLICATIONS

18 H-1B

H-1B VISA APPLICATIONS 2001-2016

The cost of these applications is estimated to be **$3,000 per application**, making the total for Harmony/ Cosmos **$54,000**.

$4.4 million

Rent paid by the ASE, **125% greater than the original value of the property.**

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as): Albuquerque School of Excellence
- Total number of schools in state: 1
- Total student enrollment 2015-16: 289
- Charter Holder/Governing Board(s): Albuquerque School of Excellence Governing Council
  - Unlike most states, the school's governing board is not organized as a 501(c)(3) non profit organization;
  - The school was created by the Focus Foundation, now inactive
- Charter Management Services Vendor: Harmony Public Schools
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Harmony Public Schools (TX); Riverwalk Education Foundation (TX); Harmony D.C. (Washington DC); Little Scholars of Arkansas (AR); Dove Science/Sky Foundation (OK); Pelican Educational Foundation/ Kenilworth Science (LA); Millennium Education Foundation/Frontier Schools (MO); Read Foundation/ Memphis School of Excellence (TN)
- Total Revenues for FY 2016: $2,275,242[1]
- New Mexico Network Founders:
  - **Sam Altunc:** Founder, President, Focus Foundation (NM); Ph.D. in Electrical Engineering, University of New Mexico (NM)[2]
  - **Unal Sakoglu:** Vice President, Focus Foundation (NM); Ph.D. in Electrical and Computer Engineering, University of New Mexico (NM); Project Judge, I-SWEEEP, Harmony Public Schools' Science Fair competition (TX); Assistant Professor, University of Houston (TX)[3]
  - **Mehmet Fatih Su:** Vice President, Focus Foundation (NM); Ph.D. in Engineering[4]
  - **Mustafa Zengin:** Secretary, Focus Foundation (NM); Student of Computer Science, University of New Mexico (NM); Software Engineer, MilSoft Software Technologies (Turkey); Teaching Assistant, University of Delaware (DE).[5]
  - **Arife B. Colak:** Treasurer, Focus Foundation (NM); PhD in Industrial Engineering, Arizona State University (AZ); Instructor, Central New Mexico Community College (NM)[6]

1 Total Revenue; the New Mexico State Public Education Department Financial Statements; vol III, pg. 132, Albuquerque School of Excellence Budgetary Basis, available at: https://tinyurl.com/y9l8d57x (last checked 5/26/2017).

2 Albuquerque School of Excellence charter application, available at: https://tinyurl.com/lofzrtp (last checked 5/25/2017).

3 Information taken from: Albuquerque School of Excellence charter application, available at: https://tinyurl.com/lofzrtp (last checked 5/25/2017); LinkedIn profile, available at: https://tinyurl.com/klsj82t (last checked 5/25/2017).

4 Albuquerque School of Excellence charter application, available at: https://tinyurl.com/lofzrtp (last checked 5/25/2017).

5 Information taken from: Biographical information for the Governing Board; Albuquerque School of Excellence initial charter application, available at https://tinyurl.com/lofzrtp (last checked 5/25/2017); LinkedIn profile, available at: https://tinyurl.com/lkxdyzm (last checked 5/25/2017).

6 Biographical information for the Governing Board; Albuquerque School of Excellence initial charter application, available at: https://tinyurl.com/lofzrtp (Last checked 5/25/2017).

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Overview

The Albuquerque School of Excellence (ASE) opened in 2010 under the Focus Foundation, a New Mexico nonprofit organization, in partnership with the Harmony Public Schools in Texas. ASE is an example of Harmony's strategic efforts to expand its model, influence, and funding sources within the Greater Texas region. As with many Gülen schools, the founding Board members of the Focus Foundation and New Mexico network were university professors in STEM fields at the University of New Mexico. The Focus Foundation was never a tax-exempt 501(c)(3) non-profit organization, and it was later replaced by a seven-member Governing Council, also not tax-exempt. Like most Gülen-controlled charter schools, ASE's governing council is operated by a supermajority of board members of Turkish national origin.

Harmony Public Schools (formerly known as the Cosmos Foundation) played a key role in the approval of ASE's charter application in 2009 and continues to be central to ASE's management and operations. Harmony Public Schools is the Gülen-affiliated charter network that currently operates 48 schools in Texas and acts as the regional oversight entity for Gülen schools in eight states, including New Mexico, referred throughout this report as the Greater Texas region of the Gülen Organization. ASE continues to contract with Harmony for many administrative and management services for a fee through a support services agreement that renews annually.

School	Operation	Student Demographic Information[7] *	Authorizer	Governing Board
Albuquerque School of Excellence 13201 Lomas Blvd NE, Albuquerque, NM 87112	Grades 1-11[8] 2010-present[9]	Enrollment: 289 44.6% White 7.3% African American 31.1% Hispanic 11.1% Asian 5.8% Native American/ Multiracial 9% SWD 5.2% ELL 59.2% FRL	New Mexico Public Education Commission[10]	Albuquerque School of Excellence Governing Council; Formerly the Focus Foundation (now inactive)[11]
Closed/Abandoned Schools				
None				
Charter Petition Denials				
None				
Private Schools				
None				

*ELL – English Language Learner; FRL – students eligible for free and reduced price lunch (economically disadvantages); SWD – Student with disabilities (special education)

7 Student Demographic data; New Mexico Education Department Albuquerque School of Excellence Charter School Report Card; 2015-2016, available at: https://tinyurl.com/k5vyuy7 (last checked 5/23/2017).

8 Grades; the Albuquerque School of Excellence Website, available at: https://tinyurl.com/lhbxng7 (last checked 5/25/2017).

9 Operational information; the National Charter School Resource Center, available at: https://tinyurl.com/lt95euj (last checked 5/25/2017).

10 New Mexico Public Education Commission, available at: http://tinyurl.com/ycuugfj5 (last checked 6/6/17).

11 Albuquerque School of Excellence charter application, available at: https://tinyurl.com/lofzrtp (last checked 5/25/2017).

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A History of Strategic Ambiguity and Conflicting Interests

Similar to Tennessee and other states within the Greater Texas region, Harmony Public Schools (formerly known as the Cosmos Foundation) played a key role in the approval of ASE's charter application in 2009 and continues to be central to ASE's management and operations. Harmony Public Schools is the Gülen-affiliated charter network that currently operates 48 schools in Texas and acts as the regional oversight entity for Gülen schools in eight states, including New Mexico, referred throughout this report as the Greater Texas region of the Gülen Organization. Soner Tarim, the Harmony CEO, was the lead presenter at ASE's 2009 charter application hearing before the New Mexico Public Education Commission.[12] Members of the Focus Foundation were also present at the hearing, but they did not answer substantive questions about the operation or financing of the school. In his testimony, Tarim told the Commission that the Cosmos Foundation (Harmony) "will play a critical role in the establishment" of ASE, including "human resources, student achievement, professional development, curriculum development, testing, technology support, facilities and school operation, and database management."[13] He also stated that Harmony would help ASE replicate the Harmony model at the school. When questioned about an item in the budget called "other professional services" that showed an increase in cost each year, Mr. Tarim stated it would be paid to "we" as a "contract association to do accounting services,"[14] which likely referred to the much broader list of functions that would be included in the support services agreement between ASE and Harmony.

ASE's school leadership are all veterans of Harmony Public Schools, having served in various positions in Texas before coming to Albuquerque, and many return to Harmony after several years as ASE. Our research indicates that this frequent transfer of key individuals ensures that the Harmony model is implemented and that Harmony's influence over the school and the ASE Governing Council is maintained. In addition, ASE continues to contract with Harmony for many administrative and management services for a fee through a support services agreement that renews annually.

Although the original support services agreement with Harmony from 2010 is not available, ASE Board minutes from an April 13, 2013 meeting show ASE Board approval to renew the services agreement.[15] Starting in 2010, ASE paid Harmony a flat fee of $45,000 per year.[16] Harmony changed its billing structure in 2012 or 2013 and currently bills for its services at the rate of $80 - $120/hour, making it easy to upcharge ASE and exploit ASE's funds as Harmony needs by falsifying work hours. In addition, Harmony charges a licensing fee for is intellectual property software, ranging from $15,000 - $147,000 per school per year.[17] ASE does not disclose the actual payments made to Harmony annually in public documents.

Harmony has similar agreements in place with seven other Gülen-affiliated charter school networks in the Greater Texas region, all of which are described in Harmony's bond documents.[18] Like ASE, the original agreements for these other networks were also based on a

[12] Transcript for ASE Charter School Public Input Hearing, available at: http://tinyurl.com/y8yy7vd2 (last checked 6/6/2017).

[13] Id.

[14] Id. p. 30-31

[15] ASE Board minutes are no longer posted on its website. Minutes for April 13, 2013 were retrieved in 2016.

[16] See Cosmos Foundation bond issue May 1, 2011; Official Statement P. B-2 & 3, available at: http://tinyurl.com/y7pn3wbq (last checked 5/19/17).

[17] See Harmony bond issue Official Statement P. B-3, available at: http://tinyurl.com/y7pn3wbq (last checked 5/19/17).

[18] See Cosmos Foundation bond issues for 2011 and 2012; Harmony bond issues 2014, 2015, 2016 and 2017; Official Statements – Appendix B, available at: http://tinyurl.com/y7pn3wbq (last checked 5/19/17).

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percent of all state funds received and changed to an hourly basis in 2013 as well:

- Riverwalk Education Foundation (TX) (5% of state funding)
- Millennium Education Foundation (MO) (3% of state funding)
- Sky Foundation/Dove Public Charter School Foundation (OK) (3% of state funding)
- Pelican Educational Foundation (LA) (5% of state funding)
- Read Foundation (TN) (3% of state funding)
- Little Scholars of Arkansas (LISA) (AR) (3% of state funding)
- Harmony DC Public Schools (Washington DC) (5% local/state funding)

We believe the fees paid to Harmony through these agreements yield significant benefits to the Gülen Organization. Harmony has created a steady revenue from public funds that can be expended without any fiscal restrictions, providing resources to expand its model within a state or in other states, which in turn increases overall student enrollment as well as its annual fees. It is difficult to identify the actual payments made by these charter schools and networks to Harmony through public documents, including the payments made by ASE. These transactions are not transparent, and as a result, there is little accountability regarding how the funds are used, whether they fulfill the stated purposes in the support services agreement, and how well the services are delivered. The extensive support provided to ASE by Harmony, and the ASE administrative leadership that is almost exclusively from Harmony, positions Harmony to have extensive and undue influence over the operations of its client ASE that are not at arm's length.

ASE has not been successful to date with regards to its student enrollment. In fact, the school has fallen far below projections, with 289 students enrolled in 2015-2016,[19] less than one-third of the expected enrollment of 917 originally projected for that year.[20] As a K-11 school, it is difficult to see how ASE can provide sufficient core academic and elective course options for high school students given the low enrollment. This is likely why the ASE New Mexico network has not grown beyond its initial school. In addition, little up-to-date information is posted on the school's website (the most recent school newsletter is from 2011).[21] Governing Council members and Board minutes are not available on the site so public information about contracts and other operational information is very limited.

Financial Issues

Like the vast majority of Gülen-controlled charter schools, ASE has been found to engage in poor financial practices that practically serve to obscure the true use of public funds. The 2015-2016 Financial Statements - Schedule of Findings and Questioned Costs for ASE conducted by the New Mexico Public Education Departments included one finding that required corrective action: ASE did not follow its policies and procedures regarding cash disbursements. 20% of purchase orders tested were created after the expenditure was incurred, mostly for staff reimbursements.[22]

[19] ASE Report Card from New Mexico Public Education Department, available at: https://tinyurl.com/k5vyuy7 (last checked 6/6/17).

[20] See ASE projected student enrollment in 2009 charter application p. 4, available at http://tinyurl.com/lofzrtp (last checked 6/6/17).

[21] School Newsletter, available at: https://tinyurl.com/y8ya9xx3 (last checked 5/26/2017).

[22] Albuquerque School of Excellence Financial Statements 2016, State of New Mexico Public Education Department; Vol II and III, available at: http://tinyurl.com/y844zdks (last checked 6/6/2017).

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Bond Financing

ASE is utilizing Harmony Public Schools' real estate arm, Charter School Solutions (CSS), to borrow money on its behalf through a bond issue used to purchase, renovate, and equip the ASE school facility at 13201 Lomas Blvd NE in Albuquerque.[23] As part of this transaction, CSS purchased the school building in June 2016 for $3.9 million.[24] CSS will own the ASE building and lease the school building back to ASE, repaying the bond debt from the rental payments made by ASE. The rental agreement with CSS is a "triple net" lease, which means that in addition to the monthly lease payments, ASE will pay all costs for insurance premiums, taxes, utility charges, maintenance, upkeep, repairs, and operations.[25] Importantly, even when ASE repays the bonds in full, it will not own the building.

The bond to CSS was issued on June 1, 2016 through the Industrial Development Authority of the County of La Paz, Arizona for a total of $8,210,000 to be repaid over 30 years. Rental payments from ASE will start at $661,141 annually, $55,000 per month, and increase by a percentage each year. These lease payments are inflated and represent 125% of the actual bond debt for the building. This means that over the life of the bond, ASE will pay CSS $4,475,458 more than what is owed on the bond – an extra $150,000 annually. As a result, CSS will receive substantially more from ASE than what the bond issue requires and privately own the building publicly financed by New Mexico tax dollars.[26]

Harmony Public Schools appears to have created CSS in 2015 as its third-party real estate arm to purchase property and construct or renovate charter schools that are in the Greater Texas regional network. The CSS Board is composed of individuals affiliated with Harmony, including a former Harmony Board member, Harmony's legal counsel, and the former President of the Sky Foundation in Oklahoma, the Gülen organization that operates four Gülen schools in Oklahoma.[27] The Sky Foundation was the subject of a 2016 Oklahoma state audit that found it had misused state funds, paying itself more than $3 million in excessive rental payments from the schools it managed to fund its own operations.[28]

CSS has also borrowed $43.2 million in bonds for the purchase and renovation of five schools operated by Harmony in Texas.[29] Like ASE in New Mexico, the Texas schools will pay $18 million more than what is owed over the life of the bond – a total of $650,000 extra every year. CSS will receive combined revenue of $780,000 annually from excess lease payments made by the schools in Texas and New Mexico.

CSS corporate documents state that CSS will use the excess rental payments to fund its own operations and programs and to expand the Harmony model to other states.[30] One characterization of this scenario is that CSS is charging public charter schools a hidden tax that will take taxpayer dollars and divert them to CSS for its own operations rather than directing these funds to educational services for students.

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23 Charter School Solutions bond issue for Albuquerque School of Excellence, available at: http://tinyurl.com/yary29pl (last checked 6/5/17).

24 Release of mortgage to CSS/purchase price; Bernalillo County Clerk, available at: http://tinyurl.com/y745bcea (last checked 6/6/17).

25 Charter School Solutions bond issue for Albuquerque School of Excellence- Official Statement; lease agreement on p. E-3-2 (#7), available at: http://tinyurl.com/yary29pl (last checked 6/5/17).

26 See Charter School Solutions bond issue for Albuquerque School of Excellence - Official Statement payment schedule on p.3 and debt service on p. 1, available at: http://tinyurl.com/yary29pl (last checked 6/5/17).

27 See corporate documents for Charter School Solutions; Texas Secretary of State SOS Direct, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

28 Investigative report on Dove Schools in Oklahoma, available at: http://tinyurl.com/kv3ade4 (last checked 6.5.17).

29 CSS bond issue for Harmony Public Schools, available at: http://tinyurl.com/y9xs5rdd (last checked 6.5.17).

30 See corporate documents for Charter School Solutions, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

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Real Estate

ASE leases its school facility from Charter School Solutions, a nonprofit organization that is the third-party real estate arm of Harmony Public Schools in Texas (see description in bond section in this report). CSS purchased the building as part of an $8.2 million bond issue and serves as ASE's landlord. ASE pays CSS rental payments of $661,141 annually, $55,000 per month, and increase by a percentage each year. These lease payments are inflated and represent 125% of the actual bond debt for the building. Over the life of the bond, ASE will pay CSS $4,475,458 more than what is owed on the bond – an extra $150,000 annually.[31] Once the bond is repaid, ASE will still not own the school building. The renovation of the building paid by bond revenue was completed in March 2017.[32]

Excessive Use of H1-B Visa Program

Like other Gülen organization charter networks, ASE and Harmony Public Schools utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools. From 2010 to 2016, ASE alone filed a total of 7 H-1B visa applications.[33] The cost of these applications is estimated to be $3,000 per application, for a total of $21,000 expended public funds. Harmony, which is much larger, filed for over 2,558 H-1B visas since 2005.[34]

While Gülenist administrators claim that the international visas are necessary to fill shortages for math and science teachers, positions are also filled for a wide range of positions, including: middle school teachers, assistant principals, and instructional coordinators.[35]

ASE use the same limited number of attorneys to file and process their H-1B visa applications as other known Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

Leonard D'Arrigo, the New Mexico network used D'Arrigo, a New York-based attorney, to file numerous H-1B applications.[36] D'Arrigo also filed applications for these clients:

- Cosmos Foundation (TX)
- Little Scholars of Arkansas (AR)
- Raindrop Foundation
- Central Jersey College Prep Charter School (NJ)
- Syracuse Academy of Science Charter School (NY)
- Millennium Education Foundation/ Frontier Schools (MO)
- Rochester Academy Charter School (NY)
- Dove/Sky Foundation (OK)
- Bergen Arts and Science Charter School (NY)
- Albuquerque School of Excellence (NM)
- Truebright Science Academy Charter School (PA)

31 Charter School Solutions bond issue for Albuquerque School of Excellence, available at: http://tinyurl.com/yary29pl (last checked 6.5.17).

32 ABQ Staff; Charter school finishes renovations, vailable from http://tinyurl.com/y9dfsvzd (last checked 6/6/17).

33 H-1B visas applications from the Albuquerque School of Excellence, available at: http://tinyurl.com/yanhkndl (Albuquerque School of Excellence) (7) (last checked 7/16/2017).

34 See Texas state profile.

35 H1-B visas application occupations, available at: https://tinyurl.com/l6hoo4v (last checked 5/25/2017)

36 Leonard D'Arrigo H1-B visas filed, available at: https://tinyurl.com/kcb3kjq (last checked 5/24/2017).

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Notable Turkish Vendors

Harmony Public Schools: ASE has contracted with Harmony through a support services agreement to provide a range of management and administrative services to the school for a fee. The agreement is renewed annually. Previously, ASE paid Harmony a flat fee of $45,000 per year.[37] Harmony changed its billing structure in 2012 or 2013 and currently bills for its services at the rate of $80 - $120/hour. In addition, Harmony now charges a licensing fee for its intellectual property software from $15,000 - $147,000 per school per year.[38] ASE does not disclose the actual payments made to Harmony annually in public documents.

Because minutes from the ASE Governing Council are not available publicly, other vendors and contractors cannot be identified.

Scandals, Investigations, & Notable Activities

ASE has experienced two incidents in the last three years that reflect negatively on its screening process for teachers, on the school's administrative procedures for identifying and addressing bullying incidents at the school that put children at risk, and on the teacher's lack of classroom management skills that allowed such an incident to occur. In one incident, a former ASE teacher was arrested for possession and distribution of child pornography. Although the school stated that there were no "red flags" or complaints reported while the teacher was employed at the school, the school failed to address whether it would conduct an in-depth investigation following the arrest.[39]

In the second incident, a student at ASE targeted another student using offensive racial slurs in the classroom.[40] The school official present when the incident occurred did not contact the parents of the children involved to inform them about the incident. Another student captured the lengthy incident on video and posted it on social media in January of 2014. Another parent of a student in the classroom saw the video and reported it to the assistant principal in February. School officials did not act because "it was not seen as a bullying incident," and later admitted that they hadn't watched the video at that time.[41] The parent of the targeted student only heard of the incident from another parent in April of 2014, who had also viewed the video on social media. School officials finally agreed that the incident was bullying. Despite failure to take action against the actual bully, ASE leadership had already disciplined the student who filmed the incident and posted it on social media.[42]

[37] See Cosmos Foundation bond issue May 1, 2011, Official Statement P. B-2 & 3, available at: http://tinyurl.com/y7pn3wbq (last checked 5/19/17).

[38] See Harmony bond issue July 2, 2014, Official Statement P. B-3, available at: http://tinyurl.com/y7pn3wbq (last checked 5/19/17).

[39] See news story on teacher arrest; Former state-run charter school teacher arrested on child p porn charges; KRQE News 13; August 18, 2016, available at: http://tinyurl.com/yb7jgrye (last checked 6/5/17).

[40] See news story on racist incident; Parent upset after son called 'N' word in class; KRQE News 13; (April 1, 2014), available at: https://tinyurl.com/l7557c6 (last checked 5/25/2017) (last checked 6/5/17).

[41] Id.

[42] Id.

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Gülenist Cultural and Business Organizations Active in State

Turkish cultural organizations play a central role in the Gülen landscape, serving as the external face to the community that obscures the true activities of the organization. They are generally nonprofit organizations with governing boards often composed largely of individuals of Turkish national origin and other community members. The organizations provide a platform for community involvement, hosting events where local leaders who can benefit the organization are honored, convening forums and conferences, and sponsoring expense-paid trips to Turkey that promote the Gülen Movement. In addition, funds collected through the various Gülen charter school schemes – vendor contracts, excessive rents, and teacher tuzuk payments – can be channeled through the organizations to pay for programs that will enhance the façade of legitimacy.

- **Raindrop Turkish House - Albuquerque:** Like Turkish cultural centers in other states across the county, the Raindrop Turkish House in Albuquerque promotes Turkish culture through language and cooking classes, festivals, and local events with special guests. It also sponsors annual "dialogue" trips to Turkey for community members and leaders.[43] The Raindrop Turkish Houses are branches of the non-profit/tax-exempt Rain Drop Foundation based in Houston that sponsors 20 Raindrop Turkish Houses in cities across eight states including Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, and Tennessee, and New Mexico.[44]

- **Turquoise Council of Americans and Eurasians:** The Turquoise Council of Americans and Eurasians (TCAE) is a 501(c)(3) non-profit founded in Houston, Texas which serves as an umbrella organization for Turkic-American Associations primarily in Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, Washington D.C. and New Mexico .[45] TCAE hosts events and sponsors trips to Turkey and other affiliated countries to promote its economic, political, and social interests with elected officials and community leaders. TCAE was one of the organizations that sponsored expense-paid trips to Turkey for elected officials in New Mexico including the Congressional trip to Azerbaijan that was later investigated by the Office of Congressional Ethics when it was revealed that the trip had been secretly paid for by SOCAR, the state-owned oil company of Azerbaijan.[46]

- **The Dialogue Institute of the Southwest:** The Houston-based Dialogue Institute of the Southwest hosts forums, conferences, dinners and cultural exchange "dialogue" trips to Turkey.[47] However, while there is an evident Dialogue presence in New Mexico, its website is currently inaccessible, and thus more information about its Albuquerque activities is unavailable.[48] The Dialogue Institute is a member organization of the Alliance for Shared Values (Alliance), the umbrella organization for six Gülen groups around the United States that are openly aligned with the Gülen Movement.[49]

43 About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 and http://tinyurl.com/y7shzona (last checked 6/6/2017).

44 Id.

45 About the Turquoise Council of Americans and Eurasians available at: http://tinyurl.com/y9bcezdz (last checked 6/6/2017).

46 Higham, Scott; Rich, Steven; Crites, Alice; 10 members of Congress took trip secretly funded by foreign government; Washington Post; (13 May 2015). Available from http://tinyurl.com/yc7lk4la (last checked 5/29/17).

47 Information about the Dialogue Institute of the Southwest, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

48 Dialogue Institute of the Southwest website unavailable, from: http://tinyurl.com/y6vln2rh (last checked 6/6/2017).

49 Dialogue Institute of the Southwest on the Alliance for Shared Values website, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

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Friends of Gülen Spotlight

Elected officials participate in expense-paid trips to Turkey and other aligned countries that were organized by Gülen-affiliated organizations. For example:

U.S. Representative Michelle Lujan Grisham (D-NM) traveled on an all-expense paid 10-member Congressional trip in 2013 to Baku, Azerbaijan that was later investigated by the Office of Congressional Ethics when it was revealed that the trip had been secretly paid for by SOCAR, the state-owned oil company of Azerbaijan.[50] The members of Congress were not aware that SOCAR had funded the trip and had sought pre-trip approval from the House Ethics Committee. The Washington Post reported that during the previous year, "SOCAR and several large energy companies sought exemptions for a $28 billion natural gas pipeline project in the Caspian Sea from U.S. economic sanctions being imposed on Iran."[51]

Other New Mexico state officials accepted trips to Turkey at the invitation of the Raindrop Turkish House and Turquoise Council of Americans and Eurasians, including:

- Former Senator Dede Feldman[52]
- Senator Eric Griego[53]
- Former Senator Tim Jennings[54]
- Senator Cisco McSorley[55]
- Senator George Munoz[56]
- Senator Jerry Ortiz y Pino[57]
- Representative Debbie Rodella[58]

A group of 13 New Mexico senators, including Senators Pino, Griego, Jennings, McSorley, and Munoz introduced a memorial resolution to the Senate in 2011 honoring the Raindrop Turkish House and the Turquoise Council of Americans and Eurasians.[59]

Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H-1B visa employees, both teachers and administrators, from school to school and state to state in very different types of jobs. The individuals listed below are examples of the overlap of employees among schools, further demonstrating the interconnections and affiliation between the Gülen charter networks and organizations.

- **Soner Tarim:** CEO, Harmony Public Schools (TX); Lead presenter at charter presentation, Albuquerque School of Excellence (NM).[60]

- **Ahmet Cetinkaya:** Principal, Albuquerque School of Excellence (NM); Principal, Harmony Science Academy Beaumont (TX); Director of Accountability, Harmony Public Schools (TX).[61]

50 Higham, Scott; Rich, Steven; Crites, Alice; 10 members of Congress took trip secretly funded by foreign government; Washington Post; (13 May 2015), available at: http://tinyurl.com/yc7lk4la (last checked 5/29/17).

51 Id.

52 Center for Public Integrity; Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement; (9 February 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/31/2017).

53 Id.

54 Id.

55 Id.

56 Id.

57 Id.

58 Id.

59 2011 Senate Memorial honoring Raindrop House and TCAE, available at: http://tinyurl.com/yagsjx3j (last checked 6/6/17).

60 Information taken from: Tarim biography on Harmony website, available at: http://tinyurl.com/y7ypegdj (last checked 6/6/17); Presentation by Soner Tarim to the New Mexico Public Education Commission, available at: http://tinyurl.com/y8yy7vd2 (last checked 6/6/17).

61 Information taken from: Heinz, Hailey, Texas Charter School Chain's Resources Used at Local, but Unrelated, Campus

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- **Salih Aykac:** Principal, Albuquerque School of Excellence (NM); Principal, Harmony School of Innovation Fort Worth (TX); Principal, Harmony Science Academy San Antonio (TX); Assistant Principal, Harmony School of Science Austin (TX).[62]

- **Osman Anderoglu,** Board Member, Albuquerque School of Excellence (NM); Assistant Professor, University of New Mexico (NM); Ph.D. in Materials Science and Engineering. Texas A&M University (TX); B.S., Bogazici University (Istanbul, Turkey).[63]

- **Mustafa Cetin:** Secretary, Albuquerque School of Excellence Governing Council (NM); Ph.D. in Chemistry, Texas Tech University (TX); B.S. Karadeniz Technical University (Trabzon, Turkey).[64]

- **Ebubekir Orsun:** Assistant Principal, Albuquerque School of Excellence (NM); Assistant Principal, Guidance Counselor, and Math Teacher, Harmony School of Advancement (TX).[65]

Notable Press Coverage and Research Regarding the New Mexico Gülenist Network

Schmitt, Madeline. *Former state-run charter school teacher arrested on child porn charges.* KRQE News 13, August 18, 2016. Available at: http://tinyurl.com/yb7jgrye (last checked 6/14/2017).

Gutierrez, Crystal. *Parent upset after son called 'N' word in class.* KRQE News, April 1, 2014. Available at: http://tinyurl.com/l7557c6 (last checked 6/14/2017).

ABQ Journal News Staff. *Charter School finishes renovations.* Albuquerque Journal, March 20, 2017. Available at: http://tinyurl.com/y9dfsvzd (last checked 6/14/2017).

Heinz, Hailey. *Texas Charter School Chain's Resources Used at Local, but Unrelated, Campus.* Albuquerque Journal, October 11, 2010. Available at: http://tinyurl.com/l4ujvqs (last checked 6/14/2017).

Terrell, Steve. *New Mexico lawmakers' 2011 visits to Turkey linked to controversial cleric.* The Santa Fe New Mexican, July 18, 2016. Available at: http://tinyurl.com/m5x3gnq (last checked 6/14/2017).

Terrell, Steve. *N.M., Turkey get tight as lawmakers get gratis visit;* Santa Fe New Mexican, June 1, 2011. Available at: http://tinyurl.com/y7e5m59y (last checked 6/14/2017).

Hess, Hannah. *Hidden Cash Financed Lawmakers' Turkey Trips" Roll Call,* October 20, 2015. Available at: http://tinyurl.com/y77tz5n6 (last checked 6/14/2017).

Higham, Scott, Rich, Steven, and Crites, Alice. *10 members of Congress took trip secretly funded by foreign government.* The Washington Post, May 13, 2015. Available at: http://tinyurl.com/lnhjqps (last checked 6/14/2017).

Albuquerque Journal (Oct. 11, 2010), available at: https://tinyurl.com/l4ujvqs (last checked 5/25/2017); LinkedIn profile, available at: http://tinyurl.com/y7ypegdj (last checked 5/25/2017).

62 Information taken from: New Mexico public education department school directory, available at: https://tinyurl.com/yapw3o3u (last checked 5/26/2017); Harmony Public Schools request for sealed proposals, 2013-2014 furniture procurement, available at: https://tinyurl.com/y9evm3lr (last checked 5/26/17); Texas Education Agency Alternative Appraisal Report for 2010, available at: https://tinyurl.com/y98pl85j (last checked 5/26/2017); Harmony School of Science Austin Brochure, available at: http://tinyurl.com/yay4gmbv (last checked 6/6/2017).

63 Information taken from: New Mexico Public Education Department, ASE Renewal Application Package, available at: https://tinyurl.com/y98ktdmq (last checked 5/26/2017); LinkedIn profile, available at: https://tinyurl.com/yap6d63x (last checked 5/29/2017).

64 Information taken from: Report to the Legislative Finance Committee, Charter School Facilities Lease Assistance and Capital Outlay Planning, available at: https://tinyurl.com/ybgajpgu (last checked 5/26/2017); LinkedIn profile, available at: https://tinyurl.com/y9p6ozev (last checked 5/29/2017).

65 LinkedIn profile, available at: https://tinyurl.com/ycwykdnq (last checked 6/6/2017).

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Oklahoma



QUICK FACTS ON GÜLEN CHARTER SCHOOLS OKLAHOMA



NUMBER OF SCHOOLS	4
KNOWN AS	**Dove Science Academy** **Dove Science Elementary** **Dove School of Discovery Tulsa (Discovery School of Tulsa)**
TOTAL ENROLLMENT	**1,842**
CHARTER VENDOR	**Harmony Public Schools (also known as Cosmos Foundation)**
TOTAL REVENUES	**$11,542,243**

RELATED INSTITUTIONS

- TX: Harmony Public Schools; Riverwalk Education Foundation
- AR: Little Scholars of Arkansas/LISA Academy
- TN: Read Foundation/Memphis School of Excellence
- MO: Millennium Education Foundation/ Frontier Schools
- LA: Pelican Educational Foundation/ Kenilworth Science
- NM: Albuquerque School of Excellence; Harmony DC Public Schools/Harmony

KEY PEOPLE



Zeynep Gunay | Halil Tas | Elvan Ceyhan | Ali Yavuz Zeybek

FINANCIAL ISSUES



Audit findings reveal that the Sky Foundation made a **$175,000 payment to Harmony Public Schools to sponsor a science fair competition that was not attended by any Dove Science Academy students.** The audit stated that the payment was "not a legitimate school purpose."

REAL ESTATE

$1,192,442



The audit also found that the Sky Foundation collected a total of $1,192,442 more in lease payments from the Dove Charter Schools than was due on the lease agreements between 2012 to 2014.

H-1B VISA APPLICATIONS

306 H-1B

H-1B VISA APPLICATIONS 2000 to 2016

$3,000 Per application

a cost of almost **$1 million**

Dove Science Academy and the Sky Foundation utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools.

Some Gülen schools in other states have paid for these costs using **public funds** and been required to reimburse the state.

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as): Dove Science, Discovery School
- Total number of schools in state: 4
- Total student enrollment 2015-16: 1,842
- Charter Holder/Governing Board(s):
  - Dove Public Charter School Foundation (formerly Sky Foundation)[1]
    - Organized as a non-profit 501(c)(3) organization
    - Oversees 4 charter schools
- Charter Management Services Vendor: Harmony Public Schools (formerly the Cosmos Foundation)[2]
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Harmony (TX); Schools of Science and Technology (TX); LISA (AR); Abramson/Kenilworth Science (LA); Frontier Schools (MO) (formerly Millenium [sic]); School of Excellence (TN); Albuquerque School of Excellence (NM) (formerly Focus Foundation); Harmony DC Public School (D.C.)
- Total Revenues for FY 2016: $11,542,243[3]
- Network Founders:
  - Zeynep Gunay: Founder/Director, Sky Foundation; M.S. Oklahoma State University; B.S., Ege University (Turkey).[4]
  - Halil Tas: Founder/Director, Sky Foundation; Superintendent, Dove Science Academy Tulsa; Area Superintendent, Harmony Public Schools; currently Professor and Chair of Department of Education, North American University (Gülen-affiliated university in TX); Ed.D., Oklahoma State University.[5]
  - Elvan Ceyhan: Founder/Director, Sky Foundation; M.S. Statistics, Oklahoma State University; B.S. Mathematics, Koc University (Turkey); current Visiting Associate Professor, University of Pittsburgh.[6]

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1 The Sky Foundation became inactive in 2016 and a new governing board was registered called the Dove Public Charter School Foundation after the Oklahoma State Auditor disclosed financial improprieties by the Sky Foundation in an investigative report. *See* Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017); Dove Charter Public School Foundation, Oklahoma Secretary of State, available at: http://tinyurl.com/y7wmjfww (last checked 7/15/2017).

2 In 2012, the Cosmos Foundation, which did business as Harmony Public Schools, changed its name to Harmony Public Schools.

3 Financial Statements and Independent Audits (June 30, 2016), Oklahoma State Auditor & Inspector, available at: https://tinyurl.com/keou44v (last checked 5/20/2017).

4 Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: http://tinyurl.com/toc3evf (last checked 6/14/2017); Sky Foundation IRS Form 990 (2001 – 2004 & 2007 – 2009), available at: http://tinyurl.com/z7xxxk6 (last checked 6/14/2017); Zeynep (Gunay) Unalan, List of Ph.D. recipients from Michigan State (2007-08), available at: http://tinyurl.com/mpqcvoj (last checked 6/14/2017).

5 Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: http://tinyurl.com/toc3evf (last checked 6/14/2017); Sky Foundation IRS Form 990 (2001 – 2002 & 2007 – 2009), available at: http://tinyurl.com/z7xxxk6 (last checked 6/14/2017); Parrish, Ashley, *Tulsa school superintendent finds first day frantic yet fun,* Tulsa World (18 August 2000), available at: http://tinyurl.com/my4yshm (last checked 6/13/2017); Martin, William. *Head of the Class*. Texas Monthly (August 2010), available at: http://tinyurl.com/mwmled3 (last checked 6/13/2017); Halil Tas, LinkedIn, available at: http://tinyurl.com/mbpwf7f (last checked 6/14/2017).

6 Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: http://tinyurl.com/toc3evf (last checked 6/14/2017); Sky Foundation IRS Form 990 (2007 – 2009), available at: http://tinyurl.com/z7xxxk6

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- Ali Yavuz Zeybek: Founder, Sky Foundation; Founder, Harmony Public Schools; CEO, Harmony Science Academies (Houston and Austin, TX).[7]

Overview

The Sky Foundation, the first Gülenist governing board in Oklahoma, formed in 1999.[8] It opened the Dove Science Academy in Tulsa in 2000, followed by the Dove Science Academy in Oklahoma City in 2001, an elementary school in Oklahoma City in 2008, and the Discovery School of Tulsa in 2009. Until 2016, the Sky Foundation, an organization "doing business as" the Dove Science Academy, operated the schools.[9] In 2016, the Sky Foundation became inactive and Dove Public Charter School Foundation assumed control of the Gülenist charter schools in Oklahoma.

The Dove Public Charter School Foundation, and formerly the Sky Foundation, has a close association with Harmony Public Schools ("Harmony"), the Gülen-affiliated charter network in Texas. They share a common founder, Ali Yavuz Zeybek, and Harmony provides the Oklahoma schools with a range of management and administrative services. Harmony serves as the regional oversight entity and charter management services vendor for Gülen schools in the Greater Texas region, including Oklahoma, and Washington, D.C.

Two schools in Oklahoma City are authorized by the Oklahoma City Public Schools. Tulsa Public Schools originally authorized one school in Tulsa, but it did not renew the school's contract due to issues with the school's treatment of special needs students and discipline policy.[10] Langston University now authorizes the two Tulsa schools.

(last checked 6/14/2017); *see also* Rolland, Megan, *Charter schools' international ties analyzed*, Tulsa World (May 1, 2011), available at: http://tinyurl.com/y88d8dtg (last checked 6/13/2017); Elvan Ceyhan, ORCID, available at: http://tinyurl.com/y8kqku6h (last checked 6/15/2017); Elvan Ceyhan, LinkedIn, available at: http://tinyurl.com/l7txhe7 (last checked 6/15/2017).

7 Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: http://tinyurl.com/toc3evf (last checked 6/14/2017); Harmony Science Academy Austin and Houston Charter Applications (Jan. 21, 2000), at p. 1, available at: http://tinyurl.com/r9gvm2l and http://tinyurl.com/mhkeovf (last checked 6/14/2017).

8 Sky Foundation, Oklahoma Secretary of State, available at: http://tinyurl.com/yaawltj6 (last checked 5/20/2017).

9 Sky Foundation IRS Forms 990, available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017).

10 Eger, Andrea. *Board votes not to renew charter for Dove school*. Tulsa World (Oct. 27, 2009), available at: http://tinyurl.com/yd4rc8p6 (last checked 6/13/2017).

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School	Operation	Student Demographic Information* 2015-2016[11]	Authorizer	Governing Board
Discovery School of Tulsa 4821 S. 72nd E. Ave. Tulsa, OK 74145	K – 9 2009 - present	Enrollment: 466 18% ELL** 78% FRL 8% SWD 36% Hispanic 2% Native Am. 2% Asian/ Hawaiian/PI 27% Af. Amer. 29% White 4% Multiracial ***The ELL students at Discovery School of Tulsa and Dove Science Academy – Tulsa are combined to calculate the percentage of ELL students for both schools.*	Langston University	Dove Public Charter School Foundation (formerly the Sky Foundation)
Dove Science Academy – Tulsa 280 S. Memorial Dr. Tulsa, OK 74112	6-12 2000 - present	Enrollment: 590 18% ELL** 81% FRL 8% SWD 57.5% Hispanic 4% Native Am. 1% Asian/ Hawaiian/PI 10% Af. Amer. 21% White 6% Multiracial ***The number of ELL students at Discovery School of Tulsa and Dove Science Academy – Tulsa are combined to calculate the percentage of ELL students for both schools.*	Langston University (Tulsa Public Schools denied renewal of Dove Science in 2009)	Dove Public Charter School Foundation (formerly the Sky Foundation)
Dove Science Academy – OKC 919 NW 23rd St. Oklahoma City, OK 73106	6-12 2001 - present	Enrollment: 493 4% ELL 83% FRL 3% SWD 10% Anglo. 13% Af.Amer. 4% Asian 71% Hispanic 2% Native Amer.	Oklahoma City Public Schools	Dove Public Charter School Foundation (formerly the Sky Foundation)
Dove Science Academy Elementary 4901 N. Lincoln Blvd. Oklahoma City, OK 73105	K-5 2008 - present	Enrollment: 308 21% ELL 75% FRL 8% SWD 22% Anglo. 45% Af. Amer. 0% Asian 32% Hispanic 0% Native Amer.	Oklahoma City Public Schools	Dove Public Charter School Foundation (formerly the Sky Foundation)

** ELL indicates English language learners; FRL indicates students eligible for free/reduced-price lunch; SWD indicates students with disabilities.*

[11] ELL student data received from Oklahoma Department of Education via email on June 19, 2017, through open records request. Student Demographics, District Reports (2015-16), Okla. Dept. of Edu., available at: http://tinyurl.com/ycsrrp7y

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A History of Strategic Ambiguity and Conflicting Interests

The Sky Foundation, formed in 1999, has close ties to other Gülen-connected organizations and individuals.[12] For example, Sharon Akdeniz served on the Sky Foundation Board. Her husband, Omer Akdeniz,[13] served as a spokesperson for the Tulsa chapter of the Dialogue Institute of the Southwest and the Raindrop Turkish House, organizations affiliated with the Gülen movement.[14] Halil Tas, a founder of the Dove schools, worked for Harmony Public Schools, a large Gülenist charter network in Texas that also serves as the regional oversight entity for the Greater Texas region. He is currently Chair of the Education Department Chair at North American University in Houston, a Gülen-affiliated university.[15] Birol Ozturk, a former president of the Sky Foundation Board, later became secretary of the governing board of the Syracuse Academy of Science Charter School in New York,[16] a Gülen-affiliated charter school.

The Sky Foundation opened Dove Science Academy – Tulsa ("DSA Tulsa") in 2000, the Dove Science Academy – Oklahoma City ("DSA – OKC") in 2001. The Sky Foundation did not expand further for several years but eventually opened two new schools in 2008 and 2009. At that time, the Sky Foundation first opened Dove Science Academy Elementary ("DSA – Elementary") and then the Discovery School of Tulsa ("Discovery School"). The Sky Foundation filed for matching trade names for all these schools: Dove Science Academy, Discovery School of Tulsa, and Dove Science Academy – Elementary.[17] The Sky Foundation also attempted to open the Dove School of Excellence Arkansas in 2009, although the attempt failed.[18]

In 2016, the Sky Foundation became inactive after a critical audit conducted by the Oklahoma State Auditor raised concerns about financial improprieties and exploitative real estate dealings on the part of the Sky Foundation.[19] Dove Public Charter School Foundation ("Dove Foundation") formed in January 2016 to serve as a new parent organization for the Oklahoma charter schools.[20] There appears to be little difference between the two organizations as the schools'

(Discovery Schools of Tulsa, Okc Charter: Dove Science Acad, Okc Charter: Dove Science ES) (last checked 6/13/2017); Free and reduced-price lunch (FRL), Low Income Reports (2015 for Dove Science Academy – Oklahoma City and Elementary; 2016 for Discovery School of Tulsa and Dove Science Academy - Tulsa), Okla. Dept. of Edu., available at: http://tinyurl.com/ms45ma4 (last checked 6/13/2017); School Site Totals with Ethnicity and Gender (2015-16), Okla. Dept. of Edu., available at http://tinyurl.com/yc4ntuuv (last checked 6/13/2017); FY 2016 Child Count/District Profiles/ Determinations, Special Education Data and Reporting Part B, Okla. Dept. of Edu., available at http://tinyurl.com/y8ekxf7v (last checked 6/15/2017).

12 Sky Foundation IRS Forms 990, available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017).

13 Sherman, Bill. *Tulsa Couple undertake pilgrimage to Mecca*, Tulsa World (Dec. 12, 2009), available at: http://tinyurl.com/le89f8k (last checked 6/13/2017).

14 Sherman, Bill. *Tulsa Couple undertake pilgrimage to Mecca*, Tulsa World (Dec. 12, 2009), available at: http://tinyurl.com/le89f8k (last checked 6/13/2017).

15 Martin, William. *Head of the Class*. Texas Monthly (Aug. 2010), available at: http://tinyurl.com/mwmled3 (last checked 6/13/2017).

16 Sky Foundation IRS Forms 990 (2006), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017); Syracuse Academy IRS Form 990 (2010), available at: http://tinyurl.com/ybopm98s (last checked 6/13/2017).

17 Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

18 Minutes (Nov. 9-10, 2009), State Board of Education, Arkansas Department of Education, available at: http://tinyurl.com/n2nvb23 (last checked 7/19/2017); Brett Bennett, *State Board Denies Request for Dove School*, Northwest Arkansas Democrat Gazette (Nov. 10, 2009), available at: http://tinyurl.com/nxdmnmo (last checked 6/15/2017).

19 Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

20 Financial Statement (June 30, 2016), Dove Science Elementary, available at: http://tinyurl.com/ya4sdcsx (last checked 6/13/2017).

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web sites describe the Dove Foundation and Sky Foundation nearly identically. The school web sites state that they are "run" by the new Dove Foundation, although DSA – Tulsa's website states it is still run by the Sky Foundation.[21] The schools' websites even describe both the Dove Foundation and Sky Foundation as "established in Stillwater, Oklahoma in 1999," even though the Dove Foundation was not created until 2016.[22] Dove Schools, Inc., a second organization created in 2016, states its purpose is "operation of a nonprofit charter school in Oklahoma."[23] It possesses two trade names: "Discovery School of Tulsa" and "Dove School of Discovery Tulsa."[24]

The two new organizations have two board members in common. One of these individuals previously served on the Sky Foundation Board and as vice principal at one of the Dove schools.[25] Because of the overlapping corporate names, trade names, and school names, it is unclear how these two new organizations will work together to operate the Dove schools. The shifting names and corporate entities also presumably helped the schools and entities mitigate any negative coverage associated with the negative state audit.

Oklahoma City Public Schools, authorizer of the Dove Science Academies in OKC, has stepped up its oversight following release of the state audit. It requires the transfer of all assets associated with Dove schools to the new Dove Public Charter School Foundation; an attempted renegotiation of the rent agreements that were the subject of the state audit; and creation of a separate bank account for state funds spent at Dove schools.[26]

The Oklahoma schools pay Harmony an annual fee to provide a range of management and administrative services through a long-term, on-going support services agreement. There is no evidence to show that this agreement was competitively bid or that other organizations had an opportunity to apply for the contract. Harmony's services allegedly include: school start-up, facility management, financial consulting, professional leadership, technology and database support, student admissions, marketing and employee recruiting, curriculum and assessment, student development, external and science fair organizations, and academic and non-academic performance services.

Beginning in 2010, the Oklahoma schools paid Harmony three percent of all state education funding to provide those services. Harmony changed its billing structure in 2012 or 2013 and currently bills for its services at the rate of $80 - $120 per hour. In addition, Harmony now charges a licensing fee for its intellectual property software, charging schools between $15,000 - $147,000 per year.[27] Harmony has similar support services agreements and licensing fees in place with seven other Gülen-affiliated charter school networks in the Greater Texas region.[28] The charter schools and networks, including

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21 *See, e.g.*, DSA - OKC, available at: http://tinyurl.com/y7qhl6xz (last checked 6/14/2017); DSA - Tulsa, available at: http://tinyurl.com/ybezslkf (last checked 7/17/2017).

22 Oklahoma Secretary of State, available at: http://tinyurl.com/y7wmjfww (last checked 6/14/2017); *compare* DSA – OKC (describing the Dove Foundation as "dedicated to high quality education," "established in Stillwater, Oklahoma 1999", and founded by "educators from distinguished universities such as the University of Oklahoma and Oklahoma State University"), available at: http://tinyurl.com/y7qhl6xz (last checked 6/14/2017); *with* DSA – Tulsa (describing the Sky Foundation with identical phrases), available at: http://tinyurl.com/ybezslkf (last checked 7/17/2017).

23 Articles of Incorporation, Dove Schools received through email request; Oklahoma Secretary of State, available at: http://tinyurl.com/ycj4jlwk (last checked 6/14/2017).

24 Oklahoma Secretary of State, available at: http://tinyurl.com/26zmdqe (last checked 6/14/2017).

25 Dmitriy Ognev, LinkedIn, available at: http://tinyurl.com/y8edjerw (last checked 6/13/2017).

26 *See* 2016 Charter School Contract for Dove Academies in OKC (June 1, 2016), Appendix B, received through 2017 open records request to Oklahoma City Public Schools.

27 Official Statement, Appendix B, Harmony Public Schools Bond Issue (July 2, 2014), available at: http://tinyurl.com/ybboyse6 (2014) (last checked 5/19/17).

28 *See* Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: http://tinyurl.com/yavbe95f (2012), http://tinyurl.com/ya9wo9ya (2011), and http://tinyurl.com/ydcvya5n (2011); Official

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the Oklahoma charter schools, do not generally disclose these payments to Harmony in public documents. For that reason, these transactions are not always transparent, and there is potentially little accountability regarding the use of the funds and Harmony's delivery of services.

The fees paid to Harmony through these agreements appear to yield significant benefits to Harmony. Based on our research, we believe that Harmony has created a steady revenue stream from public funds from Gülen charter schools in other states that can be expended without fiscal restrictions, providing funds to expand the Harmony model, which in turn increases overall student enrollment as well as its annual fees. It is difficult to identify the actual payments made by these charter schools and networks to Harmony through public documents, including the payments made by the Dove Science Academies, because the payments are not generally disclosed on public documents. These transactions are not transparent, and as a result, there is little accountability regarding how the funds are used, whether they fulfill the stated purposes in the support services agreement, and how well the services are delivered.

In addition to the support services agreement which ties the Dove Academies to Harmony, teachers and administrative staff also move frequently among the Gülen-affiliated schools in the region, especially from Gülen charter schools in Oklahoma and Arkansas to Harmony Public Schools in Texas. Some of the individuals that have worked with multiple Gülen Organization schools are listed in this report. We believe this frequent shift of employees among the Gülen Organization schools creates a ready pool of trusted Turkish administrative staff who faithfully execute the Gülen Organization's system and model.

The findings from the 2016 state audit described below are more troubling given the close relationship that exists between Harmony Public Schools and the Sky Foundation/Dove Science schools.

Financial Issues

The Oklahoma State Auditor released an audit of DSA – Elementary, DSA – OKC, and the Discovery School in March 2016 conducted at the request of the Oklahoma State Department of Education.[29] In addition to disclosure of a questionable lease agreement between the Sky Foundation and DSA – OKC, the audit discloses that the Sky Foundation paid Harmony $175,000 to sponsor an out-of-state event that no Dove or Discovery students attended. The Auditor found this to be "an apparent violation of both the school's charter and the Oklahoma Constitution", and the expense was not "not a legitimate school purpose."[30] This transfer of funds between two Gülen-affiliated charter school networks demonstrates how the entities inappropriately shift public funds between related organizations under the guise of legitimate expenses.

Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/ybboyse6 (2014), http://tinyurl.com/y7on943p (2014), http://tinyurl.com/yddvl2lq (2014), http://tinyurl.com/y96ht3fg (2015), http://tinyurl.com/y8ajh2v8 (2016), http://tinyurl.com/y9xs5rdd (2016), http://tinyurl.com/ybjw932j (2016), http://tinyurl.com/y8gduwl7 (2017) (last checked 5/19/17).

29 Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

30 *Id.*

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Bond Financing

At the time of publication, no records of bonds issued on behalf of the Oklahoma charter schools could be found.

Oklahoma however, is included in Charter School Solutions' ("CSS") territory for the construction of charter schools. Harmony apparently created CSS in 2015 as a third-party real estate arm to purchase property, construct schools, and renovate schools in a 10-state region, including Oklahoma, where Harmony serves as the regional Gülen organization oversight entity and a charter management services vendor.[31] In other states, CSS issues bonds to purchase property for charter schools and then serves as the landlord for charter schools, charging inflated rents that are more than what is owed on the bonds. The schools then make rental payments to CSS using public funds. For example, CSS issued a $44 million bond for Harmony in April 2016[32] and an $8 million bond for the Albuquerque School of Excellence in June 2016.[33] CSS charges these two affiliated charter networks $750,000 per year more than the debt on the bonds, for a total of $22.5 million over the life of the bonds. When the bonds have been repaid in full, the schools will be owned by CSS and not the charter schools. The Oklahoma State Auditor has already questioned a similar leasing arrangement between DSA – OKC and the Sky Foundation.[34] Additionally, Bilal Erturk, the president of the Sky Foundation at the time of CSS's creation, served on the original governing board for CSS, further demonstrating the close connection between the Sky Foundation/Dove Academies and Harmony.[35] In light of the Oklahoma State Auditor's finding and the Sky Foundation's connections to CSS, CSS's activities in Oklahoma should be closely monitored.

Real Estate

The Oklahoma State Auditor and Inspector's 2016 audit conducted by the Oklahoma State Auditor and Inspector also found that DSA - OKC paid the Sky Foundation approximately $3,182,000 in lease payments more than the original purchase price of its school property.[36] Since the Sky Foundation and the Dove schools functioned as one and the same entity, the auditor could find no legitimate purpose for charging lease payments above and beyond the purchase price of the facility. The audit found that the Sky Foundation's only income was public funds received through lease agreements with their own schools and stated, "It appears that the schools were supporting Sky instead of Sky supporting the schools" in contradiction to their stated non-profit purpose.[37] The limited scope of the audit did not allow the auditor to track the ultimate recipients of the excess lease payments, but the auditor indicated some of the money

[31] *See* Corporate Documents, Charter School Solutions, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/2017

[32] Official Statement, Charter Schools Solution Bond Issue for Harmony Public Schools (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd (last checked 6/5/2017).

[33] Official Statement, Charter Schools Solution Bond Issue for Albuquerque School of Excellence (June 1, 2016), available at: http://tinyurl.com/yary29pl (last checked 6/5/2017).

[34] Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

[35] Articles of Incorporation, Charter School Solutions, Texas Secretary of State, available at: https://tinyurl.com/mfxbyjr (last checked 5/20/2017).

[36] Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

[37] *Id.*

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may have been spent inappropriately.[38] Annual rents for DSA – OKC and DSA – Elementary decreased 23% between 2015 and 2016, near the time that the Oklahoma State Auditor criticized the Oklahoma charter schools' real estate transactions.[39]

The Sky Foundation owned the DSA – OKC property and leased the remaining three properties from outside vendors. It then subleased the three properties to the Dove and Discovery schools. The Sky Foundation received more than $50,000 every month from the schools in excess of its lease payments to the landlords for no apparent purpose other than making profit off of its own schools. In total, the Sky Foundation collected a total of $1,192,442 more in lease payments from the Oklahoma charter schools than the Sky Foundation owed on its leases from third parties.[40] The audit concluded that since the Sky Foundation and charter schools were the same legal entity, the lease agreements are a transfer of funds to themselves, essentially "a redirection of funds from the school bank accounts to the Sky Foundation's bank accounts."[41]

The auditors also recommended further investigation of another real estate transaction involving the Sky Foundation. In 2008, the Sky Foundation purchased a building for $780,000 and sold it to Yuksel Alp Aslandogan, Harmony affiliate and vendor and Gülen's official spokesperson, for $1,025,000 in 2010. The audit states that the funds used to purchase the building and the profit received in the sale of the building "should be satisfactorily accounted for."[42] Aslandogan sold the building to the Raindrop Foundation, a Gülenist cultural organization, four months later for only $650,000. The difference in Aslandogan's purchase and sale prices raised questions about whether Aslandogan paid the Sky Foundation an intentionally inflated price to move money to the Sky Foundation. Aslandogan currently serves as the President of the Alliance for Shared Values in New York, an umbrella organization for several key Gülen organizations, and as the spokesperson for Fethullah Gülen. Aslandogan was also the landlord for the first Harmony school in Texas and sold the building to the school for a profit of $2 million to himself.[43]

Excessive Use of the H-1B Visa Program

Like other Gülen organization charter networks, the Oklahoma Gülen charter schools utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools. From 2000 to 2016, the Oklahoma schools filed 305 H-1B visa applications,[44] an extraordinarily high number for a charter network with only 1,800 students.

While the Gülen Organization typically states that the visas are only to fill shortages for math and science teachers, these applications were filed for such positions as: law clerk, assistant principal, principals, English teachers, superintendents, Turkish and foreign language teachers,

38 Randy Ellis, *State Audit questions charter schools' site lease payments*, The Oklahoman (Mar. 17, 2016), available at: https://tinyurl.com/mlazgpf (last checked 5/20/2017).

39 *Compare* Financial Statements (2015 – 2016), DSA – OKC and DSA - Elementary (E-005 and E-013), Oklahoma State Auditor and Investigator, available at: http://tinyurl.com/keou44v (last checked 6/16/2017).

40 Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

41 *Id.*

42 *Id.*

43 *See* the Texas state profile.

44 H-1B Visa applications from MyVisaJobs are available at: http://tinyurl.com/yd9ymqm2 (Sky Foundation) (21); http://tinyurl.com/y7qrldp8 (Dove Science Academy-Tulsa) (22); http://tinyurl.com/y85zfslx (Dove Science Academy) (198); http://tinyurl.com/ydhqcftf (Dove Science Academy-Oklahoma City) (52); http://tinyurl.com/ydysgp66 (Discovery School of Tulsa) (12) (last checked 7/14/2017).

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budget analysts, education administrators, dean of students, accountants, social studies teachers, educational consultants, English as a second language teachers, high school counselors, secondary art teachers, and business managers.[45]

The Oklahoma charter schools use the same limited number of attorneys to file and process their H-1B visa applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

- Yalcin Karadag: The Oklahoma charter schools used Karadag, a Houston-based attorney, to file applications. Karadag also filed applications for:
  - Cosmos Foundation, Inc.
  - Pelican Educational Foundation
  - LISA Academy
  - Riverwalk Foundation
  - Millennium Education Foundation[46]

- Tina Nguyen: The Oklahoma charter schools used Nguyen, a Houston-based attorney, to file applications. Nguyen also filed applications for:
  - Pelican Educational Foundation
  - Dove Science Academy
  - Little Scholars of Arkansas
  - Millennium Education Foundation
  - Harmony Public Schools/Cosmos Foundation[47]

- Garrett White: The Oklahoma schools used White, a Houston-based attorney, to file numerous H-1B applications. White also filed applications for:
  - Memphis School of Excellence/ Read Foundation (TN)
  - Harmony Public Schools/ Cosmos Foundation
  - Riverwalk Education Foundation (TX)
  - Pelican Educational Foundation (LA)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Millennium Foundation (MO)
  - Texas Gulf Foundation (TX)
  - Helix Design and Production
  - Solidarity Contracting
  - Brighten Technologies
  - Target Design and Management
  - Institute of Interfaith Dialog for World Peace
  - Nur International[48]

Notable Turkish Vendors

- Harmony Public Schools ("Harmony"): The Oklahoma schools contract with Harmony for a range of management and administrative services through a support services agreement under which the schools pay $80 - $120 per hour. They also pay Harmony licensing fees for use of intellectual property. The Oklahoma State Auditor and Inspector has questioned the payment of fees to Harmony. In 2013 and 2014, the Sky Foundation paid Harmony a total of $175,000 for sponsorship applications for a science fair competition. No students from the Gülenist charter schools in Oklahoma attended the competitions, and the payments did not appear to have a legitimate school purpose.[49]

- Atlas Texas Construction and Trading

[45] Jobs in Tech, available at: http://tinyurl.com/yc5vmlhj (Sky Foundation), http://tinyurl.com/y87gj48y (Dove Science Academy) (last checked 6/14/2017).

[46] Yalcin Karadag, Jobs in Tech, available at: http://tinyurl.com/yckgzf2c (last checked 5/20/17).

[47] Tina Nguyen, Jobs in Tech, available at: http://tinyurl.com/mh29kbe (last checked 5/20/17).

[48] Garrett White, Jobs in Tech; available at: https://tinyurl.com/lg5f2aq (last checked 5/24/2017).

[49] Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

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("Atlas Construction"): Atlas Construction's parent organization, Atlas Group (Turkey), lists the construction of a gymnasium at DSA – OKC as one of its projects in the United States.[50] Atlas Construction is a preferred vendor for Gülen schools in the Greater Texas area. It had over $12 million in construction projects with Harmony and other projects at schools in Arkansas and Washington, D.C.[51] Atlas Construction has also been accused of attempting to bribe public officials in Louisiana. While Louisiana investigated one of the state's Gülenist charter schools, an employee conducting the investigation informed law enforcement authorities that Inci Akpinar, Vice President of Atlas Construction, offered him a $25,000 bribe to "help fix the problem" at the school.[52] When he responded that it would be a conflict of interest for a state official to accept money from the school, Akpinar told him that he would "only need to advise them."[53] Akpinar participated in a meeting with the state official and representatives of Harmony at Abramson just before she made the bribery offer.

Other vendors are not identified because minutes from the Sky Foundation Board of Directors meetings that might include Board decisions about vendor contracts are not available to the public online.

Scandals, Investigations, & Notable Activities

As part of a 2009 investigation into DSA – Tulsa, Tulsa Public Schools identified areas of non-compliance and deficiencies regarding services to students with special needs.[54] These findings mirror other reports and investigations of Gülen schools in other states, including an in-depth report from the U.S. Dept. of Education's Office of Civil Rights regarding Harmony in Texas.[55]

In particular, Tulsa Public Schools stated that it appeared that DSA-Tulsa "plug[ged] all special needs students into one system rather than making individualized decisions." The District also cited DSA – Tulsa for failing to make individualized decisions for special education students to minimize the cost of special education staff, stating, "Given the small number of special education staff members at Dove, the documentation also suggests that this service delivery method is being overused so that Dove stays within caseload requirements with existing special education personnel rather than having to take on additional staff to serve its special needs students through a continuum of services."

Other concerns listed in the letter regarding Dove's services to students with disabilities included:

- Failure to meet federal Individualized Education Plan (IEP) review timelines;

50 *See* Projects, Atlas Group, available at: http://tinyurl.com/yc3ns92z (last checked 6/15/2017).

51 *See* the Arkansas and D.C. profiles.

52 Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time-Picayune (22 July 2017), available at: http://tinyurl.com/3l2cnxs (last checked 5/25/17).

53 *Id.*

54 Letter from Rosenstein, Fist, Ringold law firm dated June 9, 2009 received through open records request; Memo to the Tulsa Board of Education from Chairman of the Charter School Committee received through open records request.

55 *U.S. Education Department Reaches Agreement with Texas' Harmony Public Schools to Ensure Equal Access for English Language Learner Students and Students with Disabilities*, U.S. Dept. of Education (Nov. 26, 2014), available at: https://tinyurl.com/k3ent6w (last checked 7/15/2017); *see also* Consolidated Monitoring Reports, New Jersey Dept. of Education, available at: https://tinyurl.com/mn7tdyx (Bergen Arts and Science Charter School) (Mar. 31, 2016), https://tinyurl.com/myypsku (Passaic Arts and Science) (May 20, 2015), https://tinyurl.com/mkudfut (Paterson Science and Technology) (Apr. 2015) (last checked 5/20/2017).

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- Inability to locate IEPs for 46% of students supposedly receiving special education services;
- Errors in the content of IEPs;
- Failure to re-evaluate student within the required deadlines; and
- Insufficient staff to meet the needs of special education students.

Tulsa Public Schools also investigated DSA – Tulsa in 2009 for problems related to the school's discipline policy following the rape of an eleven-year-old female by an older student.[56] Tulsa Public Schools' letter denying DSA – Tulsa's renewal application stated that the school's disciplinary policies did not comply with state law and contained many deficiencies.[57] Because Harmony purportedly provides DSA – Tulsa with administrative and management services, the deficiencies discovered in DSA – Tulsa's disciplinary policies raises concerns about the quality of Harmony's services.

Similar issues with disciplinary policies and procedures arose in Louisiana. There, one school lacked clear policies and procedures and did not adhere to the existing policies to ensure the health and safety of students. In Louisiana, the Abramson Science and Technology Charter School closed in 2011 following an in-depth investigation by the state Board of Elementary and Secondary Education that uncovered misconduct by the administration and multiple incidents that threatened the health, safety and welfare of the students.[58]

Gülenist Cultural and Business Organizations Active in Oklahoma

- Raindrop Foundation: Raindrop Foundation is a Houston-based organization that sponsors Raindrop Turkish Houses in Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, Tennessee, and New Mexico.[59] There are two Raindrop Turkish houses in Oklahoma: Oklahoma City and Tulsa.[60] The Raindrop Foundation promotes Turkish culture through language and cooking classes, festivals and local events with special guests. It also sponsors annual "dialogue" trips to Turkey for community members and leaders.[61] In Oklahoma City, the Raindrop Turkish House purchased its building from Yuksel Alp Aslandogan, a prominent leader of the Gülen movement, for a price much lower than what he paid to purchase it from the Sky Foundation. The Oklahoma State Auditor and Inspector questioned this transaction and recommended further

[56] Eger, Andrea, *Board votes not to renew charter for Dove school*; Tulsa World (Oct. 27, 2009), available at: http://tinyurl.com/yd4rc8p6 (last checked 6/13/2017). Marshall, Nicole, *Teen Charged in Rape of 11-year-old*; Tulsa World (Dec. 18, 2008), available at: http://tinyurl.com/y9dourj5 (last checked 6/13/2017).

[57] Problems with the discipline policy at DSA – Tulsa is included in a memorandum from the Chair of the Charter School Committee dated October 26, 2009, to the Board of Education. Memo received through a 2017 open records request to Tulsa Public Schools.

[58] Recommendation to revoke charter from Acting State Superintendent made to BESE on August 3, 2011. Document received from the Louisiana Dept. of Education through 2017 open records request; Vanacore, Andrew, *Abramson Charter in eastern New Orleans shut down amid TP investigation into startling misconduct*, New Orleans Times-Picayune (July 15, 2011), available at: http://tinyurl.com/y99fzhj8 (last checked 5/1/2017).

[59] About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

[60] Raindrop Turkish House, available at: http://tinyurl.com/yaqn2g7b (last checked 6/13/2017).

[61] About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

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investigation.[62] The Raindrop Foundation was involved in trips to Turkey for former Governor Brad Henry and former Attorney General Drew Edmondson.[63]

- The Dialogue Institute of the Southwest: The Houston-based Dialogue Institute of the Southwest hosts forums, conferences, dinners, and cultural exchange "dialogue" trips to Turkey.[64] The Dialogue Institute has branches in both Oklahoma City and Tulsa, and operates in Texas, Kansas, Mississippi, Arkansas and New Mexico.[65] The Dialogue Institute is a member organization of the Alliance for Shared Values, the umbrella organization for six Gülenist groups around the United States.[66]

- Turquoise Council for Americans and Eurasians ("TCAE"): The Raindrop Foundation is a member of TCAE,[67] which is in turn a member of the Turkic American Alliance.[68] TCAE is active in Texas and neighboring states. It hosts awards dinners, forums on various topics, and other community and cultural events, and sponsors trips to Turkey and other countries and for local elected officials and leaders.[69] TCAE helped organize a trip for ten members of Congress in 2013 to Baku, Azerbaijan. The Office of Congressional Ethics later investigated the trip when it learned that SOCAR, the state-owned oil company of Azerbaijan, secretly paid for the trip.[70] At the time of the trip, Kemal Oksuz, a founder of a Harmony construction vendor named Target Design and Management ("TDM Construction"), served as TCAE's director.[71] TDM Construction has received over $55 million in contracts from Harmony.[72]

Friends of Gülen Spotlight

Numerous Oklahoma elected officials have taken trips to Turkey or Azerbaijan sponsored by Gülen-affiliated organizations.

U.S. Representative Jim Bridenstine participated in a ten-member Congressional trip in 2013 to Baku, Azerbaijan, organized by TCAE. The Office of Congressional Ethics investigated the trip when it learned SOCAR, the state-owned oil company of Azerbaijan, secretly paid for the trip.[73] The members of Congress did not know that SOCAR funded the trip and sought pre-trip approval from the House Ethics Committee. In the year before the trip, "SOCAR and several large energy companies sought exemptions for a $28 billion natural gas pipeline project in

62 Dove Science Academy Investigative Report (Mar. 2016), Oklahoma State Auditor and Inspector, available at: https://tinyurl.com/kv3ade4 (last checked 6/13/2017).

63 '*Friend of a friend' landed Bridenstine in ethics probe over free trip,* The Oklahoman (Nov. 18, 2015), available at: https://tinyurl.com/n2ar7ag (last checked 5/20/2017); *Raindrop Turkish House Welcomes Attorney General Drew Edmondson*, Raindrop Foundation (Nov. 19, 2008), available at: https://tinyurl.com/n2dc3jn (last checked 5/20/2017).

64 Dialogue Institute of the Southwest, Alliance for Shared Values, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

65 Branches, Dialogue Institute of the Southwest, available at: http://tinyurl.com/ycldgejx (last checked 6/13/2017).

66 Members, Alliance for Shared Values, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

67 Component Members, TCAE, available at: http://tinyurl.com/y8axv2ok (available at 7/15/2017).

68 Turkic American Alliance Members, available at: http://tinyurl.com/ycy89wv2 (last checked 6/18/17).

69 TCAE About Us, available at: http://tinyurl.com/yannxyqc (last checked 6/18/17).

70 Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: http://tinyurl.com/y7pegxo9 (last checked 5/29/2017).

71 TDM Construction, Texas Secretary of State; available at: http://tinyurl.com/r7iw (last checked 2016).

72 Harmony IRS Form 990s (2009 – 2014), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/17).

73 Scott Higham, Steven Rich & Alice Crites, 10 members of Congress took trip secretly funded by foreign government, Washington Post (May 13, 2015), available at: http://tinyurl.com/y7pegxo9 (last checked 5/29/17).

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the Caspian Sea from U.S. economic sanctions being imposed on Iran."[74]

Shortly after returning from the conference, U.S. Rep. Bridenstine sponsored legislation to require the Department of Defense to report on the strategic importance of natural gas interests near the Caspian Sea and the value of building a pipeline out of the region.[75] U.S. Rep. Bridenstine also reportedly accepted $25,000 in campaign contributions at events organized by Kemal Oksuz, the Chairman of TCAE.[76] Oksuz was also affiliated with Target Design and Management, a Houston-based construction company that had over $51 million in contracts between 2009 – 2014 from Harmony Public Schools, the Gülen-affiliated charter network in Texas.[77]

- Other elected officials who participated in expense paid trips to Turkey include[78]:
- Former Oklahoma Governor Brad Henry;
- Former U.S. Representative John Sullivan;
- Former Oklahoma Attorney General Drew Edmondson; and
- Phil Cotten, Norman Chief of Police (2006).

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Zekeriya Yuksel: Superintendent, Harmony (TX); former Executive Director, DSA – Tulsa.[79]
- Kaan Camuz: Chief Communications and Outreach Officer/Director of External Relations, Harmony (TX); former Superintendent, Dove charter schools.[80]
- Birol Furat: Principal, DSA - Tulsa; Principal, LISA Academy (AR).[81]

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74 *Id.*

75 Choma, Russ, *Lawmakers who traveled to Azerbaijan urged action benefiting state oil company that funded trip*, Open Secrets (May 26, 2015), available at: https://tinyurl.com/lun344a (last checked 5/20/2017).

76 *Id.*; *see also Friend of a friend' landed Bridenstine in ethics probe over free trip,* The Oklahoman (Nov. 18, 2015), available at: https://tinyurl.com/n2ar7ag (last checked 5/20/2017).

77

78 *Friend of a friend' landed Bridenstine in ethics probe over free trip,* The Oklahoman (Nov. 18, 2015), available at: https://tinyurl.com/n2ar7ag (last checked 5/20/2017); *Raindrop Turkish House Welcomes Attorney General Drew Edmondson*, Raindrop Foundation (Nov. 19, 2008), available at: https://tinyurl.com/n2dc3jn (last checked 5/20/2017); Brianna Bailey, *Police Chief talks Turkey at Interfaith Dinner*, The Norman Transcript (Oct. 6, 2006), available at: https://tinyurl.com/lnr9ugy (last checked 5/20/2017).

79 Zekeriya Yuksel, LinkedIn, available at: https://tinyurl.com/mn9ablv (last checked 5/20/2017); Sara Plummer, *Dove Faces challenges as charter school*, Tulsa World (Dec. 28, 2015), available at: https://tinyurl.com/n84kjwl (last checked 5/20/2017).

80 Kaan Camuz; LinkedIn, available at: https://tinyurl.com/kbe2svl (last checked 5/20/2017); *see also* Megan Rolland, *Schools' backers say Islamic ties pose no threat*, The Oklahoman (May 1, 2011), available at: https://tinyurl.com/k4ubmjl (last checked 5/20/2017).

81 Sky Foundation IRS 990 Forms (2002 – 2003), available at: https://tinyurl.com/z7xxxk6 (last checked 5/22/2017); *see also* Turkish Cultural Center, New York State Assembly Transcript (May 18, 2011), available at: https://tinyurl.com/l8osue2 (last checked 5/20/2017); LISA Academy, Buzzfile Information Profile, available at: https://tinyurl.com/mv5ukf4 (last checked 5/20/2017); LEA Supervisors by District, (Sep. 14, 2004), available at: https://tinyurl.com/kcq2afa (last checked 5/20/2017).

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- Yalcin Akyildiz: Principal, DSA – OKC; former Principal, Harmony (TX); Regional Superintendent, Harmony (TX); currently CFO, Harmony (TX).[82]

- John Can Topuz: VP of Academic Affairs, North American University; Curriculum Consultant, Sky Foundation (paid $52,836 in 2006).[83]

- Bilal Erturk: President, Sky Foundation; Founder/Officer, Charter School Solutions (real estate organization for Greater Texas region).[84]

- Sharon Akdeniz: Director, Sky Foundation; married to Omer Akdeniz, the spokesperson for the Dialogue Institute of the Southwest in Tulsa and the Raindrop Turkish House.[85]

- Cuneyt Akdemir: Director of Leadership Development/Area Superintendent, Harmony (TX); Superintendent/Principal, LISA Academy (AR); IT Manager/Computer Science Teacher, Dove Science Academy; B.S., Middle East Technical University.[86]

- Birol Ozturk: President, Sky Foundation (OK); Secretary of Board, Syracuse Academy of Science (NY).[87]

- Hakan Yagci: Treasurer, Sky Foundation; CEO, Charter School Solutions; former Budget Director/Principal, Harmony (TX); former Marketing Manager, Design Textile; B.S., Bogazici University (Turkey).[88]

- Mustafa Guvercin: Principal/COO/Assistant Principal/Teacher, DSA – OKC; Superintendent, Abramson Science and Technology Charter School (LA); Math Teacher/Assistant Superintendent, Harmony (TX); Executive Director, Bluebonnet Learning Center; former Teacher, UFUK Educational Foundation and UB International School in Ulaanbaatar, Mongolia.[89]

- Fevzi Simsek: Former Contact Person, DSA – Tulsa; current Cluster Superintendent, Harmony (TX); former Superintendent/CAO/CEO, Harmony (TX); former Principal, Harmony (TX).[90]

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82 Harmony Public Schools Request for Sealed Furniture Bids (2013-2014), available at: http://tinyurl.com/y9evm3lr (last checked 7/16/2017); Yalcin Akyildiz, LinkedIn, available at: http://tinyurl.com/yd3m9ft4 (last checked 7/16/2017); Harmony Public Schools IRS 990 Forms (2011-2012), available at: http://tinyurl.com/hu9wqcl (last checked 6/5/17).

83 John C. Topuz, LinkedIn, available at: http://tinyurl.com/y7opyfxn (last checked 6/14/2017); Sky Foundation IRS 990 Form (2006), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017).

84 Sky Foundation IRS 990 Form (2013), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017); Bilal Erturk, Corporation Wiki, available at: http://tinyurl.com/y7vy3kdk (last checked 7/12/2017).

85 Bill Sherman, *Tulsa Couple undertake pilgrimage to Mecca Tulsa World*, Tulsa World (Dec. 12, 2009), available at: http://tinyurl.com/le89f8k (last checked 6/13/17); Bill Sherman, *Embattled Turkish cleric's influence felt in Tulsa*, Tulsa World (Dec. 20, 2014), available at: https://tinyurl.com/l7wk249 (last checked 5/20/2017).

86 Cuneyt Akdemir, LinkedIn, available at: https://tinyurl.com/kgo8qgh (last checked 5/20/2017).

87 Sky Foundation IRS Form 990 (2006), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017); Syracuse Academy IRS Form 990 (2010), available at: http://tinyurl.com/ybopm98s (last checked 6/13/2017).

88 Sky Foundation IRS Form 990 (2006), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017); Design Build Services for School Construction Projects, Texas Bid Network, available at: http://tinyurl.com/ybgg9fxs (last checked 6/14/2017); Hakan Yagci, Rocket Reach, available at: http://tinyurl.com/ycgntmj6 (last checked 6/14/2017).

89 Charter applications for Abramson Science and Technology, Cowen Institute for Public Education Initiatives at Tulane University, available at: http://tinyurl.com/24t7emn (last checked 6/15/2017); Pelican IRS 990 Form (2007), available at: http://tinyurl.com/y8rdjjx9 (last checked 7/14/2017); Harmony IRS 990 Form (2005), available at: http://tinyurl.com/hu9wqcl (last checked 7/14/2017); Bluebonnet Learning Center Letter to Parents (Apr. 22, 2010), available at: http://tinyurl.com/ybmt35k5 (last checked 6/14/2017); Abramson Charter Application, available at: http://tinyurl.com/ycybxeeb (last checked 7/16/2017).

90 Dove Science Academy, My Visa Jobs, available at: http://tinyurl.com/y7v9prvt (last checked 6/16/2017); Superintendent Salary Reports, Texas Education Agency (last updated Apr. 5, 2017), available at: http://tinyurl.com/ya87d7zw (accessed by searching by Harmony district numbers: 015828, 071806, 101846, 101858, 101862, 161807, and 227816); Texas Education

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- Umit Alpaslan: Superintendent, Dove charter schools; Cluster Superintendent/ School Director, Harmony (TX).[91]

- Vahap Uysal: Founder, Harmony (formerly Cosmos Foundation) (TX); former Oklahoma Area Representative, Turquoise Council of Americans and Eurasians; current faculty advisor, Turquoise University Club (part of the Turkish American Society, Chicago); Board member, Concept Schools (Midwestern Region); wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[92]

Notable Press Coverage and Research Regarding the Oklahoma Gülenist Network

- Felder, Ben. *Oklahoma's schools struggle with plans, unsure of state funding cuts*. The Oklahoman – NewsOK (26 March 2017).[93]

- Ellis, Randy. *Oklahoma schools accused of squandering millions on bond fees*. The Oklahoman – NewsOK (01 November 2016).[94]

- Farley, Tim. *Dove Charter Schools, foundation under scrutiny for financial irregularities*. Red Dirt Report (23 March 2016).[95]

- Habib, Nour. *State audit of Dove Science Academy charter school questions operating foundation's management*. Tulsa World (18 March 2016).[96]

- Ellis, Randy. *State audit questions charter schools' site lease payments*. The Oklahoman – NewsOk (17 March 2016).[97]

- Casteel, Chris. '*Friend of a friend' landed Oklahoma congressman in ethics probe over free trip*. The Oklahoman (18 October 2015).[98]

- Rolland, Megan. *Oklahoma charter schools hire math, science teachers from overseas*. The Oklahoman – News OK (24 May 2011).[99]

- Rolland, Megan. *Schools' backers say Islamic ties pose no threat*. The Oklahoman

Agency Teacher Master List for 2015-2016, received through open records request to Texas Education Agency.

91 Dove Science Elementary (School No. E-013), Financial Statement (June 30, 2016), available at: http://tinyurl.com/ya4sdcsx (last checked 6/13/2017); Umit Alpaslan, LinkedIn, available at: http://tinyurl.com/ybjfa48s (last checked 6/13/2017); Harmony Science Academy - El Paso Letter to Parents, available at: http://tinyurl.com/y9w24yxf (last checked 6/13/2017).

92 Harmony Science Academy Charter Application (Jan. 21, 2000), Texas Education Agency, available at: http://tinyurl.com/r9gvm2l (last checked 6/15/2017); *Raindrop Turkish House Oklahoma City Chapter Host Azerbaijan Ambassador Elin Suleymanov*, Raindrop Foundation, available at: http://tinyurl.com/yb2qxojd (last checked 6/15/2017); Turquoise University Club, available at: http://tinyurl.com/y7oolwkv (last checked 6/15/2017); *Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice*, Agenda (Nov. 3, 2007), http://tinyurl.com/gt2vujs (last checked 10/31/2016).

93 Available at: http://tinyurl.com/yddclz99 (last checked 7/14/2017).

94 Available at: http://tinyurl.com/y7ktvues (last checked 7/14/2017).

95 Available at: http://tinyurl.com/y9cde99t (last checked 7/14/2017).

96 Available at: http://tinyurl.com/y8r6bjl3 (last checked 7/14/2017).

97 Available at: http://tinyurl.com/mlazgpf (last checked 7/14/2017).

98 Available at: http://tinyurl.com/y9n6uzbu (last checked 7/14/2017).

99 Available at: http://tinyurl.com/y9l7ypr5 (last checked 7/14/2017).

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- NewsOK (1 May 2011).[100]

- Rolland, Megan. *Dove Science Academy in OKC celebrates 10 years of success*. The Oklahoman – NewsOK (28 March 2011).[101]

- Eger, Andrea. *Dove School Contract renewed*. Tulsa World (20 January 2010).[102]

- Eger, Andrea. *Board votes not to renew charter for Dove School*. Tulsa World (27 October 2009).[103]

- Eger, Andrea. *Tulsa board ends charter with Dove Science Academy*. Tulsa World (26 October 2009).[104]

- Griffin, Andrew W. *Dove Science Academy: A charter school striving for excellence*. Red Dirt Report (18 September 2009).[105]

[100] Available at: http://tinyurl.com/y97tud7x (last checked 7/14/2017).

[101] Available at: http://tinyurl.com/ybsqyygc (last checked 7/14/2017).

[102] Available at: http://tinyurl.com/y7v73d7r (last checked 7/14/2017).

[103] Available at: http://tinyurl.com/yd4rc8p6 (last checked 6/13/2017).

[104] Available at: http://tinyurl.com/y73hobgh (last checked 7/14/2017).

[105] Available at: http://tinyurl.com/y8dtbksz (last checked 7/14/2017).

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Tennessee


NASHVILLE
CROSSROADS
MUSIC CITY
at&t
ERNEST TUBB
RECORD SHOP
SOARING TO
70TH YEA
WORLD WI
TOURS
TICKETS
BIG TIME
BOOTS
BAILEY'S
OPEN

QUICK FACTS ON GÜLEN CHARTER SCHOOLS TENNESSEE



NUMBER OF SCHOOLS	**1 (2 campuses)**
KNOWN AS	**Memphis School of Excellence**
TOTAL ENROLLMENT	**454**
CHARTER VENDOR	**Harmony Public Schools**
TOTAL REVENUES	**$4,159,192**

RELATED INSTITUTIONS

- TX — Cosmos Foundation/Harmony Public Schools, Riverwalk Education Foundation
- OK — Dove Science
- DC — Harmony D.C.
- LA — Pelican Educational Foundation/ Kenilworth Science
- NM — Albuquerque School of Excellence
- MO — Millennium Education Foundation/ Frontier Schools

KEY PEOPLE



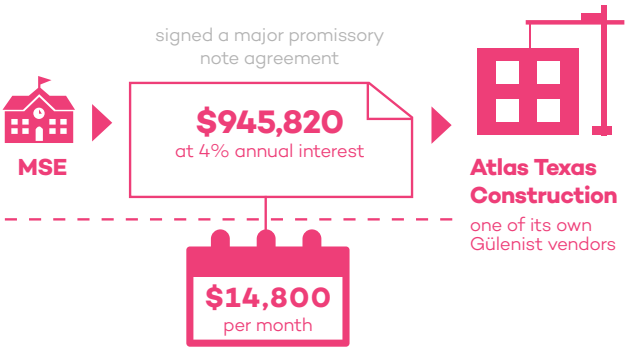
Cem Akkus



Emin Kuscu

FINANCIAL ISSUES

Like other charter schools within the Gülen Organization, MSE displays evidence of poor decision-making and inappropriate use of its public funds.



No reason was provided for the loan in MSE's Financial Statement or minutes. MSE chose Atlas Texas Construction (one of it's own vendors) as its contractor for a $803,750 construction project in 2010-2011 at MSE. The acceptance of a long-term loan of almost **$1 million from a paid vendor incurs an obligation for MSE that raises questions about conflict of interest.**

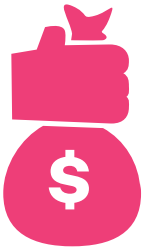
H-1B VISA APPLICATIONS

21 H-1B

H-1B VISA APPLICATIONS 2011 to 2016

$3,000	$63,000
Per application	In total

CORRUPTION ALLEGATIONS



So far, **Atlas Texas Construction** has received over **$12 million** in contracts from Harmony Public Schools. An officer of Atlas Texas Construction was accused of **attempted bribery** of a Louisiana state official in order to influence the outcome of a state investigation of a Gülen school in New Orleans.

All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Greater Texas
- School Names (known as): Memphis School of Excellence
- Total number of schools in state: 1 (2 campuses)
- Total student enrollment 2015-16: 454
- Charter Holder/Governing Board(s):
  - Read Foundation
    - Organized as a non-profit 501(c)(3) organization
    - Read Foundation d.b.a. Memphis School of Excellence[1]
- Charter Management Services Vendor: Harmony Public Schools
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Cosmos Foundation/Harmony Public Schools (TX) Riverwalk Education Foundation (TX); Harmony D.C. (Washington D.C.); Little Scholars of Arkansas (AR); Dove Science (OK); Pelican Educational Foundation/ Kenilworth Science (LA); Millennium Education Foundation/Frontier Schools (MO); Albuquerque School of Excellence (NM)
- Total Revenues for FY 2016: $4,159,192[2]
- Network Founders:
  - Cem Akkus: President, Read Foundation (TN); GIS developer at the University of Memphis (TN); B.S. from Karadeniz Teknik University (Turkey).[3]
  - Emin Kuscu: Board Member, Read Foundation (TN); PHP Developer, SmartSource Technical Staffing (TN).[4]

1 Information taken from Read Foundation IRS Form 990, available at: http://tinyurl.com/ld6lu3y (last checked 7/17/2017).

2 Information taken from Memphis School of Excellence Financial Statements FY 2016, available at: https://tinyurl.com/y8rz6vmf (last checked 7/17/2017).

3 Information taken from: Read Foundation Founding Board Membership on IRS 990 Form 2011, available at: https://tinyurl.com/ld6lu3y (last checked 7/17/2017); Cem Akkus LinkedIn profile, available at: https://tinyurl.com/l3ccaod (last checked 7/17/2017).

4 Information taken from: Read Foundation Founding Board Membership on IRS 990 Form 2011, available at: https://tinyurl.com/ld6lu3y (last checked 7/17/2017); Emin Kuscu LinkedIn Profile, available at: https://tinyurl.com/lq4wjm3 (last checked 7/17/2017).

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Overview

The Memphis School of Excellence (MSE) opened in 2010 operated by the Read Foundation, a Tennessee nonprofit tax-exempt organization d.b.a. MSE. MSE has been tied to Harmony Public Schools and its governing board, the Cosmos Foundation, from MSE's inception. News stories from MSE's first year of operation stated "the Texas-based Cosmos Foundation will open the Memphis School of Excellence."[5] MSE is an example of Harmony's strategic efforts to expand its model, influence, and funding sources within the Greater Texas region. MSE contracted with Harmony Public Schools starting in at least 2011 to provide a range of administrative and management services. Like the majority of Gülenist-controlled charter schools around the country, a supermajority of MSE's board members is of Turkish national origin. MSE's second school opened in July of 2017 and has several pending applications currently up for consideration and approval.

In addition to MSE's efforts to open new charter schools, several other notable Gülenists have filed unsuccessful applications throughout Tennessee. For example, North Carolina network founder Suzan Mertyurek has filed an application to open a charter school in Knoxville.[6] Mertyurek also serves on the Board of Trustees for Virginia International University, a Gülenist institution run by other Gülenist charter network founders[7] and is currently employed as the Public Relations Coordinator of the Knoxville Turkish Cultural Center.[8] Additionally, Ismail Fidan has filed at least three charter applications in Nashville. He is the former President of the Society of Universal Dialogue, a Gülenist cultural association,[9] and serves as the Academic Director of the Advisory Board and Outreach Coordinator for the Atlantic Institute – Tennessee, a Gülenist cultural association affiliated with the FL Gülenist networks.[10] Fidan is also connected to the Coral Academy of Science, a Gülenist network in Reno, Nevada.[11]

5 Roberts, Jane. *New charter leaders savvy, supported – Expansion of eligibility for new schools in Tennessee is an opening for dedicated, experienced organizers*. Commercial Appeal. 6 March 2010. Available in the archives of Commercial Appeal here http://tinyurl.com/y9ggtnv3 (last checked 6/09/2017) or alternately hosted here: http://tinyurl.com/yacx7ngr (last checked 7/17/2017).

6 Board member biography information taken from Triad Math and Science Academy Charter School application received from the North Carolina Department of Public Instruction, response in email 5/12/2017 in response to 2017 FOIA request.

7 Board member biography information taken from Triad Math and Science Academy Charter School application received from the North Carolina Department of Public Instruction, response in email 5/12/2017 in response to 2017 FOIA request.

8 Information taken from: Constantine, Mary. *Dishing with Suzan Mertyure.* Knox News. 16 September 2010. Available at: https://tinyurl.com/mku6zm9 (last checked 7/17/2017).

9 Board membership information taken from: Society of Universal Dialogue IRS 990 Form 2011, available at: https://tinyurl.com/yajw86qq (last checked 7/17/2017).

10 Information taken from Atlantic Institute website, available at https://tinyurl.com/ybsjmkwr (last checked 7/17/2017).

11 Information taken from 2005 research study authored by Ismail Fidan and others involving students at Coral Academy of Science in Reno, Nevada titled *Teaching Basic Engineering Concepts in a K-12 Environment Using LEGO ® Bricks and Robotics*, available at: http://tinyurl.com/y8u8zcmt (last checked 7/17/2017).

School	Operation	Student Demographic Information[14]*	Authorizer	Governing Board
Memphis School of Excellence 4450 S. Mendenhall Rd, Memphis, TN 38141	Grades 6-12[15] 2010-present[16]	Enrollment: 454 50.9% FRL 3.3% SWD 6.6% ELL 76.7% African American 21.1% Hispanic 1.3% Asian <1.0% White	Shelby County Schools[17]	Read Foundation[18]
Memphis School of Excellence 4921 Winchester Road, Memphis, TN	Grades 9-12 2017-present[19]	N/A	Shelby County Schools	Read Foundation
Pending Charter School Applications				
Memphis School of Excellence North *(3 additional schools if approved)*	*Grades K-12* *Vote to approve or deny anticipated August 2017*[20]		*Shelby County Schools*	*Read Foundation*
Closed/Abandoned Schools				
None				
Charter Petition Denials				
Knoxville Charter Academy[21]	*2011-2012*[22]		*Knox County Board of Education*[23]	*Charter Company: Iris Education Foundation*[24] *Petitioners: Suzan Mertyurek, Leyla Achilova*

12 School operation and student demographic data taken from Tennessee School State Report Card for school year 2015-2016, available at https://tinyurl.com/ko96pkn (last checked 7/17/2017).

13 *Ibid*.

14 Information regarding Memphis School of Excellence first year of operation taken from Shelby County Charter Schools 2017 annual report, available at: https://tinyurl.com/mt5ct5p (last checked 7/17/2017)

15 *Ibid*.

16 Memphis School of Excellence governing board information taken from Memphis School of Excellence website, available at: https://tinyurl.com/y9gvumsn (last checked 7/17/2017).

17 Information taken from: Winchester Road ownership via Shelby County Register of Deeds, available at http://tinyurl.com/y8qvfhdh (last checked 6/7/2017); telephone conversation with MSE to confirm opening date. *See* Nichols, Meagan. *Construction: $2m build-out for Memphis charter school*. Memphis Business Journal. 6 September 2016. Available at: http://tinyurl.com/y8r7otlb (last checked 7/17/2017).

18 Information taken from article on new charter applications in Memphis: Kebede, Laura Faith. *Here's who wants to open charter schools in Memphis in 2018.* Chalkbeat. 24 April 2017. Available at: http://tinyurl.com/yb3auxoh (last checked 7/17/2017).

19 Information taken from Knoxville Charter Academy 2010 initial application, available at https://tinyurl.com/m8zwttl (last checked 7/17/2017).

20 Information regarding Knoxville Charter Academy appeal of application denial by the Knox County Board of Education to the Tennessee State Board of Education taken from affirmation of county board denial by State Board, available at: https://tinyurl.com/llgqo7c (last checked 7/17/2017).

21 *Ibid*.

22 Information taken from Knoxville Charter Academy initial application, available at: https://tinyurl.com/m8zwttl (last checked 7/17/2017).

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School	Operation	Student Demographic Information[14]*	Authorizer	Governing Board
Nashville Academy of Science and Technology	*2007-2008*[25]		*Metropolitan Nashville Public Schools Board of Education*[26]	*Petitioner: Ismail Fidan*
Nashville Charter Middle School	*2007*[27]		*Metropolitan Nashville Public Schools Board of Education*[28]	*Petitioner: Ismail Fidan*
Nolensville Academy for Math and Science[29]	*2013*[30]		*Metropolitan Board of Public Education Davidson County, Nashville*[31]	*Petitioner: Ismail Fidan, Mohammed Kokoy*[32]
Private Schools				
None				

**ELL – English Language Learner; FRL – students eligible for free and reduced-price lunch (economically disadvantages); SWD – Student with disabilities (special education)*

A History of Strategic Ambiguity and Conflicting Interests

The Tennessee network began in 2006 with the founding of the first Gülenist cultural associations that would later pave the way for Gülenist charter applications to be approved. The Read Foundation, the non-profit governing board overseeing the MSE chain, was incorporated later in the fall of 2009. The Read Foundation's first school, MSE, opened in Memphis, Tennessee in 2010 under the oversight and direction of Harmony Public Schools, the regional oversight entity for the Greater Texas region of the Gülen Organization. MSE's second school opened in July of 2017, and while this growth seems slower and later than in other states within the Gülen Organization, the amount of attempted but denied charter petitions throughout other cities in Tennessee indicates the Gülen Organization's deep interest in expanding throughout Tennessee. With two schools in operation at the time of this report's publication, and an additional three up

23 Information regarding Nashville Academy of Science and Technology denial taken from Metropolitan Nashville Public Schools Board of Education 11/13/2007 Amended Board Minutes, available at: https://tinyurl.com/ku7eo8o (last checked 7/17/2017).

24 *Ibid*.

25 Information regarding Nashville Charter Middle denial taken from Tennessee State Board of Education Charter School Appeal Decision History in which the State Board affirmed the denial, available at: https://tinyurl.com/lwfhqb5 (last checked 7/17/2017).

26 *Ibid*.

27 Information taken from Nolensville Academy Letter of Intent submitted 1/13/2013, available at: https://tinyurl.com/l99ojfu (last checked 7/17/2017).

28 Information regarding Nolensville's absence from list of approved charters taken from: Zelinski, Andrea. *MNPS recommends four new charters for school board approval.* Nashville City Paper. 14 June 2014. Available at: https://tinyurl.com/lvqq6hx (last checked 7/17/2017).

29 Information taken from Nolensville Academy Letter of Intent submitted 1/13/2013, available at: https://tinyurl.com/l99ojfu (last checked 7/17/2017).

30 *Ibid*.

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for approval in August of 2017, the Tennessee network is poised to expand significantly in the next two years.

As a newer state network, we believe that MSE depends on its regional hub and oversight entity Harmony Public Schools based in Texas to serve as its external educational management organization. Like other state networks within the Greater Texas region, MSE pays Harmony to provide a range of administrative and academic services through a long-term, on-going support services agreement that is annually renewed. The services allegedly provided by Harmony include: school start-up services; facility management; financial consulting; professional leadership; technology and database support; student admissions; marketing and employee recruiting; curriculum and assessment; student development and school climate; cooperation with home-school, external organizations, and science fair organizations; and academic and non-academic performance.[31] Notably, many of these included services relate to what our research instructs us are the Gülen Organization's primary aims—employee recruiting through the H-1B program, facility management through use of Gülenist real estate companies, technology and database support through use of Gülenist vendors, cooperation with science fair organizations through forced involvement with Gülenist-controlled science fairs which serve as profit centers and student award mills that bolster the participating schools' reputations for winning in essentially fake competitions. For these services, MSE initially paid Harmony 3% of all its annual state revenues.[32] Harmony then changed its billing structure and now bills MSE at the rate of $80 - $120 per hour, which we believe makes it easier to upcharge MSE and exploit MSE's funds as Harmony needs by potentially manipulating work hours. In addition, Harmony charges a licensing fee for its intellectual property software, with wide-ranging amounts from $15,000 - $147,000 per school each year.[33] These agreements appear to be ongoing, with the last known renewal ending in 2016.[34]

Financial Issues

Like other charter schools within the Gülen Organization, MSE displays evidence of poor decision-making and inappropriate use of its public funds. For example, MSE signed a major promissory note agreement with Atlas Texas Construction, one of its own Gülenist vendors, on July 11, 2011 for a $945,820 loan at 4 percent annual interest. Payments of $14,800 per month were due to Atlas beginning February 1, 2012, with maturation set for December 2017.[35] No reason was provided for the loan in MSE's Financial Statement or minutes. The balance on the loan was $265,287 as of June 30, 2016.[36] MSE chose Atlas Texas Construction as its contractor for a $803,750 construction project in 2010-2011 at MSE's 4450 S. Mendenhall Road location.[37] The acceptance of a long-term loan of almost $1 million from a paid vendor incurs an obligation

31 *See* Cosmos Foundation bond issue May 1, 2011 Official Statement - Support Services Agreement on p. B-2 & 3, available at: http://tinyurl.com/yay4nstx (last checked 7/17/2017).

32 *Ibid*.

33 *See* Harmony bond issue July 2, 2014 Official Statement Pg. B-3, available at: http://tinyurl.com/ybjjzsjd (last checked 7/17/2017).

34 *See* Memphis School of Excellence Financial Statements FY 2016, p. 22, available at: https://tinyurl.com/y8rz6vmf (last checked 7/17/2017).

35 Information taken from Memphis School of Excellence Financial Statements FY 2011, p. 24, available at: https://tinyurl.com/y9x5v6jp (last checked 7/17/2017).

36 Information taken from Memphis School of Excellence Financial Statements FY 2016, p. 22, available at: https://tinyurl.com/y8rz6vmf (last checked 7/17/2017).

37 Information regarding Total Contract valuation and Contractor: Phoenix Building Group taken from 7/21/2010 attachment on the Application for Building Permit #B1028459 for 4450 S. Mendenhall Road retrieved via Memphis and Shelby County Office of Construction Code Enforcement search, available at: http://tinyurl.com/y8v3zys6 (last checked 7/17/2017).

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for MSE that raises questions about conflict of interest and whether the selection of Atlas as a contractor/vendor was through an open and competitive process, or like most Gülenist vendors chosen by Gülenist charter schools, a matter of apparent insider dealing.

As another example of financial misuse, the MSE Board approved using its limited public school funds to support a moving expense reimbursement policy for its employees on January 30, 2016.[38] While this kind of policy is practically unheard of in public education and the charter school field, it is a known practice of the Gülen Organization and is even referenced in the *tuzuk,* or contract, that Gülenist H-1B employees agree to in order to be placed in a Gülenist charter school in the United States.[39] Because Gülen charter schools recruit teachers from Turkey and continually move Turkish staff from school to school across state lines, the cost to reimburse staff for moving expenses is likely substantial, not appropriate for public funds, and we believe just another way the Gülen Organization misuses public tax dollars to fund its own agenda.

Bond Financing

Neither the Read Foundation nor MSE have borrowed funds through a bond issue. To date, Charter School Solutions, the real estate arm of Harmony Public Schools, has not borrowed money through a bond for MSE, though this network should be watched in case the three new campuses are approved as a bond may be imminent to support new buildings.

For Harmony Public Schools and other networks within the Greater Texas region, Harmony's private external real estate arm Charter School Solutions (CSS) typically applies for facilities bonds to purchase property and construct and/or renovate schools and then rent back those properties at an excessive cost for the apparent benefit of the Gülen Organization. Under its arrangement with Harmony, CSS owns these bond-financed properties and become the landlord for the schools, leasing the facilities back to the schools and charging inflated rents that are more than what is owed on the bonds. We believe that CSS uses the excess rental payments to fund its own operations and programs and expand the Harmony model to other states. CSS issued a $44 million bond for Harmony Public Schools in April 2016 and an $8 million bond for the Albuquerque School of Excellence in June 2016. CSS is charging these two affiliated charter networks $750,000 per year more than the debt on the bond, a total of $22.5 million over the life of the bond that we believe benefits the Gülen Organization directly at the public's expense.

Real Estate

So far, MSE has not rented or purchased any property from a Gülenist real estate company. As the TN network is still very new, this will likely change as MSE gets approval for additional schools and campuses throughout the state. MSE currently rents its facility at 4450 S. Mendenhall Road (Memphis) from an unaffiliated entity, RREEF America Reit II Corporation.[40] MSE purchased property on 4921 Winchester Road in April 2016 for $950,000 from an unaffiliated party and filed a $2 million building permit to update the multi-building facility for a new high school

[38] Information taken from MSE Board minutes, available at: http://tinyurl.com/yddn3xnk (last checked 7/17/2017).

[39] *See* Tuzuk agreement, Appendix I

[40] Information taken from RREEF America Reit II Corp Bloomberg Company overview, available at: https://tinyurl.com/y94ejye2 (last checked 7/17/2017).

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campus opened in July 2017, however the company doing the construction work, Ybos & Sons, does not appear to be affiliated with the Gülen Organization.[41]

MSE did hire one of Harmony's preferred vendors for the Greater Texas region, Atlas Texas Construction and Trading, to serve as the contractor for an $803,750 construction project at the 4450 S. Mendenhall Road school site in 2010.[42] In July 2011, Atlas Texas Construction then extended a $945,820 loan to MSE with monthly payments of $14,800 and a maturation date of December 2017.[43] The reason for the loan is not specified in MSE's Financial Statement. The acceptance of a long-term loan of almost $1 million from a paid vendor incurs an obligation for MSE that raises questions about conflict of interest whether the selection of a contractor/vendor has been an open and competitive process. So far, Atlas Texas Construction has received over $12 million in contracts from Harmony Public Schools.[44] Notably, the same officer of Atlas Texas Construction who is referenced in the MSE construction project letter was accused of attempted bribery of a Louisiana state official in order to influence the outcome of a state investigation of a Gülen school in New Orleans.[45]

Excessive Use of H1-B Visa Program

Like other Gülen organization charter networks, the Read Foundation and the MSE utilize the H-1B visa program to immigrate large numbers of individuals from Turkey who are affiliated with Gülen into the United States for employment in the schools. From 2011 to 2016, Read and the MSE filed a total of 6 H-1B visa applications.[46] The cost of these applications is estimated to be $3,000 per application, with a total of $63,000 spent in public funds so far.

While Gülenist administrators state that the visas are necessary to fill shortages for math and science teachers, positions are actually filled for a wide range of positions, including: Turkish teachers, principals, assistant principals, budget analysts, instructional coordinators, and foreign language teachers.[47]

Read and MSE use the same immigration attorneys to file and process their H-1B visa applications as other know Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an

41 Information regarding purchase of new MSE facility taken from: Nichols, Meagan. *Construction: $2 million build-out for Memphis charter school*. Memphis Business Journal. 6 September 2016. Available at: http://tinyurl.com/y8r7otlb (last checked 7/17/2017).

42 The following information regarding Atlas contract with MSE for 2010 renovation at 4450 S. Mendenhall Road was retrieved via Memphis and Shelby County Office of Construction Code Enforcement search, available at: http://tinyurl.com/y8v3zys6 (last checked 7/17/2017). *See* first document: Letter to Inci Akpinar (Atlas Texas Construction & Trading Inc) from Marcus Denton (lead architect on the MSE project) re: building specifications, 8/30/2010 attachment on the Application for Mechanical Permit 4450 Mendenhall Road. *See* second document: Stop Work order issued to Atlas Texas Construction for installing DOA units without permit from the Memphis and Shelby County Office of Construction Code Enforcement 12/21/2010. *See* third document: Application completed by "Owner/customer" – Atlas Texas Construction, for Mechanical Permit issued to Security Fire Protection 8/11/ 2010. *See* fourth document*:* Total Contract valuation, Contractor: Phoenix Building Group 7/21/2010 attachment on the Application for Building Permit 4450 S. Mendenhall Road.

43 Information taken from Memphis School of Excellence Financial Statements FY 2011, p. 24, available at: https://tinyurl.com/y9x5v6jp (last checked 7/17/2017).

44 *See* independent contractors with contracts $100k and over, IRS Form 990 for Harmony 2007, 2008, 2010, available at: http://tinyurl.com/hu9wqcl (last checked 7/17/2017).

45 Information taken from: Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time-Picayune. 22 July 2017. Available at: http://tinyurl.com/3l2cnxs (last checked 7/17/2017).

46 The Tennessee charter schools' H-1B applications from 2001-2016 are available at: http://tinyurl.com/yad7veos (Memphis School of Excellence) (3); http://tinyurl.com/yb45hzau (Read Foundation) (3) (last checked 7/16/2017).

47 Information regarding positions listed on H1-B visa applications available at: https://tinyurl.com/m4qoxkv (last checked 7/17/2017).

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overall network.

- Leonard D'Arrigo: the Tennessee network used D'Arrigo, an Albany, NY-based attorney, to file numerous H-1B applications. D'Arrigo also filed applications for other Gülenist entities, including:[48]
  - Cosmos Foundation (TX)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Central Jersey College Prep Charter School (NJ)
  - Syracuse Academy of Science Charter School (NY)
  - Millennium Education Foundation/ Frontier Schools (MO)
  - Rochester Academy Charter School (NY)
  - Dove/Sky Foundation (OK)
  - Bergen Arts and Science Charter School (NY)
  - Albuquerque School of Excellence (NM)
  - Truebright Science Academy Charter School
- Garrett White: the Tennessee network used White, a Houston, TX-based attorney, to file numerous H-1B applications. White also filed applications for other Gülenist entities, including:[49]
  - Cosmos Foundation (TX)
  - Dove Science Academy (OK)
  - Riverwalk Education Foundation (TX)
  - Pelican Educational Foundation (LA)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation (TX and Greater Texas region)
  - Dove/Sky Foundation (OK)
  - Millennium Education Foundation/ Frontier Schools (MO)
  - Texas Gulf Foundation (TX)
  - Helix Design and Production
  - Solidarity Contracting (TX)
  - Brighten Technologies (TX)
  - Target Design and Management (TX)
  - Institute of Interfaith Dialog for World Peace
  - Nur International

Notable Turkish Vendors

Atlas Texas Construction: Atlas Texas Construction and Trading was hired by MSE to serve as the contractor for an $803,750 construction project at the 4450 S. Mendenhall Road school site in 2010 as evidenced by numerous documents that reference Atlas Texas Construction.[50] In February 2012, despite its status with MSE as a paid vendor, Atlas Texas Construction extended a $945,820 loan to MSE with monthly payments of $14,800 and a maturation date of December 2017. The reason for the loan is not specified in the Financial Statement. Atlas is a known vendor used by Harmony Public Schools and throughout the Greater Texas region. Of particular note, the same individual listed on the MSE construction application was accused of bribing a state official in Louisiana in reference to that official's investigation of the

[48] Information regarding Leonard D'Arrigo H1-B visas filed available at: https://tinyurl.com/kcb3kjq (last checked 7/17/2017).

[49] Information regarding Garrett White H1-B visas filed available at: https://tinyurl.com/lg5f2aq (last checked 7/17/2017).

[50] The following information regarding Atlas contract with MSE for 2010 renovation at 4450 S. Mendenhall Road was retrieved via Memphis and Shelby County Office of Construction Code Enforcement search, available at: http://tinyurl.com/y8v3zys6 (last checked 7/17/2017). *See* first document: Letter to Inci Akpinar (Atlas Texas Construction & Trading Inc) from Marcus Denton (lead architect on the MSE project) re: building specifications, 8/30/2010 attachment on the Application for Mechanical Permit 4450 Mendenhall Road. *See* second document: Stop Work order issued to Atlas Texas Construction for installing DOA units without permit from the Memphis and Shelby County Office of Construction Code Enforcement 12/21/2010. *See* third document: Application completed by "Owner/customer" – Atlas Texas Construction, for Mechanical Permit issued to Security Fire Protection 8/11/ 2010. *See* fourth document: Total Contract valuation, Contractor: Phoenix Building Group 7/21/2010 attachment on the Application for Building Permit 4450 S. Mendenhall Road.

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Gülenist charter network there.[51]

Harmony Public Schools: MSE has contracted with Harmony through a support services agreement to provide a range of management and administrative services to the school for a fee. In addition, Harmony now charges a licensing fee for is intellectual property software charging $15,000 - $147,000 per school per year.[52] As of 2013, the Memphis School of Excellence renewed its contracts with Harmony Public Schools for its management services.[53]

Winport Group LLC: The MSE Board voted to approve a $7,205 contract with the Winport Group LLC for purchase of lockers and teacher desks at its October 31, 2015 meeting.[54] The Winport Group LLC, formerly Aurora Handyman or Aurora International, is a Texas company that operates under eight assumed names.[55] It had a $4.5 million contract with Harmony Public Schools[56] and is currently owned by Ahmet Duran who is affiliated with the American Turkish Business Council and the Raindrop Foundation.[57]

Scandals, Investigations, & Notable Activities

Dr. Willie Herenton, a former Mayor of Memphis and school superintendent, filed charter applications to open the W.E.B. DuBois Consortium of 9 charter schools in Memphis stating that Harmony Public Schools, the Gülen -affiliated charter network in Texas, would provide start-up assistance and ongoing school operations.[58] When questioned about the relationship with Harmony by a County Commissioner who questioned Harmony's association with Fethullah Gülen , Herenton stated that there was no actual alliance with Harmony and that he had referenced the partnership in his application only to impress a state official from Texas. Harmony also denied any connection with the W.E.B. Dubois schools. In the end, the W.E.B. DuBois charter application was denied by the Shelby County Schools, but remanded back to the district for approval by the State Board of Education[59] and later approved by the district.[60] There is no known involvement between the two entities at this time, but bizarrely it remains the most scandalous attention the Gülen Organization has received in Tennessee despite the fact that Gülenist charter schools with actual affiliations to Harmony have been opened since.

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51 Information taken from: Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time-Picayune. 22 July 2017. Available at: http://tinyurl.com/3l2cnxs (last checked 7/17/2017).

52 *See* Harmony bond issue 7/02/2014 Official Statement Pg. B-3, available at: http://tinyurl.com/ybjjzsjd (last checked 7/17/2017).

53 Information taken from Memphis School of Excellence Financial Statements FY 2016, p. 22, available at: https://tinyurl.com/y8rz6vmf (last checked 7/17/2017).

54 MSE Board minutes from 10.31.15; available from https://www.sememphis.org/Admission/2015-10-31%20Agenda%20and%20Minutes%20Read%20Foundation.pdf (last checked 6.8.17).

55 Texas Secretary of State SOSDirect to find business entities; available from https://direct.sos.state.tx.us/acct/acct-login.asp (last checked 2016).

56 *See IRS Form 990 -2011 for Harmony available from https://projects.propublica.org/nonprofits/organizations/760615245 (last checked 2016).*

57 *Corporate documents for American Turkic Business Council (2015) and Rain Drop Foundation (2.17.16) available from Texas Secretary of State, available at http://tinyurl.com/mfxbyjr (last checked 2016).*

58 Information taken from: Bailey, Clay and Roberts, Jane. *Charter's affiliation under fire*. Commercial Appeal. 12 June 2012. Available at: http://tinyurl.com/y7eon5ca (last checked 7/17/2017).

59 Information regarding decision by the State Board of Education taken from Charter School Appeal Decision History, available at: http://tinyurl.com/lwfhqb5 (last checked 7/17/2017).

60 Information regarding WEB Dubois charter approval taken from: Hannah, Faith. *Former Mayor to Break Ground on Charter Schools*. WREG. 17 April 2013. Available at: http://tinyurl.com/yc2k6uqv (last checked 7/17/2017).

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Gülenist Cultural and Business Organizations Active in State

Turkish cultural organizations play a central role in the Gülen landscape, serving as the external face to the community that obscures the true activities of the organization. They are generally nonprofit organizations with governing boards often composed largely of individuals of Turkish national origin. The organizations provide a platform for community involvement, hosting events where local leaders are honored, convening forums and conferences, and sponsoring expense-paid trips to Turkey that promote the Gülen Movement. In addition, our research suggests that funds collected through the various Gülen charter school schemes – vendor contracts, excessive rents, and teacher kickbacks – can be channeled through the organizations to pay for programs that will enhance the façade of legitimacy.

Society of Universal Dialogue (SUD): SUD is a nonprofit, tax-exempt organization founded in Nashville, Tennessee in 2006 that hosts intercultural and interfaith events often in collaboration with other community groups to "promote dialogue" across the state.[61] It hosts annual dinners that honor local leaders, and it sponsors trips to Turkey for elected officials and community leaders. The Knoxville Turkish Cultural Center is a separate unit that operates under the of SUD organization umbrella. Most recently, the Atlantic Institute - Tennessee was created as a spinoff from SUD that will take over many of its interfaith and education activities. SUD will operate as the Tennessee Istanbul Cultural Center (TNICC) with offices in Knoxville and Nashville and focus primarily on community services.[62] Many of SUD's/TNICC leaders are connected to other Gülen -affiliated organizations in Tennessee such as the Turkish American Chamber of Commerce. (see *Connections* section of this document). An example of a community event hosted by the SUD/TNICC is the annual Dialogue and Friendship dinner in 2010 that presented community service awards to Governor Phil Bredesen, Representative Jim Cooper, and Nashville Mayor Karl Dean.[63]

Tennessee Istanbul Cultural Center (TICC): The Society of Universal Dialogue (SUD) now operates as the Tennessee Istanbul Cultural Center.[64]

Turkish American Chamber of Commerce of the Southeast (TACC) - Tennessee: TACC was created in 2006 to promote trade and investment opportunities between Turkey and the Southeast region of the United States and to further social relationships between the two countries.[65] Based in Atlanta, it is active in Tennessee, Florida, South Carolina, Alabama, and Georgia and has a branch office in Nashville. Many of TACC's leaders in Tennessee are connected to other Gülen -affiliated organizations such as the Tennessee Istanbul Cultural Center (see *Connections* section of this document).

Atlantic Institute – Tennessee (Institute – TN): The Atlantic Institute - Tennessee is a spin-off from the Society of Universal Dialogue (SUD) in Tennessee and has offices in Nashville and Knoxville (shares an address with the Tennessee Istanbul Cultural Center in Nashville).[66] It recently

[61] *See* organization description on TN Istanbul Cultural Center website, available at: http://tinyurl.com/y8rx6ozc (last checked 7/17/2017).

[62] *See* About Atlantic Institute Tennessee, available at: https://tinyurl.com/y9fm7ths (last checked 7/17/2017).

[63] *See* Tennessee Istanbul Cultural Center Fourth Annual Dialogue and Friendship dinner 2010, available at: http://tinyurl.com/yb6elrtj (last checked 7/17/2017).

[64] *See* organization description on TN Istanbul Cultural Center website, available at: http://tinyurl.com/y8rx6ozc (last checked 7/17/2017).

[65] *See* About the Turkish American Chamber of Commerce of the Southeast, available at: https://tinyurl.com/yb3cmp5h (last checked 7/17/2017).

[66] *See* Atlantic Institute Tennessee staff listing, available at: http://tinyurl.com/ycqar8nl (last checked 7/17/2017).

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took over many of the activities previously sponsored by SUD including awards dinners, forums on various topics, and other community events. It also sponsors trips to Turkey for local elected officials and leaders. The Institute - TN is a member of the Atlantic Institute that has chapters throughout the Southeast United States, including Florida, Tennessee, Georgia, Alabama, Tennessee and South Carolina. The Atlantic Institute is a member organization of the Alliance for Shared Values (Alliance), the national umbrella organization for six Gülen groups around the United States that are openly aligned with the Gülen Movement.[67] Institute leaders in Tennessee are connected to other Gülen -affiliated organizations in the state such as the Turkish American Chamber of Commerce Southeast. (see *Connections* section of this document). Examples of community events sponsored by the Institute - TN include the 2014 Dialogue and Friendship dinner that presented an award to Tennessee Governor Bill Haslam[68] and the 2013 dinner that presented awards to Nashville Chief of Police Steve Anderson and Tennessee Supreme Court Justice Sharon Lee.[69]

Friends of Gülen Spotlight

Many elected officials participate in expense-paid trips to Turkey and other aligned countries such as Azerbaijan that are organized and paid by Gülen -affiliated organizations such as the Turquoise Council of Americans and Eurasians. At least 11 elected officials from Tennessee participated in the trips to Turkey in recent years, including:

- Senator Stacey Campfield (2013)[70]
- Representative Antonio Parkinson (2013)[71]
- Representative Johnnie Turner (2013)[72]
- Representative Roger Kane (2013)[73]
- Representative Harry Brooks (2012)[74] Trip partly paid for by the Azerbaijan national oil company (SOCAR)
- Representative Joe Armstrong (2012)[75]
- Senator Brian Kelsey (2013)[76]
- State Representative Joe Towns (2013)[77]
- Representative Terri Lynn Weaver (2013)[78]
- Senator Reginald Tate (2012)[79]

67 *See* Alliance for Shared Values on Atlantic Institute website, available at: https://tinyurl.com/ybsjmkwr (last checked 7/17/2017).

68 Information regarding Atlantic institute Tennessee Dialogue and Friendship dinner 2014 available at: https://tinyurl.com/y9vk4hb3 (last checked 6/5/2017).

69 Information regarding Atlantic institute Tennessee Dialogue and Friendship dinner 2013 available at: https://tinyurl.com/y956gagy (last checked 7/17/2017).

70 Information taken from: Humphrey, Tom. *Campfield, Kane among lawmakers going on trip to Turkey, Azerbaijan; Groups with ties to Muslim leader paying*. Knoxville News Sentinel. 1 May 2013. Available at: https://tinyurl.com/mgjb9a8 (last checked 7/17/2017).

71 *Ibid*.

72 *Ibid*.

73 *Ibid*.

74 *Ibid*.

75 *Ibid*.

76 *Ibid*.

77 *Ibid*.

78 *Ibid*.

79 *Ibid*.

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- Former Representative Joshua Evans (2012)[80]
- Former Representative Gary Odom (2012)[81]
- Bill Gibbons, State Safety Commissioner (2013)[82]
- David Purkey, state Safety Assistant Commissioner (2013)[83]

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H1-B visa employees, both teachers and administrators, among schools, states, and education management vendors in different types of jobs. The individuals listed below are examples of the overlap of employees among these organizations, further demonstrating the interconnections and affiliation between the networks.

- Ali Gumus: Principal and Board Member, Read Foundation/Memphis School of Excellence (TN); Principal and Superintendent of LISA Academy - Gülen -affiliate (AR).[84]
- Soner Tarim: CEO, Harmony Public Schools (TX); Director, Turkish American Business Council (TX).[85]
- Muhammet Turkay: Executive Director, Read Foundation (TN); Principal, Memphis School of Excellence (TN); Director, Sky Foundation (OK); Math Teacher, Dove Science Academy (OK); Student, Industrial Engineering (Istanbul University).[86]
- Suzan Mertyurek: Public Relations Coordinator, Knoxville Turkish Center; Lead Applicant, failed Knoxville Charter Academy (TN); Director and Founder, Triad Math and Science Academy (NC); Board of Trustees, Virginia International University - a Gülenist university (VA).[87]
- Bayram Demirbuga: Director, Read Foundation (TN); President, Society of Universal Dialogue (TN).[88]
- Ayhan Korucu: President, Turkish American Chamber of Commerce of the Southeast (GA); Founding Board Member, Fulton Educational Services,

80 *Ibid*.

81 *Ibid*.

82 *Ibid*.

83 *Ibid*.

84 Information taken from: Read Foundation IRS 990 Form 2013, available at: https://tinyurl.com/ld6lu3y (last checked 7/17/2017); Ali Gumus LinkedIn Profile, available at: https://tinyurl.com/lm6oldk (last checked 7/17/2017); Little Scholars of Arkansas Board Membership on IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 7/17/2017).

85 Information taken from: Soner Tarim LinkedIn Profile, available at: https://tinyurl.com/lfadqgq (last checked 7/17/2017); Best Company Texas information page regarding Turkish American Business Council, available at: https://tinyurl.com/ldwlfvq (last checked 7/17/2017).

86 Information taken from Muhammet Turkay LinkedIn Profile, available at: https://tinyurl.com/kferm4p (last checked 7/17/2017).

87 Information taken from: Constantine, Mary. *Dishing with Suzan Mertyurek*. Knoxville.com. 16 September 2010. Available at: http://tinyurl.com/mku6zm9 (last checked 7/17/2017); Knoxville Charter Academy initial application, available at: https://tinyurl.com/m8zwttl (last checked 7/17/2017); Suzan Mertyurek on Triad Math and Science academy governing board from Triad initial application with North Carolina Department of Public Instruction, received in an email sent in response to 2017 FOIA request on 5/12/2017; *Ibid*.

88 Information taken from: Memphis School of Excellence board meeting minutes – newly elected to Board in 2016, available at https://tinyurl.com/y9st7fgn (last checked 7/17/2017); Society of Universal Dialogue IRS 990 Form 2009, available at: https://tinyurl.com/yb9nbaq5 (last checked 7/17/2017).

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Inc. (GA); CEO, Fulton Science Academy Middle School (GA); CEO, Fulton Science Academy High School (GA); CEO, President, Fulton Sunshine Academy (GA); President, Fulton Science Academy Private School (GA).[89]

- Azamat Kolbaev: Budget Accountant, Operations Manager, Read Foundation (TN); Budget Accountant, North American University - a Gülenist university (TX); Student, International Ataturk Alatoo University (Turkey).[90]

- Emin Kuzcu: Founding Board Member, Read Foundation (TN); Board Member, Society of Universal Dialogue (TN).[91]

- Omer Casurluk: Former Executive Director, Society of Universal Dialogue (TN); Executive Director, Turkish American Chamber of Commerce Southeast (GA).[92]

- Ismail Fidan: President, Society of Universal Dialogue (TN); Academic Director, Outreach Coordinator, Atlantic Institute (TN); Lead Petitioner, multiple failed Tennessee Gülen schools (TN); position unknown, Coral Academy of Science (NV).[93]

- Alp Levent: Executive Director, Turkish American Chamber of Commerce of the Southeast (GA); Advisory Board Member, Atlantic Institute Tennessee (TN).[94]

- Adil Soyuer: Executive Director and Director of Economic Relations, Turkish American Chamber of Commerce of the Southeast (GA); Business Manager, Triad Math and Science Academy (NC); B.A. Economics, Karadeniz Teknik Universitesi (Turkey).[95]

- Ahmet Vehbi Ugur: Treasurer, Turkish American Chamber of Commerce of the Southeast (GA); Owner, TruGlobe Inc. - which bought the Fulton Science Academy Charter School when it was sold at foreclosure for much less than it was worth (GA).[96]

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89 Information taken from: TACCS IRS 990 2011, available at: http://tinyurl.com/ycnh3lor (last checked 7/17/2017); FSAMS Audit, available at: http://tinyurl.com/ybwt5837 (last checked 7/17/2017); FSAPS 990 forms, available at: http://tinyurl.com/kq8yqex (last checked 7/17/2017).

90 Information taken from Azamat Kolbaev LinkedIn Profile, available at: http://tinyurl.com/y8k2oe7k (last checked 7/17/2017).

91 Information taken from Society of Universal Dialogue IRS 990 Form 2009, available at: https://tinyurl.com/yb9nbaq5 (last checked 7/17/2017).

92 *Ibid*; information taken from Omer Casurluk LinkedIn profile, available at: https://tinyurl.com/ybtqzmrq (last checked 7/17/2017).

93 Information taken from: Board membership on Society of Universal Dialogue IRS 990 Form 2011, available at: https://tinyurl.com/yajw86qq (last checked 7/17/2017); Atlantic Institute website, available at: https://tinyurl.com/ybsjmkwr (last checked 7/17/2017); Nolensville Academy Letter of Intent submitted 1/13/2013, available at: https://tinyurl.com/l99ojfu (last checked 7/17/2017); 2005 research study authored by Ismail Fidan and others involving students at Coral Academy of Science in Reno, Nevada titled *Teaching Basic Engineering Concepts in a K-12 Environment Using LEGO ® Bricks and Robotics,* available at: http://tinyurl.com/y8u8zcmt (last checked 7/17/2017).

94 Information taken from: Humphrey, Tom. *Campfield, Kane among lawmakers going on trip to Turkey, Azerbaijan; Groups with ties to Muslim leader paying*. Knoxville News Sentinel. 1 May 2013. Available at: https://tinyurl.com/mgjb9a8 (last checked 7/17/2017); Atlantic Institute of TN board members list, available at: https://tinyurl.com/y9y9xj2n (last checked 7/17/2017).

95 Information taken from TACCS IRS 990 Form 2011, available at: http://tinyurl.com/ycnh3lor (last checked 7/17/2017); Adil Soyuer LinkedIn Profile, available at: https://tinyurl.com/yaafjxnz (last checked 7/17/2017).

96 Information taken from: TACCS IRS 990 form 2012, available at: http://tinyurl.com/ycnh3lor (last checked 7/17/2017); TruGlobe Information acquired from Georgia Corporations Division of the GA Secretary of State, available at: http://tinyurl.com/kzq4gte (last checked 7/17/2017).

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Notable Press Coverage and Research Regarding the Tennessee Gülenist Network

Lowary, Jake and Bado, Kirk A. *3 Tennessee lawmakers took Gülen -funded trips to Turkey.* The Tennessean. 9 February 2017. Available at: http://tinyurl.com/ybz6tbaa (last checked 7/17/2017).

Humphrey, Tom. *Tenn. Lawmakers encounter Turkish protestors*. Knoxville News Sentinel. 9 June 2013. Available at: http://tinyurl.com/n46tbpt (last checked 7/17/2017).

Humphrey, Tom Campfield. *Kane among lawmakers going on trip to Turkey, Azerbaijan; Groups with ties to Muslim leader paying*. Knoxville News Sentinel. 1 May 2013. Available at: https://tinyurl.com/mgjb9a8 (last checked 7/17/2017).

Kebede, Laura. *Here's who wants to open charter schools in Memphis in 2018.* Chalkbeat. 24 April 2017. Available at: http://tinyurl.com/yb3auxoh (last checked 7/17/2017).

Nichols, Megan. *Construction: $2 million build-out for Memphis charter school.* Memphis Business Journal. 6 September 2016. Available at: http://tinyurl.com/y8r7otlb (last checked 7/17/2017).

Bailey, Clay and Jane Roberts. *Charter's affiliation under fire.* The Commercial Appeal. 12 June 2012. Available at: http://tinyurl.com/l6gds29 (last checked 7/17/2017).

Texas



QUICK FACTS ON GÜLEN CHARTER SCHOOLS **TEXAS**



NUMBER OF SCHOOLS	54
KNOWN AS	**Harmony, Science and Technology**
TOTAL ENROLLMENT	**32,493**
CHARTER VENDOR	**Harmony Public Schools**
TOTAL REVENUES	**$317,437,421**

RELATED INSTITUTIONS

- OK — Dove Public Charter School Foundation
- AR — Little Scholars of Arkansas Foundation
- MO — Frontier Schools
- TX — Riverwalk Education Foundation
- DC — Harmony D.C.
- TN — Read Foundation
- LA — Pelican Educational Foundation
- NM — School of Excellence

KEY PEOPLE

Ali Yavuz Zeybek, Yetkin Yildirim, Vahap Uysal, Suleyman Bahceci, Coskun Cetinkaya, Soner Tarim, Maria Frances Curtis-Richardson, Murat Torlak, Turgay Korkmaz, Mehmet Sabri Agachan, Bulent Gumus

FINANCIAL ISSUES

In 2012, the TEA published an audit of Harmony's federal program spending. Findings included:

Harmony misspent **$186,000** **in federal funds**

Inappropriate use of federal funds for payroll

Non-compliant financial accounting records

33.7% of the Title I expenditures are questionable

Over Half of the IDEA special education expenditures are questionable

According to the TEA, the questionable costs constituted a "material amount and effectively illustrate the degree to which [Harmony] failed to comply with law, rules and grant requirements and to maintain internal control over federal programs."

BOND FINANCING

Harmony currently owes a principal and interest debt of **$645,405,203.53** On public bond issuances

Harmony created CSS in 2015 to serve as a third-party real estate arm for financing and developing charter schools in Texas and nine other states in the Greater Texas Gülen region.

CSS

Under its arrangement with Harmony, CSS will own these properties and lease the facilities back to the schools, **charging schools inflated rents** that are significantly higher than the bond service payments and more than the bond reserve fund requirements.

HIRING PRACTICES

Harmony also favors Turkish nationals for leadership positions and, in most cases, Turkish men.

100% of Harmony's ten senior leadership & six cluster superintendents positions including the CEO are Turkish men.

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas

- School Names (known as):
  - Harmony Public Schools
  - Schools of Science and Technology (SST)

- Total number of schools in state: Total - 54[1] (7 new schools to open in 2017-18)
  - Harmony - 48 (6 new schools to open in 2017-18)
  - Science and Technology – 6 (1 new school to open in 2017-18)

- Total student enrollment 2015-16: 32,493[2]
  - Harmony Public Schools: 30,450
  - Schools of Science and Technology: 2,043

- Charter Holder/Governing Board(s):
  - Harmony Public Schools
    - Organized as a non-profit 501(c)(3) organization (originally incorporated as the Cosmos Foundation)
    - Oversees the Harmony schools (48 schools, with 6 new schools opening 2017-18)
  - Riverwalk Education Foundation
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the Schools of Science and Technology (6 schools with 1 new school opening 2017-18)

- Charter Management Services Vendor: Harmony Public Schools[3]

- Regional Gülen Organization Oversight Entity: Harmony Public Schools

- Regional Sister Networks:
  - Little Scholars of Arkansas Foundation (AR) (LISA Academies)
  - Harmony DC Public Charter Schools (D.C.) (Harmony School of Excellence)
  - Dove Public Charter School Foundation (OK) (Dove Science) (formerly Sky Foundation)
  - Read Foundation (TN) (School of Excellence)
  - Frontier schools (MO) (formerly Millenium [sic])
  - School of Excellence (NM) (formerly Focus Foundation)
  - Pelican Educational Foundation (LA) (Kenilworth/Abrahamson schools)
  - Riverwalk Education Foundation (TX) (Schools of Science and Technology)

- Total Revenues for FY 2016: $317,437,421[4]
  - Harmony Public Schools: $298,731,072
  - Riverwalk Education Foundation (SST Schools): $18,706,349

- Network Founders:
  - Harmony Public Schools (formerly the Cosmos Foundation):
    - Ali Yavuz Zeybek: Founder, Harmony

1 The total number of schools includes 4 schools that opened in the 2016-17 school year (2 Harmony and 2 Science and Technology).

2 All school information from the Texas Education Agency School and District file (data current as of Dec. 2015), http://tinyurl.com/y8266jbb (last checked 6/6/2017). Total enrollment does not include enrollment for 4 schools that opened in 2016-17 (1,776 students).

3 Until 2012, the Cosmos Foundation was also known as Harmony Public Schools. In 2012, the Board changed the name to Harmony. *See* Harmony Board of Directors Minutes (Feb. 21, 2012), received from Harmony via 2016 open records request; Certificate of Amendment (June 13, 2012), Texas Secretary of State, available at http://tinyurl.com/r7iw (last checked 2016).

4 Harmony Financial Statement (June 30, 2016), available at: http://tinyurl.com/tjyfuw2 (last checked 6/16/2017). Riverwalk Education Foundation Financial Statement (June 30, 2016), available http://tinyurl.com/yd4b6zvc (last checked 7.19.2017).

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Public Schools (formerly Cosmos Foundation); CEO, Harmony Science Academy (Houston and Austin) (2000); Founder, Sky Foundation (OK).[5]

- Yetkin Yildirim: Founder, Harmony Public Schools (formerly the Cosmos Foundation); Co-founder, Terra Pave (commercial highway coating producer); former Board Member, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); Board Member, Alliance for Shared Values (national organization openly aligned with Gülen. [6]
- Vahap Uysal: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former Oklahoma Area Representative, Turquoise Council of Americans and Eurasians; current faculty advisor for Turquoise University Club, part of the Turkish American Society (Chicago); Board Member, Concept Schools; Presenter, "Gülen Movement and School Financing," Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[7]
- Suleyman Bahceci: Founder, Harmony Public Schools (formerly the Cosmos Foundation); President, Willow Education (CA); CEO and Founder, Accord (Western region oversight entity); CEO, Magnolia (CA); Creditor for $30,000, Beehive (UT); now VP of Student Affairs at Virginia International University, a Gülen-inspired university.[8]
- Coskun Cetinkaya: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former President, Cosmos Foundation; Executive Director, Texas Gulf Foundation (d/b/a North American University); former President, Frontier Public Schools (MO); former Provost, North American College.[9]

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5 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); s*ee* Harmony Science Academy Austin and Houston Charter Applications (Jan. 21, 2000), at p. 1, available at: http://tinyurl.com/r9gvm2l and http://tinyurl.com/mhkeovf (last checked 6/14/2017); Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: http://tinyurl.com/toc3evf (last checked 7/3/2017).

6 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Zaragoza, Sandra. *Ready for greener roads?* Austin Business Journal (27 July 2012), available at: http://tinyurl.com/y8yzk4mm (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017). Alliance for Shared Values, available at http://tinyurl.com/yclsm642 (last checked 7.21.2017).

7 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); *Raindrop Turkish House Oklahoma City Chapter Host Azerbaijan Ambassador Elin Suleymanov*, Raindrop Turkish House (2012), available at: http://tinyurl.com/yb2qxojd (last checked 6/15/2017); Turquoise University Club, available at http://tinyurl.com/y7oolwkv (last checked 6/15/2017); Concept Schools IRS Form 990 (2014), available at: http://tinyurl.com/z9y36lh (last checked 7/3/2017); *Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice*, Agenda (Nov. 3, 2007), available at: http://tinyurl.com/gt2vujs (last checked 10/31/2016).

8 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Willow 2004 990 form, available at: http://tinyurl.com/zvl5372 (last checked 2/14/2017); 2015 California State Audit, at p. 40, available at: http://tinyurl.com/zen2cb7 (last checked 2/14/2017); Kirsten Stewart, *Utah Charter School's Ties to Turkey Draw Scrutiny*, The Salt Lake Tribune (July 17, 2009), available at: http://tinyurl.com/zkkb8yy (last checked 3/20/2017); McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* LA Weekly (1 December 2016), available at: http://tinyurl.com/jxceqp7 (last checked 7/5/2017).

9 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Harmony Public Schools and Cosmos Foundation IRS 990 Form (2001-2002), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017); Final Technical Report: Sustainable Energy Solutions (Mar. 1, 2010), Wichita State University, available at http://tinyurl.com/yatravwk (last checked 6/15/2017); Student Handbook (2011), Frontier Public Schools, available at: http://tinyurl.com/y95lqmpj (last checked 7/5/2017); Hays County Commissioners' Court Consent to Agenda Item (June 21, 2011), Solidarity Contracting, available at http://tinyurl.

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- Maria Frances Curtis-Richardson: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former Director, Intercontinental Education Consulting; former Board Director, Texas Gulf Foundation (d/b/a North American University); former Director, Amity Foundation, Inc.; former Board Member Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).[10]
- Soner Tarim: Founder, Harmony Public Schools (formerly the Cosmos Foundation); CEO, Harmony Public Schools; Presenter at charter presentation, Albuquerque School of Excellence (NM, 2009); Applicant, Abramson and Kenilworth Science and Technology schools (LA); former Vice President, Intercontinental Education Consulting; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[11]
- Murat Torlak: Founder, Harmony Public Schools (formerly the Cosmost Foundation); former Board Director, Texas Gulf Foundation (d/b/a North American College); Director, Institute of Academic Studies.[12]

▷ Riverwalk Education Foundation:

- Turgay Korkmaz: Founder and former President, Riverwalk Education Foundation/Schools of Science and Technology.[13]
- Mehmet Sabri Agachan: Founder, Riverwalk Education Foundation/ Schools of Science and Technology.[14]
- Bulent Gumus: Founder and former Board Member, Riverwalk Education Foundation/Schools of Science and Technology.[15]

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com/yckdkkzo (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017).

10 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Intercontinental Education Consulting, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

11 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Transcript of Proceedings, Charter School Public Input Hearing (Aug. 26, 2009), New Mexico Public Education Commission, available at: http://tinyurl.com/y8yy7vd2 (last checked 6/6/17); LinkedIn Profile, available at: https://tinyurl.com/lfadqgq (last checked 5/24/2017); Abramson and Kenilworth Charter Applications, Cowan Institute for Public Education Initiatives at Tulane University, available at: http://tinyurl.com/24t7emn (last checked 7/5/2017); Intercontinental Education Consulting, available at: http://tinyurl.com/ycs3ej7c (last checked 7/5/2017); Intercontinental Education Consulting, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), The Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

12 Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at http://tinyurl.com/r9gvm2l (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Murat Torlak, Corporation Wiki, available at: http://tinyurl.com/yae7tohq (last checked 6/15/2017).

13 School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at http://tinyurl.com/y7koz4bb (last checked 6/15/2017); Riverwalk Education Foundation IRS 990 Form (2010-2012), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

14 School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at http://tinyurl.com/y7koz4bb (last checked 6/15/2017)

15 School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at http://tinyurl.com/y7koz4bb (last checked 6/15/2017); Riverwalk Education Foundation IRS 990 Form (2010-2012), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

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Overview

Harmony Public Schools ("Harmony") is the largest Gülenist charter network in the United States and the largest charter school network in Texas. It currently operates 48 schools, with an additional six schools opening in 2017-2018. Harmony also serves as the charter management services vendor and regional oversight entity for the Greater Texas region of the Gülen Organization. In 2014, Harmony opened a charter school in Washington, D.C.[16]

Harmony's governing board incorporated as the Cosmos Foundation, Inc. ("Cosmos") in 1999,[17] doing business as Harmony Public Schools. Cosmos changed its name to Harmony in 2012.[18] Cosmos opened its first Harmony school in 2001 and has rapidly expanded to 48 schools in 19 cities across Texas.[19] Harmony has been able to quickly expand its network because of Texas charter school law that favors easy replication. To open new school sites, Harmony only needs to file an amendment to its original charter contract with the Texas Education Agency (TEA) to open a new school anywhere in the state, subject to certain requirements. This amendment application is only subject to approval by the TEA Education Commissioner; the State Board of Education does not have any oversight or veto authority over the site amendment process. Since there is no required advance announcement of the amendments to the general public, local communities are often unaware that Harmony is seeking to open a new school in their area. Harmony's strategic plan projected expansion to 50 schools by 2020,[20] but the addition of six new schools in the 2017-2018 school year will push Harmony's total number of schools to 54, thereby putting them ahead of their own aggressive expansion schedule.

Riverwalk Educational Foundation ("Riverwalk"), a second Gülenist charter school network in Texas, operates six Science and Technology (SST) schools with a seventh scheduled to open in 2017. Riverwalk has close ties to Harmony and entered into a "Shared Services Agreement" with its sister network. Under the agreement, Harmony serves as Riverwalk's fiscal agent and provides management and administrative services. In return, Harmony receives five percent of all state funds from Riverwalk schools. Although Riverwalk SST schools are not well-known in Texas given the large number and prominence of Harmony schools, they are aggressively expanding. Riverwalk submitted applications to open ten new schools to the TEA 2017 through the charter amendment process (five were approved, two were denied, and three are under consideration as of March 2017). This charter school network should be closely monitored because it is positioned to grow rapidly with little public notice.

A third organization called New Dimension Educational Foundation, Inc. was formed in 2002[21] by individuals associated with various Gülen entities and with academic/STEM backgrounds similar to other Gülen school founders. There is evidence that New Dimension applied to open three charter schools in 2007 and 2010, but the schools were not approved.[22] New Dimension became inactive after 2010.[23] Key founders and leaders of New Dimensions were:

16 *See* Harmony School of Excellence DC Charter Application (Sep. 9, 2013), available at: http://tinyurl.com/yab5l5nk (last checked 6/10/17).

17 Articles of Incorporation (July 5, 1999), Texas Secretary of State, available at: http://tinyurl.com/7oy8w.

18 Certificate of Amendment (June 13, 2012), Texas Secretary of State, available at: http://tinyurl.com/7oy8w.

19 Cities with Harmony schools include: El Paso, Odessa, Lubbock, San Antonio, Laredo, Waco, Garland, Dallas, Carrollton, Fort Worth, Grand Prairie, Euless, Houston, Austin, Pflugerville, Bryan, Sugar Land, Katy, and Beaumont.

20 Harmony 2020, Harmony Public Schools, available at: http://tinyurl.com/ya45gqv3 (last checked 6/18/17).

21 New Dimension Articles of Incorporation; Texas Secretary of State, available at http://tinyurl.com/mfxbyjr (last checked 7.20.2017).

22 Minutes from Texas State Board of Education meetings in 2007 and 2010 (requested via FOIA 7.21.2017 – still pending).

23 Corporate documents available from Texas Secretary of State at http://tinyurl.com/mfxbyjr (last checked 7.19.2017).

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Kamil Sarac, currently an associate professor in computer science at the University of Texas Dallas;[24] Osman Kazan, also a founding trustee of the Pelican Educational Foundation in 2005 (the Gülen charter organization in Louisiana)[25] and currently an assistant professor at the Energy Institute, Tulane University; and Osman Kanlioglu who later served as the Dean of Students Affairs at North American University.[26]

On average, the Harmony charter schools serve 56.1% free and reduced lunch population vs. 59% state average; 8.7% students with disabilities vs. 8.6% state average; 19.2% English language learners vs. 18.5% state average; 85.5% minority students vs. 71.5% state average; and 14.5% Caucasian students vs. 28.5% state average.[27] However, when student demographics at Harmony schools are compared to student demographics at traditional public school districts where they are located, the comparison often looks very different. In a report issued in 2014, the Office of Civil Rights (OCR) of the U.S. Department of Education found that Harmony enrolls a disproportionately low number of English Language Learners ("ELL") and students with disabilities compared to the public school districts hosting Harmony's schools.[28] The OCR specifically examined enrollment rates of ELL students at eighteen Harmony charter schools. These schools enrolled approximately half the percentage of ELL students as the local school districts: 11.5% at Harmony schools compared to 22.5% for the school districts. The enrollment rate of the students with disabilities was even lower: 2.7% at the Harmony schools compared to 7.3% for the school districts.[29]

School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony Science Academy - El Paso 9405 Betel Dr. El Paso, TX 79907	K-12 2006-present	Enrollment: 1000 75.5% FRL 20.1% ELL 5.6% SWD 92% Hispanic 3% White 1.1% Asian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Selcuk Bakir

[24] Faculty profile at University of Texas Dallas, available at http://tinyurl.com/y6vkm6ll (last checked 7.20.2017).

[25] Founding Board of Pelican Education Foundation; Louisiana Secretary of State, available at http://tinyurl.com/y7n7qblw (last checked 5.21.17); *See* faculty profile at Tulane University, available at http://tinyurl.com/y83pswzd (last checked 7.20.2017).

[26] Job profile on ZoomInfo, available at http://tinyurl.com/yb9otbml (last checked 7.20.2017).

[27] These numbers are approximate since the Texas Education Agency does not make full demographic available in certain instances due to FERPA privacy concerns. These percentages are based on the 2015-16 school year statistics. This information comes from Texas Education Agency for the 2015-2016 school year, comparing statewide totals to district totals (using district numbers 101846, 227816, 161807, 015828, 071806, 101862, 101858, 015827, 015831). The reports are available at: http://tinyurl.com/ybxu5mm5 (FRL data), http://tinyurl.com/y9xmxljo (SWD data), http://tinyurl.com/yczvwmvd (ELL data), and http://tinyurl.com/y93vb5r9 (enrollment and ethnicity data).

[28] Settlement and resolution letters from OCR (2014), available at http://tinyurl.com/yaw7aeyl (last checked 7.20.2017).

[29] *Id.*

[30] Texas Education Agency Enrollment (Dec. 2016), available at: http://tinyurl.com/tuub6h5 (enrollment and grades in operation) (last checked 6/6/2017); Economically Disadvantaged Reports, Enrollment Reports, and Special Education Reports, Texas Education Agency, available at: http://tinyurl.com/swwwjb6 (FRL, SWD, and ELL statistics) (last checked 7/3/2017); *see also* Education Facility Lease Revenue Bonds Official Statement, Charter School Solutions to Harmony Public Schools (Apr. 27, 2016), available at http://tinyurl.com/k676dhq (dates in operation and FRL statistics) (last checked 6/16/2017).

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Innovation El Paso 5210 Fairbanks Dr. El Paso, TX 79924	K-12 2009-present	Enrollment: 933 63% FRL 13.4% ELL 8.3% SWD 82.8% Hispanic 8.7% White 5.5% Af. Amer. 2.2% Two or More Races	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Riza Gurlek
Harmony Science Academy – Odessa 2755 N. Grandview Ave. Odessa, TX 79762	K-8 2010-present	Enrollment: 454 56.6% FRL 10.8% ELL 9.5% SWD 71.3% Hispanic 15.5% White 8.8% Af. Amer. 3.1% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Cetin Demir
Harmony Science Academy – Lubbock 1516 53rd St. Lubbock, TX 79412	K – 12 2007-present	Enrollment: 304 72% FRL 4.6% ELL 7.9% SWD 60.4% Hispanic 19.1% White 18.6% Af. Amer. 1.4% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Hakan Simsek
**Harmony School of Excellence El Paso 9435 Betel Dr. El Paso, TX 79907	K-5 2016-present	Enrollment: 686 FRL/ ELL/ SWD Not Available 92% Hispanic 6.3% White 0.7% Af. Amer.	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Not Listed
Harmony Science Academy 8505 Lakeside Pkwy San Antonio, TX 78245	6-12 2006-present	Enrollment: 651 68% FRL 9% ELL 6.2% SWD 76.4% Hispanic 11.5% White 7.5% Af. Amer. 4% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Yasar Cakir

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Innovation - San Antonio 8125 Glen Mont Dr. San Antonio, TX 78239	K-5 2010-present	Enrollment: 610 75.2% FRL 9.5% ELL 5.6% SWD 56.6% Hispanic 13.6% White 25.4% Af. Amer. 4.5% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mert Aykanat
Harmony Science Academy – Laredo 4401 San Francisco Ave. Laredo, TX 78041	6-12 2008-present	Enrollment: 680 70% FRL 16.9% ELL 4.6% SWD 95.7% Hispanic 2.4% White 1.5% Af. Amer./Asian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mustaf Ayik
Harmony School of Innovation- Laredo 4608 Daugherty Ave. Laredo, TX 78041	K-5 2014-present	Enrollment: 541 76% FRL 41.1% ELL 3.7% SWD 97.8% Hispanic 1.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Geraldine Salas
Harmony Science Academy – Brownsville 1124 Central Blvd. Brownsville, TX 78520	K-12 2008-present	Enrollment: 475 84.6% FRL 28.2% ELL 5.3% SWD 97.3% Hispanic 1.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mustafa Altindag
Harmony School of Excellence 2015 SW Loop 410 San Antonio, TX 78227	K-5 2015-present	Enrollment: 554 62.5% FRL 14.3% ELL 4.9% SWD 73.6% Hispanic 11% White 10.2% Af. Amer. 4.5% Asian/ Two or More Races Native Hawaiian/ American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bambi Teaff
Harmony Science Academy – Waco 1900 N. Valley Mills Dr. Waco, TX 76710	K-12 2007-present	Enrollment:775 79% FRL 18.7% ELL 5.9% SWD 7% Af. Amer. 1% Asian 75.3% Hispanic 16% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serkan Beyhan

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony Science Academy – Garland 2303 Firewheel Pkwy. Garland, TX 75040	K-5 2010-present	Enrollment: 688 56% FRL 23.5% ELL 5.1% SWD 36.6% Af. Amer. 13.6% Asian 24.9% Hispanic 1.5% Two or More Races 23% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Christy Drekaj
Harmony Science Academy – Dallas 11995 Forestgate Dr. Dallas, TX 75243	K-12 2007-present	Enrollment: 1180 81% FRL 36.8% ELL 6.9% SWD 13.6% Af. Amer. 2.8% Asian 75.4% Hispanic 2.5% Two or More Races/Native Hawaiian 5.6%White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serif Mercan
Harmony School of Innovation – Carrollton 1024 W. Rosemeade Pkwy. Carrollton, TX 75007	K-12 2009-present	Enrollment: 510 38% FRL 19.4% ELL 4.1% SWD 15% Af. Amer. 35.5% Asian 30% Hispanic 2.4% Two or More Races 16.5% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Clinton Barnes
Harmony School of Business – Dallas 8080 W. President George Bush Hwy. Dallas, TX 75252	K-11 2012-present	Enrollment: 894 49% FRL 24.5% ELL 5.4% SWD 36% Hispanic 21% White 23% Af. Amer. 18% Asian 2% Two or More Races/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Muhammed Gecit
Harmony School of Innovation- Garland 2303 Firewheel Pkwy. Garland, TX 75040	6-12 2014-present	Enrollment: 563 50% FRL 11.2% ELL 7.5% SWD 26% Af. Amer. 13.3% Asian 35.3% Hispanic 2.3% American Indian/Two or More Races 23.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Murat Tunca

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony Science Academy - Fort Worth 5651 Westcreek Dr. Fort Worth, TX 76133	K-3 2006-present	Enrollment: 714 51% FRL 18.6% ELL 4.3% SWD 28% Af. Amer. 9.8% Asian 25% Hispanic 2.5% Two or More Races 34.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serena Jackson
Harmony Science Academy - Grand Prairie 1102 NW 7th St. Grand Prairie, TX 75050	K-8 2008-present	Enrollment: 573 69% FRL 25.3% ELL 7% SWD 36.3% Af. Amer. 2.3% Asian 48% Hispanic 2% Two or More Races 10.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Angela Knapp
Harmony Science Academy – Euless 701 S. Industrial Blvd Suite 115 Euless, TX 76040	5-12 2009-present	Enrollment: 625 54% FRL 11% ELL 5.3% SWD 24.2% Af. Amer. 15% Asian 18.2% Hispanic 2.4% Two or More Races 40.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Maksat Altiyev
Harmony School of Nature & Athletics 8210 W. Camp Wisdom Rd. Dallas, TX 75249	K-12 2010-present	Enrollment:1000 60% FRL 17.7% ELL 5% SWD 28% Af. Amer. 6.7% Asian 50.4% Hispanic 2.6% American Indian/ Two or More Races 12.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bilal Ozen
Harmony School of Innovation - Fort Worth 8100 S. Hulen St. Fort Worth, TX 76123	4-12 2012-present	Enrollment: 887 46% FRL 5.5% ELL 6% SWD 21.4% Af. Amer. 1% American Indian 12.8% Asian 35.2% Hispanic 3% Two or More Races 26.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Basoglu

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Innovation – Euless 701 S. Industrial Blvd Ste. 105 Euless, TX 76949	K-5 2013-present	Enrollment: 646 54% FRL 27.4% ELL 6.2% SWD 30.6% Af. Amer. 28.6% Asian 14% Hispanic 3.8% Two or More Races 22.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Crystal McAnalley
Harmony Science Academy Carrollton 1024 W. Rosemeade Pkwy. Carrollton, TX 75007	K-5 2015-present	Enrollment: 423 50% FRL 10.2% ELL 7.6% SWD 17.5% Af. Amer. 18.2% Asian 44.8% Hispanic 2.5% Two or More Races 16.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Huseyin Sari
Harmony School of Exploration – Houston 9305 W. Sam Houston Pkwy. S. Houston, TX 77099	K-5 2013-present	Enrollment: 671 76% FRL 42.2% ELL 5.8% SWD 37% Af. Amer. 15% Asian 44.2% Hispanic 12% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Nora Morales
Harmony School of Fine Arts and Technology 9115 Kirby Dr. Houston, TX 77054	K-8 2010-present	Enrollment: 734 61.2% FRL 19.2% ELL 5.7% SWD 58.5% Af. Amer. 5.7% Asian 64.3% Hispanic 2% Two or More Races 4.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Alain Frankiewicz
Harmony School of Ingenuity 10555 Stella Link Rd. Houston, TX 77025	6-12 2009-present	Enrollment: 587 65.6% FRL 13.8% ELL 4.8% SWD 28.7% Af. Amer. 2% Asian 66.3% Hispanic 2.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Recep Yilmaz

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Innovation – Houston 9421 W. Sam Houston Pkwy. S. Houston, TX 77099	6-8 2005-present	Enrollment: 581 73% FRL 16.9% ELL 3.6% SWD 21% Af. Amer. 16% Asian 39% Hispanic 5.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Ali Yilmaz
Harmony Science Academy – High School 9431 W. Sam Houston Pkwy S. Houston, TX 77099	9-12 2001-present	Enrollment: 578 77% FRL 10% ELL 4.7% SWD 18% Af. Amer. 13.5% Asian 42% Hispanic 1% Two or More Races 9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Subas
Harmony Science Academy – Houston 5435 Braeswood Houston, TX 77096	K-8 2010-present	Enrollment: 367 84.2% FRL 34.9% ELL 4.9% SWD 40.2% Af. Amer. 2.8% Asian 52.4% Hispanic 2.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Oguzkaan Torun
Harmony Science Academy – Austin 930 E. Rundberg Ln. Austin, TX 78753	K-8 2001-present	Enrollment: 562 86.3% FRL 57.7% ELL 7.8% SWD	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Kyle Borel
Harmony Science Academy - North Austin 1421 Wells Branch Parkway W. Ste. 200 Pflugerville, TX 78660	6-12 2008-present	Enrollment: 808 49% FRL 15.7% ELL 5.2% SWD 9.8% Af. Amer. 16.7% Asian 54% Hispanic 4% Two or More Races 15.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bunyamin Bozdogen
Harmony School of Science – Austin 11800 Stonehollow Dr. Austin, TX 78758	K-7 2006-present	Enrollment: 532 42% FRL 31% ELL 5.3% SWD 9.2% Af. Amer. 4.3% Asian 91.5% Hispanic 2% Two or More Races 4.5% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Allanur Agaberdiyev

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Political Science and Communication 13415 FM 620 N Austin, TX 78717	K-12 2011-present	Enrollment: 906 28% FRL 13.8% ELL 4.6% SWD 15.7% Af. Amer. 1% Am. Indian/ Alaskan 37.5% Asian 14.4% Hispanic 2.6% Two or More Races 28.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Ilker Yilmaz
Harmony School of Innovation- Austin 2124 E. St. Elmo Rd. Austin, TX 78744	K-5 2014-present	Enrollment: 468 74.4% FRL 46.8% ELL 5.1% SWD 7% Af. Amer. 1% Asian 82% Hispanic 1.6% Two or More Races 8.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Talitha Alexander
Harmony School of Excellence – Austin 2100 E. St. Elmo Rd. Austin, TX 78744	6-12 2009-present	Enrollment: 565 69.7% FRL 26.7% ELL 9.6% SWD 4.8% Af. Amer. 1.2% Asian 86.5% Hispanic 1% Two or More Races 6.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Engin Dogan
Harmony School of Excellence – Houston 7340 N. Gessner Dr. Houston, TX 77040	K-8 2006-present	Enrollment: 901 29.6% FRL 13.4% ELL 3.8% SWD 12.6% Af. Amer. 28% Asian 38% Hispanic 3.4% Two or More Races 17.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Hasan Sazci
Harmony School of Excellence – Endeavor 5668 W. Little York Rd. Houston, TX 77091	K-12 2009-present	Enrollment: 549 81% FRL 34.4% ELL 6.2% SWD 27.6% Af. Amer. 2.5%Asian 65.6% Hispanic 2.9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Kamil Yilmaz

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony Science Academy - Bryan/College Station 2031 S. Texas Ave. Bryan, TX 77082	K-12 2007-present	Enrollment: 397 75% FRL 27% ELL 8.6% SWD 19.7% Af. Amer. 55.9% Hispanic 2.2% Two or More Races 21.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Uguz
Harmony School of Advancement – High School 3171 N. Sam Houston Pkwy. W. Houston, TX 77038	9-12 2010-present	Enrollment: 611 47% FRL 4.7% ELL 4.9% SWD 16.7 Af. Amer. 19.3% Asian 49.8% Hispanic 1.7% Two or More Races 11.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Fatih Oner
Harmony School of Discovery – Houston 6270 Barker Cypress Rd. Houston, TX 77084	6-12 2010-present	Enrollment: 625 53% FRL 8.8% ELL 4.6% SWD 22.6% Af. Amer. 15.4% Asian 45.7% Hispanic 1.9% Two or More Races 14.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Adnan Karanci
Harmony Science Academy - Houston NW 16200 Tomball Pkwy. Houston, TX 77086 *Listed as School of Technology Houston in TEA Database*[31]	K-12 2006-present	Enrollment: 678 47.5% FRL 18.6% ELL 7.7% SWD 24.1% Af. Amer. 19.2% Asian 47.1% Hispanic 3.9% Two or More Races 5.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Sezgin Aydin
Harmony School of Achievement 16209 Keith Harrow Blvd. Houston, TX 77084	K-5 2015-present	Enrollment: 626 53% FRL 29% ELL 4.8% SWD 29.1% Af. Amer. 18.2% Asian 35.4% Hispanic 1.6% Two or More Races 15.1% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Melissa Knight

[31] Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: http://tinyurl.com/y93vb5r9 (last checked 6/13/2017).

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Harmony School of Science –Houston 13415 W. Belfort Sugar Land, TX 77478 *Listed as Science Academy Sugarland in TEA Database*[32]	K-5 2008-present	Enrollment: 722 53% FRL 28.9% ELL 3.6% SWD 25.2% Af. Amer. 41% Asian 14.8% Hispanic 1.3% Two or More Races 17.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Afreem Mercahnt
Harmony School of Science - Houston High 13522 W. Airport Blvd. Sugar Land, TX 77478 *Listed as School of Innovation Sugarland in TEA Database*[33]	7-12 2011-present	Enrollment: 854 47.7% FRL 4.3% ELL 3.5% SWD 20.2% Af. Amer. 43.4% Asian 20.2% Hispanic 15.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Alpaslan Uzgoren
Harmony Science Academy-West Houston 22400 Grand Corner Dr. Katy, TX 77494 *Listed as Science Academy Katy in TEA Database*[34]	K-12 2011-present	Enrollment: 915 43% FRL 15.2% ELL 5% SWD 42.8% Af. Amer. 1.1% Am. Indian/ Alaskan 24.4% Asian 14.3% Hispanic 2.9% Two or More Races 14.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Jasmeen Kohli
Harmony Science Academy Beaumont 4055 Calder Ave. Beaumont, TX 77706	K-12 2007-present	Enrollment: 533 49.2% FRL 9.6% ELL 11.4% SWD 28.1% Af. Amer. 8.2% Asian 29.2% Hispanic 4.5% Two or More Races 29.9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Klediol Murati
**Harmony School of Innovation Katy 22400 Grand Corner Dr. Bldg B Katy, TX 77494	K-12 2016-present	Enrollment: 502 FRL not available 32.1% Af. Amer. 19.5% Asian 24.1% Hispanic 2.4% Two or More Races 21.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Jasmeen Kohli

[32] Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: http://tinyurl.com/y93vb5r9 (last checked 6/13/2017).

[33] Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: http://tinyurl.com/y93vb5r9 (last checked 6/13/2017).

[34] Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: http://tinyurl.com/y93vb5r9 (last checked 6/13/2017).

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
Riverwalk Education Foundation Science and Technology Schools				
School of Science and Technology San Antonio 1450 NE Loop 410 San Antonio, TX 78209	6-12 2005 - present	Enrollment: 450 56% FRL 2.7% ELL 6.7% SWD 8.1% Af. Amer. 5.7% Asian 58.7% Hispanic 4.4% Two or More Races 23.2% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Atila Akyurek
School of Science and Technology Alamo 12200 Crownpoint Dr. Ste. 100 San Antonio, TX 78233	K-12 2009 - present	Enrollment: 413 60.8% FRL 9.9% ELL 8% SWD 12.3% Af. Amer. 4.2% Asian 52.5% Hispanic 6.8% Two or More Races 24.5% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Mehmet Nalcaci
**School of Science and Technology Houston 16200 TX 249 Houston, TX 77086	K-8 2016-present	Enrollment: 350 38.6% Af. Amer. 9.7% Asian 38% Hispanic 2.3% Two or More Races 11% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Cecil Kucukbasol
School of Science and Technology Discovery 5707 Bandera Rd. San Antonio, TX 78238	K-12 2008 - present	Enrollment: 446 61.6% FRL 3.7% ELL 5.4% SWD 8.3% Af. Amer. 11.6% Asian 63% Hispanic 2.7% Two or More Races 14.3% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Mustafa Kililioglu
School of Science and Technology Corpus Christi 4737 Saratoga Blvd. Corpus Christi, TX 78423	K-12 2009 - present	Enrollment: 734 61.6% FRL 3.7% ELL 9% SWD 4.6% Af. Amer. 2.5% Asian 63.5% Hispanic 28% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Ekrem Demirci
**School of Science and Discovery Advancement 10550 Westoffice Dr. Houston, TX 77042	K-8 2016-present	Enrollment: 238 49.6% Af. Amer. 11.3% Asian 23.5% Hispanic 2% Two or More Races 13% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Haci Mert Dilli

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School	Operation	Student Demographic Information[30]*	Authorizer	Governing Board
		New Schools 2017 - 2018		
Harmony Science Academy Cedar Park 12200 Anderson Mill Rd. Austin, TX 78726	PK-4 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Yilker Yilmaz
Harmony School of Innovation Brownsville 3451 Dana Ave. Brownsville, TX 78526	6-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Leyla Trevino
Harmony School of Innovation Waco 1900 N. Valley Mills Dr. Waco, TX 76710	7-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serkan Beyhan
Harmony Science Academy Plano 550 Talbert Dr. Plano, TX 75075	K-5 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Scott Coleman
Harmony School of Excellence Laredo 4401 San Francisco Ave. Laredo, TX 78041	9-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Maribel Lopez
Harmony School of Enrichment Houston 3207 N Sam Houston Pkwy W Houston, TX 77038	K-5 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Brent Bardo
(Riverwalk) Science and Technology – NW Houston	K – 6 2017 – 18 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation
		New School 2018		
Harmony School of Excellence Sugar Land 1424 Eldridge Rd. Sugarland, TX 77478 (*not included in new schools for 2017 because it may be delayed until 2018 and is not on Harmony's school list*)	6-8 2017 or 18- (may be delayed to 2018) First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Not Listed

**ELL – English Language Learner; FRL – students eligible for free and reduced-price lunch (economically disadvantages); SWD – Student with disabilities (special education)*

***The four schools that opened in the 2016 - 2017 school year are included in the total number of schools reported, but their enrollment (1,776) is not included in the total enrollment for Harmony/ Riverwalk schools which is reported for the 2015-16 school year.*

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A History of Strategic Ambiguity and Conflicting Interests

Harmony Public Schools ("Harmony") receives an annual fee from Gülenist charter networks in six states plus the Schools of Science and Technology in Texas and the District of Columbia[35] to provide a range of management and administrative services through support services agreements.[36] Harmony's alleged services include: consulting services; educational technology solutions; data network solutions; efficiency analysis; strategic planning; and coaching key leadership and teacher training.[37] Additional services are provided to at least some charter networks including: human resources support (including hiring/firing employees/ international teachers); facility management; student recruitment; marketing and PR (including web site design); curriculum development (including testing); accreditation; grant writing; and purchasing services.[38]

Beginning in 2010, Harmony received a percentage of each Gülenist charter network's education funding in exchange for its services.[39] Harmony subsequently changed its billing structure and currently bills $80 - $120 per hour for its services. In addition, Harmony now charges a licensing fee for its intellectual property, charging schools $15,000 - $147,000 per year.[40]

In our view, the fees paid to Harmony through these agreements yield significant benefits to the Harmony organization. Our investigation shows that Harmony has created a steady revenue stream from public funds that can be expended without fiscal restrictions, providing funds to expand its model within a state or in other states, which in turn increases overall student enrollment as well as its annual fees. It is difficult to identify the actual payments made individually by these charter schools and networks to Harmony through public documents because Harmony's transactions are not transparently reported. As a result, there is little accountability regarding how funds are used, whether they fulfill the stated purposes in the support services agreement, and how well the services are delivered. Between 2010 and 2016, Harmony received at least $7,345,705 from other charter networks.[41] Revenues for 2012 and 2013 are not available, however. If Harmony received $1.4 million for each year, it received over $10 million in revenue from other Gülenist charter school networks in this timeframe.

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35 *See* Official Statements, Appendix B (pg. B5-6), Harmony Public Schools Bond Issues for 2017, available at: http://tinyurl.com/y8gduwl7 (last checked 5/19/17).

36 See the support services agreement for Kenilworth Middle School in the Charter Application, Pelican Educational Foundation, at pg. 209, available at: http://tinyurl.com/y8syenun (last checked 6/18/17).

37 *See* Official Statements, Appendix B (pg. B5-6), Harmony Public Schools Bond Issues for 2017, available at: http://tinyurl.com/y8gduwl7 (last checked 5/19/17).

38 See the support services agreement for Kenilworth Middle School in the Charter Application, Pelican Educational Foundation, at pg. 209, available at: http://tinyurl.com/y8syenun (last checked 6/18/17).

39 *See* Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: http://tinyurl.com/yavbe95f (2012), http://tinyurl.com/ya9wo9ya (2011), and http://tinyurl.com/ydcvya5n (2011); Official Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/ybboyse6 (2014), http://tinyurl.com/y7on943p (2014), http://tinyurl.com/yddvl2lq (2014), http://tinyurl.com/y96ht3fg (2015), http://tinyurl.com/y8ajh2v8 (2016), http://tinyurl.com/y9xs5rdd (2016), http://tinyurl.com/ybjw932j (2016), http://tinyurl.com/y8gduwl7 (2017) (last checked 5/19/17).

40 *See* Official Statements, Appendix B, Harmony Public Schools Bond Issues (July 2, 2014), available at: http://tinyurl.com/ybboyse6 (2014) (last checked 5/19/17).

41 *See* Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: http://tinyurl.com/yavbe95f (2012), http://tinyurl.com/ya9wo9ya 2011), and http://tinyurl.com/ydcvya5n (2011); Official Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/ybboyse6 (2014), http://tinyurl.com/y7on943p (2014), http://tinyurl.com/yddvl2lq (2014), http://tinyurl.com/y96ht3fg (2015), http://tinyurl.com/y8ajh2v8 (2016), http://tinyurl.com/y9xs5rdd (2016), http://tinyurl.com/ybjw932j (2016), http://tinyurl.com/y8gduwl7 (2017) (last checked 5/19/17).

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In addition to the support services agreement which ties the charter networks to Harmony, teachers and administrative staff also move frequently among the Gülen-affiliated schools in the region. Some of the individuals that have worked with multiple Gülenist schools are listed in this report. This frequent shift of employees among schools creates a ready pool of trusted Turkish employees who will faithfully execute Gülen programs and directives.

Financial Issues

In 2012, the TEA published an audit of Harmony's federal program spending, finding that Harmony misspent $186,000 in federal funds.[42] The audit findings included:

- Inadequate documentation to support Harmony's spending;
- Non-compliant financial accounting records;
- Use of Title I funds at non-Title I campuses;
- Inappropriate use of federal funds for payroll;
- Lack of documentation supporting the required qualifications of Title I staff; and
- Questionable expenditures, including 33.7% of the Title I expenditures and over half of the IDEA special education expenditures examined by the auditors. According to the TEA, the questionable costs constituted a "material amount and effectively illustrate the degree to which [Harmony] failed to comply with law, rules and grant requirements and to maintain internal control over federal programs."

Notably, Harmony's regular annual audits during this period did not catch any of these issues. Only the TEA's audit of Harmony's financials uncovered this misuse of federal funds, and no follow-up audit has been done recently to ensure that Harmony has rectified these issues.

TEA also conducted a grant audit of the use Title I and IDEA B funds at SST schools during the 2010 fiscal year that was released in August 2012, one month after the Harmony audit was released. Like the Harmony audit, the SST audit questioned costs of $80,661 and requested repayment of funds from Riverwalk.[43] It is important to note that Riverwalk/SST schools pay Harmony 5% of state revenues through a support services agreement to provide a range of management and administrative services that supposedly ensure the SST schools are following state and federal financial requirements.[44]

In addition, Riverwalk borrowed over $2 million between 2009 – 2012 from at least seven "individual companies" that are not identified by name in the Riverwalk's annual audit.[45] The loans are secured by "the academy" or by equipment. Two of the companies are identified in a Riverwalk 2014 bond document, including one loan made in October 2011 from Rasanet Construction for $361,400 that matures in 2021, and one from Winport Export made in

[42] See Harmony Audit (July 17, 2012), Texas Education Agency. *See* Lindsey Kastner, *Auditors Say Funds Misspent for Harmony Campuses*, mySA.com (July 31, 2012), available at: http://tinyurl.com/y74zu23v (last checked 7/8/2017).

[43] Riverwalk Education Foundation Financial Statement (June 30, 2013), available in Riverwalk bond issue at http://tinyurl.com/y7yxldc9 (last checked 7.20.2017).

[44] *See* Harmony bond issue; July 2, 2014; Official Statement P. B-3; available at http://tinyurl.com/k3mnqv2 (last checked 5.19.17).

[45] Loans to "individual companies" are included in Riverwalk Financial Statements for 2009 – 2012, available at http://tinyurl.com/yaonrm5g; http://tinyurl.com/y6urgxsk; http://tinyurl.com/y9ajws6n; http://tinyurl.com/y7fvsbnc (last checked 7.20.2017). Note: 2 companies identified by name in 2015 Financial Statement, available from http://tinyurl.com/yd5z5epf (last checked 7.20.2017).

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2011 for $38,592 that matures in 2014.[46] Rasanet Construction (doing business as Sam&m Trade and Construction or Sam&m Group LLC) was created in 2008 in Texas and is owned by Muhsin Davud Ozcan from Missouri City in the Houston area.[47] Ozcan was at a Turkish university from 1983 – 2015 and is involved in businesses such as Esra Trade, Cars & Credit, Serra Dis Tiscaret, and Serra Mobilya Sanayii.[48] Winport Export is not listed as a company with the Texas Secretary of State, but a company called the Winport Group LLC, formerly known as Aurora Handyman or Aurora International, does business under similar assumed names, including: Winport, Winport Rug, Winport Playgrounds, Winport Investment, and Winport Furniture. The Winport companies are currently owned by Ahmet Duran who is affiliated with the American Turkish Business Council and the Raindrop Foundation.[49] A former owner of Winport/Aurora also includes Ibrahim Sumer who is the owner of Crystal Facility Solutions, a company that has $9.5 million in contracts with Harmony.[50]

Bond Financing

Harmony (also doing business as the Cosmos Foundation) has borrowed a total of $559,540,000 between 2007 – 2017 through fifteen different public bond issuances for the purchase, renovation, and construction of school properties, as well as refinancing prior bond debt.[51] Most recently, Harmony borrowed $40,540,000 through the Arlington Higher Education Finance Corporation in 2017.[52] Harmony currently owes a principal of $354,605,000 on these bonds with a combined principal and interest debt of $645,405,203.[53]

In addition to the these bonds, Harmony will also repay $43 million in bonds acquired by Charter School Solutions ("CSS") in 2016 through rental payments made to CSS.[54] Harmony created CSS in 2015 to serve as a third-party real estate arm for financing and developing charter schools in Texas and nine other states in the Greater Texas Gülen region.[55] Under its arrangement with Harmony, CSS will own these properties and lease the facilities back to the schools, charging schools inflated rents that are significantly higher than the bond service payments and more than the bond reserve fund requirements. Our research suggests that CSS will use the excess rental

46 Riverwalk 2014 bond document (Official Statement pg. B-4), available from http://tinyurl.com/y7hjs3e7 (last checked 7.20.2017).

47 Corporate documents for Rasanet Construction from Texas Secretary of State, available at http://tinyurl.com/mfxbyjr (last checked 7.20.2017).

48 Linked in, available at http://tinyurl.com/y9u24zfh (last checked 7.20.2017).

49 Corporate documents for American Turkic Business Council (2015) and Rain Drop Foundation (2.17.16) available from Texas Secretary of State, available at http://tinyurl.com/mfxbyjr (last checked 2016).

50 Harmony IRS Forms 990 include contracts, available at http://tinyurl.com/hu9wqcl (last checked 7.20.2017).

51 *See* Cosmos Foundation Bond Issues for 2007, 2010, 2011 and 2012, available at: http://tinyurl.com/yavbe95f (2012), http://tinyurl.com/ya9wo9ya (2011), http://tinyurl.com/ydcvya5n (2011), http://tinyurl.com/yalrsm5e (2010), http://tinyurl.com/y8peyfhf (2010), http://tinyurl.com/y7mqh2vm (2007), and http://tinyurl.com/yac877sn (2007); Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: http://tinyurl.com/ybboyse6 (2014), http://tinyurl.com/y7on943p (2014), http://tinyurl.com/yddvl2lq (2014), http://tinyurl.com/y96ht3fg (2015), http://tinyurl.com/y8ajh2v8 (2016), http://tinyurl.com/ybjw932j (2016), http://tinyurl.com/y8gduwl7 (2017) (last checked 5/19/17); *see also Prior and Future Financings*, Official Statement, Cosmos Foundation Bond Issue (2012), at p. B-6, available at: http://tinyurl.com/yavbe95f (last checked 6/18/17).

52 Harmony Bond Issue Official Statement (May 9, 2017), available at: http://tinyurl.com/y8gduwl7 (last checked 6/27/2017).

53 Texas State Comptroller records for Harmony debt (2016), available http://tinyurl.com/y7t9xo4m (last checked 7.18.3017).

54 Charter School Solutions bond documents for Harmony - Official Statement (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd, http://tinyurl.com/ybjw932j (last checked 6/27/2017).

55 *See* Charter School Solutions corporate documents, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/5/17).

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payments to fund its own operations and programs and expand the Harmony model to other states. The three-member governing Board of Directors for CSS includes individuals that are affiliated with Harmony and other Gülenist organizations: Bilal Erturk, the former President of the Sky Foundation (the Gülenist charter organization in Oklahoma that is now inactive as a result of a critical audit conducted by the OK State Auditor);[56] Harmony's current legal counsel; and Gokturc Tunc, a former Harmony board member also affiliated with the Raindrop Foundation.[57] Hakan Yagci, formerly the budget director for Harmony, left that position to serve as the founding CEO of CSS in 2015.[58]

In 2016, CSS borrowed $43,285,000 through its first bond issue for construction projects at five Harmony schools in Euless, Grand Prairie, Sugar Land, Plano, and El Paso.[59] Under the terms of the bond, CSS, acting as Harmony's landlord, will receive $600,000 annually in rental payments from the Harmony schools that is in excess of the total owed for the bond. Over the life of the bonds, Harmony will pay CSS a total of $18.1 million more than the amount of the bond debt repayment—paying CSS 115% of the bond debt. The excess payments are not shared equally by the five schools, however. For example, the Harmony school in Euless will pay CSS between 134% - 151% of the bond debt for its property. Despite making excess rental payments to CSS, Harmony, and not CSS, will be responsible for all maintenance and repairs to the school facilities.

CSS also borrowed $8.21 million through a bond for the Albuquerque School of Excellence in 2016.[60] Like the Harmony Texas schools, the Albuquerque school will pay $150,000 per year more than the debt on the bond and $4.4 million more over the life of the bond. Importantly, between these two bond issuances, CSS will receive over $750,000 per year in revenue from taxpayer dollars for its own operations. Once the bonds are paid in full using taxpayer dollars, CSS will own the school properties, even though charter schools' public funds provided the resources to acquire, construct, and renovate CSS's property.

In addition, Riverwalk has borrowed a total of $14,075,000 in three bond issues in 2007 and 2014 for construction and refinancing facilities.[61]

Real Estate

One of the most significant profit centers for the Gülen Organization is real estate. This property financing scheme has been replicated throughout the country. In fact, Vahap Uysal, a Harmony Founder and board member of Concept Schools,[62] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on

[56] Sky Foundation IRS Form 990, available at http://tinyurl.com/y96wnshc (last checked 7.18.17). See Dove Science Academy Investigative Report; the Oklahoma State Auditor and Inspector; March 2016; available at https://tinyurl.com/kv3ade4 (last checked 5/20/2017). Harmony Public Schools IRS Form 990 (2006 and 2007), available at https://tinyurl.com/hu9wqcl

[57] Harmony Public Schools IRS Form 990 (2006 and 2007), available at https://tinyurl.com/hu9wqcl (last checked 7.19.29017). Rain Drop Foundation IRS 990 Form (2002), available at:http://tinyurl.com/zcvgskm (last checked 6/15/2017).

[58] *See* Charter School Solutions bond documents for Harmony - Official Statement pg. A-1 (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd, http://tinyurl.com/ybjw932j (last checked 6/27/2017).

[59] Charter School Solutions bond documents for Harmony - Official Statement (Apr. 27, 2016), available at: http://tinyurl.com/y9xs5rdd, http://tinyurl.com/ybjw932j (last checked 6/27/2017).

[60] Charter School Solutions bond documents for Albuquerque - Official Statement (June 8, 2016), available at: http://tinyurl.com/yary29pl (last checked 6/5/2017).

[61] Riverwalk bond issues: 2014 for $$7,430,000, available at http://tinyurl.com/y7hjs3e7 and 2007 for $6,345,000, available at http://tinyurl.com/y7jalmmq (both last checked 7.20.2017.)

[62] *See* Uysal's biography, *supra*.

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Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[63] Gülenists throughout the country attended and presented, including Yuksel Alp Aslandogan, former Harmony landlord, President of one Harmony's largest vendors, and Gülen's official spokesperson in his role as President/Executive Director of the Alliance for Shared Values.[64]

In Texas, Gülenist individuals have made millions of dollars in profit from real estate arrangements with Harmony schools. Several of the individuals worked with other Harmony vendors before, during, or after the time of the real estate transactions, and many of the individuals regularly move in and out of businesses that transact with Harmony. This complex network of long-standing business connections raises questions about apparent conflicts of interest and whether Harmony's real estate transactions are conducted at arm's length.

Harmony Science Academy - Austin (930 E. Rundberg Lane): Harmony (also known as the Cosmos Foundation) rented this property from Yuksel Alp Aslandogan between 2002 and 2010, after which is purchased the property from Aslandogan.[65] Aslandogan bought the property for $1.375 million in 2002.[66] Harmony paid $2 million in rent over the eight years and purchased the property for $1.7 million in 2010.[67] Even after deducting property taxes paid during this time period[68] as well as all known property improvements,[69] our research indicates that Aslandogan cleared an estimated profit of up to $2 million from the sale.

Harmony Science Academy – Houston (5435 Braeswood Blvd): Harmony rented this property from Fercan Kalkan and Dr. Cahit Gezgin from 2001 to 2010. The property first served as Harmony's central office and later became the Harmony Science Academy. The property flipped ownership between Kalkan and Gezgin several times for unknown reasons, but Kalkan borrowed $910,000 in 2006 to re-purchase the property from Gezgin.[70] Harmony paid an estimated $240,000 annually in rent and purchased the property in 2010 from Kalkan for $2.3 million.[71] Our research indicates that Kalkan made an estimated profit of up to $3.3 million on the sale even after deducting the property taxes paid on this property from 2001 - 2010.[72]

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63 *Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice*, Agenda (Nov. 3, 2007), available at: http://tinyurl.com/gt2vujs (last checked 10/31/2016).

64 *See* Aslandogan's biography, *infra*.

65 See property purchase history available from Travis County Tax Assessor at http://tinyurl.com/ybhltbas (last checked 7.19.2017).

66 See Aslandogan purchase price he quoted to New York Times (6 June 2011), available from http://tinyurl.com/3ua255n (last checked 7.19.2017).

67 See Q & A from Harmony related to Cosmos/Harmony purchase price and monthly rent paid to Aslandogan, available from http://tinyurl.com/yb7g629c (last checked 7.19.20127).

68 Aslandogan paid $217,057 in property taxes between 2002 – 2010 (through May); tax totals are archived but were received from Travis County Tax Assessor office in phone conversation on 8/03/2016: Property records available from http://tinyurl.com/y8l5hmmw; Travis County Tax Assessor available at http://tinyurl.com/ybld4ymn (both last checked 7.20.2017).

69 Search of all city permits for construction from 2002 - 2010, City of Austin Permitting, available at http://tinyurl.com/ybunndfc (last checked 8.3.2016).

70 See first general warranty deed to Kalkan in 2002, available from Harris County Clerk (Record No. V807839) at http://tinyurl.com/y9lqud7l (last checked 7.19.2017); see warranty deed with vendor lien 2006 (loan amount for property) from Harris County Clerk (Record No. Z371895) available at http://tinyurl.com/y9lqud7l (last checked 7.19.2017).

71 See Q & A from Harmony related to Cosmos/Harmony purchase price and monthly rent paid to Kalkan, available from http://tinyurl.com/yb7g629c (last checked 7.19.20127). Note that Harmony states it paid $28,000 monthly rent in one section of this document (which would be $336,000 in annual rent) and $240,000 annually in another section. The more conservative annual payment has been used in this calculation.

72 Tax payments from 2001 – 2010 totaled $170,983; received annual tax payments via telephone conversation from Harris County Tax Assessor office because records are archived for this time period, contact information for Tax Assessor available at http://tinyurl.com/y9bnf6yu (last checked 08/2016). Calculation involving this transaction are made using available public information.

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Considering these questionable transactions, Harmony's other real estate transactions should be thoroughly investigated. In particular, Fercan Kalkan sold Harmony property used for the Harmony School of Fine Arts and played a role in complicated land transactions involving the Texas Gulf Foundation/North American University, the Harmony School of Advancement, and the Harmony Science Academy NW.

Each of the individuals involved in the real estate transactions described above have been actively involved in Gülenist organizations and schools. Aslandogan, who has been a leader of many Gülen-affiliated organizations since 1999, currently serves as a spokesman for Fethullah Gülen and is the paid President/Executive Director of the Alliance for Shared Values, an openly Gülenist national organization.[73] Among his many businesses and affiliations with Gülen organizations, Kalkan became the manager of Target Design and Management in 2014,[74] a company that received a total of $52 million in contracts from Harmony and Riverwalk between 2009 - 2014.[75] Dr. Cahit Gezgin was the former Board Chairman of Texas Gulf Foundation/North American University, a Gülenist organization.[76]

Excessive Use of the H-1B Visa Program

Like other Gülen organization charter networks, the Harmony and Riverwalk schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools. Since its inception, Harmony has filed a staggering number of 2,559 H-1B visa applications;[77] Riverwalk filed an additional 258 H-1B Visa applications;[78] the total applications filed in Texas are 2,816. The cost of these applications is estimated to be between $2,000 - $4,000 per application, making the total amount expended in public funds for immigration by Harmony/Cosmos and Riverwalk an estimated $5,632,000 - $11,264,000. While the Gülen Organization typically states that the visas are only to fill shortages for math and science teachers, these applications were filed for such positions as: legal counsel, law clerks, construction engineers, art teachers, educational diagnostician, budget analysts and accountants, director of special programs, publication coordinator, assistant principals, principal, finance manager, physical education teacher, Turkish teachers, social studies and social science teachers, English as a second language teachers, account managers, economics teachers, assistant superintendents, English and English grammar teachers, elementary school teachers,

73 Alliance for Shared Values IRS 990 Form 2014, available at: https://tinyurl.com/ybvmo96o (last checked 5/26/2017)

74 See TDM Texas Franchise Tax Public Information Report 2014, available from Texas Secretary of State at http://tinyurl.com/7oy8w (last checked 7.19.2017).

75 See contracts with TDM on Harmony IRS Form 990 for 2009 – 2014, available from https://tinyurl.com/hu9wqcl (last checked 7.19.2017) and Riverwalk IRS 990 Form (2014), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

76 Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017).

77 Harmony filed 2,558 H-1B applications from 2001-2016, available at: http://tinyurl.com/ybjttopm (Harmony Science Academy-West Houston Cluster Offic) (1), http://tinyurl.com/y7f6b42z (Harmony Science Academy-Carrollton) (4), http://tinyurl.com/yb6p6s9a (Cosmos Foundation dba Harmony Elementary Austin) (3), http://tinyurl.com/ydexzwd5 (Cosmos Foundation Inc, Dba Harmony School of Excel) (1), http://tinyurl.com/ycoyr9g6 (Cosmos Foundation Inc, Dba Harmony School of Innov) (7), http://tinyurl.com/ycqh5mdw (Harmony Science Academy-Dallas) (2,006), http://tinyurl.com/y7gwj2xj (Cosmos Foundation, Inc.) (493), http://tinyurl.com/y9n8x9sz (Harmony School of Innovation-Garland) (13), http://tinyurl.com/ycgpwnc7 (Harmony School of Excellence-Houston) (7), http://tinyurl.com/yaz4epl3 (Harmony School of Political Science and Communicat) (21), http://tinyurl.com/ybepbrjk (Harmony School of Excellence-Dallas) (2) (last checked 7/6/2017)

78 Riverwalk filed 258 H-1B applications from 2001-2016, available at: http://tinyurl.com/yctpchjd (Riverwalk Education Foundation, Inc.) (183), http://tinyurl.com/y7hlxks2 (School of Science and Technology-Houston) (5), and http://tinyurl.com/y9cdoayq (School of Science and Technology-Corpus Christi) (70) (last checked 7/6/2017).

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cluster superintendents, instructional coordinators, education administrators, human resources advisor, purchasing agents and managers, director of communication, Spanish language teacher, public relations manager, curriculum developer for the gifted and talented program, operations research analyst, director of high school programs, small projects director, academic advisors, and internal auditor.[79]

Harmony uses the same limited number of attorneys to file and process its H-1B visa applications as other known Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

- Leonard D'Arrigo: the Texas network used D'Arrigo, an Albany, New York-based attorney, to file numerous H-1B applications. D'Arrigo also filed applications for:
  - Albuquerque School of Excellence (formerly Focus Foundation) (NM)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Central Jersey College Prep Charter School (NJ)
  - Syracuse Academy of Science Charter School (NY)
  - Millenium Education Foundation (MO)
  - Rochester Academy Charter School (NY)
  - Sky Foundation (OK)
  - Bergen Arts and Science Charter School (NY)
  - Read Foundation (TN)
  - Truebright Science Academy Charter School[80]

- Tina Nguyen: Harmony used Nguyen, a Houston-based attorney to file applications. Nguyen also filed applications for:
  - Pelican Educational Foundation
  - Dove Science Academy
  - Little Scholars of Arkansas
  - Millenium Education Foundation
  - Sky Foundation, Inc.[81]

- Garrett White: the Texas network used White, a Houston-based attorney, to file numerous H-1B applications. White also filed applications for:
  - Memphis School of Excellence/ Read Foundation (TN)
  - Dove Science Academy
  - Riverwalk Education Foundation (TX)
  - Pelican Educational Foundation (LA)
  - Little Scholars of Arkansas (AR)
  - Raindrop Foundation
  - Sky Foundation (OK)
  - Millennium Foundation (MO)
  - Texas Gulf Foundation (TX)
  - Helix Design and Production
  - Solidarity Contracting
  - Brighten Technologies
  - Target Design and Management
  - Institute of Interfaith Dialog for World Peace
  - Nur International[82]

- Yalcin Karadag: The Texas network used Karadag, a Houston-based attorney to file applications. Karadag also filed applications for:
  - Cosmos Foundation, Inc.
  - Dove Science Academy
  - LISA Academy
  - Riverwalk Foundation
  - Sky Foundation
  - Millenium Education Foundation[83]

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79 Jobs in Tech, available at: https://tinyurl.com/y8muahbt, https://tinyurl.com/yb2foulo, and https://tinyurl.com/ycwlm2x6 (last checked 6/11/17).

80 Leonard D'Arrigo, Jobs in Tech, available at: https://tinyurl.com/kcb3kjq (last checked 5/24/2017).

81 Tina Nguyen, Jobs in Tech, available at: http://tinyurl.com/mh29kbe (last checked 5/20/17)

82 Garrett White, Jobs in Tech; available at: https://tinyurl.com/lg5f2aq (last checked 5/24/2017).

83 Yalcin Karadag, Jobs in Tech, available at: http://tinyurl.com/yckgzf2c (last checked 5/20/17).

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Notable Turkish Vendors

According to its tax returns, Harmony has spent an estimated $161,861,038 on contracts with Turkish-owned or affiliated companies since 2004. In addition, Riverwalk schools paid approximately $5,267,054 to Turkish-owned or affiliated companies since 2005. Each company listed below is owned or operated by individuals of Turkish national origin, and they represent 72 percent of the total contracting dollars disclosed between 2004 and 2015 on Harmony's tax returns:

- Apple Catering, Inc: Harmony paid Apple Catering $2,025,095 for catering services in 2012.[84]

- Atlas Texas Construction ("Atlas Construction"): Harmony paid Atlas Construction $1,344,671 in 2006, $6,709,375 in 2007, and $3,898,941 in 2009 for a total of $11,952,987.[85] Riverwalk Education Foundation similarly paid Atlas Construction for leasehold improvements in 2005 totaling $60,000.[86] Atlas Construction received a total of $12,012,987 from Riverwalk and Harmony.

- Atlas Texas Food and Beverage, LLC ("Atlas Food"): Harmony paid Atlas Food $427,195 in 2008 and $1,948,978 in 2010 for a total of $2,376,173.[87]

- Crystal Facility Solutions, Inc.: Harmony paid Crystal Facility Solutions for maintenance and janitorial services $2,150,092 in 2010, $2,955,841 in 2011, $1,922,027 in 2012, and $2,465,502 in 2015 for a total of $9,493,462.[88]

- DNR Catering, Inc. ("DNR") (d/b/a Turquoise Grill and Alamo City Foods): Harmony paid DNR $358,061 for catering services in 2008.[89] Riverwalk had contracts with DNR Catering, Alamo City Foods, and Turquoise Grill from 2009 to 2014 totaling $2,597,279.[90] In total, DNR has received $2,955,340 since 2008 from Harmony and Riverwalk.

- Ege Construction, LLC.: Harmony paid Ege for constructing and contracting services $1,154,005 in 2006, $790,364 in 2007, and $8,301,709 in 2009 for a total of $10,246,078. Ege is also the contractor for a new school built by Charter School Solutions in Grand Prairie for an unknown amount.[91]

- Helix Design and Production, LLC ("Helix"): Harmony paid Helix $694,995 for publication and design in 2008.[92] Riverwalk also paid Helix $148,681 for advertising in 2009.[93] In total, Helix received $843,676 over two years.

- Karadag Law Firm: Harmony paid Karadag $178,520 in 2006 and $307,450 in 2008 for a total of $485,970 for legal fees.[94]

84 Harmony IRS 990 Form (2012), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

85 Harmony IRS 990 Form (2006-2009), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

86 Riverwalk IRS 990 Form (2005), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

87 Harmony IRS 990 Form (2008-2010), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

88 Harmony IRS 990 Form (2010-2014), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017); Harmony IRS 990 Form (2015), available at: http://tinyurl.com/tjyfuw2 (last checked 6/15/2017).

89 Harmony IRS 990 Form (2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

90 Riverwalk IRS 990 Form (2009-2014), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

91 Harmony IRS 990 Form (2006-2009), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

92 Harmony IRS 990 Form (2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

93 Riverwalk IRS 990 Form (2009-2014), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

94 Harmony IRS 990 Form (2006-2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

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- Macrocosm Service and Solutions: Harmony paid Macrocosm $3,085,214 for construction services in 2009.[95]

- North American Construction: Harmony paid $1,225,115 to North American Construction for building contractor services in 2007.[96]

- Northwest Catering Services, Inc.: Harmony paid Northwest Catering Services $2,420,613 in 2011, $3,186,087 in 2012, $3,610,734 in 2013, and $2,969,815 in 2015 for a total of $12,187,249.[97]

- Rainbow Construction, LLC: Harmony paid Rainbow Construction $2,343,777 in 2006 for construction.[98]

- Solidarity Contracting, LLC: Harmony paid Solidarity $5,127,139 in 2008, $18,129,632 in 2009, $14,043,279 in 2010, and $8,661,241 in 2011 for a total of $45,961,291.[99]

- Target Design and Management, LLC (a/k/a TDM Construction): Harmony paid TDM Construction $15,073,902 in 2009, $22,658,487 in 2010, $5,103,932 in 2011, $2,445,561 in 2012, $2,972,084 in 2013, $2,966,066 in 2014, and $3,654,849 in 2015. Riverwalk also paid TDM Construction $692,393 in 2014.[100] In total, TDM Construction has received $55,567,274.

- Winport Equipment: In 2010, Harmony paid Winport $4,550,690 for furniture and equipment.[101]

Harmony is required to disclose only its five largest independent contracts of $100,00 or more on its IRS Form 990 each year. The contracts listed above are compiled from those IRS documents, but they only represent a small percentage of Harmony contracts that are $100,000 or more. For example, Harmony disclosed there were 129 contracts totaling $100,000 or more on its 2014 IRS Form 990.[102] Harmony has refused to comply with numerous FOIA requests we have made to provide complete records for all its contracts of $100,000 or more so that there can be a public review of its entire contracting history.

In addition to these vendors, Harmony has used Turkish-operated businesses for E-Rate services. Brighten Technologies LLC ("Brighten") is a Turkish-owned/operated business founded and staffed by former Harmony employees that has received significant E-Rate funds from Harmony.[103] Yusuf Duzgun, also known as Joseph Duggan, taught at Harmony and later founded Brighten. Brighten now regularly wins millions in contracts from Harmony, Duzgun's former employer.

Using federal Race to the Top grant funds, Harmony awarded Brighten a sub-grant valued at $904,719 to provide wireless networks infrastructure upgrades.[104] Brighten also received $625,971 in E-Rate funds for telecommunication services

95 Harmony IRS 990 Form (2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

96 Harmony IRS 990 Form (2007), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

97 Harmony IRS 990 Form (2010-2014), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017); Harmony IRS 990 Form (2015), available at: http://tinyurl.com/tjyfuw2 (last checked 6/15/2017).

98 Harmony IRS 990 Form (2006), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

99 Harmony IRS 990 Form (2008-2011), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

100 Riverwalk IRS 990 Form (2014), available at: http://tinyurl.com/ydg4yv8m (last checked (6/15/2017).

101 Harmony IRS 990 Form (2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

102 Harmony IRS 990 Form (2008), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017).

103 Taxable Entity Search, Texas Comptroller of Public Accounts (listing Yusuf Z. Duzgun, a/k/a Joseph Duggan, as president of Brighten Technologies), available at: http://tinyurl.com/ybt4nu2s (accessed by searching for Brighten Technologies using its Texas ID (32038619923), then clicking "Officers and Directors Information") (last checked 7/7/2017); George Joseph, *Education, Inc.*, Jacobin (Nov. 4, 2014) (reporting that former Harmony employees founded and staff Brighten Technologies), available at: http://tinyurl.com/kfl5oar (last checked 7/7/2017).

104 *Brighten Technologies, LLC*, USA Spending, available at: http://tinyurl.com/ybr628gp (last checked 3/29/2016) (award details accessed by clicking on link to Award ID 017595341-1).

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provided to Harmony.[105] Although Harmony is required to follow fair and open competitive bidding processes when awarding contracts funded by Race to the Top funds and ERate,[106] there is a clear pattern of awarding contracts to companies staffed with former Harmony employees. These contractual awards should be investigated. Concept Schools, the Gülenist regional oversight entity for the Midwest region, is currently under investigation for questionable E-Rate subcontracts awarded to affiliated Turkish individuals and vendors.[107] Presumably as a result of the revenues generated by these awards, Duzgun has been able to make substantial political donations from his private funds. In fact, he has donated $83,950 to federal election campaigns since 2010, including nearly $80,000 in the 2012 election cycle alone.[108]

Harmony also contracts with the Texas Gulf Foundation ("TGF"), which does business as North American College and North American University ("NAU").[109] The owners and operators of TGF worked for Harmony before founding TGF in 2007.[110] The TEA recognized the close relationship between Harmony and TGF in 2010, stating, "[t]hese organizations work cohesively together to create an interlocking educational system, serving grades K-20, for the Houston area."[111] Between 2007 and 2011, Harmony paid TGF $525,000 for various services.[112] In 2013, Harmony awarded TGF $805,000 in contracts for consulting services using federal funds.[113] Harmony potentially violated rules governing use of federal funds by awarding substantial contracts to TGF despite prohibitions against "[o]rganizational conflicts of interest."[114] Harmony also potentially failed to use sealed bids or competitive procurement processes for these services, as required by federal law.[115]

Scandals, Investigations, & Notable Activities

In December 2014, the U.S. Department of Education's Office of Civil Rights ("OCR") found that Harmony enrolls a disproportionately low number of English language learners ("ELL") and

105 *Brighten Technologies, LLC*, USA Spending, available at: http://tinyurl.com/ybr628gp (last checked 3/29/2016) (award details accessed by clicking on link to Award ID 017595341-1).

106 34 C.F.R. Part 80 (outlining federal procurement regulations applicable to Department of Education awards prior to December 2014); 2 C.F.R. Part 200 (outlining uniform procurement rules applicable to awards from all federal agencies after December 2014); 47 C.F.R. § 54.503 (requiring all entities participating in the E-Rate program to "conduct a fair and open competitive bidding process").

107 *See, e.g.*, the Illinois and Ohio state profiles.

108 Yusuf Duzgun Contributions, Federal Election Commission, available at: http://tinyurl.com/ydemfy4q (last checked 7/8/2017); Yusuf Duzgun, CampaignMoney.com, available at: http://tinyurl.com/y7cj6g3w (last checked 7/8/2017).

109 *See* Letter from Cristian Rosas-Grillet, Assistant Attorney General, Office of Attorney General of Texas to W. Montgomery Meitler, Senior Counsel, Texas Education Agency (July 28, 2015), available at: http://tinyurl.com/ybkjlwdb (last checked 7/11/2017) (noting that Texas Gulf Foundation did business as North American College).

110 Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011) (reporting TGF owners and operators originally worked for Harmony) , available at: http://tinyurl.com/ya6cku5c (last checked 7/8/2017); NAU History, North American University (last visited Mar. 29, 2016) (noting that the Texas Gulf Foundation was founded in April 2007), available at: http://tinyurl.com/y8sdn74c (last checked 7/8/2017).

111 *One-year Compliance Report for Texas Gulf Educator Certification Program*, Texas Education Agency (Apr. 7, 2010) (emphasis added), available at: http://tinyurl.com/y7uztg7k (automatically downloads as PDF) (last checked 7/8/2017).

112 Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011), available at: http://tinyurl.com/ya6cku5c (last checked 7/8/2017).

113 *Texas Gulf Foundation*, USA Spending, available at: http://tinyurl.com/y9y9tfjd (last checked 7/8/2017).

114 34 C.F.R. Part 80 (outlining federal procurement regulations applicable to Department of Education awards prior to December 2014); 34 C.F.R. § 80.36(c)(1)(v); *see* 2 C.F.R. Part 200 (outlining uniform procurement rules applicable to awards from all federal agencies after December 2014).

115 34 C.F.R. § 80.36(d).

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students with disabilities compared to the public school districts hosting Harmony's schools.[116] The OCR specifically examined enrollment rates of ELL students at eighteen Harmony charter schools. These schools enrolled approximately half the percentage of ELL students as the local school districts: 11.5% at Harmony schools compared to 22.5% for the school districts. The enrollment rate of the students with disabilities was even lower: 2.7% at the Harmony schools compared to 7.3% for the school districts.

The OCR also found that Harmony's enrollment policies could have a chilling effect that excludes students based on their or their parents' citizenship or immigration status. The investigation revealed that Harmony policies and procedures do not ensure that students will receive adequate educational services, including language development for ELL students and special education and related services for students with disabilities. In the settlement with OCR, Harmony agreed to correct its policies, including reviewing its admissions policies, procedures, and practices to identify potential barriers to increased participation by ELL students and students with disabilities. However, as recently as 2016, Harmony settled another case with OCR regarding its apparent failure to provide required services to a student with special needs.[117]

Harmony also favors Turkish nationals for leadership positions and, in most cases, Turkish men. Harmony's favoritism for individuals with the same national origin is displayed in its recruiting, hiring, and promotion of Turkish individuals. Four of six members of the Harmony board leadership are Turkish men.[118] Other Turkish men in leadership positions in 2015-2016 include: 100% of Harmony's ten senior leadership positions including the CEO; 100% of Harmony's six cluster superintendents; 67% of campus principals; and 78% of Harmony's counselors.[119]

Atlas Texas Construction, one of Harmony's construction vendors, has been accused of attempting to bribe public officials in Louisiana. While one of the Louisiana Gülen charter schools was under investigation, an employee of the state education department conducting the investigation informed law enforcement authorities that Inci Akpinar, Vice President of the Atlas Construction, offered him a $25,000 bribe to "help fix the problem" at the school.[120] When he responded that it would be a conflict of interest for a state official to accept money from the school, Akpinar told him that he would "only need to advise them."[121] Akpinar participated in a meeting with the state official and

116 Settlement and resolution letters from OCR (2014), available from http://tinyurl.com/yaw7aeyl (last checked 7.20.2017).

117 Settlement letter (2016) from OCR to Harmony, available from http://tinyurl.com/ydalessd (last checked 7.20.2017).

118 *See Board of Directors*, Harmony Public Schools, available at: http://tinyurl.com/y98wyz2p (last visited 5/18/2016) (listing Soner Tarim, Oner Ulvi Celepcikay, Cengizhan Keskin, and Hakduran Koc as four of six directors); Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011) (reporting that Soner Tarim is from Turkey), available at: http://tinyurl.com/ya6cku5c (last checked 7/8/2017); *Biography of Oner Celepcikay* , University of Houston-Downtown (listing bachelor's degree obtained from Istanbul University in Istanbul, Turkey), available at: http://tinyurl.com/y96r5o8g (last visited 7/8/2017); *Profile of Cengizhan Keskin*, LinkedIn (listing bachelor's and master's degrees from Middle East Technical University in Ankara, Turkey), available at: http://tinyurl.com/y99lbcna (last visited 7/8/2017); *Biography of Hakduran Koc*, University of Houston Clear Lake (listing bachelor's degree from Ankara University in Ankara, Turkey), available at: http://tinyurl.com/ydxezvd6 (last visited 7/8/2017).

119 Harmony employee data for 2015-16 received from the Texas Education Agency via FOIA request; other positions identified through LinkedIn profiles, Harmony purchasing bids, Harmony Finance Committee minutes, and IRS Form 990 for 2014. See position for Soner Tarim, Yalcin Akyildiz, Zekeriya Yuksel, Ozgur Ozer, and Erdal Caglar on IRS Form 990 for 2014 available at https://projects.propublica.org/nonprofits/organizations/760615245 (last checked 8.12.17); See Kemal (Mark) Namver available at LinkedIn https://www.linkedin.com/in/mark-namver-63141aa2/ (last checked 8.12.17); see Darren Polat at LinkedIn available at https://www.linkedin.com/in/polatdarren/ (last checked 8.12.17); See Zekeriya Yaman LinkedIn available at https://www.linkedin.com/in/zekeriya-yaman-822a5b137/ (last checked 8.12.17); See Kaan Camuz LinkedIn available at https://www.linkedin.com/in/kaan-camuz-b782b92b/; See Nihat Bayhan LinkedIn available at https://www.linkedin.com/in/nihat-bayhan-50981b43/ (last checked 8.12.17).

120 Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface.* New Orleans Time-Picayune (22 July 2017), available at: http://tinyurl.com/3l2cnxs (last checked 5/25/17).

121 *Id.*

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representatives of Harmony at Abramson just before she made the bribery offer.

Gülenist Cultural and Business Organizations Active in State

- The Dialogue Institute of the Southwest: The Houston-based Dialogue Institute of the Southwest hosts forums, conferences, dinners and cultural exchange "dialogue" trips to Turkey.[122] The Dialogue Institute has branches in Little Rock and Fayetteville, as well as in Texas, Kansas, Mississippi, Oklahoma and New Mexico.[123] The Dialogue Institute is a member organization of the Alliance for Shared Values, an umbrella organization for Gülenist cultural organizations around the United States that are openly aligned with the Gülen Movement.[124]

- Raindrop Foundation: The Raindrop Foundation is a Houston-based organization that sponsors Raindrop Turkish Houses in Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, Tennessee, and New Mexico.[125] There are eleven Raindrop Turkish houses in Texas: Arlington, Austin, College Station, Dallas, El Paso, Houston, NW Houston, San Antonio, Lubbock, Corpus Christi, and Waco.[126] Like Turkish cultural centers in other states across the county, the Raindrop Foundation promotes Turkish culture through language and cooking classes, festivals and local events with special guests. It also sponsors annual "dialogue" trips to Turkey for community members and leaders.[127] The Raindrop Foundation also operates under assumed names that include: Raindrop Turkevi, Raindrop Helping Hands, Raindrop Turkish House, Bluebonnet Learning Center, Merit Learning, RD Events and Sales, Bluebonnet Child Care, Zenith Learning (inactive), Turkish-American Community Center, Institute of Turkish Studies, and Raindrop Youth Development Center – RYDC.[128]

- Turquoise Council for Americans and Eurasians ("TCAE"): TCAE is one of six Gülenist member organizations affiliated with the Turkic American Alliance.[129] TCAE is active in Texas, Arkansas and neighboring states. It hosts awards dinners, forums on various topics, and other community and cultural events, and sponsors trips to Turkey and other countries and for local elected officials and leaders.[130] TCAE helped organize a trip for ten-members of Congress in 2013 to Baku, Azerbaijan. The Office of Congressional Ethics later investigated the trip when it learned that SOCAR, the state-owned oil company of Azerbaijan,

122 Dialogue Institute of the Southwest on the Alliance for Shared Values website, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

123 Dialogue Institute of the Southwest Branches, available at: http://tinyurl.com/ycldgejx (last checked 6/13/2017).

124 Alliance for Shared Values, available at: https://tinyurl.com/ybg3psok (last checked 6/6/2017).

125 About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

126 Raindrop Turkish House, available at: http://tinyurl.com/yaqn2g7b (last checked 6/13/2017).

127 About Raindrop Turkish House, available at: http://tinyurl.com/mbf9jd6 (last checked 6/6/2017).

128 Raindrop Foundation corporate documents, available from Texas Secretary of State at http://tinyurl.com/mfxbyjr (last checked 7.20.2017).

129 Turkic American Alliance Members, available at: http://tinyurl.com/ycy89wv2 (last checked 6/18/17).

130 TCAE About Us, available at: http://tinyurl.com/yannxyqc (last checked 6/18/17).

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secretly paid for the trip.[131] At the time of the trip, Kemal Aksuz, a founder of Target Design and Management ("TDM Construction"), served as TCAE's director.[132] TDM Construction has received over $55 million in contracts from Harmony.[133]

Friends of Gülen Spotlight:

Four members of Congress from Texas participated in a ten-member Congressional trip in 2013 to Azerbaijan organized by TCAE. The Office of Congressional Ethics later investigated the trip when it learned that SOCAR, the state-owned oil company of Azerbaijan, secretly paid for the trip.[134] The trip included U.S. Representative Sheila Jackson Lee, U.S. Rep. Ted Poe, then-U.S. Rep. Ruben Hinojosa, and then-U.S. Rep. Steve Stockman. The members of Congress were not aware that SOCAR funded the trip and sought pre-trip approval from the House Ethics Committee. The Washington Post reported that during the previous year "SOCAR and several large energy companies sought exemptions for a $28 billion natural gas pipeline project in the Caspian Sea from U.S. economic sanctions being imposed on Iran."[135]

Other examples of state elected officials who participated in subsidized trips to Turkey include (not an exhaustive list)[136]:

- Representative Alma Allen
- Representative Valinda Bolton (former)
- Senator Troy Fraser (former)
- Representative Pete Gallego (former)
- Senator Joan Hoffman
- Senator Eddie Lucio
- Representative Elliot Naishtat (former)
- Representative Mark Strama (former)
- Senator Leticia Van de Putte (former)

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Yuksel Alp Aslandogan: Current President/Executive Director, Alliance for Shared Values; former Secretary, Gülen institute; former President, Dialogue Institute of the Southwest; Founder, Wisconsin Career Academy (WI);

131 Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: http://tinyurl.com/y7pegxo9 (last checked 5/29/17).

132 TDM Construction, Texas Secretary of State; available at: http://tinyurl.com/r7iw (last checked 2016).

133 Harmony IRS Form 990s; available at: http://tinyurl.com/hu9wqcl (last checked 6/15/17); *see also* Notable Turkish Vendors, *supra*.

134 Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: http://tinyurl.com/y7pegxo9 (last checked 5/29/17). *See* Will Tucker and Lise Olsen, *Lawmakers' trips to Baku raises ethics questions*, Houston Chronicle (24 July 2014) available at http://tinyurl.com/ycuq75ey (last checked 7.20.2017).

135 *Id.*

136 *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: https://tinyurl.com/lzd8zsl (last checked 5/20/2017).

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former President, Texas Gulf Foundation (d/b/a North American College); former Director, Amity Foundation, Inc.; landlord for Harmony Science Academy (Austin).[137]

- Nihat Guvercin: CEO, iLearn Schools (NJ); Founder/School Leader, four Arts and Sciences/iLearn charter schools (NJ); former Principal/Science Teacher, Harmony; School Director/ Teacher/Researcher, Gulistan Education Institutions (Turgot Ozal HS) (Albania); B.S. Middle Eastern Technical University (Turkey).[138]

- Mithat Karabulut: Principal, Triangle (NC); Science Dept. Head/Assistant Principal, Dove Science (OK); Assistant Principal, LISA Academy (AR); Superintendent/Principal, School of Science and Technology (TX); Assistant Superintendent/College Readiness, Harmony.[139]

- Atila Akyurek: Former Principal, Queen City STEM School (NC); current Principal, Harmony; former Principal, School of Science and Technology (TX); former Testing Coordinator/Physics Teacher, Dove Science (OK); former Teacher, MEF International School (Turkey); former Teacher, Yahya Kemal College (Macedonia); former Teacher, Tarsus American College (Turkey); former Teacher, Ferikoy Armenian Elementary School (Turkey).[140]

- Ahmet Cetinkaya: Principal, Albuquerque School of Excellence (NM); former Principal, Harmony; current Director of Accountability, Harmony.[141]

- Salih Aykac: Current Principal, Albuquerque School of Excellence (NM); former Principal, Harmony School of Innovation Fort Worth; former Principal, Harmony Science Academy San Antonio; former Assistant Principal, Harmony School of Science Austin.[142]

- Nihat Bayhan: Former Director/CEO, Abramson Science and Technology (LA); Teacher/Principal/Guidance Coordinator, Harmony; later Area Superintendent, Harmony; currently Chief Internal Auditor, Harmony; Teacher, Sisli Ufuk Middle School (Turkey); Teacher, FEM Education Center (Turkey); B.S., Bogazici University

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137 Alliance for Shared Values IRS 990 Form 2014, available at: https://tinyurl.com/ybvmo96o (last checked 5/26/2017); Alliance for Shared Values, available at: http://tinyurl.com/ycovvhby (last checked 7/9/2017); Gülen Institute IRS 990 Forms, available at: https://tinyurl.com/yc5zdrg4 (last checked 5/26/2017); Yuksel Alp Aslandogan, Huffington Post, available at: https://tinyurl.com/l4laf4k (last checked 5/26/2017); Wisconsin Career Academy Charter School Contract, at p. 13, available at: http://tinyurl.com/n77x7g3 (last checked 4/23/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

138 Information available from annual reports for New Jersey Arts and Sciences schools; Nihat Guvercin, LinkedIn, available at: http://tinyurl.com/y7tk8zyc (last checked 7/9/2017).

139 Maturity Schedule for Triad Math and Science Academy Education Revenue Bonds (2015), at p. 74, available at: https://tinyurl.com/yadjz4n8 (last checked 5/31/2017); Bond issue - Public Finance Authority Wisconsin (Mar. 11, 2015), at p. A-9, available at: http://tinyurl.com/y88m6hek (last checked 6/4/2017).

140 Atila Akyurek, LinkedIn, available at: https://tinyurl.com/ya4tfqoj (last checked 5/31/2017); Harmony Fine Arts and Technology Letter from Principal (June 2016), available at: https://tinyurl.com/y7zlwmp2 (last checked 5/31/2017); Texas School Directory (2012-2013), Texas Education Agency, available at: https://tinyurl.com/y9gos7lm (last checked 5/31/2017).

141 Heinz, Hailey, *Texas Charter School Chain's Resources Used at Local, but Unrelated, Campus*, Albuquerque Journal (Oct. 11, 2010), available at: https://tinyurl.com/l4ujvqs (last checked 5/25/2017); Ahmet Cetinkaya, LinkedIn, available at: https://tinyurl.com/ktzknwh (last checked 5/25/2017)

142 New Mexico Public Education Dept. Directory, State Supported Charter School Directors, available at: https://tinyurl.com/yapw3o3u (last checked 5/26/2017); Harmony Public Schools Request for Sealed Proposals, 2013-2014 Furniture Procurement, available at: https://tinyurl.com/y9evm3lr (last checked 5/26/17); Texas Education Agency Alternative Appraisal Report for 2010, available at: https://tinyurl.com/y98pl85j (last checked 5/26/2017); Harmony School of Science Austin, HSANA Brochure, available at: http://tinyurl.com/yay4gmbv (last checked 6/6/2017).

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(Turkey).[143]

- Ebubekir Orsun: Assistant Principal, Albuquerque School of Excellence (NM); former Assistant Principal/Guidance Counselor/Math Teacher, Harmony.[144]

- Tevfik Eski: CEO, Pelican Educational Foundation (LA); former Principal, Harmony.[145]

- Cuneyt Dokman: Principal, Abramson Science and Technology (LA) when it closed after scandal in 2011; Director of Housing, Texas Gulf Institute; currently College Transition Counselor, Harmony.[146]

- Mustafa Guvercin: Superintendent, Abramson Science and Technology (LA); Principal/COO/Assistant Principal/ Teacher, Dove Science (OK); Math Teacher/Assistant Superintendent, Harmony; Teacher, UFUK Educational Foundation and UB International School (Mongolia).[147]

- Azamat Kolbaev: former Budget Accountant/Operations Manager, Read Foundation (TN); currently Budget Accountant, North American University; B.B.A., International Ataturk Alatoo University (Turkey).[148]

- Kemal Namver (a/k/a Mark Namver): current Director of Development, Harmony; former Board Member, Cosmos Foundation; former Director, Intercontinental Education Consulting, Inc.; former President, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); proposed Superintendent, Riverwalk Education Foundation School of Science and Technology Discovery; former Superintendent, School of Science and Technology; former Principal, Harmony Science Academy Austin; former Director of Community Outreach, Harmony; former Principal, Harmony Science Academy Houston; B.S., Dokuz Eylul University (Turkey).[149]

- Cahit Gezgin: former Board Chairman, Texas Gulf Foundation; former Director, Amity Foundation, Inc.[150]

- John Can Topuz: Current Provost/Vice

[143] Charter applications for Abramson and Kenilworth, Cowan Institute for Public Education Initiatives at Tulane University, available at: http://tinyurl.com/24t7emn (last checked 7/8/2017); Nihat Bayhan LinkedIn, available at: http://tinyurl.com/yd3nuk6w (last checked 7/8/2017).

[144] Ebubekir Orsun, Linked In, available at: https://tinyurl.com/ycwykdnq (last checked 6/6/2017).

[145] Pelican Educational Foundation IRS 990 Form (2011), available at: http://tinyurl.com/y8rdjjx9 (last checked 7/8/2017); Texas Public Schools and Charters Directory (Oct. 2011), available at: http://tinyurl.com/ycdsyols (last checked 5/25/17).

[146] Pelican IRS 990 Form (2010), available at: http://tinyurl.com/y8rdjjx9 (last checked 7/8/2017); Cuneyt Dokman, LinkedIn, available at: http://tinyurl.com/y6usueyz (last checked 7/8/2017); TEA Non-Teacher Master File (2014-2015), available from Texas Education Agency through 2016 open records request.

[147] Pelican IRS Form 990 (2007), available at: http://tinyurl.com/y8rdjjx9 (last checked 7/8/2017); Donna Garner, *FBI Raids Turkish Gülen Charter School in LA*, Voices Empower (Dec. 12, 2013), available at: http://tinyurl.com/yc4gkj4k (last checked 7/8/2017); Harmony IRS 990 Form (2005), available at: http://tinyurl.com/hu9wqcl (last checked 7/8/2017); Abramson Charter Application, available at: http://tinyurl.com/ycybxeeb (last checked 7/8/2017).

[148] Azamat Kolbaev, LinkedIn, available at: http://tinyurl.com/y8k2oe7k (last checked 6/6/2017).

[149] Mark Namver, LinkedIn, available at: http://tinyurl.com/y76925cm (last checked 6/15/2017); Harmony IRS 990 Form (2001), available at: http://tinyurl.com/hu9wqcl (last checked 7/8/2017); Intercontinental Education Consulting, Inc., Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Charter School Application (Oct. 27, 2006), School of Science and Technology Discovery, Texas Education Agency, http://tinyurl.com/yazpgfud (last checked 6/15/2017).

[150] Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

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President for Academic Affairs, North American College; former CFO, Texas Gulf Foundation (d/b/a North American College); former Director, Institute of Academic Studies; Curriculum Consultant, Sky Foundation (OK).[151]

- Gokturk Tunc: Current Director, Charter School Solutions; former Vice President, Harmony; former President, Raindrop Foundation; former Board Secretary, Institute of Interfaith Dialog for the World Peace.[152]

- Orhan Cavdar: Former Board Member, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[153]

- Gulsah Yildirim: Former District Instructional Program Director, Harmony; former Board Member, Institute of Interfaith Dialog for the World Peace (/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).[154]

- Guner Arslan: Former Board Member, Institute of Interfaith Dialog for the World Peace; Managing Member, Apex Investors, LLC.[155]

- Mustafa Yavuz: Former Director/ President, Gülen Institute; former Board Member, Institute of Interfaith Dialog for the World Peace (/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).[156]

- Bilal Erturk: President, Sky Foundation (OK); Officer/Founder, Charter School Solutions.[157]

- Fatih Yigit: Former Board Member, Harmony Public Schools; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[158]

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151 John C. Topuz, LinkedIn, available at: http://tinyurl.com/y7opyfxn (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: http://tinyurl.com/yap2gg6k (last checked 6/15/2017); Institute of Academic Studies, Corporation Wiki, available at: http://tinyurl.com/y86vjphl (last checked 6/15/2017); Sky Foundation IRS Form 990 (2006), available at: http://tinyurl.com/z7xxxk6 (last checked 6/13/2017).

152 Charter School Solutions, Corporation Wiki, available at http://tinyurl.com/yd4uctep (last checked 7/9/2017); Official Statement (May 10, 2007), Texas Public Finance Authority, Cosmos Foundation, available at: http://tinyurl.com/y9luxja6 (last checked 6/15/2017) Rain Drop Foundation IRS 990 Form (2002), available at: http://tinyurl.com/zcvgskm (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

153 Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

154 Texas Education Agency, Non-Teacher Master File 2014-2015, available from Texas Education Agency through 2016 open records request; Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

155 Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Apex Investors, Corporation Wiki, available at: http://tinyurl.com/nyn8pvg (last checked 6/15/2017).

156 Gülen Institute IRS 990 Form (2013), available at: http://tinyurl.com/yc5zdrg4 (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

157 Sky Foundation IRS 990 Form (2013), available at: http://tinyurl.com/z7xxxk6 (last checked 6/14/2017); Bilal Erturk, Corporation Wiki, available at: http://tinyurl.com/y7vy3kdk (last checked 6/15/2017).

158 Harmony IRS 990 Form (2006), available at: http://tinyurl.com/hu9wqcl (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

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- Levent Ulusal: Former President, Solidarity Contracting; former Business Manager, Harmony; Vice President, ATL Development Corporation; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[159]

- Yunus Dogan: President, Apple Catering; Director, Atlas Texas Construction and Trading; Director, Atlas Texas Food and Beverages; Director, Center for Turkish Studies; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[160]

- Vedat Alpkiray: Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council); former Board Member, Rain Drop Foundation; Agent, ALP Trading, LLC.[161]

- Ali Ciftci: Treasurer, Rain Drop Foundation; Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council); former Director, Apex Education Foundation.[162]

- Yusuf Duzgun: President, Brighten Technologies; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).[163]

- Ferkan Engin Kalkan: Owner, Riverwalk Investments; former Director, Turquoise Council of Americans and Eurasians; former Manager, Target Design and Management; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council); Founder, Southern Lighthouse Foundation; landlord for Harmony Public Schools Harmony Science Academy (Houston).[164]

- Unal Cevak: Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council);

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159 Levent Ulusal, LinkedIn, available at: http://tinyurl.com/yc6zzg3m (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

160 Apple Catering Texas Franchise Tax Public Information Report (2014), Texas Secretary of State, available at: : http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Aug. 12, 2014), Atlas Texas Construction and Trading, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Organization (May 11, 2005), Atlas Texas Food and Beverages, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Center for Turkish Students, Corporation Wiki, available at: http://tinyurl.com/y9f3amgk (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

161 Statement of Change of Registered Agent (Nov. 12, 2010), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Rain Drop Foundation IRS 990 Form (2011), available at: http://tinyurl.com/zcvgskm (last checked 6/15/2017); ALP Trading, Corporation Wiki, available at: http://tinyurl.com/yc94lt9b (last checked 6/15/2017).

162 Rain Drop Foundation, Corporation Wiki, available at http://tinyurl.com/ycneryyh (last checked 6/15/2017); Statement of Change of Registered Agent (Nov. 12, 2010), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Apex Education Foundation, Corporation Wiki, available at: http://tinyurl.com/yaeuthj8 (last checked 6/15/2017).

163 Certificate of Formation (Jan. 5, 2009), Brighten Technologies, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Texas Franchise Tax Public Information Report (2012), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

164 Certificate of Formation (June 5, 2012), Riverwalk Investments, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Turquoise Council of Americans and Eurasians IRS 990 Form (2011), available at: http://tinyurl.com/y9v782u8 (last checked 6.15.2017); Change of Registered Agent (June 6, 2014), Target Design and Management, available at: Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Texas Franchise Tax Public Information Report (2012), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (Mar. 19, 2004), Southern Lighthouse Foundation, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017).

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Director, Apple Catering; Director, Atlas Texas Food and Beverages; Director, DNR Catering (d/b/a Alamo City Foods); Director, Northwest Catering Services, Inc.[165]

- Ramazan Ozgen: Founder/Board Member, LISA (AR); President/CEO, Westlake Trading; Managing Member, Apex Investors, LLC.[166]

- Kemal Oksuz: Director of the Turquoise Council of Americans and Eurasians who arranged the trip to Azerbaijan for U.S. Representatives that was financed illegally using funds from SOCAR, the Azerbaijan state oil company; Founder of Target Design and Management Construction that has received over $55 million in contracts from Harmony; most current reference is as Instructional Coordinator at the Institute for Interfaith Dialogue (IID) in Houston.[167]

Notable Press Coverage and Research Regarding the Texas Gülenist Network

- Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, New York Times (June 6, 2011).[168]

- Lindsay Kastner, *Auditors Say Funds Misspent for Harmony Campuses*, mySA.com (July 31, 2012).[169]

- Alia Malik, *Inquiry Finds Problems at Harmony Charters*, San Antonio Express News (Nov. 26, 2014).[170]

- Will Tucker and Lise Olsen, *Lawmakers' trips to Baku raises ethics questions*, Houston Chronicle (24 July 2014)[171]

- Will Tucker, Lise Olsen, Kevin Diaz, *House opens ethics probe into foreign travel by lawmakers paid for by nonprofits*, San Antonio Express News (13 May 2015).[172]

- Lindsay Kastner, *Harmony schools causing discord,* San Antonio Express News (4 January 2012).[173]

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165 Texas Franchise Tax Public Information Report (2011), Institute of International Commerce and Partnership, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Apple Catering Texas Franchise Tax Public Information Report (2014), Texas Secretary of State, available at: : http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Organization (May 11, 2005), Atlas Texas Food and Beverages, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Articles of Incorporation (July 13, 2007), DNR Catering, Texas Secretary of State, available at: http://tinyurl.com/7oy8w (last checked 6/15/2017); Northwest Catering Services, Corporation Wiki, available at: http://tinyurl.com/y7lh6fxt (last checked 6/15/2017).

166 LISA IRS 990 Forms; available at: https://tinyurl.com/kcy94qn (last checked 5/22/2017); Apex Investors LLC, Corporation Wiki, available at: https://tinyurl.com/nyn8pvg (last checked 5/22/2017); Ramazen Ozgen, LinkedIn, available at: https://tinyurl.com/lca6u5b (last checked 5/20/2017).

167 Will Tucker and Lise Olsen, ***Lawmakers' trips to Baku raises ethics questions***, Houston Chronicle (24 July 2014) available at http://tinyurl.com/ycuq75ey (last checked 7.20.2017). ***See*** Scott Higham, Steven Rich & Alice Crites, ***10 members of Congress took trip secretly funded by foreign government***, Washington Post (May 13, 2015), available at: http://tinyurl.com/y7pegxo9 (last checked 5/29/17). TDM Construction, Texas Secretary of State; available at: http://tinyurl.com/r7iw (last checked 2016). ***See*** Harmony IRS Form 990s; available at: http://tinyurl.com/hu9wqcl (last checked 6/15/17); ***see also*** Notable Turkish Vendors, ***supra***. LinkedIn, available at http://tinyurl.com/y7v8l9sn (last checked 7.21.2017).

168 Available at: http://tinyurl.com/ya6cku5c (last checked 7/8/2017).

169 Available at: http://tinyurl.com/y74zu23v (last checked 7/8/2017).

170 Available at: http://tinyurl.com/y78poy7n (last checked 6/18/17).

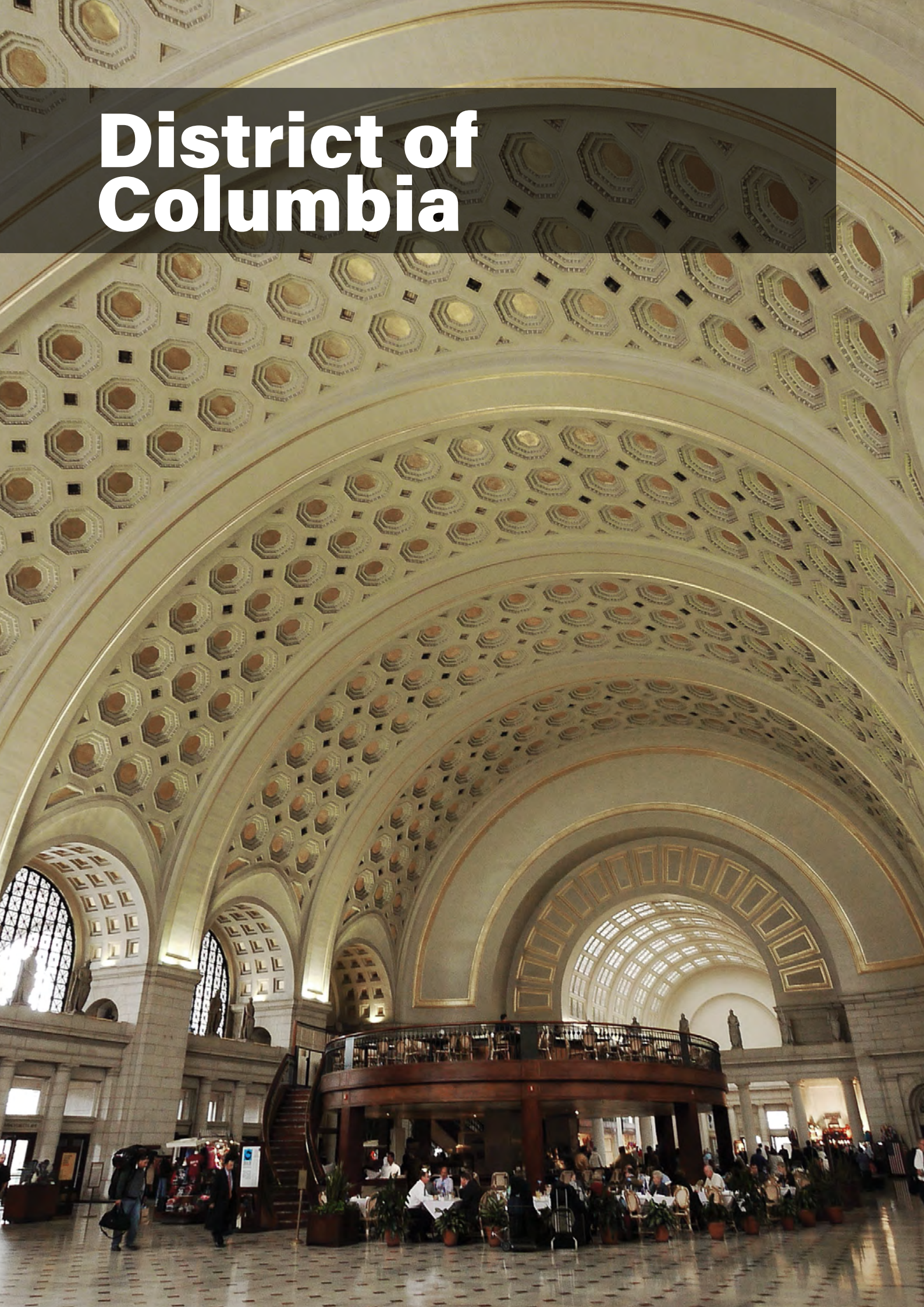
171 Available at http://tinyurl.com/ycuq75ey (last checked 7.20.2017).

172 Available at: http://tinyurl.com/ybodxe9o (last checked 7/20/17).

173 Available at: http://tinyurl.com/y7empc87 (last checked 7/20/17).

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District of Columbia



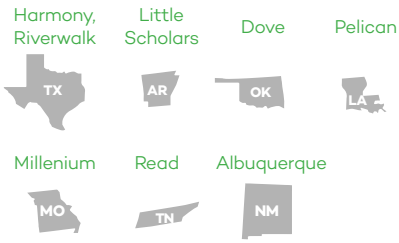
QUICK FACTS ON GÜLEN CHARTER SCHOOLS

DISTRICT OF COLUMBIA



NUMBER OF SCHOOLS	1
KNOWN AS	**Harmony School of Excellence**
TOTAL ENROLLMENT	**105**
CHARTER VENDOR	**Harmony Public Schools**
TOTAL REVENUES	**$2,089,693**

RELATED INSTITUTIONS



KEY PEOPLE



Soner Tarim

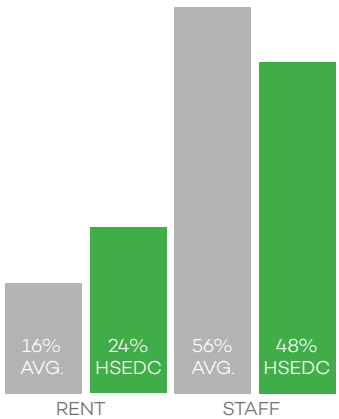
A.H. Sharif Salim

Julie Norton

FINANCIAL ISSUES

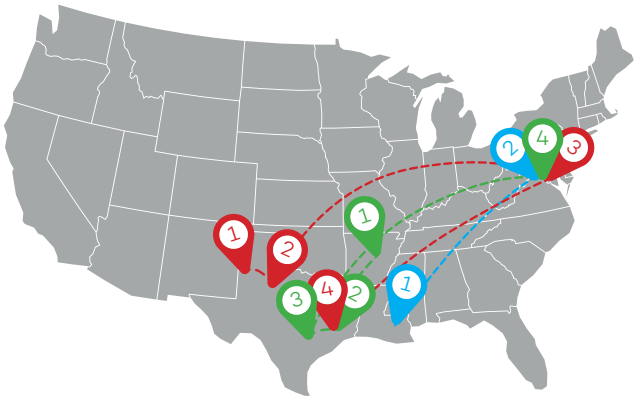
HSEDC has **high overhead costs based on DC charter school averages** and paid 24% of revenue in occupancy costs and just 48% in staff expenses. In comparison, other DC charter schools paid 16% of revenue for occupancy costs and 56% for staff expenses.

HSEDC EXPENSES VS. DC AREA AVERAGE



GÜLEN ORGANIZATION'S REVOLVING DOOR

Despite repeated denials of any link between or among the Gülen schools, there are clear links shown by the reshuffling of staff, including to Harmony DC.



EMIN CAVUSOGLU
CEO & PRINCIPAL
HARMONY DC

FATIH ONER
FORMER PRINCIPAL
HARMONY DC

NIYAZI EVREN CULHA
ASSISTANT PRINCIPAL
HARMONY DC

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Greater Texas
- School Names (known as): Harmony School of Excellence
- Total number of schools in District: 1
- Total student enrollment 2015-16: 105[1]
- Charter Holder/Governing Board(s):
  - Harmony DC Public Charter Schools[2]
  - Operating as a nonprofit 501(c)(3) organization
- Charter Management Services Vendor: Harmony Public Schools (also known as the Cosmos Foundation)[3]
- Regional Gülen Organization Oversight Entity: Harmony Public Schools
- Regional Sister Networks: Harmony Public Schools (TX); Riverwalk Education Foundation (TX); Little Scholars of Arkansas/LISA Academy (AR); Dove (OK); (formerly Sky Foundation); Pelican Educational Foundation (LA); Millennium Education Foundation/Frontier Schools (MO); Read Foundation/ Memphis School of Excellence (TN); Albuquerque School of Excellence (NM) (formerly Focus Foundation)
- Total Revenues for FY 2016: $2,089,693[4]
- Network Founders:
  - Soner Tarim: Founder, Harmony DC (D.C.); CEO, Harmony Public Schools (Texas); Lead Presenter at charter presentation for Albuquerque School of Excellence in 2009.[5]
  - A.H. Sharif Salim: Founder, Harmony DC (D.C.); Assistant Principal and Principal of multiple D.C. area schools. In 2010, he was removed from his position as Oxon Hill Middle School principal when his son, employed as a school aide, attacked a student with mental disabilities.[6]
  - Julie Norton: Founder of Harmony DC (D.C.); Associate Director of Corporate and Foundation Relations, University of Houston Downtown (TX); substitute teacher, classroom teacher, Director of Communications, Director of Curriculum and Instruction, Director of Community Outreach, Harmony Public Schools (TX).[7]

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1 Information taken from: Harmony Public Schools 2016 School Quality Report, available at: https://tinyurl.com/y9vq4e56 (last checked 7/13/2017).

2 Information taken from: Harmony DC IRS 990 form, available at https://tinyurl.com/y9aw9f5f (last checked 5/30/2017).

3 Until 2012, the Cosmos Foundation was the operating organization doing business as Harmony Public Schools. In 2012, Harmony became the primary operating organization.

4 Information taken from: Harmony DC PCS 2015-2016 Annual Report, available at https://tinyurl.com/y9ey8fgw (last checked 5/30/2017).

5 Information taken from: Harmony School of Excellence DC 2013 charter application, available at: http://tinyurl.com/yab5l5nk (last checked 7/13/2017); Presentation by Soner Tarim to the New Mexico Public Education Commission on August 26, 2009, available at: http://tinyurl.com/y8yy7vd2 (last checked 7/13/2017).

6 Information taken from: *Oxon Hill Middle School Principal Removed over assault allegations* (20 April 2010), available at: https://tinyurl.com/yc9rwbem (last checked 7/13/2017).

7 Information taken from: LinkedIn profile, available at: http://tinyurl.com/yb9ptzy2 (last checked 7/13/2017).

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Overview

The Harmony School of Excellence DC ("HSEDC") opened in 2014 under Harmony DC Public Schools ("Harmony DC"), a District of Columbia organization created by Harmony Public Schools ("Harmony") in Texas. Harmony is the sole member of Harmony DC with voting rights.[8] Two Harmony employees, including CEO Soner Tarim, served on the original three-person board for Harmony DC.[9] Harmony serves as the regional oversight entity and charter management services vendor for Gülen schools in the Greater Texas region and provides management and administrative services to HSEDC.

School	Operation	Student Demographic Information[10] *	Authorizer	Governing Board
Harmony School of Excellence - DC 62 T St. NE Washington, DC. 20002	Grades K-5 2014-present[11]	Enrollment: 105 2% ELL 80% FRL 12% SWD 93.9% African American 4.5% Hispanic 1.5% Asian	DC Public Charter School Board	Harmony DC Public Charter Schools

** ELL indicates English language learners; FRL indicates students eligible for free/reduced-price lunch; SWD indicate students with disabilities*

A History of Strategic Ambiguity and Conflicting Interests

Harmony DC, HSEDC's parent organization, pays Harmony to provide a range of administrative and academic services as HSEDC's charter management organization. HSEDC pays Harmony through two different contracts. First, the entities entered into a five-year support services agreement that expires in June 2019 and can be annually renewed.[12] Harmony makes $80 – $120 per hour under this agreement. Harmony's services allegedly include consulting, educational technology solutions, data network solutions, efficiency analysis, strategic planning, and leadership and teacher training.[13] In addition to the support services agreement, HSEDC pays Harmony five percent of all the state and local per pupil funds it receives annually in licensing

8 Information taken from: Harmony DC Public Charter Schools IRS 2014 Form 990, available at: http://tinyurl.com/y9aw9f5f (last checked 7/13/2017).

9 Information taken from: Harmony School of Excellence DC 2013 charter application, available at: http://tinyurl.com/yab5l5nk (last checked 7/23/2017).

10 Information taken from: Harmony School of Excellence DC PCS 2016 School Quality Report, available at: http://tinyurl.com/y9vq4e56 (last checked 7/13/2017).

11 Information taken from: Harmony School of Excellence DC PCS 2016 School Quality Report, available at: https://tinyurl.com/y9vq4e56 (last checked 7/13/2017).

12 Information taken from: Harmony School of Excellence DC 2013 charter application, available at: http://tinyurl.com/yab5l5nk (last checked 7/13/2017); IRS Form 990 2014 for Harmony DC Public Charter Schools, available at: http://tinyurl.com/y9aw9f5f (last checked 7/13/2017).

13 Information taken from: Harmony Public Schools 2014 Official Statement Pg. B-3, available at: http://tinyurl.com/ybjjzsjd (last checked 7/13/2017).

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fees for use of Harmony's trademarks and intellectual property.[14] In 2016, HSEDC received $1,838,018 in state and local revenue; this would equate to a payment to Harmony of $91,900 for licensing fees.[15]

Since Harmony plays a central role in selecting board members and governing Harmony DC, the relationship raises questions about whether Harmony DC's decision to employ Harmony was independent and competitive. In particular, Soner Tarim serves as the President of the HSEDC board and as the CEO of Harmony. Both he and another Harmony-affiliated board member served both the vendor, Harmony, and the customer, Harmony DC, in the decision to employ Harmony.

Harmony has similar support services agreements in place with seven other Gülen-affiliated charter school networks in its region.[16] The original agreements were based on a percent of all state funds received but changed to an hourly rate structure in 2013. These affiliated charter networks also pay between $15,000 - $147,000 in licensing fees per school per year for intellectual property.[17] These arrangements should be scrutinized for signs of financial abuse since there is often little oversight over the services delivered by Harmony.

Financial Abuse

HSEDC's financial reports and low enrollment raise questions about the school's overall financial sustainability. HSEDC ended the school year with a deficit of $31,664, one of only eight charter schools out of 58 that ended the year with a negative balance.[18] The school had cash on hand to cover only 14 days of operation, compared to a D.C. average of 120 days' cash on hand.[19] HSEDC also owes Harmony $32,209 under their agreement.[20]

HSEDC opened with only 66 students in 2014,[21] and it enrolled 105 students in 2015-2016. Due to its low enrollment, HSEDC has high expenses measured on a per pupil basis. For example, HSEDC paid $453,993 in occupancy costs in 2015, 24 percent of its revenue[22] and over $6,000 per pupil.[23] In comparison, the other charter schools in Washington paid, on average, just sixteen percent of revenue for occupancy costs. The high overhead decreases funds available to pay teachers: HSEDC paid only 48 percent of its revenue in personnel costs, compared to the D.C. average of 56 percent.[24]

14 *Ibid*.

15 Information taken from: Harmony DC PCS 2015-2016 Annual Report, available at: https://tinyurl.com/y9ey8fgw (last checked 7/14/2017). In addition, a total of $33,175 was recognized as donated license fee related to the five-year License Agreement with Harmony.

16 Information taken from: Cosmos Foundation 2011 Official Statement – Appendix B, available at: http://tinyurl.com/y79hpqya; Cosmos Foundation 2012 Official Statement – Appendix B, available at: http://tinyurl.com/ybmqkz2s; Harmony Public Schools 2014 Official Statement – Appendix B, available at: http://tinyurl.com/ybjjzsjd (last checked 7/13/2017).

17 *Ibid*.

18 Information taken from: DC Public Charter School Board 2015 Financial Audit Review, available at: http://tinyurl.com/yaopm3qh (last checked 7/14/2017).

19 Information taken from: DC Public Charter School Board 2015 Financial Audit Review, available at: http://tinyurl.com/yaopm3qh (last checked 7/14/2017).

20 Information taken from: Harmony DC PCS FY2015 Financial Report Card, available at: http://tinyurl.com/yavckhlg (last checked 7/13/2017).

21 Information taken from: Harmony DC PCS 2014-2015 Annual Report, available at: http://tinyurl.com/y8vp2nnf (last checked 7/14/2017).

22 Information taken from: DC Public Charter School Board 2015 Financial Audit Review, available at: http://tinyurl.com/yaopm3qh (last checked 7/14/2017).

23 Per pupil cost calculated from 2014-2015 enrollment of 66 students divided by occupancy cost of $453,993.

24 Information taken from: DC Public Charter School Board 2015 Financial Audit Review, available at: http://tinyurl.com/

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Bond Financing

Neither Harmony, Harmony DC, nor Charter School Solutions, Harmony's affiliated real estate arm, have borrowed money through a bond issue to benefit HSEDC.[25]

Real Estate

HSEDC currently leases its facilities from the Roman Catholic Archbishop of Washington[26] at an annual cost of $322,298.[27] But Harmony has stated that it will look for a new location when HSEDC expands since the current facility will be too small. This situation should be monitored in the event that HSEDC attempts to lease facilities from an affiliated landlord such as Charter School Solutions like many other Gülen charter schools across the nation.

Excessive Use of H-1B Visa Program

In 2014, HSEDC filed 1 H-1B visa application.[28] But due to its close connection with Harmony and the number of employees that have worked for both Harmony and HSEDC, Harmony's H-1B applications should be analyzed for overlap with HSEDC. Harmony has applied for 2,558 H-1B visas since 2005.[28] Harmony paid $485,970 to a Houston-based law firm that specializes in immigration.[29]

Although Gülen charter schools commonly state that the H-1B visas are necessary to fill shortages for math and science teachers, applications are submitted for a wide range of positions, including: legal counsel, law clerks, construction engineers, art teachers, educational diagnosticians, budget analysts and accountants, director of special programs, publication coordinator, assistant principals, principal, finance manager, Physical Education teacher, Turkish Teachers, social studies and social science teachers, English as a second language teachers, account managers, economics teachers, assistant superintendents, English and English grammar teachers, elementary school teachers, cluster superintendents, instructional coordinators, education administrators, human resources advisor, purchasing agents and managers, director of communication, Spanish language teacher, public relations manager, curriculum developer for gifted and talented program, operations research analyst, director of high school programs, small projects director, academic advisors, and internal auditor.[30]

yaopm3qh (last checked 7/14/2017).

25 Search for bond issues at https://emma.msrb.org/ (last checked 6/08/2017).

26 Information on ownership of HSEDC school on T Street via real property search, available at: http://tinyurl.com/yb4ecw9d (last checked 7/14/2017).

27 Information taken from: Harmony DC PCS FY2015 Financial Report Card, available at: http://tinyurl.com/yavckhlg (last checked 7/14/2017).

28 HSEDC's H-1B application is available at: http://tinyurl.com/ydexrr86 (Harmony Dc Public Charter Schools) (1); see also the Texas state profile.

29 Harmony IRS Form 990 (2007, 2009), available at: http://tinyurl.com/hu9wqcl (last checked 6/10/2017).

30 Information taken via company searches for H1-B visas application occupations and positions, available at; available at https://tinyurl.com/y8muahbt, https://tinyurl.com/yb2foulo, and https://tinyurl.com/ycwlm2x6 (last checked 7/14/2017).

Notable Gülenist Vendors

- Harmony Public Schools: HSEDC contracts with Harmony for a range of management and administrative services through a support services agreement. It also pays Harmony licensing fees for use of its trademark and intellectual property.

Scandals, Investigations, & Notable Activities

Harmony established the original three-person founding board for Harmony DC Public Schools, the parent organization for HSEDC. Two members of the Board were associated with Harmony: Soner Tarim, the CEO, and Julie Norton, Harmony's Director of Communications. The third board member worked as principal of Oxon Hill Middle School. In 2010, he lost his position as principal when his son, employed as a school aide, attacked a student with mental disabilities.[31]

HSEDC is located directly across the street from Langley Elementary School, a recently renovated public school serving the same grades with a STEM-focused curriculum.[32] Langley was working to attract students from nearby families when HSEDC moved in across the street. HSEDC's decision to locate directly across from such a similar school shows a lack of coordination and planning. Soner Tarim, President of Harmony DC at the time, stated that he did not realize Langley was a STEM school.[33] In addition, the Chancellor of the DC Schools, who first learned of HSEDC on Twitter, claimed that locating a charter school adjacent to an existing school was an inefficient use of taxpayer funds.[34]

Gülenist Cultural and Business Organizations Active in State

Washington, D.C., does not have the typical Gülen cultural organizations found in other areas. Instead, events are hosted by national Gülen organizations and tend to target federal elected officials.

Turkic American Alliance (TAA): TAA is an umbrella organization that hosts congressional events and dinners and organizes trips to Turkey for federal elected officials. TAA is located at the same address as the Rumi Forum.[35]

TAA's six regional member organizations include:

- CTAA - Council of Turkic American Associations (New York)
- MAFTAA - Mid Atlantic Federation of Turkic American Associations (D.C.)
- TAFM - Turkic American Federation of Midwest (Chicago)
- TAFS - Turkic American Federation Southwest (Atlanta)
- TCAE - Turquoise Council of Americans and Eurasians (Houston)

[31] Information taken from: *Oxon Hill Middle School Principal Removed over assault allegations* (20 April 2010), available at: https://tinyurl.com/yc9rwbem (last checked 7/13/2017).

[32] Information taken from: Brown, Emma. *New D.C. charter school highlights debate over planning.* Washington Post (5 July 2014), available at: http://tinyurl.com/y7m7yh9w (last checked 7/14/2017).

[33] *Ibid*.

[34] *Ibid*.

[35] *See* website for Turkic American Alliance, available at: http://tinyurl.com/ybsu2ps3 (last checked 7/14/2017).

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- WATC - West American Turkic Council (Los Angeles)

Rumi Forum: The Rumi Forum is based in Washington, D.C., and has chapters in Delaware, Kentucky, Maryland, North Carolina, and Virginia. Fethullah Gülen is the Forum's honorary chair, and its website promotes his teachings. The Rumi Forum states that its purpose is to foster interfaith and intercultural dialogue by hosting events and award dinners, discussions, cultural events, and trips to Turkey, Azerbaijan, and other countries. It shares an address with the Turkic American Alliance.[36] The Rumi Forum is also a member of Alliance for Shared Values, an umbrella organization based in New York openly aligned with Fethullah Gülen with six member organizations active throughout the United States.

Friend of Gülen Spotlight

U.S. Representative Sheila Jackson Lee: Sheila Jackson Lee, a congresswoman from Houston, participated in a trip to Baku, Azerbaijan, in 2013 organized by the Turquoise Council of Americans and Eurasians. The Office of Congressional Ethics investigated the trip after learning that SOCAR, the state-owned oil company of Azerbaijan, secretly paid for the trip.[37] Members of Congress were not aware that SOCAR funded the trip and sought approval for the trip from the House Ethics Committee. In the year preceding the trip, SOCAR sought an exemption from economic sanctions on Iran for a $28 billion natural gas pipeline project.[38]

Lee was also one of the top recipients of campaign contributions from individuals connected to Gülen schools and businesses. Harmony's former CFO called Lee a supporter of the Harmony schools and stated she helped Harmony's effort to open a charter school in Washington, D.C.[39]

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H-1B visa employees from school to school and state to state. The individuals listed below are examples of the overlap of employees among schools, further demonstrating the interconnections and affiliation between the Gülen charter networks and organizations.

- Emin Cavusoglu: CEO/ Principal, Harmony DC Public Charter Schools (D.C.); Principal/Superintendent, LISA Academy Schools (AR); Area superintendent, Harmony Public Schools (TX); Superintendent, San Antonio School of Science and Technology (TX).[40]

- Fatih Oner: Principal, Harmony DC (D.C.); current Principal, Harmony School of Advancement (TX); Cluster

[36] *See* website for the Rumi Forum, available at: http://tinyurl.com/yc94e6wz (last checked 7/14/2017).

[37] Information taken from: Higham, Scott et al., *10 members of Congress took trip secretly funded by foreign government*. Washington Post. 13 May 2015. Available at: http://tinyurl.com/yc7lk4la (last checked 7/14/2017).

[38] *Ibid*.

[39] *See* discussion of support for Gülen organizations: Gray, Rosie and Medina Mora, Nicolas. *Secretive Turkish movement buys U.S. influence*. BuzzFeed. 23 July 2014. Available at: http://tinyurl.com/yazgkdf3 (last checked 7/14/2017).

[40] Information taken from: Harmony DC IRS 990 Forms, available at: https://tinyurl.com/y9aw9f5f (last checked 7/14/2017); Little Scholars of Arkansas Board Membership 2007-2011 IRS 990 Forms, available at: https://tinyurl.com/kcy94qn (last checked 7/14/2017); LinkedIn Profile, available at: https://tinyurl.com/m8q9dc5 (last checked 7/14/2017).

Superintendent, Harmony Science Academy Lubbock (TX); Principal, Harmony Science Academy Brownsville and Harmony Science Academy Fort Worth (TX).[41]

- Niyazi Evren Culha; Assistant Principal, Harmony DC (D.C.); Assistant Principal, Kenilworth Science and Technology Charter School (LA).[42]

Notable Press Coverage and Research Regarding the DC Gülenist Network

- Brown, Emma. *New D.C. charter school highlights debate over planning*. The Washington Post. 5 July 2014. Available at: http://tinyurl.com/yadky36a (last checked 7/14/2017).

- Brown, Emma. *Harmony charter school seeks to expand to D.C.; business practices raise questions*. The Washington Post. 12 November 2013. Available at: http://tinyurl.com/yc2pzvgn (last checked 7/14/2017).

- Lewis, Tisha. *Complaint filed against charter school system for misuse of funds, discriminatory hiring practices*. Fox 5 D.C. 31 May 2016. Available at: http://tinyurl.com/y92rnz6a (last checked 7/14/2017).

[41] Information taken from: LinkedIn Profile, available at: https://tinyurl.com/ybreu9oc (last checked 7/14/2017).

[42] *See* Louisiana Department of Education Louisiana Believes website, Teacher Data for Kenilworth Science and Technology Charter School (2011), received from a FOIA Request.

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Pittsburgh
Harrisbur
Columbus
PENN
Charleston
Richmon
VIRGINIA
Charlot
Columbia
Macon
Albany

Quick Facts

- Total # of Schools in Region: 32. After June 30, 2017, 31.

- Total Regional Revenues for the 2015-16 school year: $113,161,501.

- Regional Charter Networks:

Horizon/Noble (OH) – 17 schools

  - Horizon/Math and Science (IL) – 4 schools
  - Gateway (MO) – 4 schools
  - Math and Science (IN) – 4 schools (3 after June 30, 2017).
  - Math and Science (MI) – 1 school
  - Math and Science (MN) – 1 school
  - Math and Science (WI) – 1 school

- Total Student Enrollment 2015-16: 14,091 students

- Total # of H-1B applications filed from 2000-2016 in region by Midwestern charter networks and Concept Schools: 1,286 applications at an estimated cost of $2.6 million - $5.1 million in public funds spent to immigrate Turkish Gülenists.[1]

- Regional Vendors:
  - Concept Schools, Inc.
  - New Plan Learning
  - The Core Group
  - Advanced Solutions for Education
  - Quality Builders of Midwest

- Regional Founders and Key Members:
  - Taner Ertekin: Established Gülenist schools in Thailand and Japan; Co-founder of first Horizon Science Academies; founder of Concept Schools; used HSA Cleveland funds to pay immigration expenses for his wife; founder and president of Breeze, Inc., Concept's preferred Gülenist landlord entity; founder of Chicago Math and Science Academy.[2]
  - Vedat Akgun: Co-founder of first Horizon Science Academies;[3] Co-Founder of Attempted Indiana Life Sciences Academy;[4] Founder of Concept Schools;[5] Co-founder of Breeze, Inc. and New Plan Learning, alongside Ertekin;[6] Fulton Science (GA) board member;[7] CEO of Charter Housing Corporation (GA);[8] CFO of Global Spectrum Foundation, Inc, D.B.A. Istanbul Center (GA);[9] Board member of Fulton Science Private

1 H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

2 Information taken from Bond statement at A-23 describing Ertekin's involvement, available at: http://tinyurl.com/keaa5f5 (last checked 4/19/2017); *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders, available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016); 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016); CMSA 990 tax documents listing Ertekin, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

3 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

4 Corporation registration information available at: http://tinyurl.com/kjr6lu4 (last checked 4/19/2017).

5 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

6 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

7 2012 990 tax return, showing Akgun as a board member, available at: http://tinyurl.com/lv8ssnk (last checked 4/19/2017).

8 Georgia Secretary of State business search for Officer Vedat Akgun, available at: http://tinyurl.com/pa73vlw (last checked 4/19/2017).

9 Id.

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School (GA);[10] President of the Turkic American Federation of Southeast (GA).[11]

- Y. Alp Aslandogan: Founder, Wisconsin Career Academy; Board President, Institute Interfaith Dialog – Gülenist cultural association; Contributing Editor, Fountain Magazine – known Gülenist publication; Secretary, The Gülen Institute; openly supports Fethullah Gülen; Landlord, Harmony (TX); CEO, North American University – Gülenist vendor to Harmony (TX); currently Official Spokesperson for Fethullah Gülen and Executive Director, Alliance for Shared Values – Gülen's foundation.[12]
- Sedat Duman: Founder of Horizon Science Academies;[13] Co-Founder of Concept Schools, Inc.;[14] CEO of Concept Schools, Inc;[15] Currently being investigated by the FBI for his suspected role in certifying fraudulent forms to procure E-Rate funding.[16]
- Salim Ucan: Teacher HSA Cleveland;[17] Principal Science Academy of Chicago, private Gülenist school run by the Niagara Foundation;[18] Founding Principal Chicago Math and Science;[19] Co-Founder of Concept Schools, Inc.;[20] Founding board member for Breeze Inc., for-profit Gülenist landlord for Concept Schools;[21] Vice President of Concept Schools, Inc.;[22] currently Professional Development coach for Concept.[23]
- Ozgur Balsoy: Horizon Science Academy Superintendent;[24] Incorporator of Concept Schools, Ohio;[25] Owner of Advanced Solutions for Education - Gülenist vendor;[26] member of the Scioto Foundation – Gülenist cultural association; Currently being investigated by FBI for his suspected role in the fraudulent use of E-Rate funds and engaging

10 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

11 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

12 Information gathered from: Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017); Yuksel Alp Aslandogan, Huffington Post, available at: http://tinyurl.com/l4laf4k (last checked 4/23/2017); The Gülen Institute, 2013 990, available at: http://tinyurl.com/msxhmmg (last checked 4/23/2017); Y. Alp Aslandogan, Twitter, available at: http://tinyurl.com/kooavoq (last checked 4/23/2017); Alliance for Shared Values, http://tinyurl.com/kz42gu5 (last checked 4/23/2017). For more information regarding Aslandogan's involvement with Harmony (TX), see the Greater Texas Regional Summary and Texas Profile.

13 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

14 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

15 CEO's welcome, available at: http://tinyurl.com/k2ybgnm (last checked 4/20/2017).

16 Search warrant, pg 22, available at: http://tinyurl.com/jt9j4ed (last checked 4/20/2017).

17 Resume pg 78, available at: http://tinyurl.com/mej56l8 (last checked 4/23/2017).

18 Id.

19 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

20 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

21 Breeze Articles of Incorporation, available at: http://tinyurl.com/mlc5jc4 (last checked 4/20/2017).

22 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

23 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

24 Listing of superintendents, available at: http://tinyurl.com/kggtysh (last checked 4/19/2017).

25 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

26 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

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in illegal kickbacks;[27] Owner of Euclid Properties (OH) – Noble Academy landlord.[28]

- ▷ Ertugrul Gurbuz: President/Owner, The Core Group – Gülenist vendor under FBI investigation for allegedly defrauding E-Rate program and engaging in illegal kickbacks; Owner/Founder, Quality Builder of Midwest – Gülenist Construction Vendor for Midwestern region.[29]
- ▷ Engin Karatas, a.k.a. Engin Blackstone: Co-founded Chicago Math and Science Academy; Assistant Principal HSA Denison Middle; Principal HSA Toledo; Principal Quest Charter Academy; Assistant Principal Wisconsin Career Academy;[30] visited Fethullah Gülen at the Golden Generation Retreat Center with Concept whistleblower Mustafa Emanet;[31] Superintendent Gateway Science Academy (MO).[32]
- ▷ Ugur Zengince: Email listed as Representative for Gateway Science Academy charter petition; Principal HSA Cleveland Middle School (OH); Principal HSA Dayton (OH); Featured in OH Whistleblower testimony because of his misuse of federal funding;[33] Provided signature on E-Rate funding form for Concept and The Core Group, one of the vendors under investigation for defrauding the E-Rate program; Superintendent Concept Schools; Superintendent Triad Math and Science Academy (NC).[34]

- ► Regionally Active Turkish cultural associations: The Niagara Foundation, Turkish American Federation of Midwest (TAFM), Turkish American Society (Minnesota, Indiana, Missouri).

The Origins of the Midwestern Region

The Midwestern region is one of the oldest and most established regions within the Gülen Organization. When Fethullah Gülen relocated to the United States in 1999, it prompted a wave of charter schools opened by his followers. In the Midwestern region, the seeding educational foundations were formed in 1999 and 2000 in Ohio, Wisconsin, and Indiana by a group of Gülenists that would go on to seed and develop more states and regions within the Gülen Organization. Taner Ertekin, who established Gülenist schools abroad in Japan and Thailand, formed the first Gülenist charter schools within Ohio, along with Vedat Akgun. Akgun also formed the first Gülenist foundation in Indiana with a key figure of the Western region, Ali Korkmaz. Akgun later played a pivotal role in establishing the failed Fulton Science network in Georgia. Y.

27 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

28 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

29 *See* Mihalopoulos, Dan. *Nearly $1 million from charters went to firms named in FBI probe.* Chicago Sun-Times. (August 18, 2014) available at: http://tinyurl.com/m9z2mf7 (last checked 4/29/2017). Targeted Firms Still Get Tax Money After Charter Raids, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

30 Interview with Engin Blackstone, available at: http://tinyurl.com/mw9bey6 (last checked 4/23/2017).

31 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

32 Linkedin profile, available at: http://tinyurl.com/lylm33o (last checked 4/25/2017).

33 "The first day of school, the principal, Mr. Ugur Zengince – he goes by Mr. Zen. – pulled me into his office and said, 'You can teach English, right? You are going to teach freshman and sophomore English' instead of being a Title I teacher. They still were collecting federal Title I money but had nobody performing Title I services." Testimony available at: http://tinyurl.com/kdamb9a (last checked 4/25/2017).

34 Information gathered from Gateway charter petition, pg 7; E-rate form, available at: http://tinyurl.com/lln2o8s (last checked 4/25/2017); Linkedin profile, available at: http://tinyurl.com/kjcze93 (last checked 4/25/2017).

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Alp Aslandogan, Gülen's official spokesperson, formed the Wisconsin foundation before leaving to develop the Harmony (TX) region.

From 1999-2002, these Gülenist foundations applied to open charter schools throughout Ohio, Wisconsin, and Indiana. Only Ohio and Wisconsin were successful, however. Indiana did not gain approval for its first Gülenist charter school until 2007. In 2002, Ertekin, Akgun, and other Gülenists formed Concept Schools, Inc., to serve as an external charter management organization over all Gülenist charter schools opened in the developing Midwestern region. Concept coordinates the hiring of Gülenists via the H-1B program, the use of affiliated Turkish vendors, the shuffle of Gülenist employees throughout the Midwestern region, the transfer of funds between its schools, the use of their schools' public funds, and the gathering of the *tuzuk* funds from its Gülenist employees, up to 40% of their monthly salaries. By using a private corporation to conduct the majority of its illegal business, the Gülenists effectively obscure the use of their schools' public funds for private purposes.

In 2003, Ertekin and Akgun formed Breeze, Inc., to serve as Concept's real estate arm. Breeze, Inc. acquired properties, then leased them back at extremely high rents to Concept-controlled charter schools. Interestingly, Akgun and the other initial Indiana founders had relationships with Imagine Schools, a for-profit charter management organization, during this time period in Indiana. Imagine is well known for using the exact same model—a charter management organization that opens its own charter schools that are then required to use Imagine's real estate arm, Schoolhouse Finance. When charter authorizers discovered that Schoolhouse Finances charges exorbitant rates in rent to Imagine's captive charter school customer base, the Imagine chain came under fire, and its schools lost authorization. In fact, Imagine was recently required to pay $1 million due to this "self-dealing scheme" for one specific rent case.[35] To date, no action has been taken against Breeze, Inc. and Concept for its similar scheme.

After Concept and Breeze, Inc. were created, Concept expanded into Illinois by opening Chicago Math and Science Academy in 2004. From 2004-2007, Concept opened more schools in Ohio, opened its first school in Indiana, and established educational foundations in Missouri and Minnesota. By this time, New Plan Learning had formed and controlled Breeze, Inc., as well as several other subsidiaries that acquired facilities to lease back to Concept-controlled schools. Concept's growth was in full swing, fueled in large part by its growing property acquisitions and revenues gleaned from seemingly overcharging its schools for rent. This scheme has been replicated around the country, and in fact, one of Concept's board members Vahap Uysal[36] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[37] Gülenists throughout the country attended and presented, including Alp Aslandogan, Wisconsin founder, Harmony (TX) landlord and vendor, and Gülen's official spokesperson in his role as President of the Alliance for Shared Values, a Gülenist cultural organization.[38]

From 2007-2011, Concept opened new schools in Minnesota, Michigan, and Missouri, and expanded further into Indiana, Ohio, Illinois, and Wisconsin. In 2011, New Plan Learning received a tremendous boost financially by securing bond financing for four Concept-controlled charter schools in Illinois and Ohio. The $33 million in bond proceeds largely paid for New Plan

[35] Gross, Allie. Imagine Schools Ordered to Pay $1 Million in 'Self-Dealing' Scheme, Education Dive (Jan 22, 2015) http://tinyurl.com/lmownu7 (last checked 4/29/2017).

[36] See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt.

[37] Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

[38] See Texas profile for more information about Alp Aslandogan.

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Learning's acquisition of the school properties, along with some minimal renovation done by the affiliated Quality Builders of Midwest. New Plan Learning's bond debt is shouldered entirely by the four implicated charter schools, thereby vesting the title of these publicly financed school properties in a private Gülenist corporation to the public detriment.

From 2011-present, Concept has continued to expand its network throughout the Midwestern region. It currently oversees 32 schools, though one is set to close at the end of the 2016-17 school year. Of these 32 schools, New Plan Learning owns or has owned 16 of the school properties. It is currently leasing 14 properties to Concept-controlled schools, and sold the other two properties to the schools themselves. Ozgur Balsoy, a former Concept executive, owner of Advanced Solutions for Education, and one of the main regional vendors under FBI investigation for fraud, also owns his own real estate company. Balsoy's company owns and rents a property to a Concept-controlled charter school at an extreme rate. Of the Gülen Organization regions, the Midwestern and Greater Texas regions have the most advanced real estate schemes.

The Midwestern region's most serious controversy to date is the ongoing FBI investigation concerning the suspected collusion of Concept executives and their vendors to defraud the federal E-Rate grant program of millions of dollars.[39] According to the released FBI's search warrant application, Concept executives are believed to have violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud the E-Rate program, outside of the normal procurement process. Then, Concept's Chief Information Officer purportedly directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work purportedly was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[40] Former Concept executive and Ohio Founder Ozgur Balsoy was one of the Turkish vendors believed to have been fraudulently enriched.[41] While Balsoy's business is under suspicion in the FBI investigation and has already been raided, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[42] In fact, all seven state networks have filed for E-Rate funding using the two primary vendors named for fraud in the search warrant application, thereby implicating every network in the Midwestern region in the ongoing fraud investigation.

Six out of seven of the Concept-controlled charter networks operating in the Midwestern Region have been documented by external entities for lack of transparency, financial impropriety, and misuse of public funds. All seven networks use the same regional vendors, are managed by Concept Schools, and display the other markers common to all Gülen Organization charter networks. Within the region, Minnesota and Wisconsin have experienced the most scrutiny from their authorizers, however Ohio and Illinois have received the most scrutiny from federal authorities. Missouri's Gateway network seems to have the cleanest record, perhaps due to the fact that its schools are newer, its Gülenist administrators are seasoned from elsewhere in the Concept network, and it engages in the H-1B program less than other networks.

Two of the seven state networks have

[39] Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[40] Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[41] *See id.; see also* Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[42] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

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experienced major investigations, while six out of seven have received significant audit findings signaling the financial misuse and impropriety endemic to the Gülen Organization. Highlights of these investigations include:

Horizon/Noble (OH)

- State Board of Education Investigation: Four Horizon (OH) teachers testified to the State Board that they had witnessed the Turkish administration manipulating attendance records to gain more funding; testing fraud to inflate student performance; discrimination against non-Turkish and/or female employees; discrimination against students; and misuse of federal Title funds.[43]

- FBI Investigation for Concept Fraud: In 2014, the FBI in conjunction with the Inspector General of the US Department of Education initiated an investigation into Concept and its vendors for purportedly defrauding the federal E-Rate program. The search warrant alleges Concept executives colluded with vendors and engaged in a system of kickbacks with federal funds. This investigation is ongoing and includes schools, vendors, and Concept offices located in both Ohio and Illinois.[44]

- Department of Labor H-1B investigation: Teachers reported their Horizon (OH) schools to the Department of Labor for hiring H-1B teachers and discrimination in pay and promotion for Turkish employees, which resulted in an investigation.[45]

- Special State Audit for Testing Fraud: State Auditor of Ohio conducted an audit of Horizon's testing procedures in 2015 and found them lacking and unimplemented.[46]

- Audits: Findings include: Extensive inter-school lending, a known money-laundering technique;[47] Illegal payments of school funds to charter school governing board members;[48] Illegal "reimbursements" paid by principals to themselves with school funds;[49] Use of public funds to pay for employee personal expenses;[50]Use of public funds to pay for the immigration expenses of Turkish individuals that weren't employed at the schools, including the spouses of Taner Ertekin, Concept co-founder, and Sedat Duman, the current CEO of Concept;[51] Failure to document "bonuses" to select employees, which were not

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43 Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal *(*July 15, 2014) http://tinyurl.com/zsdkk35 ; *see also* Livingston, Doug, *Auditor Joins Invesigation of 19 Charter Schools,* Akron Beacon Journal *(*July 17, 2014) http://tinyurl.com/hevz2h8; See Melissa Randolph testimony to the Ohio State Board of Education, available at http://bit.ly/1TaqRXP.

44 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

45 Ravitch, Diane. *Concept Schools in Ohio Import Large Numbers of Turkish Teachers for Gülen Schools*, (October 14, 2014) http://tinyurl.com/hcy34t9

46 Audit report, available at: http://tinyurl.com/ljtomjp (last checked 4/29/2017).

47 See Ohio Profile for chart for enter-lending activity.

48 Board member Unal from HSA Denison ES received a $500 stipend as noted in the 2015 audit available at http://tinyurl.com/zcyug6w; HSA Denison MS board members Malloy and Duzgun received money as noted in the 2015 audit available at http://tinyurl.com/znmlrx4; HSA Lorain board member Bonilla received money as noted in the 2015 audit available at http://tinyurl.com/z7347ok;and Noble Academy Cleveland board members Malloy and Duzgun again received money as noted in the 2015 audit available at http://tinyurl.com/jdyo9rm.

49 Audit available at: http://tinyurl.com/je428za (last checked 9/8/2016).

50 Id.

51 *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders. Numerous Concept-operated schools received findings for the illegal payment of immigration fees for non-employees. Audit available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016).

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approved by the school governing board according to policy, or earned according to school policy;[52] Improper enrichment of a Turkish board member for both HSA Springfield and HSA Toledo, who received over $79,000 in business paid for by school funds for his restaurant from those schools since he became a board member—despite the fact that his restaurants are both located in Toledo, almost three hours away from HSA Springfield;[53] Improper and/or unobserved financial controls and deficiencies;[54] and Misuse of ESEA federal Title I funding.[55]

Horizon/Math and Science (IL)

- Department of Labor H-1B: In 2011, CMSA non-Gülenist employees complained to the American Federation of Teachers ("AFT") regarding CMSA and Concept's apparent abuse of the H-1B program to hire unqualified Turkish teachers and discriminatory preferential pay to Turkish employees. The AFT presented these complaints to the U.S. Department of Labor, who initiated an investigation that is still ongoing.[56]

- Union Busting: In 2010, CMSA principal Ali Yilmaz fired a teacher who was eight months' pregnant at the time.[57] The teacher had been involved in establishing a union for CMSA employees, and prior to her efforts to organize the staff, she'd received performance bonuses and had her contract renewed. CMSA spent extensive resources fighting its teachers' union organization efforts. CMSA ultimately settled with the teacher in 2011 for the wrongful termination, and no union was formed on campus.

- FBI Investigation for Concept Fraud: See above for (OH).

Math and Science (WI)

- Special Audit Report: Findings include: Inappropriate Use of Funds for Immigration Fees; legal fees for immigration expenses for one person never employed by the school; Lack of compliance with charter contract; Failure to comply with charter requirements pertaining to percentage of funds spent on instructional costs; Failure to comply with charter requirements pertaining to immunizations; and Failure to comply with charter requirements pertaining to asbestos management. One school was later closed due to losing accreditation.

- Probation Report: Poor academic performance; Failure to secure required licensing and permits for instructional staff; High principal turnover, three in three years; Large drops in instructional staff return rate (from 76.9% to 31.6%); and operating at a net negative position.

Math and Science (MN)

- Authorizer Report: Authorizer noted testing irregularities, insufficient special education services, financial missteps, problems with Concept; and the schools

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52 *See, e.g.,* HSA Cincinnati 2007 audit, pg 32, available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

53 While the name is not disclosed in the audits, the board member appears to be Mustafa Ilgin. http://tinyurl.com/hcky5d7 The audits for these schools from 2010-2015 have noted over $79,000 in business to a board member's restaurant from 2011-2015, with the number jumping significantly in 2015.

54 HSA Cleveland (2002, 2006), HSA Columbus (2001, 2005, 2006), HSA Cincinnati (2006, 2007, 2008), HSA Dayton (2006), and HSA Dayton Downtown (2011).

55 See Melissa Randolph testimony to the Ohio State Board of Education, available at http://bit.ly/1TaqRXP.

56 Saul, Stephanie. Charter Schools Tied to Turkey Grow in Texas, The New York Times (June 6, 2011), available at: http://tinyurl.com/3ua255n (last checked 4/23/2017).

57 Lydersen, Kari. Firing of pregnant Chicago teacher becomes battle over charter school unionization. In These Times. (August 9, 2010) Available at: http://tinyurl.com/jqytnct.

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were operating at a negative net financial position since opening.

Math and Science (IN)

- Audits: Findings include: Lack of compliance with Required Financial Procedures and Accounting Standards; Lack of proper controls and segregation of duties for the collection, depositing, receipting, and refunding of money; Failure to timely make deposits, in spite of numerous and repeated promises to correct this issue; Failure to reconcile receipts; Lack of documentation for refunds; Improper calculation and failure to maintain balances for student textbook rentals; Lack of a formal policy for handling uncollectible school lunch and textbook rental accounts; Lack of controls to verify free and reduced meal applications; Lack of documentation justifying textbook reimbursements and free and reduced meal reimbursements; Inappropriate determinations on free and reduced meal applications; Lack of documentation for credit card disbursements and electronic funds transfers; Use of a credit card and electronic funds transfers that by-pass required cash disbursement procedures; Payment of interest and sales tax on credit card transactions; Disbursement of $500 petty cash fund without documentation; Failure to appropriately bond all individuals handling funds; Improper recording and classification of disbursements and receipts; Excess cash carried further between years; Understating cash on hand[58]; Failure to maintain documentation supporting the allocation of salaries to Title I activities; and Improper Student Attendance Records.[59]

- Authorizer Operational Audits: Findings include: Governance Issues; Untimely submission of board documents; Board communication through e-mails in violation of the Indiana Open Door Law; Lack of formal method to evaluate the superintendent; Failure to evaluate the performance of the school leader, the management organization, or the board itself; Failure to properly post or update board meeting agendas or meeting times and locations; Financial Issues; Lack of sufficient daily cash on hand; Multiple years with negative net-income; Insufficient current ratio;[60] Insufficient debt service coverage; Lack of resources for teachers; Improper student attendance and free/reduced lunch records which can lead to increased funding; Missing documentation for FRL students; Teacher certification issues; Teacher retention issues; Deficiency in amount of appropriately licensed teachers; Teachers with expired or questionable licenses; Special Education and English language learner issues; Special education services provided in hallways; Lack of individual language plans for ELL students; Missing information in special education and IEP files; IEP goals lacked specificity and measurability; and Concerns about licensure of Special Education staff.[61]

Math and Science (MI)

- Audits: Signficant findings include: Lack

[58] In 2013, the IMSA – North supplemental audit revealed that the school understated its cash on hand in the Indiana Department of Revenue by $202,066.

[59] These findings were taken from a review of school audits from the years 2007-2016, searchable at: http://tinyurl.com/lmq55gw (last checked 4/19/2017).

[60] An insufficient current ratio indicates that a school's assets are too low and liabilities are too high, imperiling its financial stability.

[61] These reports are available at: http://tinyurl.com/kqczffl (IMSA - West); http://tinyurl.com/mphf6fr (IMSA - North); http://tinyurl.com/nxofa3k (IMSA - South).

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of appropriate documentation over cash disbursements;[62] Improper recording of debt forgiveness and related payments;[63] Failure to prepare proper financial statements;[64]Accounting records not maintained in accordance with GAAP;[65] Loss of almost all electronic accounting information due to alleged theft;[66] Failure to prepare its budget on the proper accounting basis; Expenditures exceeded revenues by $247,091 when revenues were expected to exceed expenditures by $359,154; Transfer of funds from the general fund to subsidize school operations;[67] Deficits in the General Fund which prevented further allocation from the Michigan Department of Education;[68]and Necessity of short-term loans.[69]

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
Horizon/Noble (OH)			Approaching Stage Four	
Horizon/Math and Science (IL)			✓	
Math and Science (IN)	✓			
Gateway (MO)		✓		
Math and Science (MI)	✓			

62 The 2014-15 Audit revealed cash disbursements which were not supported by appropriate documentation, available at: https://tinyurl.com/kww6lsk (last checked 4/26/2017); the 2013-14 Audit revealed case disbursements which were not supported by appropriate documentation, available at http://tinyurl.com/nx3ojec (last checked 4/26/2017); the 2009-10 Audit revealed that cash receipts were not correctly deposited, available at: http://tinyurl.com/mrcrg5z (last checked 4/26/2017).

63 See 2011-12 Audit, available at: http://tinyurl.com/m53s4dk (last checked 4/26/2017).

64 The 2010-11 Audit revealed that grants were not reconciled on a timely basis, year-end payroll accruals were inaccurately calculated, and debt and capital outlay expenditures were treated on an incorrect accrual method, available at: http://tinyurl.com/lhz7t7s (last checked 4/26/2017).

65 See 2009-10 Audit, available at: http://tinyurl.com/mrcrg5z (last checked 4/26/2017).

66 See 2009-10 Audit, available at: http://tinyurl.com/mrcrg5z (last checked 4/26/2017).

67 The 2014-25 Audit revealed an interfund transfer of $39,595 to the School Lunch Fund from the General Fund, available at: https://tinyurl.com/kww6lsk (last checked 4/26/2017); the 2012-13 Audit revealed an interfund transfer of $28,142 to the School Lunch Fund from the General Fund, available at http://tinyurl.com/m22yr45 (last checked 4/26/2017); the 2011-12 Audit revealed an interfund transfer of $21,136 to the School Lunch Fund from the General Fund, available at: http://tinyurl.com/m53s4dk (last checked 4/26/2017); the 2010-11 Audit revealed an interfund transfer of $16,248 to the School Lunch Fund from the General Fund, available at: http://tinyurl.com/lhz7t7s (last checked 4/26/2017); the 2009-10 Audit revealed an interfund transfer of $8,848 to the School Lunch Fund from the General Fund, available at: http://tinyurl.com/mrcrg5z (last checked 4/26/2017).

68 The 2012-13 Audit revealed a deficit of $76,117 in the General Fund, which resulted in the Michigan Department of Education withholding further allocation until the school submitted a budget to eliminate the deficit within two fiscal years, available at: http://tinyurl.com/m22yr45 (last checked 4/26/2017).

69 The 2009-10 Audit revealed that MMSA received a short term loan of $4,975 from an employee of Concept, a $26,000 loan from the Turkish American Society of Michigan, and a $417,000 loan from Concept Schools, available at: http://tinyurl.com/mrcrg5z (last checked 4/26/2017).

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Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
Math and Science (MN)	✓			
Math and Science (WI)	✓			

Of the seven state networks under Concept, Ohio is the largest and most developed, and thus, is approaching Stage Four. Ohio is likely never to fully accomplish "Too Big To Fail" status, however, in large part due to Ohio's requirement that each charter school within Ohio must be governed by its own board of directors. This keeps the schools legally distinct, and if Ohio found issue with one or several of the Concept-controlled schools, it could revoke their charters individually without having to challenge or dismantle the entire network at once. This is in contrast to Harmony (TX), which is the only state network with Stage Four status. The entire Harmony (TX) network is governed by a single board of directors, which also constitutes and runs the charter management organization itself. To take issue with any one of Harmony's charter schools, the state would have to challenge the Harmony board and corporate entity, which we believe is too far entrenched in Texas education and public financing to eliminate without major repercussions to the state of Texas.

In 2011 New Plan Learning expanded its capital significantly by applying for a bond for approximately $33 million dollars to purchase, refinance, and/or renovate four Concept schools, CMSA (IL) and three Concept (OH) schools--HSA Dayton HS, HSA Toledo HS, and HSA Springfield.[70] Due to their inclusion in the bond, these schools are now subject to extremely high annual rents in non-cancelable leases set to expire in 2041.[71] The bond was issued by the Industrial Development Authority of the County of Pima, Arizona, the same organization that issued bonds for both the Sonoran (AZ) and Coral (NV) Gülen Organization charter networks.[72]

Regional Vendors

As discussed previously, Concept's history is directly entwined with the growth and development of the Midwestern region of the Gülen Organization. In many ways, Concept set the blueprint for other smaller regions, particularly regarding the use of an external landlord corporation, bond financing, and the creation of a multi-state network. Concept continues to expand despite the seriousness of the ongoing FBI investigation, though this growth has been stymied in certain states. For example, the US Department of Education awarded a large grant to Concept while its own joint investigation into Concept's fraud with the FBI remains ongoing.

Like the other regional Gülenist charter management organizations Accord (Western region), Apple Educational Services (Northeast region), Harmony Public Schools (Greater Texas region), and Charter Educational Services & Resources (Southeastern region), Concept shares and shuffles its employees and board members with its charter schools, preferred regional vendors, and other charter networks throughout

[70] New Plan Learning, Inc. 2011A Bond Official Statement, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[71] *Id.*

[72] Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

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the Gülen Organization. Concept takes approximately 10-12% of its customer schools' revenues. Using the 2015-16 funding for the region as an example, Concept garnered approximately $11.3 - $13.6 million in fees alone from its schools that year, not including the amounts charged for additional services provided to the schools.

Former Concept employees own or are employed at every regional vendor Concept uses, including New Plan Learning – landlord; Advanced Solutions for Education – educational services and E-Rate consulting; Quality Builders of Midwest – construction company; and The Core Group – technology services. Concept has been very successful in creating a vertical economy whereby it creates the customer and demand by opening new charter schools, then supplies that demand by creating vendors to serve its customers. The evidence suggests that Concept controls each side of many transactions involving these schools, which then allows it to control pricing and even more importantly, the charter schools' acceptance of that pricing, no matter how egregious it may be. Mustafa Emanet, a former Concept employee procured through the H-1B program, provided interviews to the FBI regarding his work as a network administrator and teacher at HSA Toledo (OH). He corroborated that Concept purposefully used related Gülenist service providers who overcharged, just like other charter networks throughout the Gülen Organization.[73] Since his cooperation with the FBI, Emanent and his wife Mary Addi, also employed with Concept, have come forward and provided information regarding the forced *tuzuk* payments and tithing to the Gülen Organization required of Turkish H-1B employees.[74]

Quality Builders of Midwest fulfills the role of the Gülenist construction company for the Midwestern Region. Based on our interpretation of the evidence, the company provides an easy cover for the networks' systematic overpayment due to "unforeseen" project costs, delays, materials, and issues that can commonly occur on construction jobs. Quality Builders has been used for several Concept jobs in OH, IL, and MO, and perhaps more that are not publicly listed.[75]

A prime example of the Gülenist apparent control over a series of problematic transactions concerns the Chicago Math and Science Academy (CMSA). CMSA's board president, Edip Pektas, was a paid business development consultant for New Plan Learning during his tenure at CMSA. Pektas sat on the CMSA board through each of its transactions with New Plan Learning, beginning with the sale of CMSA's property from CMSA to New Plan Learning at a significant loss. Pektas also sat on the CMSA board when New Plan Learning involved CMSA in its bond financing and developed a lease with terrible terms, which CMSA accepted without question. In exchange for a non-cancelable lease of 30+ years that would strip CMSA of over $40 million in rent for a building it once owned, CMSA would receive a new gym constructed by Quality Builders of Midwest for $1 million. In addition to Pektas's paid position with New Plan Learning, Pektas is also the registered agent for Quality Builders of Midwest. Pektas was involved with all three entities and had significant personal financial interests, but despite his fidiciary duties of care and loyalty owed to CMSA, CMSA suffered in each of these transactions to benefit Pektas's employers.[76]

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73 Search Warrant application, pg 44, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

74 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

75 See project information, available at http://tinyurl.com/zwzkxy2 (last checked 11/11/2016).

76 See IL profile for more information; see also Quality Builders of Midwest Corporate filing, available at: http://tinyurl.com/zallyt7 (last checked 4/28/2017).

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Regional Employee Overlap*

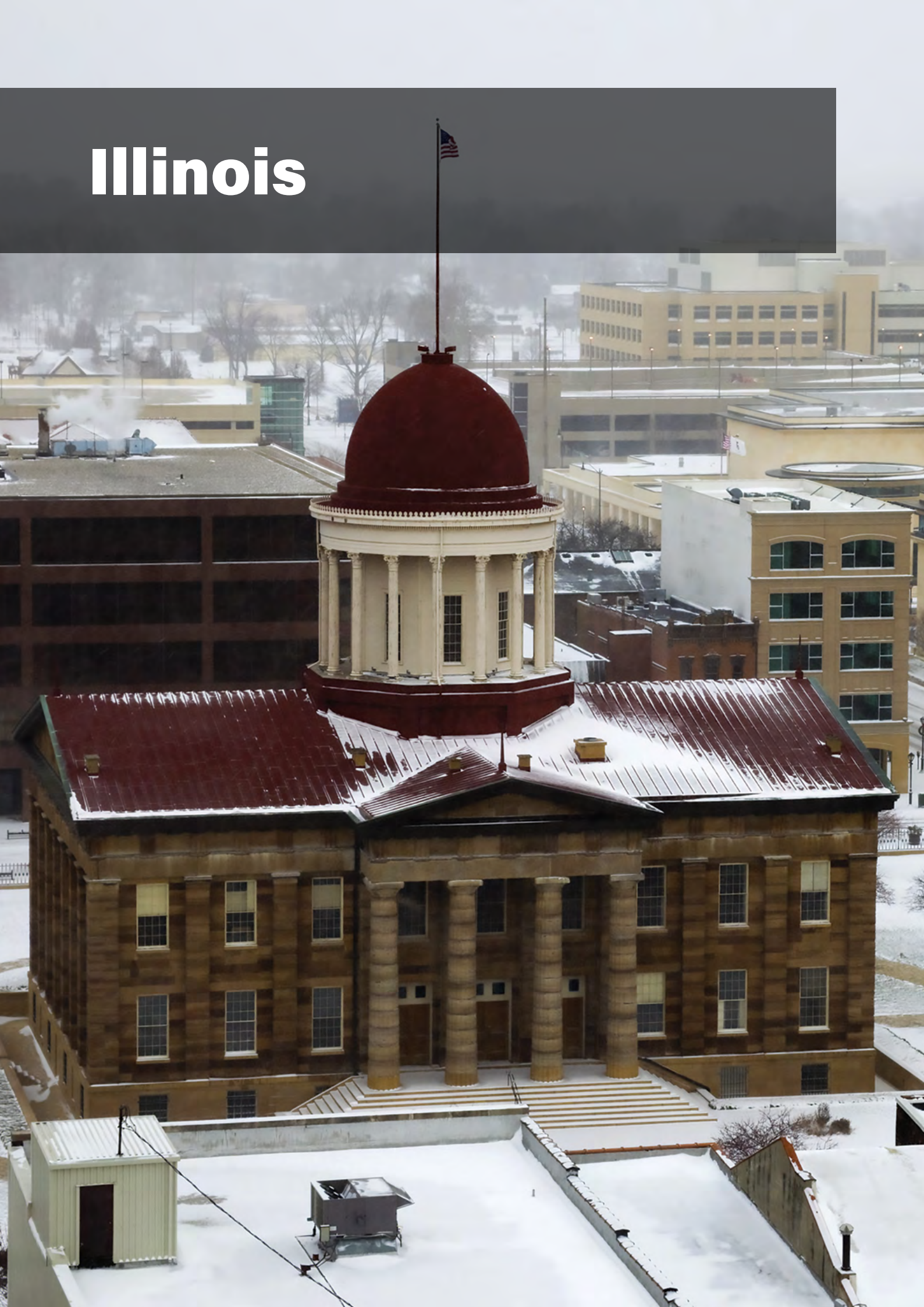
Employee	OH	IL	MO	IN	MI	MN	WI	Other States, Vendors, Cultural Associations
Tolga Hayali	✓							NJ, NY, Apple Ed, Concept
Gultekin "John" Aytekin	✓			✓			✓	Concept
Engin Karatas "Blackstone"	✓	✓	✓				✓	
Cafer Cengiz	✓	✓			✓		✓	
Serkan Aykan	✓						✓	Niagara Foundation
Yasar Bora	✓					✓	✓	
Ahmet Akyol						✓	✓	Turkish American Society of Minnesota
Ali Yilmaz	✓	✓					✓	Concept
Cenk Kandemir	✓	✓	✓					
Oguzhan Yildiz	✓				✓			Prospect Foundation (KY)
Cengiz Karatas	✓	✓	✓					Concept
Aydin Kara	✓	✓						The Fountain
Ali Kuran	✓	✓		✓				
Levent Elibal				✓				Concept, Quality Builders, Ramson Contractors (Western Region)
Mustafa Arslan	✓				✓			
Mustafa Yazici	✓	✓		✓				Turkish American Society of Chicago
Hasan Akkaya	✓			✓				
Mustafa Icel	✓		✓				✓	
Murat Oguz	✓						✓	
Hasan Kose	✓						✓	Concept, ASE

**This is just a sampling of the employment overlap of the Midwestern Region's Turkish employees.*

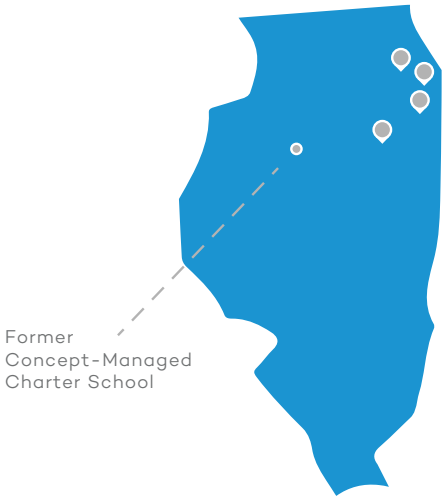
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Illinois



QUICK FACTS ON GÜLEN CHARTER SCHOOLS Illinois



NUMBER OF SCHOOLS: 4

KNOWN AS: **HORIZON SCIENCE ACADEMY**
MATH AND SCIENCE ACADEMY

TOTAL ENROLLMENT: **2,196**

CHARTER VENDOR: **CONCEPT SCHOOLS, INC.**

TOTAL REVENUES: **$22,827,232**

RELATED INSTITUTIONS:

MATH AND SCIENCE



GATEWAY



HORIZON, NOBLE



KEY PEOPLE:



Taner Ertekin

Sedat Duman

Salim Ucan

Engin Karatas, a.k.a. Engin Blackstone

H-1B VISA PROGRAM OVERUSE

During the period of **2001-2016**:

200-253 H-1 B applications were filed by **Concept IL**.

176-197 H-1 B applications were filed by **Concept** itself.

REAL ESTATE AND BONDS

CMSA sold its property To **NPL** at a loss and was bound to inclusion in a $33 million educational facility revenue bond.



Of the **$33 million** borrowed by NPL, approximately **$12.8 million** was allocated to CMSA.

A NOTABLE TURKISH VENDOR - CONCEPT SCHOOLS INC.

Concept is the contracted **nonprofit management** services vendor for **30 charter schools** across **7 states**.



Concept Schools Inc. reports for a **12% fee** of each school's **total revenues**.



All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Midwestern
- School Names (known as):
  - Horizon Science Academy
  - Math and Science Academy
- Total # of Schools in State: 4
- Total Student Enrollment 2015-16: 2196[1]
- Charter Holder/Governing Board(s):
  - Chicago Math and Science Academy, Inc.
    - Non-profit organization with 501(c)(3) status, oversees Chicago Math and Science Academy.
  - Concept Schools NFP
    - Oversees HSA McKinley Park, HSA Belmont, HSA Southwest
- Charter Management Services Vendor: Concept Schools, Inc.
- Regional Gülen Organization Oversight Entity: Concept Schools, Inc.
- Regional Sister Networks: Horizon (OH); Noble (OH); Math and Science (IN); Math and Science (MN); Math and Science (MI); Gateway (MO); Math and Science (WI).
- Total Revenues for the 2015-16 school year: Approximately $22,827,232[2]
- Network Founders:
  - Taner Ertekin: Established Gülenist schools in Thailand and Japan;[3] Co-founder of first Horizon Science Academies; founder of Concept Schools;[4] used HSA Cleveland funds to pay immigration expenses for his wife;[5] founder and president of Breeze, Inc., Concept's preferred Gülenist landlord entity;[6] founder of Chicago Math and Science Academy.[7]
  - Sedat Duman: Founder of Horizon Science Academies;[8] Co-Founder of Concept Schools, Inc.;[9] CEO of Concept Schools, Inc;[10] Currently being investigated by the FBI for his role in purportedly certifying fraudulent forms to procure E-Rate funding.[11]
  - Salim Ucan: Founding Principal Chicago Math and Science;[12] Co-Founder of Concept Schools, Inc.;[13] Founding board member for Breeze Inc., for-profit Gülenists

1 Student enrollment and demographic information available at: http://tinyurl.com/lhvvo8r (last checked 4/19/2017).

2 Figure includes revenues from 2015-16 revenues for CMSA, available at: http://tinyurl.com/kx7zjm9 (last checked 4/23/2017); 2014-15 revenues for HSA Belmont, HSA McKinley Park, and HSA Southwest, available from a FOIA request at: http://tinyurl.com/lbtsubt (last checked 4/23/2017).

3 Bond statement at A-23 describing Ertekin's involvement, available at: http://tinyurl.com/keaa5f5 (last checked 4/19/2017).

4 Id.

5 *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders, available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016).

6 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

7 CMSA 990 tax documents listing Ertekin, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

8 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

9 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

10 CEO's welcome, available at: http://tinyurl.com/k2ybgnm (last checked 4/20/2017).

11 Search warrant, pg 22, available at: http://tinyurl.com/jt9j4ed (last checked 4/20/2017).

12 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

13 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

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landlord for Concept Schools;[14] Vice President of Concept Schools, Inc.;[15] currently Professional Development coach for Concept.[16]

- Engin Karatas, a.k.a. Engin Blackstone: Co-founded Chicago Math and Science Academy; Assistant Principal HSA Denison Middle; Principal HSA Toledo; Principal Quest Charter Academy; Assistant Principal Wisconsin Career Academy;[17] visited Fethullah Gülen at the Golden Generation Retreat Center with Concept whistleblower Mustafa Emanet;[18] Superintendent Gateway Science Academy (MO).[19]

Overview

As of the 2016-2017 school year, Illinois has 4 Gülen Organization charter schools in operation. CMSA is overseen by its own incorporated governing board, but the Concept Schools governing board directly controls and oversees HSA McKinley Park, HSA Belmont, and HSA Southwest. All 4 schools contract with Concept Schools, Inc., the charter management organization responsible for the Midwestern region of the Gülen Organization charter network. Concept allegedly provides additional educational management services for the charter schools for a percentage fee of total school revenues.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Chicago Math and Science Academy 7212 N. Clark St. Chicago, IL 60626	Grades 6-12 2004-Present	10% SWD 13% ELL 92.5% FRL 97.5% Minority 2.5% Caucasian	Chicago Public Schools	Chicago Science and Math Academy Inc.
HSA Belmont 5035 W. North Ave. Chicago, IL 60639	Grades K-7 (eventually K-12) 2013-Present	10.6% SWD 13.3% ELL 94.7% FRL 98.5% Minority 1.5% Caucasian	Illinois State Charter School Commission	Concept Schools NFP
HSA McKinley Park 2245 W. Pershing Rd. Chicago, IL 60609	Grades K-11 (eventually K-12) 2013-Present	9% SWD 25% ELL 83% FRL 95% Minority 5% Caucasian	Illinois State Charter School Commission	Concept Schools NFP
HSA Southwest 5401 S. Western Avenue Chicago, IL 60609	Grades K-10 (eventually K-12) 2014-Present	14% SWD 24% ELL 95% FRL 99% Minority 1% Caucasian	Illinois State Charter School Commission	Concept Schools NFP

[14] Breeze Articles of Incorporation, available at: http://tinyurl.com/mlc5jc4 (last checked 4/20/2017).

[15] Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

[16] Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

[17] Interview with Engin Blackstone, available at: http://tinyurl.com/mw9bey6 (last checked 4/23/2017).

[18] 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

[19] Linkedin profile, available at: http://tinyurl.com/lylm33o (last checked 4/25/2017).

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Former Concept-Managed Charter Schools				
Quest Charter Academy 2503 N University St, Peoria, IL 61604	Grades 5-12 2010-Present	14.3% ELL 62% FRL 7.5% SWD 86% Minority 14% Caucasian	Peoria Public School District 150	Peoria Charter School Initiative Co

**Student demographic information was taken from the 2015-2016 school year. "SWD" indicates students with disabilities. "ELL" indicates English language learners. "FRL" indicates students receiving free/reduced lunch.*[20]

A History of Strategic Ambiguity and Conflicting Interests

After Gülen relocated to the United States in 1999, his followers promptly formed non-profit educational foundations and filed applications for the first of the Gülen Organization's charter schools throughout the country. Some of the earliest charter school efforts by the Gülen Organization took place in the Midwestern region orchestrated by a tight-knit group of Turkish businessmen, led predominantly by Taner Ertekin and Vedat Akgun. After forming the first of the Horizon Science Academies in Ohio, these Gülenists formed Concept Schools to serve as an external charter management organization that would oversee the charter schools they opened throughout the Midwestern region.[21] Then, in 2003, Ertekin and Akgun followed up by forming Breeze Inc., a for-profit corporation to serve as the Concept schools' landlord.[22] In 2004, the first of the Concept IL schools was opened—Chicago Math and Science Academy ("CMSA"). Within four years, Ertekin, Akgun, and their Gülenist colleagues created a vertically integrated chain of businesses and vendors, all feeding upon a captive customer base of their own charter schools in Ohio and Illinois.

After CMSA, Concept did not attempt to open another of its own schools until 2013. Before that, however, Concept was hired by Quest Charter Academy to provide charter management services in 2010. Quest was unique within the Gülen Organization as it was the only school under Gülenist control that was not directly created by Gülenists, nor operated by a Gülenist governing board. In 2009, community efforts within Peoria to open a STEM charter school began.[23] An application was submitted for approval and granted in January of 2010. The governing board then hired Concept Schools as its management partner shortly thereafter. As a result, the Quest governing board was not controlled by Gülenists, although the school's administration was Gülenist since Concept controlled hiring the members of the administration. In 2015, the Quest governing board and Concept "mutually agreed to end their contract."[24] The authorizer then renewed Quest's charter and it has been operating independently since.[25]

[20] Student enrollment and demographic information available at: http://tinyurl.com/k52paej (last checked 4/19/2017).

[21] Concept Schools NFP corporate information, available at: http://tinyurl.com/zallyt7 (last checked 4/20/2017).

[22] Corporate information available at: http://tinyurl.com/kn9xuzr (last checked 4/20/2017).

[23] Quest history, available at: http://tinyurl.com/m4awbgx (last checked 4/23/2017).

[24] Id.

[25] Adams, Pam. Quest Charter Academy Approves Five-Year Plan, Peoria Journal Star, February 27, 2015. Available at: http://tinyurl.com/kqzxcc7 (last checked 4/23/2017).

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In 2013, Concept applied to Chicago Public Schools to open HSA Belmont and HSA McKinley Park. Chicago Public Schools denied both applications, however, stating that CMSA's poor academic performance did not warrant Concept's expansion. Concept then appealed CPS's denials to the Illinois State Charter School Commission, which approved both charter schools to open under its management that same year. The following year, the Commission approved a fourth Concept-managed school, HSA Belmont, to open as well.

Concept's most serious controversy to date is the ongoing FBI investigation concerning the purported collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[26] According to the released FBI's search warrant application, Concept executives violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, according to the search warrant application, Concept's Chief Information Officer directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work purportedly was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[27] In 2014, FBI agents raided numerous locations throughout Illinois and Ohio, including CMSA, Concept's regional offices, and the offices of several Gülenist vendors. According to several sources, former Concept executive and Ohio Founder Ozgur Balsoy was one of the fraudulently enriched Turkish vendors who was raided.[28] While Balsoy and his business remains under suspicion in the FBI investigation, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[29] The investigation is ongoing.

Mustafa Emanet, a former H-1B employee and Gülenist, provided interviews to the FBI regarding his work as a network administrator and teacher at HSA Toledo. He corroborated that Concept purposefully used related service providers who overcharged, just like all of the charter networks throughout the Gülen Organization.[30] Since his cooperation with the FBI, Emanent and his wife who was also employed with Concept, Mary Addi, have come forward and provided information regarding the forced tuzuk payments and tithing to the Gülen Organization required of Turkish H-1B employees.[31] Emanet also produced a copy of the tuzuk agreement itself, which is attached to this report as Appendix I.

Financial Issues

While Illinois requires its charter schools to undergo annual audits, these audits are not made publicly available without submission of a Freedom of Information Act request. Requests have been made for these audits but have not yet been fulfilled.

[26] Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Aug. 9, 2016). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[27] Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[28] *See id.; see also* Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Aug. 9, 2016). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[29] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[30] Search Warrant application, pg 44, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[31] 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

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Real Estate

One of the most significant profit centers for the Gülen Organization, and in particular the Midwestern region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[32] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[33] Gülenists throughout the country attended and presented, including Alp Aslandogan, former Harmony Public Schools landlord, CEO of one Harmony's largest vendors, property buyer from Dove Science Academy, and Gülen's official spokesperson in his role as President of the Alliance for Shared Values, a Gülenist cultural organization.[34]

Early on, the founders of the Midwestern region established Breeze Inc, as a for-profit corporation to acquire properties for Concept Schools throughout the Concept network.[35] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.[36] Murat Arabaci, a former Concept employee,[37] has managed New Plan Learning and each of its subsidiaries since 2005.[38] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

Currently, New Plan Learning owns only one of the Concept IL properties—the Chicago Math and Science Academy ("CMSA")—though it owns over a dozen other Concept school properties throughout the Midwestern region. As many of the Concept IL charter schools have opened within the last five years, New Plan Learning will likely seek to acquire more of these new school properties over time, as it did in Ohio and other states where it is more established. New Plan Learning's property dealings with CMSA are particularly egregious, however, and serve as a prime demonstration of the apparent self-dealing by Concept and its preferred Gülenist vendors and the resulting exploitation of Gülenist-controlled charter schools.

CMSA bought its property in 2009 for $10.4 million. Two years later, CMSA sold its building to New Plan Learning at a loss and entered into a lease-back arrangement with extremely poor terms. The lease had a non-cancelable term of thirty-five years, with annual rents ranging from $1 million to $1.2 million set to increase each year.[39] Over the term of the lease, CMSA would pay well over $40 million in rent for a building it once owned and sold at a loss. The lease-back agreement also bound CMSA to inclusion in a $33 million educational facility revenue bond.

Of the $33 million borrowed by NPL with this bond, approximately $12.8 million was allocated to CMSA for two purposes: 1) to cover NPL's purchase of property from CMSA for $10.2 million; and 2) for NPL to construct a 9,775 square

[32] See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt.

[33] Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

[34] See Texas profile for more information about Alp Aslandogan.

[35] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[36] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[37] *See* 2007 Concept 990 with Arabaci listed as employee, available at: http://tinyurl.com/z9y36lh (last checked 9/8/2016).

[38] *See* Business profile for New Plan Learning, Inc., showing its incorporation in 2005 and listing Arabaci as agent, available at: http://tinyurl.com/hu2d6x7 (last checked 9/8/2016).

[39] See CMSA 2012 audit, available at http://tinyurl.com/h5xcob2 (last checked 11/23/2016).

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foot gym for up to $1.5 million.[40] This means that CMSA will pay upwards of $40 million in rent in exchange for the construction of a gym costing less than $1.5 million,[41] the approximate price of one year of CMSA's rent to NPL. CMSA's $40 million in rent over the next three decades will pay off the construction of the gym in a little over one year, NPL's mortgage on CMSA shortly thereafter, with the remaining decades of million-dollar rents resulting in pure profit to NPL, a nonprofit organization that cannot legally profit off of its charter school customers.

What is particularly concerning about CMSA's bad property deal with New Plan Learning is that Edip Pektas, CMSA's board treasurer and president, was a paid business development consultant for New Plan Learning during all of the relevant transactions.[42] This was an explicit conflict of interest as Pektas was on both sides of the transaction and had a personal financial interest in New Plan Learning, and in fact was paid to help New Plan Learning develop business. A few years later, when Pektas was CMSA's board president, New Plan Learning renegotiated the lease-back agreement with even worse terms, taking away the school's ability to buy back the property at the end of the lease and increasing the rent significantly.[43] Pektas' loyalty to New Plan Learning, his employer, instead of to CMSA, cannot be doubted.

In our view, New Plan Learning put CMSA at an even greater disadvantage by hiring a related Gülen-affiliated construction vendor, Quality Builders of Midwest, to construct CMSA's gym. CMSA's board president Pektas is also listed as the registered agent for Quality Builders, adding another layer of his conflict of interest.[44] Within one year of construction, the $1 million gym displayed significant building issues, including multiple leaks in its roof, cracks in its foundation, rodent problems, sanitary issues, and flooring that peeled upward due to an improperly installed bleacher system.[45] Despite these major concerns with the gym's construction, Quality Builders did not provide repairs, and neither NPL nor Concept covered the repair costs. CMSA was on the hook per the terms of its lease-back agreement to fix the gym's issues, and could not rely on a warranty with Quality Builders to correct its building flaws. The exploitation of CMSA is a prime example of the Gülen Organization's highly suspect property scheme, which appears to enrich private Gülenist interests in both money and property holdings, all orchestrated at the tax payers' expense.

Bond Financing

In 2011 New Plan Learning expanded its capital significantly by applying for a bond for approximately $33 million dollars to purchase, refinance, and/or renovate four Concept schools, CMSA and three Concept OH schools--HSA Dayton HS, HSA Toledo HS, and HSA Springfield.[46] Due to their inclusion in the bond, these schools are now subject to extremely high annual rents in

40 New Plan Learning, Inc. 2011A Bond Official Statement pg 9, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

41 According to the project information, the contract's price was listed as approximately $1 million. See project information, available at http://tinyurl.com/zwzkxy2 (last checked 11/11/2016).

42 New Plan Learning, Inc. 2011A Bond Official Statement pg A-6, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016); Mihalopoulos, Dan. *Lawyers for Turkey Call for Probe of Chicago Charter School*, Chicago Sun-Times (Jan. 25, 2017), available at: http://tinyurl.com/jzmzevh (last checked 4/27/2016).

43 See CMSA 2014 audit, pg 13 located at http://tinyurl.com/h37lkov (last checked 11/11/2016).

44 Quality Builders of Midwest corporate documents, available at: http://tinyurl.com/zallyt7 (last checked 4/28/2017).

45 See Whistle Blower pg 640 for a personal statement from CMSA's former athletic director regarding the quality of the gym. Pictures are available online of the moisture damage and cracks in the gym's foundation. A concerned citizen documented these issues on a blog post, available at: http://tinyurl.com/hjq4zjk (last checked 11/11/2016).

46 New Plan Learning, Inc. 2011A Bond Official Statement, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

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non-cancelable leases set to expire in 2041.[47] The bond was issued by the Industrial Development Authority of the County of Pima, Arizona, the same organization that issued bonds for both the Sonoran (AZ) and Coral (NV) Gülen Organization charter networks.[48]

Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, Concept and their IL schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Concept IL network filed between 200-253 H-1B applications from 2001-2016, while Concept itself filed between 176-197 H-1B applications during the same time period.[49] It is difficult to ascertain the exact amount because Concept used a number of slightly different names for its entities when filing H-1B applications. While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: physical education teachers, school business managers, administrators, English teachers, network administrators, accountants, and auditors.

Concept IL uses the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen. Concept IL used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)[50]
- David Nachman: Concept IL used Nachman, a New Jersey-based attorney, to file H-1B applications.[51] Nachman also filed H-1B applications for:
  - MilkyWay Education Center (NJ)
  - Paterson Charter School for Science and Technology (NJ)
- Nuzhat Hafeez: Concept IL schools used Hafeez, an Illinois-based attorney, to file numerous H-1B applications.[52] Hafeez also filed H-1B applications for:
  - Concept Schools, Inc.
  - Niagara Educational Services, Inc. (IL)
  - Niagara Foundation (IL)
  - The Core Group (IL)

47 *Id.*

48 Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

49 In another example of strategic ambiguity, Concept and its schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of the Concept IL schools from 2001-2016 is between 200-253 applications, and the numbers supporting that total are located at the following links: 1) CMSA, anywhere from 24 H-1Bs-60 H-1Bs, due to multiple names used, http://tinyurl.com/k9pbuvy; http://tinyurl.com/ny94qjd; http://tinyurl.com/n3yyw6t; http://tinyurl.com/k8mz7aa; http://tinyurl.com/lrr5v79. Concept filed between 176-197 H-1B applications 2001-2016. *See* http://tinyurl.com/j3whatt for Concept Schools, Inc.; http://tinyurl.com/zhgx3xl for Concept Schools Nfp.

50 List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 3/21/2017).

51 Nachman profile listing entities represented for H-1B visa work, available at http://tinyurl.com/ny5h3ty (last checked 4/13/2017).

52 Hafeez profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/mvnttav (last checked 4/13/2017).

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Scandals, Investigations & Notable Activities

In 2011, CMSA non-Gülenist employees complained to the American Federation of Teachers ("AFT") regarding CMSA and Concept's excessive use of the H-1B program to hire unqualified Turkish teachers and discriminatory preferential pay to Turkish employees. The AFT presented these complaints to the U.S. Department of Labor, who initiated an investigation that is still ongoing.[53] The Department of Labor had already been investigating a Horizon Science Academy in Ohio due to a July 2008 complaint by Mustafa Emanet regarding the forced tithing payments to Concept.[54]

In 2010, CMSA principal Ali Yilmaz fired a teacher who was eight months' pregnant at the time.[55] The teacher had been involved in establishing a union for CMSA employees, and prior to her efforts to organize the staff, she'd received performance bonuses and had her contract renewed. CMSA spent extensive resources fighting its teachers' union organization efforts. CMSA ultimately settled with the teacher in 2011 for the wrongful termination, and no union was formed on campus.

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalists at the time and asked for a thorough investigation.[56]

Spotlight: Friends of Gülen Mike Madigan

Michael Madigan is the Speaker of the Illinois State House of Representatives, a title he has held for the last three decades. Madigan has extensive ties with Concept Schools and the Niagara Foundation, and has taken at least four trips to Turkey coordinated by the Niagara Foundation.[57] Madigan created the Illinois Charter School Commission, the authorizer of three of Concept's four charter schools in the state, though the Commission states that Madigan did not pressure the Commission to approve the applications for either HSA McKinley Park or HSA Southwest.[58] Madigan has also visited CMSA's campus, speaking highly of the school and its leadership, and his son, Andrew Madigan, provides insurance services to CMSA, HSA McKinley Park, and HSA Southwest.[59]

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53 Saul, Stephanie. Charter Schools Tied to Turkey Grow in Texas, The New York Times (June 6, 2011), available at: http://tinyurl.com/3ua255n (last checked 4/23/2017).

54 Feds Question Schools' Visa Use, The Columbus Dispatch (May 20, 2011), available at: http://tinyurl.com/m2ssl9h (last checked 4/23/2017).

55 Lydersen, Kari. Firing of pregnant Chicago teacher becomes battle over charter school unionization. In These Times. (August 9, 2010) Available at: http://tinyurl.com/jqytnct.

56 Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

57 Article discussing Madigan's involvement with Concept, available at pg 107-08: http://tinyurl.com/m9fmvo4 (last checked 4/22/2017).

58 Id.

59 Id.

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Notable Turkish Vendors

- Concept Schools, Inc. Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and one in Minnesota.[60] The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter.

- Breeze Inc./New Plan Learning: Breeze, Inc., was created in 2004 as a for-profit corporation to acquire properties for Concept Schools throughout the Concept Network.[61] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned Ohio-based subsidiaries (250 Shoup Mill LLC, OG-Ohio LLC, NOG-Ohio LLC, and 2350 Morse LLC).[62] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

- Quality Builders of Midwest: Quality Builders is a Gülen-affiliated construction company that does the majority of Concept and NPL's construction work.[63] Several of Quality Builders' Gülenist employees have worked at Concept and its schools, as well as at other charter networks throughout the Gülen Organization.

- The Core Group: The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept used purportedly to defraud the E-Rate program.[64] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[65] The Core Group also provided uniforms to the Fulton Science (GA) network at an excessive cost and amount, as noted by the forensic audits prior to the network's termination.[66]

- Advanced Solutions for Education: Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the purported defrauding of the E-Rate program.[67] The company served as an E-Rate funding consultant to the schools.

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60 *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

61 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

62 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

63 See project information, available at http://tinyurl.com/zwzkxy2 (last checked 11/11/2016).

64 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

65 Id.

66 See Georgia profile; see also Georgia Forensic Audit of Gülen-affiliated Charter Schools (June 1, 2012), at 17-25, available at http://bit.ly/1TATHiy.

67 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

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Gülenist Cultural Foundations

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[68] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science Academy of Chicago, a private Gülenist school. In 2007, the Niagara Foundation gave an extensive loan to Breeze Inc. (New Plan Learning's predecessor) to purchase new properties for Concept charter schools.[69] Several Concept employees as well as school employees are members of the Niagara Foundation. Niagara provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[70]

Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Aydin Kara: Teacher, Director at HSA Columbus;[71] Director for HSA Cleveland MS;[72] Principal for Chicago Math and Science Academy (IL);[73] Director for HSA Toledo;[74] Author for The Fountain, a known Gülenist magazine.[75]
- Ali Kuran: Teacher, Dean HSA Columbus (OH);[76] Principal HSA Dayton Elementary (OH);[77] proposed Principal for Indiana Math and Science Academy South (IN);[78] Principal Quest Charter Academy (IL);[79] Principal, CMSA (IL).[80]
- Ahmet Ozarslan: Board member Fulton Science (GA);[81] Quality Builders of Midwest – Gülen-affiliated construction vendor (Midwestern region);[82]
- Levent Elibal: Employed at Ramson Contractors - Gülenist construction vendor (Western region);[83] Quality Builders of Midwest – Gülen-affiliated

68 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

69 Audit available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

70 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017).

71 http://tinyurl.com/mkvkmgs (last checked 4/20/2017).

72 http://tinyurl.com/m6obc3h (last checked 4/20/2017).

73 CMSA 990 tax forms 2012-2015, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

74 Director's message, available at: http://tinyurl.com/kcc8v48 (last checked 4/20/2017).

75 http://tinyurl.com/lz3bwoz (last checked 4/20/2017).

76 Bio available at: http://tinyurl.com/l5h956w (last checked 4/23/2017).

77 Press release listing Kuran as Principal, available at: http://tinyurl.com/lhgbatn (last checked 4/23/2017).

78 Petition available at: http://tinyurl.com/mej56l8 (last checked 4/23/2017).

79 Article quoting Kuran as principal, available at: http://tinyurl.com/ne6dwhy (last checked 4/23/2017).

80 School information, available at: http://tinyurl.com/mwkpu9l (last checked 4/23/2017).

81 See Fulton Educational Services 990 tax forms, available at http://tinyurl.com/zxtjkrm (last checked 11/23/2016). Ozarslan was on the board from 2007-2010.

82 See Linkedin profile for Ahmet Ozarslan, available at: http://tinyurl.com/jdrhk34 (last checked 11/23/2016).

83 See Linkedin profile for Levent Elibal, available at http://tinyurl.com/zu3r3nv (last checked 11/23/2016).

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construction vendor (Midwestern region);[84] Director of Purchasing Concept (Midwestern region);[85] Indiana Math and Science Academy (IN).[86]

Notable Articles regarding the Illinois Network

- Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh.
- Cohen, Rachel M. *The National Labor Relations Board says charter school teachers are private employees*. The American Prospect. (September 8, 2016) Available at: http://tinyurl.com/joesxk2.
- Torres, Louie, *Teacher Accuses Chicago Charter School of Sexual Harassment*, Cook County Record (May 9, 2016) Available at: http://tinyurl.com/hvo72py.
- Mihalopoulos, Dan. *Federal funds for clout school operator despite probe*. Chicago Sun-Times. (May 7, 2016) Available at: http://tinyurl.com/jmy8web.
- Adams, Pam. *Quest Charter Academy Approves Five-Year Plan,* Peoria Journal Star, February 27, 2015. Available at: http://tinyurl.com/kqzxcc7 (last checked 4/23/2017).
- Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad.
- Ravitch, Diane. *Concept Schools in Ohio Import Large Numbers of Turkish Teachers for Gülen Schools*. (October 14, 2014) Available at: http://tinyurl.com/hcy34t9.
- Livingston, Doug, *Auditor Joins Investigation of 19 Charter Schools,* Akron Beacon Journal (July 17, 2014) Available at: http://tinyurl.com/hevz2h8.
- Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal *(*July 15, 2014) Available at: http://tinyurl.com/zsdkk35.
- Karp, Sarah. *Concept Charter Schools get a green light*. Catalyst Chicago. (April 22, 2013) Available at: http://tinyurl.com/jag6699.
- Strauss, Valerie. *Charter school ruled private entity for labor relations*. The Washington Post. (January 4, 2013) Available at: http://tinyurl.com/hhrn5jv.
- Lydersen, Kari. *Firing of pregnant Chicago teacher becomes battle over charter school unionization*. In These Times. (August 9, 2010) Available at: http://tinyurl.com/jqytnct.

[84] Id.

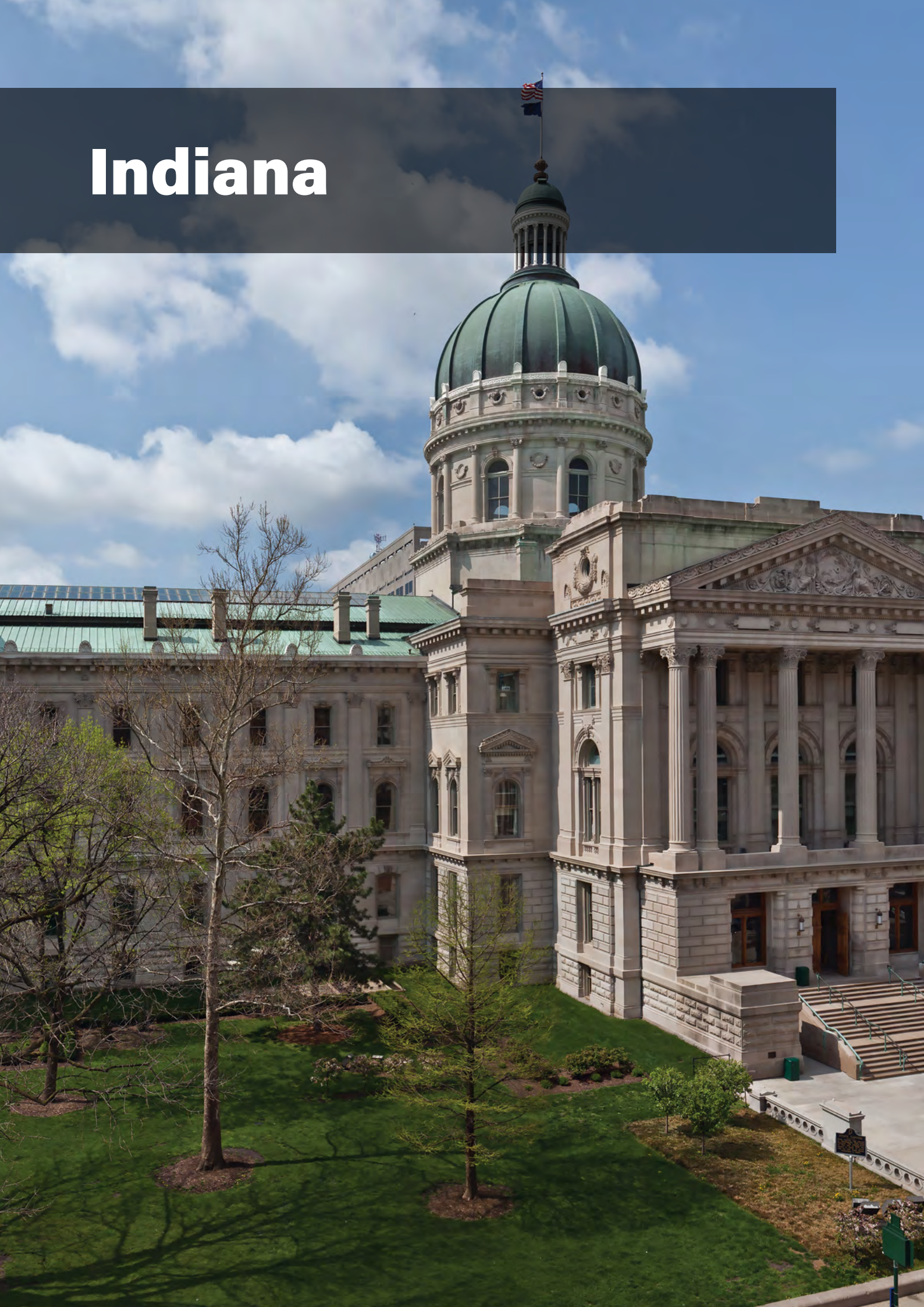
[85] Id.

[86] Id.

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Indiana



QUICK FACTS ON GÜLEN CHARTER SCHOOLS Indiana



NUMBER OF SCHOOLS: 3

KNOWN AS: **INDIANA MATH AND SCIENCE ACADEMY "IMSA"**

TOTAL ENROLLMENT: **1,476**

CHARTER VENDOR: **CONCEPT SCHOOLS, INC.**

TOTAL REVENUES: **$14,419,490**

RELATED INSTITUTIONS:

MATH AND SCIENCE



GATEWAY



HORIZON



NOBLE



KEY PEOPLE:



Gultekin "John" Aytekin | Numan Koca | Kazim Eldes | Cemil Selcuk | Tim Nation

ALLEGED FINANCIAL ABUSE

Inter-entity lending practices from school to school and between schools and Concept are a known warning sign for money laundering. **IMSA** South has a **$330,000 credit facility** with Concept. Below are amounts owed by **IMSA** South to Concept:

in 2014	**$280,000 owed**
in 2015	**$330,000 owed**
in 2016	**$245,000 owed**

BOARD SEATS ACROSS IMSA

All three **IMSA** corporate entities **substantially overlap**.

In total, **12 individuals** fill **29 board seats** across all three entities.



- the **largest board** features **10 members**
- **7 individuals** serve on **all three boards**
- **2 individuals** serve on only **one board**

H-1B VISA PROGRAM OVERUSE

Gülen charter networks claim the visas are used to hire hard-to-find math and science teachers. However, applications for other positions were filed as well, including: **educational** and **school counselors, school business managers, ESL teachers, network administrators, accountants, Turkish teachers,** and **assistant directors**.

83 H-1B

applications filed by **IMSA** during years **2001-2016**:

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Midwest Region
- School Names (known as):
  - Indiana Math and Science Academy ("IMSA")
- Total # of Schools in State: 3 charter schools currently open, 1 school to close at the end of the 2016-17 school year[1]
- Total Student Enrollment 2015-16: 1,476[2]
- Charter Holder/Governing Board(s):
  - Indiana Math and Science Academy – Indianapolis Inc.
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school ("IMSA West")
  - Indiana Math and Science Academy – North Indianapolis
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school ("IMSA North")
  - Indiana Math and Science Academy – South Indianapolis Charter School, Inc.
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school ("IMSA South")
- Charter Management Services Vendor: Concept Schools
- Regional Gülen Organization Oversight Entity: Concept Schools ("Concept")
- Regional Sister Networks: Math and Science (IL); Horizon (IL); Horizon (OH); Noble (OH); Math and Science (MN); Math and Science (MI); Gateway (MO); Math and Science (WI).
- Total Revenues for the 2015-16 school year: $14,419,490[3]
- Network Founders:
  - Gultekin "John" Aytekin: Teacher, Wisconsin Career Academy (WI); Teacher/Director, HSA Columbus (OH); Founding Principal, Indiana Math and Science Academy (IN); Superintendent for Concept (IN); Implicated in alleged de-frauding of the E-Rate program and currently under investigation by the FBI; Director of Accountability for Concept.[4]
  - Numan Koca: Founder, IMSA; Incorporator, The Holy Dove Foundation (now known as Turkish American Society of Indiana, Inc.);[5] manager of Guven Transportation (Turkey); manager of Polen Securities (Turkey); CEO of Elvan LLC (TX and IN); purchasing manager at Bio-Botanical Labs (Canada); real estate salesperson for Century 21 (Canada).[6]

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1 Vic Ryckaert, Low Enrollment Leads to Indianapolis Charter School's Closure, USA Today (Feb. 7, 2017), available at: http://tinyurl.com/kdb6sf2 (last checked 4/17/2017).

2 Student enrollment and demographic information available at: http://tinyurl.com/mbo5ens (IMSA - West); http://tinyurl.com/l6jvtto (IMSA North); http://tinyurl.com/jvhjgj6 (IMSA - South) (last checked 4/17/2017).

3 Figure includes revenues of IMSA North, IMSA South, and IMSA West, audits available at: http://tinyurl.com/k4mmupk (last checked 4/19/2017).

4 Information taken from: Resume available pg 99 at: http://tinyurl.com/mytqkaj (last checked 4/19/2017); Linkedin Profile available at: http://tinyurl.com/my9p3y2 (last checked 4/19/2017); Search Warrant application, pg 40, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

5 Corporate documents in Indiana are available at: http://tinyurl.com/mmy5t79 (last checked 4/19/2017).

6 Numan Koca, LinkedIn, available at: http://tinyurl.com/kgxgqhw (last checked 4/19/2017).

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- ▷ Kazim Eldes: Immigration fees paid by Horizon (OH) to Concept;[7] Founder, IMSA (IN); Incorporator, Wisdom Educational Services, Inc.;[8] Incorporator, The Holy Dove Foundation (now known as Turkish American Society of Indiana, Inc.);[9] Vice President, Turkish American Society, Inc.;[10] 2007 Registered Agent, IMSA West (IN);[11] Math Consultant, Concept.[12]

- ► Cemil Selcuk: Treasurer, Atlantis Foundation Inc.; Incorporator, Indiana Math and Science Academy Indianapolis Inc. and Indiana Math and Science Academy Gary Inc (IN).[13]

- ► Tim Nation: Founding Board member, IMSA West (IN);[14] currently Executive Director at Peace Learning Center,[15] which includes Fethullah Gülen in its peacemaker curriculum taught to young students after a trip to Turkey with the Turkish Friendship Center in Indianapolis.[16]

Overview

As of the 2016-2017 school year, Indiana has 3 Gülen Organization charter schools in operation. These schools are overseen by three governing boards: Indiana Math and Science Academy Indianapolis Inc. incorporated in 2006; Indiana Math and Science Academy North Indianapolis Inc. incorporated in 2008; and Indiana Math and Science Academy South Indianapolis Charter School, Inc. incorporated in 2012 (collectively, the "IMSA" network). In spite of the separate corporate entities governing each school, there is significant overlap among all three governing boards. The first school opened in 2007, then 2010 and 2013. One school will close at the end of the 2016-17 school year. The IMSA network was the second attempt to start Gülen charter schools in Indiana as two prior applications filed by other major Gülen charter network founders failed in 2001.[17] IMSA contracts with Concept Schools ("Concept"), the corporate entity responsible for the Midwestern region of the Gülen Organization charter networks, allegedly for additional educational management services for the state schools. On average, these schools serve 10% English Language Learners vs. 5% state average; 85% free and reduced lunch population vs. 46% state; 15% students with disabilities vs. 15% state; 67% African American students vs. 12% state; 9% Caucasian students vs. 69% state; and 17% Hispanic students vs. 12% state. As these numbers indicate, the IMSA network serves high percentages of vulnerable student populations.

7 Horizon Science Academy-Dayton Initial Audit, at 27 (July 27, 2007), available at: http://tinyurl.com/l4dc3es (last checked 4/19/2017).

8 Corporate documents in Indiana are available at: http://tinyurl.com/kxhfr79 (last checked 4/19/2017).

9 Corporate documents in Indiana are available at: http://tinyurl.com/mmy5t79 (last checked 4/19/2017).

10 Id.

11 Corporate documents in Indiana Math and Science Academy – Indianapolis Inc. are available at: http://tinyurl.com/k6nd57l (last checked 4/19/2017).

12 IMSA – West Replication Application, at 242 (Sep. 20, 2013), available at: http://tinyurl.com/m8b9vdy (last checked 4/19/2017).

13 Corporate documents in Indiana for these entities are searchable at: http://tinyurl.com/lylalt8 (last checked 4/19/2017).

14 IMSA – West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017).

15 Tim Nation, Peace Learning Center, available at: http://tinyurl.com/knhe2wj (last checked 4/19/2017); Tim Nation, LinkedIn, available at: http://tinyurl.com/kohj8w7 (last checked 4/19/2017).

16 Peace Curriculum Includes Fethullah Gülen, YouTube (Feb. 17, 2012), available at: http://tinyurl.com/lnjxhuh (last checked 4/19/2017); Peace Curriculum Includes Fethullah Gülen, Hizmet Movement News Portal (Dec. 12, 2010), available at: http://tinyurl.com/lr4k7uz (last checked 4/19/2017).

17 Staff Report, 21 Applications Were Reviewed, The Indianapolis Recorder (Dec. 14, 2001), available at: http://tinyurl.com/m5lses9 (last checked 4/17/2017).

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Indiana Math and Science Academy – West (IMSA – West) 4575 W. 38th Street Indianapolis, IN 46254	K-8 (at various times, has been 6-8, 6-12, and K-12) 2007-Present	23% ELL 80% FRL 12% SWD 61% African American 04% Caucasian 32% Hispanic	Ball State University, 2007-2014 Mayor's Office of Indianapolis, 2014 – Present	Indiana Math and Science Academy – Indianapolis, Inc.
Indiana Math and Science Academy – North (IMSA – North) 7435 N. Keystone Ave. Indianapolis, IN 46240	K-12 2010-Present	04% ELL 85% FRL 18% SWD 77% African American 06% Caucasian 09% Hispanic	Mayor's Office of Indianapolis	Indiana Math and Science Academy – North Indianapolis Inc.
Indiana Math and Science Academy – South (IMSA – South) 2710 Bethel Ave. Indianapolis, IN 46203	K-8 2013-Present (Closing in 2017 due to low enrollment)	04% ELL 85% FRL 18% SWD 77% African American 06% Caucasian 09% Hispanic	Mayor's Office of Indianapolis	Indiana Math and Science Academy – South Indianapolis Charter School, Inc.
Failed Applications				
Indiana Science Academy	*Denied in 2001*		*Indianapolis Charter Schools Board*	*Crossroads Educational Services, Inc.*
Indiana Life Sciences Academy	*Denied in 2002*			*Crossroads Educational Services, Inc. (name changed to Indiana Life Sciences Academy Inc. in 2002)*
Indiana Math and Science Academy – Gary	*Denied in 2008 due to lack of facilities, students, and teachers*		*Ball State University*	*Indiana Math and Science Academy – Gary Inc.*
Indiana Math and Science Academy – Fort Wayne	*Failed or never attempted application*			*Indiana Math and Science Academy Fort Wayne Inc.*

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.*[18]

[18] Student enrollment and demographic information available at: http://tinyurl.com/mbo5ens (IMSA - West); http://tinyurl.com/l6jvtto (IMSA - North); http://tinyurl.com/jvhjgj6 (IMSA - South) (last checked 4/17/2017).

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A History of Strategic Ambiguity and Conflicting Interests

The first attempt to open a Gülen charter school in Indiana was in 2001. Turgay Faki, Osman Arslan, Ali Korkmaz (Western region founder), and Vedat Akgun (Midwestern region founder) attempted to open Indiana Science Academy under the control of Crossroads Educational Services, Inc.[19] The application was denied, and Vedat Akgun, Ali Korkmaz, and Bulent Bayraktar then applied to open the Indiana Life Sciences Academy in 2002.[20]

After this second failed application, Crossroads Educational Services, Inc. changed its name to Indiana Life Sciences Academy, Inc. and Gregory Taylor and Theresa Wright became the entity's principal officers until its dissolution in 2009. Imagine Indiana Life Sciences Academy West, Inc., an entity controlled by the non-Gülenist Imagine Schools education management organization and Theresa Wright, would later amend its name to Indiana Life Sciences Academy, Inc. The school which resulted, Indiana Life Sciences Academy West, closed in 2016.[21]

After the earlier failed attempts, the Indiana Gülenists succeeded in gaining approval for IMSA – West, which opened in 2007. A charter application for IMSA Gary failed shortly thereafter in 2008, but IMSA North opened in 2010, followed by IMSA South in 2013. IMSA South is already scheduled to close at the end of the 2016-17 school year due to low enrollment.

The IMSA corporate entities running these schools have undergone frequent and seemingly needless name changes that make it difficult to piece together the history of the Gülenist presence in the state. Indiana Math and Science Academy East Indianapolis Incorporated, created in 2008, changed its name to Indiana Math and Science Academy North Indianapolis Incorporated in 2010. In 2012, it changed its name again to its current name: Indiana Math and Science Academy North Indianapolis Inc. It now operates IMSA North under that name. In 2012, the "East" label was recycled and incorporated the now defunct Indiana Math and Science Academy East, Inc. In 2008, Kazim Eldes incorporated Indiana Math and Science Academy South Indianapolis Inc., which would dissolve in 2010. In 2012, Gülenists incorporated the similarly-named Indiana math and Science Academy South Indinapolis [sic] Charter School Inc. Just a year later, articles of amendment changed the entity's name to Indiana Math and Science Academy South Indianapolis Charter School, Inc. This entity currently operates IMSA South. Only the first governing board incorporated in 2006, Indiana Math and Science Academy Indianapolis, Inc. currently has the name it received at its founding. It operates the original IMSA school, IMSA West.[22]

The governing boards of all three IMSA corporate entities substantially overlap. Seven individuals serve on all three boards, and the largest board features only ten members. In total, 12 individuals fill 29 board seats across all three entities, and only two individuals (Ferit Akova and Atilla Sit) serve on only one board. Unlike other states, the boards are not Turkish dominated, although the boards still feature a substantial Turkish presence. In addition to the

[19] Corporate documents in Indiana are available at: http://tinyurl.com/lmecvhq (last checked 4/19/2017). See also Staff Report, 21 Applications Were Reviewed, The Indianapolis Recorder (Dec. 14, 2001), available at: http://tinyurl.com/m5lses9 (last checked 4/17/2017); Indiana Science Academy Charter School Proposal at 1, available at: http://tinyurl.com/kem5s8u (last checked 4/17/2017).

[20] Indiana Life Sciences Academy, Charter School Prospectus, available at: http://tinyurl.com/lnkq7cz (last checked 4/26/2017).

[21] The last Imagine charter school in Indiana—Indiana Life Sciences Academy West—closed in 2016. Dylan Peers McCoy, Struggling Indy Charter School Will Close at the End of the Year, Chalkbeat (May 19, 2016), available at: http://tinyurl.com/kdhk9zu (last checked 4/19/2017).

[22] Corporate documents in Indiana for these entities are searchable at: http://tinyurl.com/lylalt8 (last checked 4/19/2017).

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overlapping board members, IMSA West loaned IMSA North start-up funds, cementing the lack of distinction between the entities and the potential for breaches of fiduciary duties.[23]

All three schools currently contract with Concept Schools for management services. Each school has an agreement requiring them to pay Concept 10% - 12% of their revenue. IMSA South also has a $330,000 line of credit with Concept.[24]

Concept's most serious controversy to date is the ongoing FBI investigation concerning the collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[25] According to the released FBI's search warrant application, Concept executives purportedly violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer allegedly directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work purportedly was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[26] Former Concept executive and Ohio Founder Ozgur Balsoy was one of the purportedly fraudulently enriched Turkish vendors.[27] While Balsoy's business is under suspicion in the FBI investigation and has already been raided, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[28] This investigation is ongoing and includes IMSA, other Concept schools, vendors, and Concept offices located in both Ohio and Illinois.

Financial Abuse

Indiana requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues at the IMSA network that are endemic to all Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks. Inter-entity lending practices in particular—from school to school and between schools and Concept—are a known warning sign for money laundering.[29] In Indiana, IMSA West has loaned money to IMSA North; meanwhile, IMSA South has a $330,000 credit facility with Concept. In 2014, the school owed Concept $280,000; in 2015, the school owed $330,000 to Concept; in 2016, the school owed $245,000 to Concept.

There are issues with accurately documenting attendance, absences, and withdrawals of

[23] IMSA West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017); IMSA North, 990s, available at: http://tinyurl.com/kgoqh5j (last checked 4/19/2017); IMSA South, 990s, available at http://tinyurl.com/mzxwu3m (last checked 4/19/2017).

[24] School audits from the years 2007-2016 are searchable at: http://tinyurl.com/lmq55gw (last checked 4/19/2017).

[25] Dan Mihalopoulos and Jon Seidel, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015), available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[26] Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[27] *See id.; see also* Dan Mihalopoulos and Jon Seidel, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015), available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[28] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[29] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

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students throughout the Gülen Organization charter networks. Failure in this recordkeeping, intentional or not, may allow a school to garner the most public funds while educating the least number of students. If intentional, this method particularly takes advantage of "problem" students, whose truancy is purposefully unreported while the schools continue to collect their FTE funding. Similarly, there are issues with accurately documenting free and reduced meals for students throughout the Gülen Organization charter networks. Again, this method would be effective for garnering the most public funds while serving the least number of students.

The numerous audit findings occur across multiple years and at multiple schools, including:

- ▷ Lack of compliance with required financial procedures and accounting standards:
- ▷ Lack of proper controls and segregation of duties for the collection, depositing, receipting, and refunding of money;
- ▷ Failure to timely make deposits, in spite of numerous and repeated promises to correct this issue;
- ▷ Failure to reconcile receipts;
- ▷ Lack of documentation for refunds;
- ▷ Improper calculation and failure to maintain balances for student textbook rentals;
- ▷ Lack of a formal policy for handling uncollectible school lunch and textbook rental accounts;
- ▷ Lack of controls to verify free and reduced meal applications;
- ▷ Lack of documentation justifying textbook reimbursements and free and reduced meal reimbursements;
- ▷ Inappropriate determinations on free and reduced meal applications;
- ▷ Lack of documentation for credit card disbursements and electronic funds transfers;
- ▷ Use of a credit card and electronic fund transfers that by-pass required cash disbursement procedures;
- ▷ Payment of interest and sales tax on credit card transactions;
- ▷ Disbursement of $500 petty cash fund without documentation;
- ▷ Failure to appropriately bond all individuals handling funds;
- ▷ Improper recordation and classification of disbursements and receipts;
- ▷ Excess cash carried further between years;
- ▷ Understating cash on hand[30]; and
- ▷ Failure to maintain documentation supporting the allocation of salaries to Title I activities.

- ► Improper Student Attendance Records which Can Lead to Increased Funding:
  - ▷ Incorrect attendance reports.[31]

On top of these financial concerns, the Office of Education Innovation for the Mayor of Indianapolis maintains reports on the IMSA schools. These reports detail similar financial, educational, and governance issues common among Gülen charter schools. The numerous criticisms occur across multiple years and multiple schools, including:

- ► Governance Issues:
  - ▷ Untimely submission of documents;
  - ▷ Board communication through e-mails in violation of the Indiana Open Door Law;
  - ▷ Lack of formal method to evaluate the superintendent;
  - ▷ Failure to evaluate the performance of the school leader, the management organization, or the board itself; and
  - ▷ Failure to properly post or update board meeting agendas or meeting

[30] In 2013, the IMSA – North supplemental audit revealed that the school understated its cash on hand in the Indiana Department of Revenue by $202,066.

[31] These findings were taken from a review of school audits from the years 2007-2016, searchable at: http://tinyurl.com/lmq55gw (last checked 4/19/2017).

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times and locations.

- Financial Issues:
  - Lack of sufficient days cash on hand;
  - Years with negative net-income;
  - Insufficient current ratio;[32]
  - Insufficient debt service coverage; and
  - Lack of resources for teachers.

- Improper Student Attendance and FRL Records which Can Lead to Increased Funding:
  - Missing documentation for FRL students.

- Teacher Certification Issues:
  - Teacher retention issues;
  - Deficiency in amount of appropriately licensed teachers; and
  - Teachers with expired or questionable licenses.

- Special Education and ELL Issues:
  - IEP services provided in hallways;
  - Lack of Individual Language Plans (ILPs) for ELL students;
  - Missing information in Special Education and IEP files;
  - IEP goals lacked specificity and measurability; and
  - Concerns about licensure of Special Education staff.[33]

Bond Financing

IMSA does not have any known municipal bonds. Concept Schools and its affiliated real estate arm, however, have used bond financing for schools in other states. For that reason, the situation should be monitored in the event that IMSA does apply for bond financing.

Real Estate

Of the three IMSA schools, one school (IMSA West) owns its own building and appears to have recently purchased the building from an unaffiliated third party. Before the purchase of the property in January 2016, the school leased its facility from the same party. IMSA North currently leases its facilities from what appears to be an unrelated entity.[34]

IMSA South leases its facility from 2710 Bethel LLC, an Indiana LLC that is a wholly owned subsidiary of Concept's real estate arm, New Plan Learning.[35] Murat Arabaci, the president of New Plan Learning, Inc., created 2710 Bethel LLC in 2012. 2710 Bethel LLC shares the same address and suite number as New Plan Learning.[36] The school's total lease expenses (facility lease plus office equipment lease) for 2014-2016 are: $262,643 in 2014; $283,303 in 2015; and $288,662 in 2016.[37] Without additional information or comparisons, the reasonableness of amounts spent on the facilities lease cannot be determined. But these payments warrant further investigation given the fact that New Plan

[32] An insufficient current ratio indicates that a school's assets are too low and liabilities are too high, imperiling its financial stability.

[33] These reports are available at: http://tinyurl.com/kqczffl (IMSA - West); http://tinyurl.com/mphf6fr (IMSA - North); http://tinyurl.com/nxofa3k (IMSA - South).

[34] Indiana corporate records available at: http://tinyurl.com/lylalt8 (last checked 4/21/2017). Property records are available at: http://tinyurl.com/kr8juov (last checked 4/17/2017).

[35] IMSA South lease information found in audits available at: http://tinyurl.com/k4mmupk (last checked 4/21/2017). Property records are available at: http://tinyurl.com/kr8juov (last checked 4/17/2017).

[36] Indiana corporate records available at: http://tinyurl.com/lylalt8 (last checked 4/21/2017).

[37] IMSA – South lease information taken from audits available at: http://tinyurl.com/k4mmupk (last checked 4/21/2017).

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Learning apparently overcharges its Concept-controlled schools in other states and is a prime tenet of Gülen Organization's suspicious real estate dealings.[38]

Excessive use of the H-1B Visa Program

Like all Gülen Organization charter networks, the IMSA network utilizes the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. From 2001-2016, IMSA filed 83 H-1B visa applications for foreign workers.[39] While Gülen charter networks claim the heavy dependence on the H-1B program is to hire hard-to-find math and science teachers, these applications were filed for such positions as: educational and school counselors, education administrators, school business managers, ESL teachers, network administrators, accountants, Turkish teachers, and assistant directors.

IMSA use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen. IMSA used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)[40]

- Nuzhat Hafeez: IMSA schools used Hafeez, an Illinois-based attorney, to file numerous H-1B applications. Hafeez also filed H-1B applications for:
  - Concept Schools, Inc.
  - Niagara Educational Services, Inc. (IL)
  - Niagara Foundation (IL)
  - The Core Group (IL)[41]

- Mustafa Genc. IMSA used Genc, an Illinois-based attorney, to file numerous H-1B applications. Genc also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Gateway (MO)[42]

38 See, e.g., the Texas, Ohio, and Oklahoma for more information on this pattern of fraud.

39 In another example of strategic ambiguity, IMSA schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of their organizations is 83, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/mhfltf8 (53); http://tinyurl.com/kku2sbg (4); http://tinyurl.com/l67e4kn (18); http://tinyurl.com/k4hdddf (1); http://tinyurl.com/jw7m2a3 (1). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (6) (last checked 1/30/2017).

40 List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 4/21/2017).

41 Hafeez profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/mvnttav (last checked 4/13/2017).

42 List of entities represented by Mustafa Genc, available at http://tinyurl.com/ko77hqq (last checked 4/20/2017).

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Scandals, Investigations & Notable Activities

As detailed above, federal agents are investigating IMSA as part of a broader probe into E-Rate funding fraud by Concept.[43] In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Indiana, Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalists at the time and asked for a thorough investigation.[44]

Notable Turkish Vendors

- Concept Schools, Inc.: Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and one in Minnesota.[45] Gultekin Aytekin, a founder of IMSA, is currently the Director of Accountability at Concept.[46] Between 2007 and 2016, IMSA paid Concept $5,496,673.[47]

- 2710 Bethel LLC: 2710 Bethel LLC was created in 2002 by Murat Arabaci, the president of New Plan Learning, Inc., and owner of the facility leased by IMSA South.[48] New Plan Learning acts as a non-profit umbrella organization for several subsidiaries.[49] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

- Advanced Solutions for Education: Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the alleged defrauding of the E-Rate program.[50] The company served as an

[43] Bill McCleery, Charter School Indicates FBI Raid Is Over Federal Grant Money, IndyStar (June 6, 2014), available at: http://tinyurl.com/kv6pjh9 (last checked 4/20/2017).

[44] Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

[45] *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

[46] Linkedin Profile available at: http://tinyurl.com/my9p3y2 (last checked 4/19/2017).

[47] Figure includes payments by IMSA North, IMSA South, and IMSA West, audits available at: http://tinyurl.com/k4mmupk (last checked 4/19/2017), and IMSA - West 990s available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017).

[48] IMSA – South lease information found in audits available at: http://tinyurl.com/k4mmupk (last checked 4/21/2017). Property records are available at: http://tinyurl.com/kr8juov (last checked 4/17/2017).

[49] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016); *see also* the Ohio State Narrative.

[50] *See* Dan Mihalopoulos, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

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E-Rate funding consultant to the schools. In 2014, Gultekin Aytekin filed an FCC Form 471 on behalf of IMSA. The form names Ozgur Balsoy, who is implicated in Concept's suspected E-Rate fraud, as the contact person and Advanced Solutions for Education as a consultant.[51]

- The Core Group: The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept allegedly used to defraud the E-Rate program.[52] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[53] In 2014, Gultekin Aytekin filed an FCC Form 471 on behalf of IMSA. The form names Core Group, Inc. as the service provider.[54]

Gülenist Cultural Foundations

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[55] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science Academy of Chicago, a private Gülenist school. In 2007, the Niagara Foundation gave an extensive loan to Breeze Inc. to purchase new properties for Concept charter schools.[56] Several Concept employees as well as school employees are members of the Niagara Foundation. It maintains a presence in Indiana that provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[57]

- Turkish American Federation of Midwest (TAFM): TAFM is a member of the Turkic American Alliance (TAA).[58] The TAA posts articles and op-eds written by Fethullah Gülen.[59] TAFM has four member organizations in Indiana, three of which overlap with the Niagara Foundation: Niagara Foundation Indianapolis, Niagara Foundation Lafayette, Niagara Foundation Bloomington, and Turkish American Society of Indiana.[60] TAFM provides year-round informational bulletins to members of Congress, sponsors congressional trips to Turkey, and provides a platform for Turkish American activism and advocacy.[61] One board member for IMSA has served on the board of TAFM, as described below.[62]

- Turkish American Society of Indiana, Inc. (TASI) (formerly The Holy Dove Foundation, Inc.): Two IMSA founders,

51 USAC Form 471 available at: http://tinyurl.com/mw4ewf8 (last checked 4/21/2017).

52 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

53 Id.

54 USAC Form 471 available at: http://tinyurl.com/mw4ewf8 (last checked 4/21/2017).

55 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

56 Audit available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

57 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017); BilalEksili.com, available at: http://tinyurl.com/m477jnd (last checked 4/21/2017).

58 Turkic American Alliance, available at: http://tinyurl.com/mm9ko3r (last checked 4/21/2017).

59 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

60 Turkic American Federation of Midwest, available at: http://tinyurl.com/lgz6odt (last checked 4/21/2017).

61 Turkic American Federation of Midwest, available at: http://tinyurl.com/k7occf5 (last checked 4/21/2017).

62 IMSA – West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017); IMSA – North, 990s, available at: http://tinyurl.com/kgoqh5j (last checked 4/19/2017); TAFM, 990s, available at: http://tinyurl.com/luzmomm (last checked 4/19/2017).

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Kazim Eldes and Numan Koca, incorporated TASI as The Holy Dove Foundation in 2004. The third incorporator, Turgay Faki, attempted to found Indiana Science Academy in 2001. Other IMSA board members later served on the board or work for TASI.[63] TASI organized dialogue events and friendship trips to Turkey.[64] It dissolved in 2014. In another example of strategic ambiguity, multiple entities connected to individuals with Gülenist ties in Indiana have used names based on "Turkish American Society."[65]

Friends of Gülen Spotlight: Bilal Eksili

Bilal Eksili exemplifies the Gülen Organization's cultural and political outreach with political and community leaders. Eksili's roots are in the IMSA network where he served as vice president and director of IMSA West and IMSA North. His wife was also employed at IMSA West.[66] Eksili also served as executive director of the Niagara Foundation Indiana, vice president of TAFM, and president of the Turquoise Council of Americans and Eurasians (TCAE), an entity active in Gülenist politics nationally and at one point investigated by the Congressional Ethics Committee.[67] Eksili has also worked with Ant Travel & Tours and Artun Travel in Chicago, outfits that arrange the Gülenist junkets to Turkey.[68] His personal website features news critical of the Turkish government and favorable to Fethullah Gülen.[69] He currently works as a consultant in Washington, D.C.[70]

- Trips: Eksili has hosted and coordinated multiple trips to Turkey across his different roles to build political support for the Gülenist agenda.[71]

- Donations: In 2013, Eksili donated $5,000 to federal campaigns. At the time, he worked as the vice president of the Turkic American Federation of Midwest but only earned a salary of only $31,592.[72] This led one news report to question the legitimacy of the donations.[73] Since 2010, he has given over $33,000 to political campaigns, including: $5,000 to

63 Corporate documents are available at: http://tinyurl.com/mmy5t79 (last checked 4/21/2017);

64 IMSA – West Replication Application, at 85 (Sep. 20, 2013), available at: http://tinyurl.com/m8b9vdy (last checked 4/19/2017).

65 Corporate documents are available at: http://tinyurl.com/lylalt8 (last checked 4/21/2017). Murat Dundar and Emin Ozdemir serve on IMSA boards. IMSA – West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017); IMSA – North, 990s, available at: http://tinyurl.com/kgoqh5j (last checked 4/19/2017); IMSA - South, 990s, available at http://tinyurl.com/mzxwu3m (last checked 4/19/2017).

66 IMSA – West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017); IMSA – North, 990s, available at: http://tinyurl.com/kgoqh5j (last checked 4/19/2017); IMSA – South Application at 115, available at: http://tinyurl.com/lxxkags (last checked 4/21/2017).

67 Linkedin Profile available at: http://tinyurl.com/l9vlx85 (last checked 4/19/2017); BilalEksili.com, available at: http://tinyurl.com/m477jnd (last checked 4/21/2017). TCAE has a history of questionable involvement in trips to Turkey and Azerbaijan. Paul Singer and Paulina Firozi, Turkish Faith Movement Secretly Funded 200 Trips for Lawmakers and Staff, USA Today (Oct. 29, 2015), available at: http://tinyurl.com/m3ztm7q (last checked 4/20/2017); Scott Higham, Steven Rich & Alice Crites, 10 Members of Congress Took Trip Secretly Funded by Foreign Government, The Washington Post (May 13, 2015) (discussing former senator from Indiana Richard Lugar's speech at an Azerbaijani conference ostensibly sponsored in part by TCAE), available at: http://tinyurl.com/nxqnsm5 (last checked 4/22/2017).

68 IMSA West Replication Application, at 85 (Sep. 20, 2013), available at: http://tinyurl.com/m8b9vdy (last checked 4/19/2017).

69 BilalEksili.com, available at: http://tinyurl.com/mt8ntgw (last checked 4/21/2017).

70 BilalEksili.com, available at: http://tinyurl.com/m477jnd (last checked 4/21/2017).

71 Id.; 2008 Director's Community Leadership Awards, FBI, available at: http://tinyurl.com/myumu6g (last checked 4/22/2017).

72 Paul Singer, U.S. Lawmakers Got Suspect Turkish Cash, USA Today (Nov. 19, 2015), available at: http://tinyurl.com/me9aett (last checked 4/22/2017).

73 Id.

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Todd Rokita (U.S. Representative for Indiana's 4th Congressional District), $2,500 to Joseph Donnelly (U.S. Senator for Indiana), and $2,650 to Andre Carson (U.S. Representative for Indiana's 7th Congressional District).[74] The IMSA – South website features praise and favorable testimonials from both Rep. Rokita and Sen. Donnelly.[75]

- Political Networking: Eksili networked extensively with Indiana and national politicians. He has been pictured with Hillary Clinton,[76] Bill Clinton,[77] Jeb Bush,[78] Sen. Ted Cruz,[79] Gov. Scott Walker,[80] former U.S. Sen. from Indiana Richard Lugar,[81] FBI Director Robert Mueller,[82] U.S. Rep. from Indiana Andre Carson,[83] former Indiana Lt. Governor Becky Skillman,[84] and Virgil Madden, a policy advisor for Indiana Lt. Governor and proposed board member for IMSA South.[85] Notably, former Sen. Richard Lugar would provide a video greeting as co-sponsor for the Niagara Peace and Dialogue Awards for the Niagara Foundation posted to Bilal Eksili's YouTube channel.[86]

Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Concept. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Ali Kuran: Teacher/Dean of Academics/Director, Horizon (OH); proposed Principal of IMSA South;[87] Principal, Quest Academy (IL) when school cut ties with Concept;[88] Principal, Chicago Math and Science Academy (IL).[89]

- Mustafa Yazici: Teacher/Dean of Academics/Director, Horizon (OH); School Leader/Proposed Founder, IMSA (IN);[90] currently Executive Director, Turkish

74 Campaign contributions are searchable at http://tinyurl.com/fgdcj (last checked 4/21/2017).

75 IMSA – South Testimonials available at: http://tinyurl.com/m4th7wg (last checked 4/21/2017).

76 Bilal Eksili on Flickr, available at: http://tinyurl.com/mf49gch (last checked 4/21/2017).

77 Bilal Eksili on Flickr, available at: http://tinyurl.com/n5zd5al (last checked 4/21/2017).

78 Bilal Eksili on Flickr, available at: http://tinyurl.com/lwesq6w (last checked 4/21/2017).

79 Bilal Eksili on Flickr, available at: http://tinyurl.com/lj8xpmw (last checked 4/21/2017).

80 Bilal Eksili on Flickr, available at: http://tinyurl.com/mjtb8t9 (last checked 4/21/2017).

81 Bilal Eksili on Flickr, available at: http://tinyurl.com/kxtdn55 (last checked 4/21/2017).

82 Bilal Eksili on Flickr, available at: http://tinyurl.com/mcd54rc (last checked 4/21/2017).

83 TAA Staff, Congressional Ramadan Dinner at the U.S. House of Representatives, Turkic American Allicance (July 16, 2014), available at: http://tinyurl.com/mho4yut (last checked 4/21/2017).

84 Bilal Eksili on Flickr, available at: http://tinyurl.com/kad4pad (last checked 4/21/2017).

85 IMSA – South Application available at: http://tinyurl.com/lxxkags (last checked 4/21/2017); Bilal Eksili on Flickr, available at: http://tinyurl.com/l9j5d6m (last checked 4/21/2017).

86 Bilal Eksili on Youtube, available at: http://tinyurl.com/kxer8l5 (last checked 4/21/2017).

87 IMSA South Application at 81, available at: http://tinyurl.com/lxxkags (last checked 4/21/2017).

88 Pam Adams, Quest Academy Cuts Ties with Management Company, Extends Deal with District 150, Journal Star (Jan. 22, 2015), available at: http://tinyurl.com/koq86ay (last checked 4/21/2017).

89 CMSA Press Release available at: http://tinyurl.com/mv66vuy (last checked 4/21/2017); Illinois High School Association Contact Information, CMSA, available at: http://tinyurl.com/k9g8qks (last checked 4/21/2017).

90 IMSA West Replication Application, at 94 (Sep. 20, 2013), available at: http://tinyurl.com/m8b9vdy (last checked 4/19/2017).

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American Society of Chicago (IL).[91]

- Levent Elibal: Employed at Ramson Contractors - Gülenist construction vendor (Western region);[92] Employed at Quality Builders of Midwest – Gülenist construction vendor (Midwestern region);[93] Director of Purchasing, Concept (Midwestern region);[94] Operations Manager, IMSA (IN).[95]

- Hasan Akkaya: Assistant Director/ Director, Horizon (OH); currently director IMSA (IN).[96]

- Murat Dundar: Board member for IMSA;[97] President, TASI;[98] Secretary, Crossroads Community Center, Inc. (d/b/a Turkish American Society);[99] currently Associate Professor, Indiana University/Purdue University, Indianapolis.[100]

- Ali Korkmaz: Co-Founder of attempted Indiana Science Academy and Indiana Life Sciences Academy;[101] Board Member Magnolia (CA);[102] Researcher, Accord (Western region); Strategic Data Project Fellow; currently Director of Institutional Research, Univ. of Missouri-Kansas City.[103]

- Turgay Faki: Co-Founder of Indiana Science Academy;[104] Incorporator, Wisdom Educational Services, Inc.;[105] Incorporator/President, Crossroads Community Center, Inc. (d/b/a Turkish American Society);[106] Incorporator/ President, TASI.[107]

- Vedat Akgun: Co-founder of first Horizon Science Academies (OH);[108] Co-Founder of Attempted Indiana Science Academy and Indiana Life Sciences Academy;[109] Founder of Concept Schools;[110]

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91 Linkedin Profile available at: http://tinyurl.com/lg973pe (last checked 4/19/2017).

92 See Linkedin profile for Levent Elibal, available at http://tinyurl.com/zu3r3nv (last checked 11/23/2016).

93 Id.

94 Id.

95 Id.

96 Linkedin Profile available at: http://tinyurl.com/n7g68nc (last checked 4/19/2017).

97 IMSA West, 990s, available at: http://tinyurl.com/lrzjkf7 (last checked 4/19/2017); IMSA North, 990s, available at: http://tinyurl.com/kgoqh5j (last checked 4/19/2017); IMSA South, 990s, available at http://tinyurl.com/mzxwu3m (last checked 4/19/2017).

98 Corporate documents in Indiana are available at: http://tinyurl.com/mmy5t79 (last checked 4/19/2017).

99 Corporate documents in Indiana are available at: http://tinyurl.com/n6y7qhf (last checked 4/19/2017).

100 Murat Dundar Curriculum Vitae, available at: http://tinyurl.com/m2pnezn (last checked 4/21/2017).

101 Corporation registration information available at: http://tinyurl.com/kjr6lu4 (last checked 4/19/2017); Indiana Science Academy Charter School Proposal at 1, available at: http://tinyurl.com/kem5s8u (last checked 4/17/2017); Indiana Life Sciences Academy, Charter School Prospectus, available at: http://tinyurl.com/lnkq7cz (last checked 4/26/2017).

102 Magnolia Public Schools Board available at: http://tinyurl.com/m64mtrh (last checked 4/26/2017).

103 Linkedin Profile available at: http://tinyurl.com/lx3h7no (last checked 4/19/2017).

104 Indiana Science Academy Charter School Proposal at 1, available at: http://tinyurl.com/kem5s8u (last checked 4/17/2017).

105 Corporate documents in Indiana are available at: http://tinyurl.com/kxhfr79 (last checked 4/19/2017).

106 Corporate documents in Indiana are available at: http://tinyurl.com/n6y7qhf (last checked 4/19/2017).

107 Corporate documents in Indiana are available at: http://tinyurl.com/mmy5t79 (last checked 4/19/2017).

108 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

109 Corporation registration information available at: http://tinyurl.com/kjr6lu4 (last checked 4/19/2017); Indiana Science Academy Charter School Proposal at 1, available at: http://tinyurl.com/kem5s8u (last checked 4/17/2017); Indiana Life Sciences Academy, Charter School Prospectus, available at: http://tinyurl.com/lnkq7cz (last checked 4/26/2017).

110 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

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Co-founder of Breeze, Inc. and New Plan Learning;[111] Board member, Fulton Science (GA);[112] CEO, Charter Housing Corporation (GA);[113] CFO, Global Spectrum Foundation, Inc, D.B.A. Istanbul Center (GA);[114] Board member of Fulton Science Private School (GA);[115] President of the Turkic American Federation of Southeast (GA).[116]

Notable Articles regarding the Indiana Network

- Shaina Cavazos, *These 10 Indianapolis Schools Have the Fewest Kids Passing the 2016 ISTEP Test*, ChalkBeat (Nov. 18, 2016) (lists IMSA – South as one of the ten worst performing schools on ISTEP tests in 2016 in Marion County).[117]

- Scott Elliott, *Most Indianapolis Charter Schools Scored Below the Indianapolis Public Schools Average on ISTEP*, ChalkBeat (Apr. 17, 2016) (details academic failures IMSA schools and mentions FBI probe into Concept).[118]

- Jill Glavan, *Dirty Dining: Critical Violations Found Inside Local School Cafeterias*, Fox59 (Feb. 16, 2015) (detailing critical issues with sanitation in the cafeteria at IMSA – West due to a lack of hot water, rating IMSA – West's sanitation an "F," and describing how an inspector forced the school provide cold sack lunches at IMSA – North to be delivered to IMSA – West).[119]

- Sandra Chapman, *Nearly Half of Indiana's Charter Schools Doing Poorly or Failing*, 13 WTHR (Nov. 6, 2014) (discussing issues with teacher retention, unlicensed teachers from Teach for America, and a lack of textbooks).[120]

- Amber Stearns, *Feds Probe Parent Company of Charter School*, Nuvo (June 18, 2014) (discussing FBI executing a search warrant at IMSA in conjunction with E-Rate fraud investigation).[121]

111 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

112 2012 990 tax return, showing Akgun as a board member, available at: http://tinyurl.com/lv8ssnk (last checked 4/19/2017).

113 Georgia Secretary of State business search for Officer Vedat Akgun, available at: http://tinyurl.com/pa73vlw (last checked 4/19/2017).

114 Id.

115 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

116 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

117 http://tinyurl.com/htlq3tz (last checked 4/21/2017).

118 http://tinyurl.com/jh6d3z3 (last checked 4/21/2017).

119 http://tinyurl.com/jl7uxcm (last checked 4/21/2017).

120 http://tinyurl.com/grxqgke (last checked 4/21/2017).

121 http://tinyurl.com/h3vs88g (last checked 4/21/2017).

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Michigan



QUICK FACTS ON GÜLEN CHARTER SCHOOLS Michigan



NUMBER OF SCHOOLS: **1**

KNOWN AS: **MICHIGAN MATH ANDSCENCE ACADEMY "MMSA"**

TOTAL ENROLLMENT: **615**

CHARTER VENDOR: **CONCEPT SCHOOLS, INC.**

TOTAL REVENUES: **$5,290,707**

KEY PEOPLE:



Atilla Yusuf Guleker

Salim Ucan

Taulant Kadiu

Abuzer Saglik

RELATED INSTITUTIONS:

MATH AND SCIENCE



GATEWAY



HORIZON



NOBLE



VULNERABLE STUDENT POPULATIONS

MMSA VS. **state average**:

100% **free and reduced lunch**
46.3% **state average**

87.5% **minority students**
32.9% **state average**

4.7% **students with disabilities**
12.8% **state average**

REAL ESTATE

MMSA currently leases its property from the **Archdiocese of Detroit**.

$395,000.00 **amount paid by MMSA on its lease**

LOANS, FEES AND PAYMENTS

MMSA opened in **2009** and immediately **received loans from three related entities**:

$26,000
from the **Turkish American Society** of Michigan

$4,975
from **Salim Ucan** personally

$417,000
from **Concept Schools** itself



MMSA is obligated to pay **Concept 10%** of the **per pupil revenues**, including grant funding.



MMSA is authorized by **Grand Valley State University** to which they pay an administrative oversight fee of **3%** of its **state school aid**.

All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Midwestern
- School Names (known as):
  - Michigan Math and Science Academy ("MMSA")
- Total # of Schools in State: 1
- Total Student Enrollment 2015-16: 615[1]
- Charter Holder/Governing Board(s):
  - Michigan Mathematics and Science Initiative
- Charter Management Services Vendor: Concept Schools, Inc.[2]
- Regional Gülen Organization Oversight Entity: Concept Schools, Inc.
- Regional Sister Networks: Horizon (OH); Noble (OH); Math and Science (IL); Horizon (IL); Math and Science (IN); Math and Science (MN); Gateway (MO); Math and Science (WI).
- Total Revenues for the 2015-16 school year: $5,290,707[3]
- Network Founders:
  - Atilla Yusuf Guleker: founder of Zaman International School (Cambodia);[4] former journalist of the Turkish daily *Zaman*.[5]
  - Salim Ucan: Teacher HSA Cleveland;[6] Principal Science Academy of Chicago, private Gülenist school run by the Niagara Foundation;[7] Founding Principal Chicago Math and Science;[8] Co-Founder of Concept Schools, Inc.;[9] Founding board member for Breeze Inc., for-profit Gülenist landlord for Concept Schools;[10] Vice President of Concept Schools, Inc.;[11] currently Professional Development coach for Concept.[12]
  - Taulant Kadiu: Director, Balkan American Community Center;[13] CFO, Federation of Balkan American Associations, Inc.;[14] Registered Agent, Maintenance Building Solutions, Inc.[15]
  - Abuzer Saglik: Board member, MMSA; President, Affordable Accounting II, LLC; Member, Islamic Center of East Lansing; Owner, Complete Tax & Payroll Services[16]

1 Student enrollment and demographic information available at: https://tinyurl.com/lmyj8ow (last checked 4/26/2017).

2 See Michigan Mathematics and Science Academy Annual Financial Report Year Ended June 30, 2016, available at: http://tinyurl.com/m9h7rhs (last checked 4/26/2017).

3 See Michigan Mathematics and Science Academy Annual Financial Report Year Ended June 30, 2016, available at: http://tinyurl.com/m9h7rhs (last checked 4/26/2017).

4 See YouTube, Zaman International School Inauguration Mr. Atilla Yusuf Guleker, available at: http://tinyurl.com/mt7p77u (last checked 4/26/2017); Abstract, FGülen.com, available at: http://tinyurl.com/kkvjwne (last checked 4/26/2017).

5 Deputy PM Arinc Opens Zaman University in Cambodia, Today's Zaman (Feb. 22, 2011), available at: http://tinyurl.com/jvklmyd (last checked 4/26/2017).

6 Resume pg 78, available at: http://tinyurl.com/mej56l8 (last checked 4/23/2017).

7 Id.

8 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

9 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

10 Breeze Articles of Incorporation, available at: http://tinyurl.com/mlc5jc4 (last checked 4/20/2017).

11 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

12 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

13 Linkedin profile, available at: http://tinyurl.com/lf4x4zy (last checked 4/26/2017).

14 Corporate documents for Federation of Balkan American Associations, Inc. available at: http://tinyurl.com/k3hbkm2 (last checked 4/17/2017).

15 Michigan corporate documents available at: http://tinyurl.com/kdgsvtm (last checked 4/26/2017).

16 Michigan corporate documents available at: http://tinyurl.com/mzr5jaq (last checked 4/26/2017).

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Overview

As of the 2016-2017 school year, Michigan has one Gülen Organization charter school in operation, the Michigan Math and Science Academy ("MMSA"). MMSA is authorized by Grand Valley State University and pays an administrative oversight fee of 3% of its state school aid to Grand Valley State University.[17] MMSA contracts with Concept Schools, Inc., the charter management organization responsible for the Midwestern region of the Gülen Organization charter network. Concept allegedly provides additional educational management services for the charter schools for a percentage fee of total school revenues. We understand that MMSA is obligated to pay Concept 10% of the per pupil revenues received by MMSA, including grant funding. MMSA paid Concept $326,556 during the year ending on June 30, 2016.

MMSA serves 1.8% English Language Learners vs. 5.9% state average; 100% free and reduced lunch population vs. 46.3% state average; 4.7% students with disabilities vs. 12.8% state average; 87.5% minority students vs. 32.9% state average; and 12.5% Caucasian students vs. 67.1% state average. As these numbers indicate, MMSA serves a high poverty, high minority population, but does not serve representative percentages of students with disabilities or English language learners.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Michigan Math and Science Academy 8155 Ritter St., Center Line, MI 48015	K-12 2009-Present	1.8% ELL 100% FRL 4.7% SWD 87.5% Minority 12.5% Caucasian	Grand Valley State University	Michigan Mathematics and Science Initiative

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.18*

A History of Strategic Ambiguity and Conflicting Interests

Michigan hosts one Gülen charter school: the Michigan Math and Science Academy (MMSA) governed by the Michigan Mathematics and Science Initiative. Salim Ucan, then Vice President of Concept Schools, helped incorporate MMSA's governing board in 2008. The school then opened in 2009 and immediately received loans from three related entities: $4,975 from Salim Ucan pesonally; $26,000 from the Turkish American Society of Michigan; and $417,000 from Concept itself.[19] Ucan's involvement and these loans underscore our view of the lack of separation between the school's governing board and their hired services vendor, a relationship that should be conducted at arm's length.

MMSA has ties to its third lender, too. Many of the board members of the Turkish American Society of Michigan ("TASM") have served as directors or employees of MMSA. For example, Attila Yusuf Guleker (MMSA founder) and Oguzhan Yildiz (MMSA director) incorporated

[17] See Michigan Mathematics and Science Academy Annual Financial Report Year Ended June 30, 2016, available at: http://tinyurl.com/m9h7rhs (last checked 4/26/2017).

[18] Student enrollment and demographic information available at https://tinyurl.com/jvmzwlg (last checked 4/26/2017).

[19] MMSA 2010 Audit, available at: http://tinyurl.com/mbmedzr (MMSA's audits are listed under Oakland Schools for 2010-2012 and Macomb ISD for 2013-2016) (last checked 4/26/2017).

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TASM in 2009.[20] Our analysis of these overlapping directors and officers and their repeated business with each other led us to believe that it has created the appearance of conflicts of interest on the part of MMSA, Concept, and TASM.

MMSA's connections to Concept raise additional concerns. Concept's most serious controversy to date is the ongoing FBI investigation concerning the alleged collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[21] According to the released FBI's search warrant application, Concept executives violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[22] Former Concept executive and Ohio Founder Ozgur Balsoy was one of the purportedly fraudulently enriched Turkish vendors.[23] While Balsoy's business is under suspicion in the FBI investigation and has already been raided, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[24] Like Concept's other schools, MMSA listed two of the implicated entities, Advanced Solutions for Education and The Core Group, as vendors on an FCC Form 471 used for E-Rate funding.[25] As such, MMSA is implicated in this ongoing fraud investigation and may have also been used as a vehicle for fraud.

Financial Issues

Michigan requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues that are endemic to other Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks. Examples of these issues can be found from a review of the independent audits conducted during the years 2009-present, including:[26]

- Lack of appropriate documentation over cash disbursements;[27]
- Improper recording of debt forgiveness and related payments;
- Failure to prepare proper financial statements;
- Accounting records not maintained in accordance with GAAP; and

[20] Michigan's corporate documents for these entities are available at: http://tinyurl.com/juljt (last checked 4/26/2017).

[21] Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[22] Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[23] *See id.; see also* Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[24] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[25] MMSA FCC Form 471 (Mar. 25, 2014), available at: http://tinyurl.com/mlrz7s4 (last checked 4/26/2017).

[26] MMSA audits are available at: http://tinyurl.com/mbmedzr (last checked 4/26/2017). The 2013 through 2016 audits are listed under the Macomb ISD section; the 2010 through 2012 audits are listed under the Oakland Schools section.

[27] The 2014-15 Audit revealed cash disbursements which were not supported by appropriate documentation, available at: https://tinyurl.com/kww6lsk (last checked 4/26/2017); the 2013-14 Audit revealed case disbursements which were not supported by appropriate documentation; the 2009-10 Audit revealed that cash receipts were not correctly deposited.

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- Loss of almost all electronic accounting information due to alleged theft.

Notably, the 2012-13 Audit revealed that MMSA failed to prepare its budget on the proper accounting basis. As a result, expenditures exceeded revenues by $247,091, when revenues were expected to exceed expenditures by $359,154. The problems noted in this Audit caused the Audit to request certain representations from the school's management, which included:

1. Management is not aware of fraud by management; employees with roles in internal control; or others;

2. No knowledge of fraud by employees;

3. Management has disclosed on instances of noncompliance; and

4. Management disclosed the identities of all related parties and transactions.

Finally, the audits reveal signs of financial distress:

- Transfer of funds from the general fund to subsidize school operations;[28]
- Issuance of state aid anticipation notes;[29]
- Deficits in the General Fund which prevented further allocation from the Michigan Department of Education;[30] and
- Necessity of short-term loans.[31]

Real Estate

MMSA currently leases its property, which is located at 8155 Ritter Street, Center Line, MI 48015, from the Archdiocese of Detroit. The current lease runs through July 2017, lease expenses for the year ending on June 30, 2016, were approximately $395,000.00.[32]

The 2012-13 Audit revealed that MMSA's general fund was operating at a deficit due to unexpected leasehold improvements due to moving to 8155 Ritter Street location.[33] Since other Gülen charter schools have overpaid construction vendors, the payments for these leasehold improvements should be investigated to determine if they were made to a Gülenist construction builder such as Quality Builders of Midwest.[34]

Prior to moving to the 8155 Ritter Street location, MMSA leased a building at 99 E. Woodward Heights, Hazel Park, MI 48030 from the Archdiocese of Detroit from 2009-2012.[35]

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28 The 2014-25 Audit revealed an interfund transfer of $39,595 to the School Lunch Fund from the General Fund; the 2012-13 Audit revealed an interfund transfer of $28,142 to the School Lunch Fund from the General Fund; the 2011-12 Audit revealed an interfund transfer of $21,136 to the School Lunch Fund from the General Fund; the 2010-11 Audit revealed an interfund transfer of $16,248 to the School Lunch Fund from the General Fund; the 2009-10 Audit revealed an interfund transfer of $8,848 to the School Lunch Fund from the General Fund.

29 MMSA issued state aid anticipation notes in 2015 ($512,000) and 2014 ($339,000), available at: http://tinyurl.com/m9h7rhs (last checked 4/27/2017); MMSA issued a state aid anticipation note in 2013 ($406,000), available at: https://tinyurl.com/kww6lsk (last checked 4/26/2017); MMSA issued a state aid anticipation note in 2012 ($370,000).

30 The 2012-13 Audit revealed a deficit of $76,117 in the General Fund, which resulted in the Michigan Department of Education withholding further allocation until the school submitted a budget to eliminate the deficit within two fiscal years.

31 The 2009-10 Audit revealed that MMSA received a short term loan of $4,975 from an employee of Concept, a $26,000 loan from the Turkish American Society of Michigan, and a $417,000 loan from Concept Schools.

32 See http://tinyurl.com/m9h7rhs (last checked 4/26/2017).

33 MMSA audits are available at: http://tinyurl.com/mbmedzr (last checked 4/26/2017). The 2013 through 2016 audits are listed under the Macomb ISD section; the 2010 through 2012 audits are listed under the Oakland Schools section.

34 See the Illinois State Profile.

35 Kozlowski, Andy. *Michigan Math and Science Academy leaves Hazel Park*. C&G Newspapers. 13 July 2012. Available at: http://tinyurl.com/gtmt6y8 (7 March 2017).

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Bond Financing

MMSA has not procured any known municipal bonds. Concept Schools and its affiliated real estate arm, however, have used bond financing for schools in other states.

Excessive Use of the H-1B Visa Program

Like many Gülen Organization charter networks, Concept and MMSA utilizes the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. MMSA filed 18 H-1B applications from 2001-2016.[36] While Concept Schools leadership states that these H-1Bs are only to fill shortage areas for math and science teachers,[37] MMSA filed applications for several "business manager" positions and a "network administrator" position.[38]

Concept (MI) use the same immigration attorneys to file and process their H-1B applications as other suspected Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen. MMSA used Kulen, a New York-based attorney, to file numerous H-1B applications.[39] Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MN)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)[40]

- Joseph Yoo: MMSA used Yoo, a New York-based attorney, to file H-1B applications. Yoo also filed H-1B applications for other Gülenist entities, such as:
  - Milkyway Education Center, Inc. (NJ)
  - American Turkish Friendship Association (VA)
  - Hampden Charter School Of Science (MA)
  - Wellspring Cultural & Educational Foundation, Inc. (CT)
  - Turkish Cultural Center (NY)
  - Rochester Academy Charter School (NY)
  - Bergen Arts And Science Charter School (NJ)
  - Zaman Ltd. (NY)
  - Metropolitan Education And Consulting Services LLC (NY)[41]

MMSA leases virtually all of its employees from professional employer organization ("PEO"), MM1, Inc.[42] Based on corporate records, this entity does not appear to be Gülenist.[43] It has, however, applied for 12 H-1B visas since

[36] See http://tinyurl.com/k6u9ad7 (last checked 4/28/2017) and http://tinyurl.com/ltl6wjv (last checked 4/28/2017) for MMSA.

[37] Article quoting Concept regarding H-1B use, available at: http://tinyurl.com/l7bw4zt (last checked 4/23/2017).

[38] See http://tinyurl.com/ltl6wjv (last checked 4/28/2017).

[39] See http://tinyurl.com/ltl6wjv (last checked 4/28/2017).

[40] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 3/21/2017).

[41] List of entities represented by Joseph Yoo, available at: http://tinyurl.com/k8ux2el (last checked 4/28/2017).

[42] See 2012-2013 Audit, available at: http://tinyurl.com/mbmedzr (last checked 4/28/2017).

[43] Corporate records are available at: http://tinyurl.com/mb6v5vl (last checked 4/28/2017).

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2001.[44] It is likely that these visa applications were for MMSA in light of Gülen charter schools' hiring practices.

Scandals, Investigations & Notable Activities

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalists at the time and asked for a thorough investigation.[45]

Notable Turkish Vendors

- Concept Schools, Inc.: Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and one in Minnesota.[46] The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter. According to MMSA's audit, it paid Concept $326,556 in 2015-2016.[47]

- The Core Group: MMSA listed The Core Group, Inc. as an E-Rate service provider in a 2014 FCC Form 471.[48] According to Media reports, The Core Group is currently under federal investigation as one of the vendors Concept used to defraud the E-Rate program.[49] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[50]

- Advanced Solutions for Education: MMSA listed Advanced Solutions for Education as an E-Rate consultant in a 2014 FCC Form 471.[51] Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated by media reports in the ongoing FBI investigation regarding the defrauding of the E-Rate program.[52]

Additionally, MMSA leases virtually all of its

44 H-1B Visa statistics available at: http://tinyurl.com/khom9ob (last checked 4/28/2017).

45 Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

46 *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

47 MMSA 2015-16 Audit available at: http://tinyurl.com/m9h7rhs (last checked 4/26/2017).

48 MMSA FCC Form 471 (Mar. 25, 2014), available at: http://tinyurl.com/mlrz7s4 (last checked 4/26/2017).

49 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

50 Id.

51 MMSA FCC Form 471 (Mar. 25, 2014), available at: http://tinyurl.com/mlrz7s4 (last checked 4/26/2017).

52 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/

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employees from professional employer organization ("PEO"), MM1, Inc.[53] Based on corporate records, this entity does not appear to be Gülenist.[54] But Concept also provides human resources and employment services to its schools. Since other Gülen charter schools have made multiple vendors for duplicative services, MMSA's relationship with MM1, Inc. should be investigated.[55]

Gülenist Cultural Foundations

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[56] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science Academy of Chicago, a private Gülenist school. Several Concept employees as well as school employees are members of the Niagara Foundation. It maintains a presence in Michigan.[57] It provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[58] For example, the Niagara Foundation sponsored a trip to Turkey for Rochester Hills mayor Bryan Barnett.[59] One trip to Turkey for Michigan educators sponsored by the Niagara Foundation and organized by Serkan Aykan involved research and lessons on Fethullah Gülen.[60]

- Turkish American Federation of Midwest (TAFM): TAFM is a member of the Turkic American Alliance (TAA).[61] The TAA posts articles and op-eds written by Fethullah Gülen.[62] TAFM has four member organizations in Michigan, two of which overlap with the Niagara Foundation: Niagara Foundation Detroit, Niagara Foundation Lansing, Turkish American Society of Michigan, and Bosnian American Great Lakes Society of Friendship and Culture.[63] TAFM provides year-round informational bulletins to members of Congress, sponsors congressional trips to Turkey, and provides a platform for Turkish American activism and advocacy.[64]

- Turkish American Society of Michigan ("TASM"): MMSA received a $26,000 loan from TASM.[65] MMSA board members and employees have served as directors of TASM, including Oguzhan Yildiz and Atilla Guleker.[66] Between May 2, 2013, and November 9, 2015, "Turkish American

jzmzevh (last checked 9/8/2016).

53 See 2012-2013 Audit, available at: http://tinyurl.com/mbmedzr (last checked 4/28/2017).

54 Corporate records are available at: http://tinyurl.com/mb6v5vl (last checked 4/28/2017).

55 See the Arizona State Profile.

56 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

57 Michigan, Niagara Foundation, available at: http://tinyurl.com/m9vobeg (last checked 4/27/2017).

58 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017); Intercultural Reception at Michigan State Capitol, Niagara Foundation (Sep. 18, 2010), available at: http://tinyurl.com/kn794gg (last checked 4/28/20117).

59 John McKay, Rochester Hills Mayor Visits Turkey to Meet with Government Officials, Patch (June 7, 2013), available at: http://tinyurl.com/me7nl53 (last checked 4/28/2017).

60 Trip to Turkey 2012, available at: http://tinyurl.com/m76xp9q (last checked 4/28/2017).

61 Turkic American Alliance, available at: http://tinyurl.com/mm9ko3r (last checked 4/21/2017).

62 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

63 Turkic American Federation of Midwest, available at: http://tinyurl.com/lgz6odt (last checked 4/21/2017).

64 Turkic American Federation of Midwest, available at: http://tinyurl.com/k7occf5 (last checked 4/21/2017).

65 MMSA 2010 Audit, available at: http://tinyurl.com/mbmedzr (MMSA's audits are listed under Oakland Schools for 2010-2012 and Macomb ISD for 2013-2016) (last checked 4/26/2017).

66 Corporate documents for the entities are available at: http://tinyurl.com/kwmos8p (TASM) and http://tinyurl.com/jvq8fee (MMSA) (last checked 4/26/2017).

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Society of Michigan" was an assumed name of the Turkish American Society, Inc ("TASI").[67] TASI is an Illinois entity incorporated by Ahmet Asar, Yuksel Alpaslan, Neldet Conger, Suleyman Uludag, and Mehmet Yorukoglu connected to the Niagara Foundation.[68]

Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, our research indicates that this shuffling only appears to occur with Turkish employees.

- Cafer Cengiz: Employee, Wisconsin Career Academy;[69] Principal. Michigan Math and Science Academy (MI); Principal, Horizon (OH); Principal, Horizon (IL).[70]
- Oguzhan Yildiz: Director, MMSA;[71] Assistant Director, Horizon (OH);[72] Founder, Prospect Foundation, Inc. (KY) – Gülenist cultural association.[73]
- Mustafa Arslan: Supervisor, MMSA;[74] Director/Teacher, Horizon (OH).[75]
- Zafer Alpay: Incorporator TASM;[76] Board Member, Noble/Horizon (OH).[77]
- Yunus Zeytuncu: President, TASM;[78] Board Member, Horizon (OH);[79] currently Professor University of Michigan-Dearborn.[80]

Notable Articles regarding MMSA

- Franz, Norb. *Bomb threats force evacuation at charter school in Center Line*. The Macomb Daily. 19 May 2015. Available at: http://tinyurl.com/z7ab86j (last checked 3/7/2017).
- Kozlowski, Andy. *Michigan Math and Science Academy leaves Hazel Park*. C&G Newspapers. 13 July 2012. Available at: http://tinyurl.com/gtmt6y8 (7 March 2017).

67 Corporate documents are available at: http://tinyurl.com/k6lu945 (last checked 4/26/2017).

68 Illinois corporate records are searchable at: http://tinyurl.com/zallyt7 (last checked 4/28/2017).

69 Employee reports for Wisconsin Career Academy (2001-02) are available at: http://tinyurl.com/lcekw7l (last checked 4/23/2017).

70 Linkedin profile, available at: http://tinyurl.com/l7al9rw (last checked 4/23/2017).

71 Linkedin profile, available at: http://tinyurl.com/mnwvmo5 (last checked 4/23/2017).

72 Horizon Times (Sep. 2011), available at: http://tinyurl.com/kennvrl (last checked 4/28/2017).

73 Kentucky corporate documents are available at: http://tinyurl.com/nx9axf6 (last checked 4/28/2017).

74 MMSA FCC Form 471 (Mar. 25, 2014), available at: http://tinyurl.com/mlrz7s4 (last checked 4/26/2017).

75 Horizon Science Academy of Lorain Annual Report 2009-2010, available at: http://tinyurl.com/jwan98q (last checked 4/28/2017); Mustafa Arslan, Facebook, available at: http://tinyurl.com/mooau3e (last checked 4/28/2017).

76 Corporate documents for the entities are available at: http://tinyurl.com/kwmos8p.

77 Horizon Science Academy, Inc. 990 available at: http://tinyurl.com/n64665d (last checked 4/28/2017); Noble Academy Board of Directors available at: http://tinyurl.com/mb9mhmo (last checked 4/28/2017).

78 Corporate documents for the entities are available at: http://tinyurl.com/kwmos8p.

79 Horizon Science Academy Springfield 990 available at: http://tinyurl.com/mndenma (last checked 4/28/2017).

80 Yunus Zeytuncu, University of Michigan-Dearborn, available at: http://tinyurl.com/lasks5f (last checked 4/28/2017).

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Minnesota



QUICK FACTS ON GÜLEN CHARTER SCHOOLS Minnesota



NUMBER OF SCHOOLS: **1**

KNOWN AS: **MINNESOTA MATH AND SCIENCE ACADEMY "MMSA"**

TOTAL ENROLLMENT: **340**

CHARTER VENDOR: **CONCEPT SCHOOLS, INC.**

TOTAL REVENUES: **$5,192,659**

RELATED INSTITUTIONS:

MATH AND SCIENCE



GATEWAY



HORIZON



NOBLE



KEY PEOPLE:



Ozer Asdemir | Murat Ergen | Gene Scapanski | Ahmet Akyol | Mustafa Igdelioglu

ALLEGED FINANCIAL ABUSE



MMSA's 990 tax documentation and **annual reports** show that the school has operated at a **negative net financial position** since opening.

REAL ESTATE

MMSA leases its facility from **Gülenist landlords**, **New Plan Learning.** A substantial portion of its **revenue** is spent on **sites and buildings**:

in 2014 -15	**$1,166,966 spent**
in 2015- 16	**$1,176,248 spent**

These expenditures far exceed **MMSA's** expenses when it leased facilities from the unaffiliated **Minneapolis Public Schools**.

2013 EVICTION



A court ruled to evict **MSS** from its **Minneapolis Public Schools** property in 2013, citing concerns regarding its financial mismanagement, testing irregularities, and **discriminatory treatment** of special needs students. Earlier, **MSS** had **expelled 40 special needs students** claiming that they brought down their test scores.

SPONSORED TRIPS FOR POLITICIANS



Minnesota Gülenists favored with state politicians by **sponsoring trips to Turkey** for **Kurt Daudt** (Crown), **Sandy Pappas** (St. Paul), **Ron Kresha** (Little Falls), **Ron Latz** (St. Louis Park), **Paul Rosenthal** (Edina,) and **Claire Robling** (Carver).

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Midwest
- School Name (known as):
  - Math and Science Academy
- Total # of Schools in State: 1
- Total Student Enrollment 2015-16: 340[1]
- Charter Holder/Governing Board(s):
  - Minnesota Math and Science Academy
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school
- Charter Management Services Vendor: Concept Schools, Inc. ("Concept")
- Regional Gülen Organization Oversight Entity: Concept
- Regional Sister Networks: Math and Science (IL); Horizon (IL); Math and Science (IN); Math and Science (MI); Horizon (OH); Noble (OH); Gateway (MO); Math and Science (WI).
- Total Revenues for the 2015-16 school year: $5,192,659[2]
- Network Founders:
  - Ozer Asdemir: Founder, Minnesota Math and Science Academy; President, Turkish American Society Minnesota (formerly Northern Lights Society); Speaker, 7th Annual Dialogue Iftar Dinner by Niagara Foundation; Professor, Purdue University; currently Professor, University of St. Thomas.[3]
  - Murat Ergen: Founder, Minnesota School of Science; President, Turkish American Society Minnesota (formerly Northern Lights Society); Marketing Database Analyst, Wells Fargo Home Mortgage; Econometrician, DHSoft Inc.; Corporate Advisor, Snapscreen.com; Chairman of Advisory Board, Algomus Inc.; currently Executive Director, Ergenomics.com.[4]
  - Gene Scapanski: Vice President/Professor, Mission at the University of St. Thomas; Chairman, The LINK; Speaker, Niagara Foundation 4th Annual Dialogue Iftar Dinner.[5]
  - Ahmet Akyol: Wisconsin Career Academy sponsored H-1B visa; Executive Director, Northern Lights Society/Turkish American Society of Minnesota; Founder, Minnesota Math and Science Academy.[6]

1 Student enrollment and demographic information available at: http://tinyurl.com/m86xl5y (last checked 4/26/2017).

2 Figure includes revenues of Minnesota Math and Science Academy, annual report available at: http://tinyurl.com/m86xl5y (last checked 4/26/2017).

3 Turkish American Society of Minnesota 990s available at: http://tinyurl.com/ltuf69h (last checked 4/26/2017); 7th Annual Dialogue Iftar Dinner, Niagara Foundation (July 22, 2011), available at: http://tinyurl.com/n3rlj7r (last checked 4/26/2017); Minnesota School of Science Charter Application, available at: http://tinyurl.com/kqowjgm (last checked 4/26/2017); Linkedin profile, available at: http://tinyurl.com/kyo23a3 (last checked 4/23/2017).

4 Turkish American Society of Minnesota 990s available at: http://tinyurl.com/ltuf69h (last checked 4/26/2017); Linkedin profile, available at: http://tinyurl.com/lmr6uba (last checked 4/23/2017).

5 Minnesota School of Science Charter Application, available at: http://tinyurl.com/kqowjgm (last checked 4/26/2017); 4th Annual Dialogue Iftar Dinner, Niagara Foundation (Aug. 27, 2010), available at: http://tinyurl.com/k5bbdq9 (last checked 4/26/2017).

6 Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017); Minnesota School of Science Charter Application, available at: http://tinyurl.com/kqowjgm (last checked 4/26/2017).

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- Mustafa Igdelioglu: Founder, Minnesota Math and Science Academy; President, Philadelphia Dialogue Forum; President, Turkish American Society of Minnesota (formerly Northern Lights Foundation/Northern Lights Academy); Registered Agent, Turkish American Society, Inc.; currently Engineer, Barr Engineering Co.[7]

Overview

As of the 2016-2017 school year, Minnesota has one Gülen Organization charter school in operation- the Minnesota Math and Science Academy ("MMSA"). This school is overseen by an educational foundation by the same name in operation since 2013. MMSA is the successor to Minnesota School of Science, a prior school that closed in 2013. Although the two entities have not formally merged, MMSA's own fact sheet states that the Minnesota School of Science board of directors opened the new MMSA.[8] MMSA contracts with Concept Schools, Inc., the corporate entity responsible for the Midwestern region of the Gülen Organization charter networks, allegedly for additional educational management services. On average, this school serves 66% English Language Learners vs. 8% state average; 97% free and reduced lunch population vs. 38% state; 3% special education students vs. 15% state; 91% African American students vs. 10.7% state; 1% Caucasian students vs. 68% state; and 2% Hispanic students vs. 9% state. As these numbers indicate, MMSA serves a significant percentage of vulnerable student populations.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Minnesota Math and Science Academy 169 East Jenks Avenue, Saint Paul, MN 55117	K-6 2014 -Present	66% ELL 96% FRL 03% SPED 91% African American 01% Caucasian 02% Hispanic	Pillsbury United Communities	Minnesota Math and Science Academy
Closed Schools				
Minnesota School of Science	*K-8 (starting with K-5 and adding one grade per year) 2011-2013*	*Court ruled school could not receive lease aid since Minneapolis Public Schools served as both authorizer and landlord*	*Minneapolis Public Schools*	*Minnesota School of Science*

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SPED" indicates special education students.9*

[7] Minnesota School of Science Charter Application, available at: http://tinyurl.com/kqowjgm (last checked 4/26/2017); Minnesota Corporate Records, available at: http://tinyurl.com/ltgpo75 (last checked 4/26/2017); Minnesota Corporate Records, available at: http://tinyurl.com/meb359v (last checked 4/26/2017); Mustafa Igdelioglu, Barr Engineering, available at: http://tinyurl.com/mjh2g5e (last checked 4/26/2017).

[8] Fact Sheet, Minnesota Math and Science Academy, available at: http://tinyurl.com/k3g4wum (last checked 4/26/2017).

[9] Student enrollment and demographic information available at: http://tinyurl.com/m7a4q3n (last checked 4//2017).

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A History of Strategic Ambiguity and Conflicting Interests

Minnesota School of Science ("MSS") incorporated in 2004 and opened a school in 2011 under the same name authorized by the Minneapolis school district. Our research indicated that MSS was beset with problems including testing irregularities, insufficient special education services, financial missteps, and problems with Concept.[10] In 2013, MSS asked to switch authorizers, but the district refused to release a school with so many problems to a new authorizer.[11]

After the MSS school closed in 2013, its governing board petitioned Pillsbury, its desired authorizer, to open the Minnesota Math and Science Academy.[12] One year later, Minnesota Math and Science Academy opened under the auspices of Pillsbury United Communities. This move also made it possible for the board to escape Minneapolis Public Schools' suspicions regarding its financial missteps, testing irregularities, and Concept, its management organization.

According to media reports, Concept is currently involved in an ongoing FBI investigation concerning the alleged collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[13] According to the FBI's released search warrant application, Concept executives allegedly violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[14] Concept continues to award substantial business to the vendors under scrutiny and named in the search warrant application.[15]

The Minnesota Gülen schools are implicated in the ongoing investigation due to their business with the entities under suspicion. Before it closed, MSS completed an FCC Form 471 naming Advanced Solutions for Education as an E-Rate consultant and the Core Group, Inc. as an E-Rate service provider.[16] Both companies are suspected to be the primary companies involved with the alleged fraudulent activity under investigation, and the Minnesota network used them for the same services.[17] Additionally, Hasan Kose, the founding director of Minnesota School of Science, became president and CEO of Advanced Solutions for Education upon leaving the school.[18]

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10 Id.

11 Cristeta Boarini, Minnesota School of Science Loses in Court: Out of Cityview, Twin Cities Daily Planet (July 31, 2013), available at: http://tinyurl.com/lutmlso (last checked 4/26/2017).

12 Minnesota Corporate Records, available at: http://tinyurl.com/mm62g2p (last checked 4/26/2017).

13 Dan Mihalopoulos & Jon Seidel, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Dec. 16, 2015), available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

14 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

15 *See* Dan Mihalopoulos, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

16 Minnesota School of Science FCC Form 471 (Mar. 14, 2013), available at: http://tinyurl.com/l8egh2h (last checked 4/26/2017).

17 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

18 Linkedin profile, available at: http://tinyurl.com/l8xo7el (last checked 4/23/2017).

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Financial Abuse

Minnesota requires charter schools like MMSA to undergo annual audits, but the audits are not made publicly available. The audits must be requested from the organizations. This requirement decreases charter school transparency and increases the ability of MMSA to obscure its actions in the state. The files have been requested, but as of the date of this report's publication, have not been provided.

Despite the lack of public information regarding the finances at these schools, the financial issues endemic to all Gülen charter networks—lack of transparency, financial misuse, periodic insolvency, and overpayment to affiliated vendors—can still be shown from the limited record available. Before MSS closed, Minneapolis Public Schools expressed concern about Concept and financial missteps at the school.[19] Furthermore, MMSA's 990 tax documentation and annual reports show that the school has operated at a negative net financial position since opening.[20] MMSA also utilizes the same Gülenist vendors currently being investigated by the FBI for allegedly defrauding the federal E-Rate program. Because MMSA uses the same vendors implicated in the FBI investigation and described by Concept whistleblowers as fraudulent, a forensic accounting, which examines specific payouts to vendors in comparison to goods and services actually received would likely reveal the same pattern of purposeful overcharging and underperformance endemic across the Midwestern region and the Gülen Organization.

Bond Financing

MMSA and Wisconsin Career Academy do not have any known municipal bonds. Concept Schools and its affiliated real estate arm, however, have used bond financing for schools in other states.[21] For that reason, the situation should be monitored in the event that MMSA does apply for bond financing.

Real Estate

One of the most significant profit centers for the Gülen Organization, and in particular the Midwestern region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[22] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[23] Gülenist charter operators throughout the country attended and presented.[24] The scheme is perpetuated by using affiliated Gülenist landlord entities to acquire property and then sell or lease it back to the charter schools at grossly inflated rates. This model allows the Gülen Organization to acquire property which it pays for with public tax dollars, and if the charter

19 Cristeta Boarini, Minnesota School of Science Loses in Court: Out of Cityview, Twin Cities Daily Planet (July 31, 2013), available at: http://tinyurl.com/lutmlso (last checked 4/26/2017).

20 MMSA Annual Reports available at: http://tinyurl.com/k5wf36e (last checked 4/26/2017); tax documentation at: http://tinyurl.com/l8h8b2s (last checked 4/28/2017).

21 See, e.g., the Ohio profile.

22 See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt (last checked 4/28/2017).

23 Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

24 See Texas profile for more information about Alp Aslandogan.

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school is terminated or non-renewed, the publicly financed property remains in the hands of the Gülen Organization.

In the Midwestern region, Concept's founders established Breeze Inc, to acquire properties for Concept Schools throughout the Concept network.[25] New Plan Learning was created shortly thereafter and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.[26] Murat Arabaci, a former Concept employee,[27] has managed New Plan Learning and each of its subsidiaries since 2005.[28] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools. In reality, it follows the Gülen Organization's real estate *modus operandi* by buying properties that it then rents to the schools at egregiously high lease rates.

MMSA leases its facility from 169 Jenks LLC, one of New Plan Learning's subsidiaries managed by Murat Arabaci.[29] New Plan Learning also lists MMSA's facility on its website as one of its assets.[30]

According to MMSA's annual reports, a substantial portion of its revenue is spent on sites and buildings--$1,166,966 in 2014-15 and $1,176,248 in 2015-16.[31] These expenditures far exceed Minnesota School of Science's expenses when it leased facilities from the unaffiliated Minneapolis Public Schools. In its last full year of operation (2012), Minnesota School of Science paid only $331,222 for facilities.[32] Since our research has indicated that other Gülen charter schools have been overcharged by affiliated Gülenist landlords, including New Plan Learning specifically, MMSA's lease deserves further investigation.[33]

Excessive Use of the H-1B Visa Program

Like all Gülen Organization charter networks, Minnesota's Gülen charter schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. In the limited amount of time the Minnesota schools have been open, they have filed at least 10 H-1B visa applications for foreign workers,[34] filling positions such as instructional coordinator, assistant principal, and computer science teacher.

The Minnesota schools have used the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Mustafa Genc. - IMSA used Genc, an Illinois-based attorney, to file numerous H-1B applications. Genc also filed applications for:

[25] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[26] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[27] *See* 2007 Concept 990 with Arabaci listed as employee, available at: http://tinyurl.com/z9y36lh (last checked 9/8/2016).

[28] *See* Business profile for New Plan Learning, Inc., showing its incorporation in 2005 and listing Arabaci as agent, available at: http://tinyurl.com/hu2d6x7 (last checked 9/8/2016).

[29] Minnesota Corporate Records, available at: http://tinyurl.com/n4sbjkm (last checked 4/26/2017).

[30] Our Properties, New Plan Learning, available at: http://tinyurl.com/max7t5m (last checked 4/26/2017).

[31] MMSA Annual Reports available at: http://tinyurl.com/k5wf36e (last checked 4/26/2017).

[32] Expenditures Reports for 2012-2016, available at: http://tinyurl.com/mepe3c5 (last checked 4/26/2017).

[33] See, e.g. the Ohio State Narrative.

[34] The sum total of all of their organizations is 314, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/leshe6r (2); http://tinyurl.com/m4ay4vn (1). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (last checked 1/30/2017).

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- ▻ Concept Schools (OH, IL, MO, IN, MI, MN)
- ▻ Gateway (MO)[35]

Scandals, Investigations & Notable Activities

Before MSS closed, it pushed out forty students with special needs, including students with Down syndrome, autism, and other special needs.[36] One board member stated that the school could not educate these students and still meet its testing goals, a clear contradiction of the school's legal duties under state and federal law and illegal disability discrimination.[37] While at MSS, the special education students were excluded from wearing school uniforms. The school's director, Hasan Kose, stated the special students "were not our students; they were the district's students." He asked: "Why should someone who attending a district wear [the Minnesota School of Science] school uniform just because they are coming to our classroom two to three hours a week."[38] The school's decision suggested it refused to host the students to improve its test scores.[39] In light of this treatment of special education students, coupled with concerns regarding Concept, financial missteps, testing irregularities, and a court ruling evicting the school from Minneapolis Public Schools' property, the school closed in 2013.[40]

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalisms at the time; thus, they asked for a thorough investigation.[41]

Notable Turkish Vendors

- ► Concept Schools, Inc. Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and

35 List of entities represented by Mustafa Genc, available at http://tinyurl.com/ko77hqq (last checked 4/20/2017).

36 Valerie Strauss, Why Are TFA and a California Billionaire Investing in Minnesota School Board Race, Washington Post (Oct. 9, 2014), available at: http://tinyurl.com/nykl36l (last checked 4/26/2017).

37 Education, Minnesota School of Science Will Not Welcome Back Students with Special Needs, HuffPost (Aug. 1, 2012), available at: http://tinyurl.com/mnzobkp (last checked 4/26/2017).

38 Alleen Brown, The Quest to Close the Achievement Gap in North Minneapolis, City Pages (Mar. 5, 2014), available at: http://tinyurl.com/h4qe2tj (last checked 4/26/2017).

39 Education, Minnesota School of Science Will Not Welcome Back Students with Special Needs, HuffPost (Aug. 1, 2012), available at: http://tinyurl.com/mnzobkp (last checked 4/26/2017).

40 Cristeta Boarini, Minnesota School of Science Loses in Court: Out of Cityview, Twin Cities Daily Planet (July 31, 2013), available at: http://tinyurl.com/lutmlso (last checked 4/26/2017).

41 Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

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one in Minnesota.[42] The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter. According to MMSA's tax returns, it has paid Concept $762,369.[43]

- Breeze Inc./New Plan Learning: Breeze, Inc., was created in 2004 to acquire properties for Concept Schools throughout the Concept Network.[44] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.[45] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools. MMSA's facility is listed on the New Plan Learning website.[46]

- The Core Group: Minnesota School of Science listed The Core Group, Inc. as an E-Rate service provider in a 2013 FCC Form 471.[47] The Core Group is currently under federal investigation as one of the vendors Concept used allegedly to defraud the E-Rate program.[48] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[49]

- Advanced Solutions for Education: Minnesota School of Science listed the Advanced Solutions for Education as an E-Rate consultant in a 2014 FCC Form 471.[50] Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the defrauding of the E-Rate program.[51] Additionally, Hasan Kose, the founding director of Minnesota School of Science, became president and CEO of Advanced Solutions for Education upon leaving the school.[52]

Gülenist Cultural Foundations

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[53] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science

42 *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

43 MMSA 990s available at: http://tinyurl.com/kfnsfvr and http://tinyurl.com/mmf6dnq (last checked 4/26/2017).

44 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

45 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

46 Our Properties, New Plan Learning, available at: http://tinyurl.com/max7t5m (last checked 4/26/2017); see also James Warden, Charter School Will Occupy Industrial Building in St. Paul, Finance and Commerce (June 18, 2014), available at: http://tinyurl.com/zezjetv (last checked 3/7/2017) .

47 Minnesota School of Science FCC Form 471 (Mar. 14, 2013), available at: http://tinyurl.com/l8egh2h (last checked 4/26/2017).

48 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

49 Id.

50 Minnesota School of Science FCC Form 471 (Mar. 14, 2013), available at: http://tinyurl.com/l8egh2h (last checked 4/26/2017).

51 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

52 Linkedin profile, available at: http://tinyurl.com/l8xo7el (last checked 4/23/2017).

53 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

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Academy of Chicago, a private Gülenist school. Several Concept employees as well as school employees are members of the Niagara Foundation. It maintains a presence in Minnesota.[54] It provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[55] The Niagara Foundation sponsored trips for Minnesota politicians Kurt Daudt (Crown), Ron Kresha (Little Falls), and Paul Rosenthal (Edina) to Turkey.[56] Minnesota politician Sandy Pappas discussed her trip to Turkey sponsored by the Niagara Foundation at a dinner it co-hosted.[57] She went on that trip with two former legislators, two state senators, and two house members.[58]

- Turkish American Federation of Midwest (TAFM): TAFM is a member of the Turkic American Alliance (TAA).[59] The TAA posts articles and op-eds written by Fethullah Gülen.[60] TAFM has four member organizations in Minnesota, one of which overlaps with the Niagara Foundation: Niagara Foundation of Minnesota, Turkish American Society of Minnesota, and the Turkish American Chamber of Commerce.[61] TAFM provides year-round informational bulletins to members of Congress, sponsors congressional trips to Turkey, and provides a platform for Turkish American activism and advocacy.[62]

- Turkish American Society of Minnesota ("TASM") (formerly: Northern Lights Society/Northern Lights Academy/Northern Lights Society): Many of the founders of Minnesota School of Science have served on the board of the Gülenist cultural association TASM, including Ozer Asdemir, Murat Ergen, Mustafa Igdelioglu, and Ahmet Akyol.[63] It hosts dialogue dinners attended by politicians.[64]

Individuals Caught in the Gülen Organization Web

Our research has shown that it is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Concept. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with these schools' Turkish employees.

- Yasar Bora: Wisconsin Career Academy

54 Minnesota, Niagara Foundation, available at: http://tinyurl.com/m5tmq2l (last checked 4/27/2017).

55 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017); Mark Baldwin, Turkish People Provide the Delight, Turkish American Society Minnesota (July 12, 2014), available at: http://tinyurl.com/ljdpk5o (last checked 4/26/2017).

56 Patrick Condon, Legislator's Trip to Turkey Was Led by Nonprofit with Controversial Ties, Star Tribune (Dec. 5, 2015), available at: http://tinyurl.com/kqgr4mc (last checked 4/26/2017).

57 Stephanie Fox, People of Three Religious Traditions Break Ramadan Fast Together in St. Paul, Daily Planet (Aug. 30, 2010), available at: http://tinyurl.com/mygr48h (last checked 4/26/2017).

58 Id.

59 Turkic American Alliance, available at: http://tinyurl.com/mm9ko3r (last checked 4/21/2017).

60 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

61 Turkic American Federation of Midwest, available at: http://tinyurl.com/lgz6odt (last checked 4/21/2017).

62 Turkic American Federation of Midwest, available at: http://tinyurl.com/k7occf5 (last checked 4/21/2017).

63 Turkish American Society of Minnesota 990s available at: http://tinyurl.com/ltuf69h (last checked 4/26/2017).

64 Fifth Dialogue Iftar Dinner, TASM, available at: http://tinyurl.com/kka9lye (last checked 4/26/2017); Stephanie Fox, People of Three Religious Traditions Break Ramadan Fast Together in St. Paul, Daily Planet (Aug. 30, 2010), available at: http://tinyurl.com/mygr48h (last checked 4/26/2017).

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sponsored H-1B visa;[65] Principal, Wisconsin Career Academy;[66] Superintendent, Minnesota School of Science (Concept, Midwest Region);[67] currently Superintendent, Horizon/Noble (OH).[68]

- Serkan Gunpinar: Board of Directors, MMSA (MN); Director, Sargas Trade Incorporated (FL); President, Sirius Foundation, Inc. (FL); Vice President, New Springs, Inc. (FL).[69]
- Hasan Kose: Founding Director, Noble Academy (OH); Founding Director, Minnesota School of Science (MN); President/CEO, Advanced Solutions for Education (Midwestern region); Director, School Public Relations Concept (Midwest region).[70]
- Murat Oguz: School Director, MMSA (MN);[71] Director, Horizon (OH).[72]
- Mustafa Icel: Director, Minnesota School of Science;[73] School Director, Horizon (OH);[74] currently Dean of Academics, Gateway (MO).[75]

Notable Articles regarding the Minnesota Network

David Montgomery, *MN Lawmakers Among Dozens Nationwide to Visit Turkey on Group's Dime*, Pioneer Press (Feb 9, 2017) (discussing trips to Turkey sponsored by Gülen organizations for Minnesota politicians Kurt Daudt (Crown), Sandy Pappas (St. Paul), Ron Kresha (Little Falls), Ron Latz (St. Louis Park), Paul Rosenthal (Edina), and Claire Robling).[76]

James Warden, *Charter school will occupy industrial building in St. Paul*, Finance and Commerce (June 18, 2014) (discussing facility purchase and renovation involving MMSA and New Plan Learning).[77]

Alleen Brown, *The Quest to Close the Achievement Gap in North Minneapolis*, City Pages (Mar. 5, 2014) (discussing the history, testing irregularities, special education issues, and the history of Minnesota School of Science).[78]

Steve Brandt, *Minnesota School of Science charter school closes*, Star Tribune (Aug. 22, 2013) (discussing closure of Minnesota School

65 Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017).

66 Milwaukee Public Schools, School Selections, available at: http://tinyurl.com/koa4k6b (last checked 4/26/2017).

67 Minnesota School of Science FCC Form 471 (Mar. 14, 2013), available at: http://tinyurl.com/l8egh2h (last checked 4/26/2017).

68 Linkedin profile, available at: http://tinyurl.com/mky7cp8 (last checked 4/23/2017).

69 Information taken from: MMSA 990s, available at: http://tinyurl.com/kz4nkqg (last checked 4/26/2017); Florida Corporate Documents available at: http://tinyurl.com/kem57n4 (last checked 4/26/2017); Florida Corporate Documents available at: http://tinyurl.com/mmj67c7 (last checked 4/26/2017); Linkedin profile, available at: http://tinyurl.com/lvtqxe6 (last checked 4/23/2017).

70 Linkedin profile, available at: http://tinyurl.com/l8xo7el (last checked 4/23/2017).

71 MMSA 990s, available at: http://tinyurl.com/kz4nkqg (last checked 4/26/2017);

72 Linkedin profile, available at: http://tinyurl.com/lpyjn42 (last checked 4/23/2017).

73 Minnesota School of Science 990s available at: http://tinyurl.com/klprfkv (last checked 4/26/2017).

74 The Horizon Times, Horizon (Apr. 10,2012) available at: http://tinyurl.com/klcnxjw (last checked 4/26/2017).

75 School Update, Gateway Science Academy (Sep. 25, 2015), available at: http://tinyurl.com/mg8wruo (last checked 4/26/2017); Mustafa Icel, Facebook, available at: http://tinyurl.com/n35gl3o (last checked 4/26/2017);

76 http://tinyurl.com/hf6g77b (last checked 4/17/2017).

77 http://tinyurl.com/zezjetv (last checked 4/26/2017).

78 http://tinyurl.com/h4qe2tj (last checked 4/26/2017).

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of Science).[79]

Tim Post, *School of Science supporters protest district decision to end lease*, MPR News (June 17, 2013) (discussing Minneapolis Public Schools' suspicions about Minnesota School of Science's test scores).[80] Available at: http://tinyurl.com/jvbdgd8 (7 March 2017).

Cristeta Boarini, *Minnesota School of Science Loses in Court: Out of Cityview*, Twin Cities Daily Planet (July 31, 2013) (discussing the history and difficulties at Minnesota School of Science).[81]

N. Mpls Charter School Closing Amid Allegations, CBS Minnesota (June 17, 2013) (discussing testing irregularities and closure of Minnesota School of Science).[82]

Education, *Minnesota School of Science Will Not Welcome Back Students with Special Needs*, HuffPost (Aug. 1, 2012) (discussing Minnesota School of Science's refusal to host students with special needs).[83]

Stephanie Fox, *People of Three Religious Traditions Break Ramadan Fast Together in St. Paul*, Daily Planet (Aug. 30, 2010) (discussing a dialogue dinner hosted by Gülen cultural organizations attended by local politicians and their trip to Turkey).[84]

79 https://tinyurl.com/lg4gg5y (last checked 4/26/2017).

80 http://tinyurl.com/jvbdgd8 (last checked 4/26/2017).

81 http://tinyurl.com/lutmlso (last checked 4/26/2017).

82 http://tinyurl.com/jgsv9bt (last checked 4/26/2017).

83 http://tinyurl.com/mnzobkp (last checked 4/26/2017).

84 http://tinyurl.com/mygr48h (last checked 4/26/2017).

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Northern Missouri



QUICK FACTS ON GÜLEN CHARTER SCHOOLS NORTHERN MISSOURI



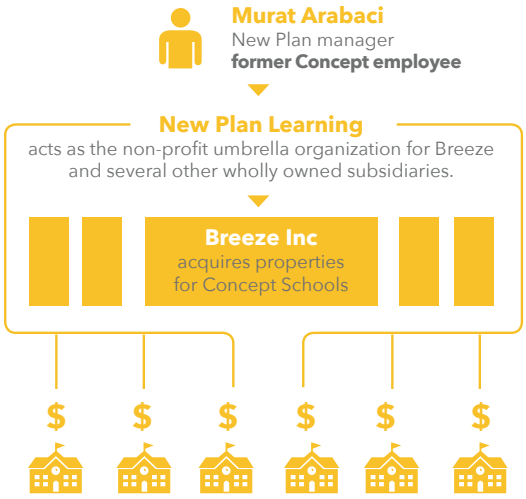
NUMBER OF SCHOOLS	9
KNOWN AS	**Gateway Science Academy, Frontier**
TOTAL ENROLLMENT	**2789**
CHARTER VENDOR	**Concept Schools, Inc.**
TOTAL REVENUES	**$12,538,911**
RELATED INSTITUTIONS	IL Math and Science, Horizon OH Horizon, Noble WI MI MN IN Math and Science WI Career Academy

KEY PEOPLE



Kemal Akkaya Ugur Zengince Emre Celebi Taner Ertekin

REAL ESTATE



NPL buys, renovates, leases, and sometimes sells properties to Concept-managed schools.

New Plan Learning claims it operates as a supporting organization to its Concept school tenants, but in reality, it buys properties that it then rents to the schools at egregiously high lease rates. This model allows the Gülen Organization to acquire property **which it pays for with public tax dollars**.

FINANCIAL ABUSE

A review of annual audits revealed the extensive amounts Gateway paid in rent to **New Plan Learning,** the Gülenist-controlled real estate arm of Concept Schools. Furthermore, the audits also revealed that Gateway's tax-exempt status was in jeopardy due to its repeated failure to file mandatory IRS tax documentation for its first three years of operation.



Because Gateway uses the same vendors implicated in the **FBI investigation** and identified by Concept whistleblowers as fraudulent, a forensic accounting, which examines specific payouts to vendors in comparison to goods and services actually received would likely reveal the same pattern of purposeful overcharging and underperformance endemic across the Midwestern region and the Gülen Organization.



All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Midwestern
- School Names (known as):
  - Gateway Science Academy
  - Frontier
- Total # of Schools in State: 9
  - 4 Gateway Science Academies: Overseen by Concept Schools, and included in Midwestern region
  - 5 Frontier schools: Overseen by Harmony Public Schools, and included in Greater Texas region
- Total Student Enrollment 2015-16: 2789[1]
  - Gateway Science Academies: 1285
  - Frontier schools: 1504
- Charter Holder/Governing Board(s):
  - Gateway Science Academy of St. Louis
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the 4 Gateway Science Academy campuses
  - Frontier Schools, Inc. (formerly Millenium Education Foundation *sic*)
    - Organized as a non-profit 501(c)(3) organization
    - Oversees the 5 Frontier campuses
- Charter Management Services Vendor: Concept Schools, Inc.
- Regional Gülen Organization Oversight Entity: Concept Schools, Inc.
- Regional Sister Networks: Math and Science (IL); Horizon (IL); Horizon (OH); Noble (OH); Math and Science (IN); Math and Science (MN); Math and Science (MI); Math and Science (WI); Career Academy (WI).
- Total Revenues for the 2015-16 school year: $ 12,538,911[2]
- Gateway MO Network Founders:
  - Kemal Akkaya: Incorporator of Gateway Science Academy of St. Louis (MO); Board President of Gateway Science Academy of St. Louis; former board member of MARTI, a Gülenist cultural association in Maryland; led trip to Turkey for fellow professors sponsored by the Niagara Foundation and disclosed that it was openly Gülenist; Professor at Florida International University.[3]
  - Ugur Zengince: Email listed as Representative for Gateway Science Academy charter petition; Principal HSA Cleveland Middle School (OH); Principal HSA Dayton (OH); Featured in OH Whistleblower testimony because of his misuse of federal funding;[4] Provided signature on E-Rate funding form for Concept and The Core Group, one of the vendors under investigation for allegedly defrauding the E-Rate program; Superintendent Concept Schools; Superintendent Triad Math and Science Academy (NC).[5]

1 Student enrollment and demographic information available at: http://tinyurl.com/k6mbw3y (last checked 4/19/2017).

2 Figure represents only the Gateway MO schools, taken from the Gateway Science Academy 2016 audit.

3 Information gathered from Articles of Incorporation, pg 67, available at: http://tinyurl.com/l2elx4y (last checked 4/25/2017); Akkaya bio from Gateway's charter petition, pg 13; Trip summary featuring Akkaya and write-up regarding sponsorship of trip, available at: http://tinyurl.com/lfjlyc6 (last checked 4/25/2017); Bio available at: http://tinyurl.com/kxbr6wv (last checked 4/25/2017).

4 "The first day of school, the principal, Mr. Ugur Zengince – he goes by Mr. Zen. – pulled me into his office and said, 'You can teach English, right? You are going to teach freshman and sophomore English' instead of being a Title I teacher. They still were collecting federal Title I money but had nobody performing Title I services." Testimony available at: http://tinyurl.com/kdamb9a (last checked 4/25/2017).

5 Information gathered from Gateway charter petition, pg 7; E-rate form, available at: http://tinyurl.com/lln2o8s (last

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- Emre Celebi: Incorporator of Gateway Science Academy of St. Louis; Published several academic papers with Y. Alp Aslandogan, Gülen's official spokesperson and Executive Director of Alliance for Shared Values, Harmony (TX) landlord, and major Harmony (TX) vendor; Professor at LSU Shreveport.[6]
- Taner Ertekin: Established Gülenist schools in Thailand and Japan; Co-founder of first Horizon Science Academies; founder of Concept Schools; used HSA Cleveland funds to pay immigration expenses for his wife; founder and president of Breeze, Inc., Concept's preferred Gülenist landlord entity; founder of Chicago Math and Science Academy.[7]

Overview

As of the 2016-2017 school year, Missouri has nine charter schools within the Gülen Organization. Unlike other states, Missouri is split across two regions of the Gülen Organization. Four of the nine charter schools are operated by Gateway Science Academy of St. Louis and are managed by Concept Schools, which classifies them within the Midwestern region. The other five charter schools are operated by Frontier Schools and are managed by Harmony Public Schools (TX), which classifies them within the Greater Texas region of the Gülen Organization.[8] The information in this profile is limited to the Gateway (MO) network.

Concept Schools, Inc. is the charter management organization responsible for the Midwestern region of the Gülen Organization charter network. Concept allegedly provides additional educational management services for the charter schools for a percentage fee of total school revenues. On average, the Concept Gateway MO schools serve 50% free and reduced lunch population vs. 100% district average; 28.3% minority students vs. 88.7% district average; and 71.7% Caucasian students vs. 11.3% district average. As these numbers indicate, the Concept Gateway MO schools do not serve a proportional share of the vulnerable student populations within the city.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Gateway Science Academy of St. Louis-Elementary School Smiley Campus 6576 Smiley Avenue, Saint Louis, MO 63139	Grades K-5 2010-present	1.1% ELL 31.5% FRL 5.7% SWD 17.8% Minority 82.2% Caucasian	Lindenwood University	Gateway Science Academy of St. Louis

checked 4/25/2017); Linkedin profile, available at: http://tinyurl.com/kjcze93 (last checked 4/25/2017).

6 Information taken from Articles of Incorporation, pg 67, available at: http://tinyurl.com/l2elx4y (last checked 4/25/2017); List of three articles by Celebi and Aslandogan, available at: http://tinyurl.com/lysx8v6 (last checked 4/25/2017); see Greater Texas region for more information about Alp Aslandogan; Celebi resume, available at: http://tinyurl.com/mml9lma (last checked 4/25/2017).

7 Information taken from Bond statement at A-23 describing Ertekin's involvement, available at: http://tinyurl.com/keaa5f5 (last checked 4/19/2017); *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders, available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016); 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016); CMSA 990 tax documents listing Ertekin, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

8 For more information about the Frontier (MO) network, please see the Missouri profile in the Greater Texas region.

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Gateway Science Academy of St. Louis-Elementary School South 6651 Gravois Avenue, Saint Louis, MO 63316	Grades K-5 2013-present	9.9% ELL 68% FRL 9.6% SWD 38.7% Minority 61.3% Caucasian		
Gateway Science Academy of St. Louis-Middle School 5049 Fyler Avenue, Saint Louis, MO 63139	Grades 6-8 2010-present	2.5% ELL 45% FRL 3.8% SWD 27.2% Minority 72.8% Caucasian		
Gateway Science Academy of St. Louis-High School 5049 Fyler Avenue, Saint Louis, MO 63139	Grades 9-12 2012-present	3.3% ELL 55.6% FRL 8.6% SWD 29.5% Minority 70.5% Caucasian		

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.*[9]

A History of Strategic Ambiguity and Conflicting Interests

After Gülen relocated to the United States in 1999, his followers promptly formed non-profit educational foundations and filed applications for the first of the Gülen Organization's charter schools throughout the country. Some of the earliest charter school efforts by the Gülen Organization took place in the Midwestern region orchestrated by a tight-knit group of Turkish businessmen, led predominantly by Taner Ertekin and Vedat Akgun. After forming the first of the Horizon Science Academies in Ohio, these Gülenists formed Concept Schools to serve as an external charter management organization that would oversee the charter schools they opened throughout the Midwestern region.[10]

Concept's efforts to expand into Missouri began in 2006, when the Gateway Science Academy of St. Louis formed as a non-profit organization, led by a founding board of Kemal Akkaya, Mehmet Kahveci, and Emre Celebi. All three were graduate students at the time of forming the foundation, which from our research appears to be typical of most founding governing boards for Gülen Organization charter schools. Akkaya lived and worked in Carbondale, IL, two hours away from St. Louis; Celebi lived and attended university in Rolla, MO, also two hours away; and Kahveci lived and attended university four hours away at the time. Kahveci eventually moved to Columbia, MO, still two hours away. Two years after they formed the foundation in 2008, Akkaya and Kahveci submitted a charter petition to the Missouri Science and Technology University, which was unsuccessful. In 2009, they submitted the charter petition again, this time to Lindenwood University, which approved them to open the first campus for the 2010-11

[9] Student enrollment and demographic information available at: http://tinyurl.com/k6mbw3y (last checked 4/19/2017).

[10] Concept Schools NFP corporate information, available at: http://tinyurl.com/zallyt7 (last checked 4/20/2017).

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school year.[11] During the entirety of their time on the Gateway board, Akkaya and Kahveci lived over two hours away from St. Louis.[12] During this time, Akkaya led a trip paid for by the Niagara Foundation to Turkey for several of his colleagues at the Southern University of Illinois, which they documented extensively and noted that it was paid for by the Gülen Movement.[13]

Gateway expanded with its additional campuses in 2012 for the middle and high school, and in 2013 for the Gateway South campus. Concept has been Gateway's charter management organization since it submitted its first application in 2008.

According to media reports, Concept's most serious controversy to date is the ongoing FBI investigation concerning the alleged collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[14] According to the released FBI's search warrant application, Concept executives violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[15] In 2014, FBI agents raided numerous locations throughout Illinois and Ohio, including Concept-managed schools, Concept's regional offices, and the offices of several Gülenist vendors. Former Concept executive Ozgur Balsoy was one of the purportedly fraudulently enriched Turkish vendors who was raided.[16] According to the same media reports, While Balsoy and his business remains under suspicion in the FBI investigation, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[17] In fact, Gateway Science Academy uses Balsoy's business to provide services, as well.[18] The investigation is ongoing.

Mustafa Emanet, a former H-1B employee and Gülenist, provided interviews to the FBI regarding his work as a network administrator and teacher at a Concept-managed school in Ohio. He corroborated that Concept purposefully used related service providers who overcharged, just as he said all of the charter networks did throughout the Gülen Organization.[19] Since his cooperation with the FBI, Emanent and his wife, who was also employed with Concept, Mary Addi, have come forward and provided information regarding the forced tuzuk payments and tithing to the Gülen Organization required of Turkish H-1B employees.[20] Emanet also produced a copy of the tuzuk agreement itself, which is attached to this report as Appendix I.

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11 Information available at Lindenwood University's charter website, available at: http://tinyurl.com/lymkxbk (last checked 4/25/2017) as well as from Gateway's initial charter petition.

12 See Akkaya's resume, available at: http://tinyurl.com/kxbr6wv (last checked 4/25/2017).

13 Trip summary featuring Akkaya and write-up regarding sponsorship of trip, available at: http://tinyurl.com/lfjlyc6 (last checked 4/25/2017).

14 Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

15 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

16 *See id.; see also* Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

17 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

18 ASE provides day-camp services at Gateway, available at: http://tinyurl.com/lh4bpc5 (last checked 4/25/2017).

19 Search Warrant application, pg 44, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

20 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

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Financial Abuse

Missouri requires its charter schools to undergo annual audits. A review of these audits revealed the extensive amounts Gateway paid in rent to New Plan Learning, the Gülenist-controlled real estate arm of Concept Schools. Gateway's property arrangements are discussed in more detail in the *Real Estate* section below. Furthermore, the audits also revealed that Gateway's tax-exempt status was in jeopardy due to its repeated failure to file mandatory IRS tax documentation for its first three years of operation.[21]

While the Gateway MO audits are overall much cleaner than its sister networks within the Gülen Organization, Gateway utilizes the same Gülenist vendors currently being investigated by the FBI for defrauding the federal E-Rate program. Because Gateway uses the same vendors implicated in the FBI investigation and identified by Concept whistleblowers as fraudulent, a forensic accounting, which examines specific payouts to vendors in comparison to goods and services actually received would likely reveal the same pattern of purposeful overcharging and underperformance endemic across the Midwestern region and the Gülen Organization.

Real Estate

One of the most significant profit centers for the Gülen Organization, and in particular the Midwestern region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[22] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[23] Gülenists throughout the country attended and presented, including Alp Aslandogan, former Harmony Public Schools landlord, CEO of one Harmony's largest vendors, property buyer from Dove Science Academy, and Gülen's official spokesperson in his role as President of the Alliance for Shared Values, a Gülenist cultural organization.[24]

Early on, the founders of the Midwestern region established Breeze Inc. to acquire properties for Concept Schools throughout the Concept network.[25] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.[26] Murat Arabaci, a former Concept employee,[27] has managed New Plan Learning and each of its subsidiaries since 2005.[28] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools. New Plan Learning claims it operates as a supporting organization to its Concept school tenants, but in reality, it buys properties that it then rents to the schools at egregiously high lease rates. This model allows the Gülen Organization to acquire

21 Gateway Science Academy 2012 audit.

22 See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt.

23 Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

24 See Texas profile for more information about Alp Aslandogan.

25 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

26 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

27 *See* 2007 Concept 990 with Arabaci listed as employee, available at: http://tinyurl.com/z9y36lh (last checked 9/8/2016).

28 *See* Business profile for New Plan Learning, Inc., showing its incorporation in 2005 and listing Arabaci as agent, available at: http://tinyurl.com/hu2d6x7 (last checked 9/8/2016).

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property which it pays for with public tax dollars, and if the charter school is terminated or non-renewed, the publicly financed property remains in the hands of the Gülen Organization.

Currently, New Plan Learning owns the Gateway South building under its subsidiary 6651 Gravois LLC. New Plan Learning purchased the building in 2012 for $1.2 million. In May of 2013, the Gateway governing board entered into a fifteen-year lease with New Plan Learning. Per the terms of the lease, Gateway is also responsible for all costs associated with the use, maintenance, financing, or repair of the property and all utilities, insurance, periodic capital replacement reserve amounts and management fees. The base rent started at $32,800 per month, which increases each year of the lease. From the lease's inception in August of 2013 projected through to July 31, 2017, New Plan Learning will have collected $1.6 million in rent for the building,[29] $400,000 more than the price it paid. By 2028, when the lease term ends, Gateway will have paid New Plan Learning over $6.7 million dollars in rent.[30]

In contrast to the $33,000+ rent per month Gateway pays New Plan Learning for the Gateway South facility, Gateway pays only $10,000-$11,000 per month in rent for the Gateway Smiley campus.[31] While Gateway will pay $6.7 million in rent to New Plan Learning from 2015-28, Gateway will pay only $1.8 million for the Gateway Smiley campus over the same period, nearly four times' less.[32] Based on our interpretation of the evidence, the rationale for this extreme discrepancy is clear; Gateway rents the Smiley campus from an actual non-profit organization that is unaffiliated with the Gülen Organization and is not seeking to exploit its public resources.[33]

Gateway owns the Gateway Middle/High campus in its own name, having purchased it in 2013 from an unaffiliated third party for $795,000.[34] Thus, according to Gateway's proposed 2016 budget, approximately 72% of the funds it allocated for property leases and payments went to pay for only one of its three campuses, the one owned by New Plan Learning.[35]

Egregious rents far above the purchase price are not the only means that New Plan Learning, Concept, and the Gülen Organization extract public funds in real estate. Hiring Gülenist affiliated contractors who routinely overcharge and underperform is another critical moneymaker for the Gülen Organization. Just as it had throughout Ohio and Illinois, New Plan Learning hired Quality Builders of Midwest, the preferred Gülenist contractor for the Midwestern region, for a million dollar renovation of the Gateway South building at the school's additional expense.[36]

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29 Figures (actual rent paid 2013-14, 2014-15, 2015-16, and projected rent for 2016-17 as this audit has not been conducted as of the writing of this report) taken from New Plan Learning's financial reports, available at: http://tinyurl.com/m6xmpc8 , http://tinyurl.com/kradwj6 , http://tinyurl.com/l22szpv , and http://tinyurl.com/lz9lqze (last checked 4/25/2017).

30 Gateway Science Academy 2016 audit projections, pg 14.

31 Gateway Science Academy 2012 Audit, pg. 11.

32 The Gateway Smiley rent projections are based off of those contained in the Gateway Science Academy 2016 audit projections, pg 14.

33 Gateway Science Academy 2012 Audit, pg. 11.

34 See sale price, available at: http://tinyurl.com/mtnbhdc; purchase details at: http://tinyurl.com/he9gru6 (last checked 4/25/2017).

35 Budget, pg 112, available at: http://tinyurl.com/l2elx4y (last checked 4/25/2017).

36 Project details, available at: http://tinyurl.com/mpml25u (last checked 4/25/2017). For a list of other projects Quality Builders has performed for Concept-managed schools, see: http://tinyurl.com/kmbj878 (last checked 4/25/2017).

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Bond Financing

In 2011 New Plan Learning expanded its capital significantly by applying for a bond for approximately $33 million dollars to purchase, refinance, and/or renovate four Concept schools, CMSA and three Concept OH schools--HSA Dayton HS, HSA Toledo HS, and HSA Springfield.[37] Due to their inclusion in the bond, these schools are now subject to extremely high annual rents in non-cancelable leases set to expire in 2041.[38] The bond was issued by the Industrial Development Authority of the County of Pima, Arizona, the same organization that issued bonds for both the Sonoran (AZ) and Coral (NV) Gülen Organization charter networks.[39] New Plan Learning has not implicated any of the Gateway MO schools directly in a bond to date, but the rental income from Gateway MO is reported as part of the New Plan Learning's assets to justify the bond financing.

Abuse of the H-1B Visa Program

Like all Gülen Organization charter networks, Concept and their MO schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Concept Gateway network filed 30 H-1B applications from 2001-2016, while Concept itself filed 176 H-1B applications during the same time period.[40] While the Gülen Organization typically states that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: physical education teachers, school business managers, administrators, and school librarians.

Concept and Gateway MO use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen: Concept and Gateway MO used Kulen, a New York-based attorney, to file numerous H-1B applications.[41] Kulen also filed applications for:
  - Concept Schools (OH, IL, IN, MI, MN)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)

- Mustafa Genc: Gateway MO used Genc, an Illinois-based attorney, to file numerous H-1B applications.[42] Genc also filed applications for:
  - Concept Schools
  - Horizon (OH)
  - Noble (OH)
  - Math and Science (IL)
  - Math and Science (IN)

- David Nachman: Concept used Nachman, a New Jersey-based attorney, to file H-1B

[37] New Plan Learning, Inc. 2011A Bond Official Statement, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[38] *Id.*

[39] Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

[40] Gateway MO schools filed 30 H-1B applications from 2001-2016, available at: http://tinyurl.com/mhmefs9 (last checked 4/24/2017). Concept filed 176 H-1B applications 2001-2016. *See* http://tinyurl.com/j3whatt for Concept Schools, Inc.; http://tinyurl.com/zhgx3xl for Concept Schools Nfp.

[41] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 3/21/2017).

[42] List of entities represented by Mustafa Genc, available at http://tinyurl.com/ko77hqq (last checked 4/24/2017).

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applications.[43] Nachman also filed H-1B applications for:

- ▷ MilkyWay Education Center (NJ)
- ▷ Paterson Charter School for Science and Technology (NJ)

- ► Nuzhat Hafeez: Concept MO schools used Hafeez, an Illinois-based attorney, to file numerous H-1B applications.[44] Hafeez also filed H-1B applications for:
  - ▷ Concept Schools, Inc.
  - ▷ Niagara Educational Services, Inc. (IL)
  - ▷ Niagara Foundation (IL)
  - ▷ The Core Group (IL)

Notable Turkish Vendors

- ► Concept Schools, Inc. Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a ten percent fee of each school's total revenues.[45] Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and one in Minnesota.[46] The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter.

- ► Breeze Inc./New Plan Learning: Breeze, Inc., was created in 2004 as a for-profit corporation to acquire properties for Concept Schools throughout the Concept Network.[47] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries, including 6651 Gravois LLC, the owner of the Gateway South property.[48] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

- ► Quality Builders of Midwest: Quality Builders is a construction company that does the majority of Concept and NPL's construction work.[49] Several of Quality Builders' Gülenist employees have worked at Concept and its schools, as well as at other charter networks throughout the Gülen Organization. Quality Builders was hired by New Plan Learning to do a million dollar renovation on the Gateway South property.

- ► Advanced Solutions for Education: Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the defrauding

[43] Nachman profile listing entities represented for H-1B visa work, available at http://tinyurl.com/ny5h3ty (last checked 4/13/2017).

[44] Hafeez profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/mvnttav (last checked 4/13/2017).

[45] Gateway Science Academy 2012 audit, pg. 12.

[46] *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

[47] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[48] New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[49] See project information, available at http://tinyurl.com/zwzkxy2 (last checked 11/11/2016).

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of the E-Rate program.[50] The company served as an E-Rate funding consultant to the schools and also provides services to the Gateway MO network.[51]

Gülenist Cultural Foundations

- Turkish American Society of Missouri: Gülenist cultural association that works in St. Louis alongside the Niagara Foundation to lobby political leaders, host dialog dinners, and sponsor trips to Turkey.[52]

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago (IL). Gülen is its honorary president.[53] Niagara Educational Services, Inc., oversees the Niagara Foundation, the Science Academy of Chicago, a private Gülenist school, and is very active throughout the Midwestern region. For example, in 2007, the Niagara Foundation gave an extensive loan to Breeze Inc. (New Plan Learning's predecessor) to purchase new properties for Concept charter schools.[54] Several Concept employees as well as school employees are members of the Niagara Foundation. Niagara provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[55] In Missouri, Niagara assisted the Turkish American Society of Missouri in hosting a dialog dinner for the state legislature.[56]

Individuals Caught in the Gülen Organization Web

Our research indicates that it is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Engin Karatas, a.k.a. Engin Blackstone: Co-founded Chicago Math and Science Academy; Assistant Principal HSA Denison Middle; Teacher, HSA Cleveland Middle (Same year as he was a principal at HSA Toledo); Principal HSA Toledo; Principal Quest Charter Academy; Assistant Principal Wisconsin Career Academy; visited Fethullah Gülen at the Golden Generation Retreat Center with Concept whistleblower Mustafa Emanet; Superintendent Gateway Science Academy (MO).[57]

50 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

51 ASE provides day-camp services at Gateway, available at: http://tinyurl.com/lh4bpc5 (last checked 4/25/2017).

52 See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: http://tinyurl.com/l28269f (last checked 4/25/2017).

53 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

54 Audit available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

55 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017).

56 See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: http://tinyurl.com/l28269f (last checked 4/25/2017).

57 Information taken from an interview with Engin Blackstone, available at: http://tinyurl.com/mw9bey6 (last checked 4/23/2017); 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017); Linkedin profile, available at: http://tinyurl.com/lylm33o (last checked 4/25/2017); and state employee salary search, available at: http://tinyurl.com/kzp43af (last checked 4/27/2017) (searching both "Engin Karatas" and "Engin Blackstone").

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- Nuh Celik: Substitute teacher, HSA schools (OH); Teacher, HSA Springfield (OH); Director HSA Denison (OH); Principal Gateway Smiley campus (MO).[58]
- Murat Sagnak: Substitute teacher, HSA Cleveland (OH); Principal, HSA Denison Middle (OH); Principal HSA Dayton Downtown (OH); Principal, Gateway Middle/High (MO).[59]
- Cenk Kandemir: Substitute teacher, HSA Toledo (OH); Teacher, HSA Cleveland (OH); Principal, HSA Cleveland Middle (OH); Principal, Science Academy of Chicago (IL); Principal, Gateway Middle/High (MO).[60]
- Cengiz Karatas: Substitute teacher, HSA (OH); Principal, HSA Cleveland (OH); Founding Principal, Gateway Science Academy-Smiley (MO); Director of Concept Educational Programs; Director of Concept Alumni Network.[61]

Notable Articles regarding the Missouri Network

- Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh.
- Mihalopoulos, Dan. *Federal funds for clout school operator despite probe*. Chicago Sun-Times. (May 7, 2016) Available at: http://tinyurl.com/jmy8web.
- Crouch, Elisa. *St. Louis Public Schools tries to shed vacant buildings*. St. Louis Post-Dispatch. 17 April 2015. Available at: http://tinyurl.com/zk83ux8 (1 March 2017).
- Mihalopoulos, Dan and Seidel, Jon. *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad.
- *SLPS sells Gardenville School to Concept Schools for $1.2M*. The St. Louis American. 16 August 2012. Available at: http://tinyurl.com/js98995 (1 March 2017).
- Cambria, Nancy. *Charter school finalizes purchase of vacant St. Louis school*. St. Louis Post-Dispatch. 24 July 2012. Available at: http://tinyurl.com/j4czbj4 (1 March 2017).
- Crouch, Elisa. *Slay defends role as recruiter of charter schools for city*. 25 April 2011. Available at: http://tinyurl.com/zaz8n9y (1 March 2017).
- Clubb, Shawn. *Parishioners say goodbye to St. Pius V school*. St. Louis Post-Dispatch. 5 December 2008. Available at: http://tinyurl.com/zo6owfw (1 March 2017).

[58] Information taken from educator credentials search OH, available at: http://tinyurl.com/j7bxyhk (last checked 4/27/2017); Concept newsletter 2011, available at: http://tinyurl.com/jwbsmzt (last checked 4/27/2017); Missouri Department of Education School Directory, available at: http://tinyurl.com/n7st5jg.

[59] Information taken from educator credentials search OH, available at: http://tinyurl.com/j7bxyhk (last checked 4/27/2017); Missouri Department of Education School Directory, available at: http://tinyurl.com/n7st5jg.

[60] Information taken from Educator credentials search OH, available at: http://tinyurl.com/j7bxyhk (last checked 4/27/2017); state employee search, available at: http://tinyurl.com/kzp43af (last checked 4/27/2017); 2013 Missouri department of education directory, available at: http://tinyurl.com/kw997d5 (last checked 4/27/2017); Linkedin profile, available at: http://tinyurl.com/m2v28zc (last checked 4/27/2017).

[61] Information taken from Educator credentials search OH, available at: http://tinyurl.com/j7bxyhk (last checked 4/27/2017); and Linkedin profile, available at: http://tinyurl.com/mzvncps (last checked 4/27/2017).

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Ohio



QUICK FACTS ON GÜLEN CHARTER SCHOOLS OHIO



NUMBER OF SCHOOLS **17**

KNOWN AS **— HORIZON SCIENCE ACADEMY — NOBLE ACADEMY**

TOTAL ENROLLMENT **6,334**

CHARTER VENDOR **CONCEPT SCHOOLS, INC.**

TOTAL REVENUES **$50,226,432**

RELATED INSTITUTIONS **Math and Science**



Horizon



Gateway



KEY PEOPLE



Taner Ertekin

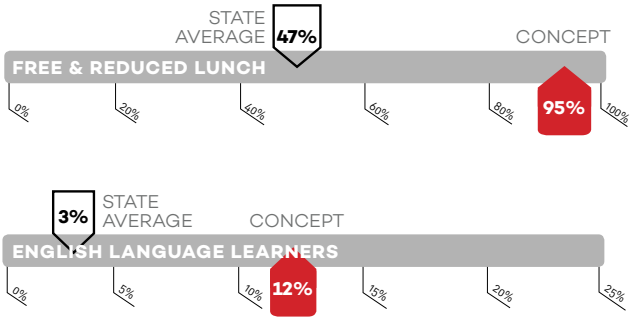


Vedat Akgun



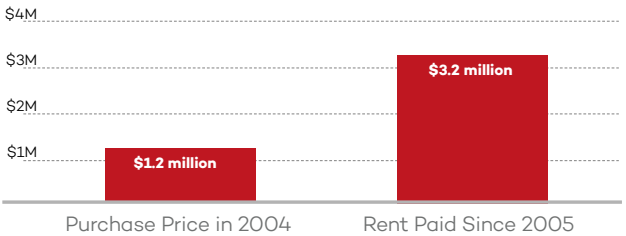
Sedat Duman

VULNERABLE STUDENT POPULATIONS



REAL ESTATE COSTS

Rent paid by HSA Cincinnati to Breeze since 2005, **three times the original purchase price** of the school.



ADDITIONAL FIGURES

833

H-1B VISA APPLICATIONS 2001-2016

$27.3 MILLION

MISPENT BY OHIO CHARTER SCHOOLS SINCE 2001

Source: Akron Beacon Journal

BOARD MEMBER POSITIONS

OUT OF 85 TOTAL BOARD POSITIONS

JUST 38 PEOPLE SERVE

with some sitting on up to 4 Concept school boards at once

All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Midwestern
- School Names (known as):
  - Horizon Science Academy
  - Noble Academy
- Total # of Schools in State: 17
- Total Student Enrollment 2015-16: 6,334[1]
- Charter Holder/Governing Board(s): Each Concept-managed charter school in Ohio has its own non-profit governing board of directors. These governing boards are organized as 501(c)(3) non-profit organizations, with many of the board members serving on multiple Concept-controlled charter schools within OH.
- Charter Management Services Vendor: Concept Schools, Inc.
- Regional Gülen Organization Oversight Entity: Concept Schools, Inc.
- Regional Sister Networks: Math and Science (IL); Horizon (IL); Math and Science (IN); Math and Science (MN); Math and Science (MI); Gateway (MO); Math and Science (WI).
- Total Revenues for the 2015-16 school year: $50,226,432[2]
- Network Founders:
  - Taner Ertekin: Established Gülenist schools in Thailand and Japan;[3] Co-founder of first Horizon Science Academies; founder of Concept Schools;[4] used HSA Cleveland funds to pay immigration expenses for his wife;[5] founder and president of Breeze, Inc., Concept's preferred Gülenist landlord entity;[6] founder of Chicago Math and Science Academy.[7]
  - Vedat Akgun: Co-founder of first Horizon Science Academies;[8] Co-Founder of Attempted Indiana Life Sciences Academy;[9] Founder of Concept Schools;[10] Co-founder of Breeze, Inc. and New Plan Learning, alongside Ertekin;[11] Fulton Science (GA) board member;[12] CEO of Charter Housing Corporation (GA);[13] CFO of

1 Student enrollment and demographic information available at: http://tinyurl.com/m6yjq9s (last checked 4/19/2017).

2 Figure includes revenues from OH HSA and Noble audits, available at: http://tinyurl.com/lw7mjph and for those schools without 2015-16 audits, the state revenues only, available at: http://tinyurl.com/jvlfrn7 (last checked 4/19/2017).

3 Bond statement at A-23 describing Ertekin's involvement, available at: http://tinyurl.com/keaa5f5 (last checked 4/19/2017).

4 Id.

5 *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders, available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016).

6 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

7 CMSA 990 tax documents listing Ertekin, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

8 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

9 Corporation registration information available at: http://tinyurl.com/kjr6lu4 (last checked 4/19/2017).

10 New Plan Learning, Inc. 2011A Bond Official Statement pg A-32, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

11 2007 Breeze Inc. 990 form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

12 2012 990 tax return, showing Akgun as a board member, available at: http://tinyurl.com/lv8ssnk (last checked 4/19/2017).

13 Georgia Secretary of State business search for Officer Vedat Akgun, available at: http://tinyurl.com/pa73vlw (last checked 4/19/2017).

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Global Spectrum Foundation, Inc, D.B.A. Istanbul Center (GA);[14] Board member of Fulton Science Private School (GA);[15] President of the Turkic American Federation of Southeast (GA).[16]

- Sedat Duman: Founder of Horizon Science Academies;[17] Co-Founder of Concept Schools, Inc.;[18] CEO of Concept Schools, Inc;[19] Currently being investigated by the FBI for his role in certifying suspect forms to procure E-Rate funding.[20]
- Salim Ucan: Teacher HSA Cleveland;[21] Principal Science Academy of Chicago, private Gülenist school run by the Niagara Foundation;[22] Founding Principal Chicago Math and Science;[23] Co-Founder of Concept Schools, Inc.;[24] Founding board member for Breeze Inc., for-profit Gülenist landlord for Concept Schools;[25] Vice President of Concept Schools, Inc.;[26] currently Professional Development coach for Concept.[27]
- Ozgur Balsoy: Horizon Science Academy Superintendent;[28] Incorporator of Concept Schools, Ohio;[29] Owner of Advanced Solutions for Education - Gülenist vendor;[30] member of the Scioto Foundation – Gülenist cultural association; Currently being investigated by FBI due to suspect use of E-Rate funds and engaging in purportedly illegal kickbacks;[31] Owner of Euclid Properties (OH) – Noble Academy landlord.[32]

Overview

As of the 2016-2017 school year, Ohio has 17 Gülen Organization charter schools in operation. Each of these schools is overseen by its own non-profit governing board, and all 17 schools contract with Concept Schools, Inc., the charter management organization responsible for the Midwestern region of the Gülen Organization charter network. Concept allegedly provides additional educational management services for the charter schools for a percentage fee of total

14 Id.

15 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

16 Linkedin profile, available at: http://tinyurl.com/kamscfk (last checked 4/19/2017).

17 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

18 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

19 CEO's welcome, available at: http://tinyurl.com/k2ybgnm (last checked 4/20/2017).

20 Search warrant, pg 22, available at: http://tinyurl.com/jt9j4ed (last checked 4/20/2017).

21 Resume pg 78, available at: http://tinyurl.com/mej56l8 (last checked 4/23/2017).

22 Id.

23 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

24 See Concept Schools, Our Story narrative, available at: http://tinyurl.com/z6s23yh (last checked 9/6/2016).

25 Breeze Articles of Incorporation, available at: http://tinyurl.com/mlc5jc4 (last checked 4/20/2017).

26 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

27 Linkedin profile, available at: http://tinyurl.com/lt6se6n (last checked 4/19/2017).

28 Listing of superintendents, available at: http://tinyurl.com/kggtysh (last checked 4/19/2017).

29 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

30 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

31 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

32 Business Search Ohio Secretary of State for Ozgur Balsoy, available at: http://tinyurl.com/lphhlyp (last checked 4/19/2017).

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school revenues. On average, the Concept OH schools serve 11.7% English Language Learners vs. 2.9% state average; 95.4% free and reduced lunch population vs. 46.9% state average; 10.1% students with disabilities vs. 14.3% state average; 84.7% minority students vs. 26% state average; and 15.9% Caucasian students vs. 74% state average. As these numbers indicate, the Concept OH schools serve large percentages of vulnerable student populations in predominantly urban areas.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
HSA Cincinnati 1055 Laidlaw Ave., Cincinnati, OH 45237	K-8 2005-Present	4.1% ELL 99.3% FRL 10.6% SWD 97.4% Minority 2.6% Caucasian	ESC of Lake Erie West	Horizon Science Academy Cincinnati
HSA Cleveland HS 6000 S Marginal Rd. Cleveland, OH, 44103	Grades 9-12 2000-Present	2.8% ELL 85.9% FRL 9.2% SWD 94.6% Minority 5.4% Caucasian	ESC of Lake Erie West	Horizon Educational Services, Inc.
HSA Cleveland MS 6100 S Marginal Rd. Cleveland, OH, 44103	K-8 2005-Present	5.1% ELL 80% FRL 9.4% SWD 97.7% Minority 2.3% Caucasian	ESC of Lake Erie West	Horizon Science Academy Cleveland Middle School
HSA Columbus HS 1070 Morse Rd., Columbus, OH 43229	Grades 9-12 2000-Present	14.3% ELL 99.8% FRL 7.5% SWD 93.6% Minority 6.4% Caucasian	ESC of Lake Erie West	Horizon Science Academy Inc.
HSA Columbus MS 2350 Morse Rd. Columbus, OH 43229	Grades 6-8 2008-Present	10% ELL 99.8% FRL 7.4% SWD 94.5% Minority 5.5% Caucasian	Buckeye Community Hope Foundation	Horizon Educational Services of Columbus, Inc.
HSA Columbus ES 2835 Morse Rd. Columbus, OH 43231	K-5 2009-Present	40.3% ELL 100% FRL 7.8% SWD 97.8% Minority 2.3% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Elementary School
HSA Dayton HS 250 Shoup Mill Rd. Dayton, OH 45415	Grades 6-12 2010-Present	14.3% ELL 99.7% FRL 14.4% SWD 82.8% Minority 17.2% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Dayton High School
HSA Dayton ES 4751 Sue Ann Blvd. Dayton, OH 45415	K-5 2005-Present	9% ELL 100% FRL 16% SWD 88.7% Minority 11.3% Caucasian	ESC of Lake Erie West	Horizon Science Academy Dayton

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
HSA Dayton Downtown 121 S Monmouth St Dayton, OH 45403	K-8 2011-Present	25.3% ELL 100% FRL 13.1% SWD 30.2% Minority 69.8% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Dayton Downtown Inc.
HSA Denison MS 1700 Denison Ave. Cleveland, OH 44109	K-8 2005-Present	14% ELL 100% FRL 9.9% SWD 85.8% Minority 14.2% Caucasian	ESC of Lake Erie West	Horizon Science Academy Denison
HSA Denison ES 2261 Columbus Road. Cleveland, OH 44113	K-5 2009-Present	16.2% ELL 100% FRL 14.9% SWD 86.1% Minority 13.9% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Denison Elementary
HSA Lorain 760 Tower Blvd. Lorain, OH 44052	K-12 2010-present	9.5% ELL 89.1% FRL 11.7% SWD 71.6% Minority 28.4% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Lorain
HSA Springfield 630 S. Reynolds Rd. Toledo OH, 43615	K-8 2005-Present	0.8% ELL 99.9% FRL 12.6% SWD 84.8% Minority 15.2% Caucasian	ESC of Lake Erie West	Horizon Science Academy Springfield
HSA Toledo 2600 W. Sylvania Ave. Toledo, OH 43613	K-12 2005-Present	4.6% ELL 99.9% FRL 14.6% SWD 81.6% Minority 18.4% Caucasian	ESC of Lake Erie West	Horizon Science Academy Toledo
HSA Youngstown 3403 Southern Blvd Youngstown, OH 44507	K-8 2011-Present	5.2% ELL 100% FRL 10.7% SWD 92.8% Minority 17.2% Caucasian	Buckeye Community Hope Foundation	Horizon Science Academy Youngstown Inc.
Noble Academy Cleveland 1200 E 200 St. Euclid, OH 44117	K-8 2007-present	0.21% ELL 80.1% FRL 6.8% SWD 97.3% Minority 2.7% Caucasian	Buckeye Community Hope Foundation	Noble Academy Cleveland Inc.
Noble Academy Columbus 1329 Bethel Road Columbus, OH 43220 PN: 010-251649-00	K-8 2007-present	22.5% ELL 87.8% FRL 5.3% SWD 62.4% Minority 37.6% Caucasian	Buckeye Community Hope Foundation	Noble Academy Columbus Inc.

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.33*

[33] Student enrollment and demographic information available at: http://tinyurl.com/m6yjq9s (last checked 4/19/2017).

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A History of Strategic Ambiguity and Conflicting Interests

After Gülen relocated to the United States in 1999, his followers promptly formed non-profit educational foundations and filed applications for the first of the Gülen Organization's charter schools throughout the country. Some of the earliest charter school efforts by the Gülen Organization took place in Ohio orchestrated by a tight-knit group of Turkish businessmen, led predominantly by Taner Ertekin and Vedat Akgun. In 2000, these Gülenists opened the first of the Horizon Science Academies in Ohio, HSA Columbus HS and HSA Cleveland HS. In 2002, Ertekin and Akgun formed Concept Schools to serve as an external charter management organization that would oversee the charter schools they opened in Ohio and throughout the Midwestern region.[34] Then, in 2003, Ertekin and Akgun followed up by forming Breeze Inc., a for-profit corporation to serve as the Concept OH schools' landlord.[35] Within four years, Ertekin and Akgun and their Gülenist colleagues created a vertically integrated chain of businesses and vendors, all feeding upon a captive customer base of their own charter schools.

A prime demonstration of the overlapping leadership and decisionmaking between Concept, its schools, and Breeze took place in 2005 with regards to HSA Cincinnati. Akgun signed the school's lease with Breeze on the school's behalf as the school's founder, a clear conflict of interest as Akgun also founded Breeze.[36] Since 2005, the school has incurred over $3.6 million in rental fees, three times Breeze's original purchase price of $1.25 million. Furthermore, the $3.6 million constitutes the rent for only one of the three parcels bought for the $1.25 million purchase price. Despite this objectively poor business deal for HSA Cincinnati, Concept and Breeze (now known as New Plan Learning) claim that the schools benefit from the overlap in leadership by securing better deals in leasing. As discussed in the Real Estate section below, this is not the case.

Concept continued to open Horizon Science Academies and Noble Academies throughout Ohio, stacking the schools' supposedly independent governing boards with the same group of Gülenists again and again. 84% of Concept OH charter school governing board members are of Turkish descent.[37] With 17 Concept OH schools and five board member slots per school, a total of 85 board member positions are available. These 85 spots are filled by the same 38 individuals however, with some board members sitting on up to four Concept school boards at once.[38] While there is nothing inherently illegal in Ohio about an individual sitting on less than five charter school governing boards at the same time (the legal limit), this overlap increases the risk of a fiduciary duty violation (as well as self-dealing, conflicts of interest, and illegal behavior) when the governing board member has to make a decision that impacts more than one of the entities which that member represents. This risk is compounded when the overlap is not just one member, but the entire board, virtually putting the same set of people on both sides of a transaction with fiduciary obligations to the entities on both sides. This is a common occurrence in the Concept OH schools due to the inter-school borrowing and transfer of public funds, as discussed further below.

Some governing boards are duplicated for all of the Concept schools in that specific geographic area. For example, the five individuals who serve

[34] Concept Schools NFP corporate information, available at: http://tinyurl.com/zallyt7 (last checked 4/20/2017).

[35] Corporate information available at: http://tinyurl.com/kn9xuzr (last checked 4/20/2017).

[36] *See* HSA Cincinnati 2007 audit, available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

[37] Of 38 governing board members identified for the 2014-2015 school year, an estimated 32 of the 38, or 84%, are of Turkish national origin. These names were taken from school websites and/or 990 tax documents for each school.

[38] These numbers were based on names identified from the official 990 tax documents filed for the 2014-2015 year.

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on the governing board of HSA Columbus ES also serve as the governing board for three other schools: HSA Columbus MS, HSA Columbus HS, and NA Columbus (Zafer Alpay, Veysi Malkoc, Enver Ozer, Jane Smirniotopoulos, and Adem Cakmak). In other cases, however, there is no local representation whatsoever on the governing board, with the members living almost three hours away from the school they serve. For example, the same five members comprise the governing boards of both HSA Toledo and HSA Springfield, even though these schools are located approximately 150 miles apart (Ziya Baghmanli, Jackie Blueitt, Mustafa Ilgin, Nazim Ozbakier, and Yunus Zeytuncu).

In addition to the majority of these governing board members sharing the same national origin as the leadership of Concept and their schools, several of the Turkish school board members also belong to the Scioto Foundation, now d.b.a. as the Turkish American Society of Ohio, which is a cultural association affiliated with Fethullah Gülen.[39] Other notable members of the Scioto Foundation include Concept leadership; Concept's preferred Turkish vendors; Concept school employees; school landlords; lenders (private and institutional); and members of the Niagara Foundation,[40] a Turkish cultural association based in Chicago which made Gülen its honorary president.[41] From a review of the Scioto Foundation's membership and their connections to the Concept OH schools, a picture emerges of an extremely tight-knit community drawn along cultural, religious, and national origin lines. This community is represented on all sides of every transaction for the Concept OH schools, from the governing boards to Concept, the landlords, and the vendors chosen to serve those schools. These connections are not accidental and have led to actions that in our view illegally benefit private actors within the Gülen Organization at the public's expense.

Concept's most serious controversy to date is the ongoing FBI investigation concerning the apparent collusion of Concept employees and their vendors allegedly to defraud the federal E-Rate grant program of millions of dollars.[42] According to the released FBI's search warrant application, Concept executives may have violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer purportedly directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work appears to have been performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[43] Former Concept executive and Ohio Founder Ozgur Balsoy was one of the fraudulently enriched Turkish vendors.[44] While Balsoy's business is under suspicion in the FBI investigation and has already been raided, Concept continues to give him and the other Turkish-owned vendors named in the search warrant application substantial business.[45] This investigation

[39] This information was taken from a review of the 990 tax documents filed for the Scioto Foundation, available at: http://tinyurl.com/zgjb8dm (last checked 9/6/2016).

[40] *Id.* For example, Scioto's membership includes Ben (Bunyamin) Koz, Concept's CFO; Ozgur Balsoy, former Concept employee and current Concept vendor and landlord; Oguz Kurt, Veysi Malkoc, Enver Ozer, Huseyin Coskun all Concept school board members; Cebrail Altindag, a Concept school employee; and Serkan Aykan, the president of the Niagara Foundation.

[41] *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

[42] Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[43] Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

[44] *See id.; see also* Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

[45] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

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is ongoing and includes schools, vendors, and Concept offices located in both Ohio and Illinois, as well.

Mustafa Emanet, a former H-1B employee and Gülenist, provided interviews to the FBI regarding his work as a network administrator and teacher at HSA Toledo. He corroborated that Concept purposefully used related service providers who overcharged, just like all of the charter networks throughout the Gülen Organization.[46] Since his cooperation with the FBI, Emanent and his wife who was also employed with Concept, Mary Addi, have come forward and provided information regarding the forced tuzuk payments and tithing to the Gülen Organization required of Turkish H-1B employees.[47] Emanet also produced a copy of the tuzuk agreement itself, which is attached to this report as Appendix I.

Financial Abuse

Ohio requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues at the Concept OH charter schools that are endemic to all Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks.

Numerous examples of Concept and its schools misusing school funds to benefit private persons can be found from a review of the Ohio Concept school audits and investigations, including:

- Illegal payments of school funds to charter school governing board members;[48]
- Illegal "reimbursements" paid by principals to themselves with school funds;[49]
- Use of public funds to pay for employee personal expenses;[50]
- Use of public funds to pay for the immigration expenses of Turkish individuals that weren't employed at the schools, including the spouses of Taner Ertekin, Concept co-founder, and Sedat Duman, the current CEO of Concept;[51]
- Failure to document "bonuses" to select employees, which were not approved by the school governing board according to policy, or earned according to school policy;[52]
- Improper enrichment of a Turkish board member for both HSA Springfield and HSA Toledo, who received over $79,000 in business paid for by school funds for his restaurant from those schools since he became a board member—despite the

46 Search Warrant application, pg 44, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

47 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

48 Board member Unal from HSA Denison ES received a $500 stipend as noted in the 2015 audit available at http://tinyurl.com/zcyug6w; HSA Denison MS board members Malloy and Duzgun received money as noted in the 2015 audit available at http://tinyurl.com/znmlrx4; HSA Lorain board member Bonilla received money as noted in the 2015 audit available at http://tinyurl.com/z7347ok;and Noble Academy Cleveland board members Malloy and Duzgun again received money as noted in the 2015 audit available at http://tinyurl.com/jdyo9rm.

49 Audit available at: http://tinyurl.com/je428za (last checked 9/8/2016).

50 Id.

51 *See, e.g.,* HSA Cleveland 2002 audit, pg 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedat Duman and Taner Ertekin, Concept's founders. Numerous Concept-operated schools received findings for the illegal payment of immigration fees for non-employees. Audit available at: http://tinyurl.com/zlpzg45 (last checked 9/8/2016).

52 *See, e.g.,* HSA Cincinnati 2007 audit, pg 32, available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

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fact that his restaurants are both located in Toledo, almost three hours away from HSA Springfield.[53]

- Misuse of ESEA federal Title I funding.[54]

These examples demonstrate the pattern and practice of using school funds for private benefit and self-dealing from Concept's beginnings through the present. In addition to these flagrant examples of using public funds to benefit cronies of Concept, the audits also detail the broken, incomplete, and disregarded financial controls and procedures in the Ohio Concept schools which allow these kinds of abuses to occur unchecked.[55]

In addition to findings from public audits, Concept and the Ohio Concept schools have also made the news due to reports of illegal behavior from whistle blowers and former employees. These allegations have resulted in lawsuits, a State Board of Education investigation and hearing, and special audits conducted by the state auditor's office to verify attendance records and testing procedures. In each of these cases, Concept and its schools were found to be out of compliance, either in whole or in part. These allegations include:

- Testing fraud to inflate student performance;[56]
- Manipulating attendance records to gain more funding;[57]
- Discrimination against non-Turkish and/or female employees;[58]
- Discrimination against students;[59] and
- Abuse of the federal immigration H-1B program to hire unqualified, uncertified Turkish nationals.[60]

Inter-Entity Lending Practices

Concept, its preferred Gülenist vendors, and its schools engage in frequent inter-entity lending practices, ranging from school to school, from employees to the school, from vendors to the school, and even from school employees to the vendors.[61] Many of these loans seem to have no

[53] While the name is not disclosed in the audits, the board member appears to be Mustafa Ilgin. http://tinyurl.com/hcky5d7 The audits for these schools from 2010-2015 have noted over $79,000 in business to a board member's restaurant from 2011-2015, with the number jumping significantly in 2015.

[54] See Melissa Randolph testimony to the Ohio State Board of Education, available at http://bit.ly/1TaqRXP.

[55] Schools that received findings in their audits for improper and/or unobserved financial controls and deficiencies include: HSA Cleveland (2002, 2006), HSA Columbus (2001, 2005, 2006), HSA Cincinnati (2006, 2007, 2008), HSA Dayton (2006), and HSA Dayton Downtown (2011).

[56] Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal (July 15, 2014) http://tinyurl.com/zsdkk35 ; *see also* Livingston, Doug, *Auditor Joins Invesigation of 19 Charter Schools,* Akron Beacon Journal (July 17, 2014) http://tinyurl.com/hevz2h8

[57] Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal (July 15, 2014) http://tinyurl.com/zsdkk35

[58] Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal (July 15, 2014) http://tinyurl.com/zsdkk35 ; *see also* Torres, Louie, *Teacher Accuses Chicago Charter School of Sexual Harassment*, Cook County Record (May 9, 2016) http://tinyurl.com/hvo72py

[59] Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal (July 15, 2014) http://tinyurl.com/zsdkk35

[60] Ravitch, Diane. *Concept Schools in Ohio Import Large Numbers of Turkish Teachers for Gülen Schools*, (October 14, 2014) http://tinyurl.com/hcy34t9

[61] Onder Secen, a school principal, gave almost $60,000 in loans to the school's landlord Breeze, Inc. ($9,500) and to the school itself ($47,000), which also demonstrates the suspect flow of money between Concept employees, the schools, and their vendors. Audit, pg 20, available at: http://tinyurl.com/je428za (last checked 9/8/2016); *see also* 2007 Breeze Inc., 990 tax form, available at: http://tinyurl.com/zj9xbzx (last checked 9/8/2016).

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solid basis or purpose, which is a known warning sign for money laundering.[62] Additionally, these loans appear to be a violation of the governing boards' fiduciary duties of loyalty and due care to their respective charter schools.

For example, the five member board of Zafer Alpay, Adem Cakmak, Veysi Malkoc, Enver Ozer, and Jane Smirniotopoulos together constitute the governing boards for HSA Columbus ES, HSA Columbus MS, HSA Columbus HS, and Noble Academy (NA) Columbus.[63] In 2015, this governing board loaned over $1 million dollars from HSA Columbus ES to the three other schools it served. NA Columbus even had an outstanding debt to HSA Columbus ES of $85,000 from the prior year that remained unpaid when HSA Columbus ES loaned it another $290,000. Being that these loans do not carry interest or even defined repayment terms, it is highly questionable whether having $1 million less in school revenues for the 2014-2015 school year could have possibly been in HSA Columbus ES's best interests. Being that HSA Columbus ES ended up with a net position of negative $1.9 million that year, the decision to loan out a total of $1.2 million to other Concept-managed schools was decidedly not in HSA Columbus ES's best interests. Instead, these inter-school loans placed the interests of Concept first, allowing the Concept-employed treasurer to precariously balance these schools' funds to mitigate the insolvencies that resulted, at least in part, from gross over-spending on rent to affiliated Gülenist entities.

Another example of inter-school lending appears to have no logical basis occurred in 2015.[64] That year, HSA Cleveland HS loaned HSA Cleveland MS $50,000. In the same year, the MS loaned the HS $20,000. This was not a repayment of the $50,000, but a separate loan for $20,000. The same year, the HS also received a loan from HSA Denison ES for $30,000. This runaround scenario begs the question—how could making a $50,000 loan to one entity be in the best interests of the HS when the HS itself had to take out two separate loans for the total amount of $50,000 to do so? Compounding this strange scenario is the fact that the MS, who received the $50,000 loan, was one of the two lenders that provided the HS with the funds that enabled it to make the $50,000 loan. Considering that three out of the five board members on the HS and MS boards overlap with each other, this scenario calls into question the necessity of these loans, what their true purpose was, and whether any of these loans were made because they were in the best interests of the participating schools.

Real Estate

One of the most significant profit centers for the Gülen Organization, and in particular the Midwestern region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vahap Uysal, a board member of Concept Schools,[65] wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.[66] Gülenists throughout the country attended and presented, including Alp Aslandogan, former Harmony Public Schools landlord, CEO of one Harmony's largest vendors,

[62] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

[63] The information in this section is taken from 990 tax filings for these schools and the 2015 audits available on www.ohioauditor.gov.

[64] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

[65] See Concept Schools 990 tax form, available at: http://tinyurl.com/h5yvjlt.

[66] Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: http://tinyurl.com/gt2vujs (last checked October 31, 2016).

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property buyer from Dove Science Academy, and Gülen's official spokesperson in his role as President of the Alliance for Shared Values, a Gülenist cultural organization.[67] Early on, the founders of the region established Breeze Inc, as a for-profit corporation to acquire properties for Concept Schools throughout the Concept network.[68] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned Ohio-based subsidiaries (250 Shoup Mill LLC, OG-Ohio LLC, NOG-Ohio LLC, and 2350 Morse LLC).[69] Murat Arabaci, a former Concept employee,[70] has managed New Plan Learning and each of its subsidiaries since 2005.[71] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

Of the 17 Concept OH schools, ten currently pay rent to New Plan Learning, Inc., or one of its subsidiaries.[72] Of the remaining seven schools, two schools bought their buildings from New Plan Learning subsidiaries, one bought its building from a non-affiliated entity, one rents its building from Ozgur Balsoy's company, and three rent their buildings from entities believed to be unaffiliated with Concept. Notably, the three schools that rent from unaffiliated landlords pay far lower rents than those schools in lease arrangements with Gülenist landlords.

New Plan Learning asserts that it supports Concept OH schools by providing valuable real estate services, however, it is clear from the property arrangements themselves that these arrangements benefit Concept and New Plan Learning exclusively at the expense of these schools and their public funds. In fact, the Ohio Supreme Court issued an opinion in January of 2016 that New Plan Learning and its subsidiaries operate with a "view to profit" off their leases to the Concept OH schools, and thus, could not be eligible for a property tax exception based on their lessees' use of the property as schools.[73] New Plan Learning argued that its leases were set at their minimum amounts, but the Court disagreed, finding that "substantial" rent was charged above the minimum amounts required and that New Plan Learning profited. Furthermore, the profits were used to acquire more property for New Plan Learning rather than to enhance or improve the rental property for the students who attend the schools or some other legit non-profit purpose.

From the early 2000s to the present, New Plan Learning acquired numerous school properties to rent to Concept-managed schools. In some cases, the school was already renting the building from an unaffiliated third party. After New Plan Learning acquired the building, the rents paid by the schools would double, triple, and for some schools, quadruple.[74] Here are a few of the more egregious examples:

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67 See Texas profile for more information about Alp Aslandogan.

68 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

69 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016)

70 *See* 2007 Concept 990 with Arabaci listed as employee, available at: http://tinyurl.com/z9y36lh (last checked 9/8/2016).

71 *See* Business profile for New Plan Learning, Inc., showing its incorporation in 2005 and listing Arabaci as agent, available at: http://tinyurl.com/hu2d6x7 (last checked 9/8/2016).

72 New Plan Learning, Inc. 2011A Bond Official Statement pg A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

73 See 250 Shoup Mill, L.L.C. v. Testa, Slip Opinion No. 2016-Ohio-5012 (2016).

74 *See* Whistle Blower pg 640 for Property information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools, specifically HSA Lorain whose rent has quadrupled under New Plan Learning's ownership.

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HSA Cincinnati:

- In 2005, Breeze bought the property and two other parcels of land for $1.25 million.
- In 2005, founder of Concept and Breeze, Vedat Akgun, signed the lease with Breeze on the school's behalf as the school's founder, a clear conflict of interest.
- Since 2005, the school has incurred over $3.6 million in rental fees. Note that that is three times the original purchase price of $1.25 million and constitutes the rent for only one of the three parcels bought for that original purchase price.
- New Plan Learning board member Savas Kaya was also on the HSA Cincinnati school board during both of the two lease renegotiations, with each raising the rent above and beyond the already included escalation clauses.

HSA Columbus HS:

- In 2004, Breeze bought the property for $1.5 million.
- From 2005-2015, the school incurred approximately $4.8 million in rental fees.
- In 2015, Breeze sold the building to the school for $3.6 million, even though the tax value was listed as $1.9 million at the time.
- Breeze, a non-profit by that time, made over $6 million in profits off of the rent and sale of this building to a school it was supposed to be supporting.
- New Plan Learning board member Nuh Aydin was on both the selling board (New Plan Learning) and the buying board (HSA Columbus HS) at the time of the transaction.

HSA Youngstown:

- In 2010, NOG-Ohio (New Plan Learning subsidiary) purchased the building for $550,000.
- From 2010-2013, the school paid $577,000 in rental fees.
- In 2013, NOG-Ohio sold the building to the school for $980,000, even though the tax value remained at $550,000 due to no improvements being made on the building.
- NOG-Ohio made over a million dollars in profit in just three years on a school it was supposed to be supporting.

Noble Academy Cleveland:

- From 2010-2013, the school rented the building from a non-affiliated party, paying on average $155,000 per year in rent.
- In 2013, Euclid Properties LLC, owned by former Concept employee and current Concept vendor Ozgur Balsoy, bought the property from the non-affiliated party for $560,000.
- In the two years since Balsoy took over ownership, the school has already paid $551,610 in rental fees, almost the full purchase price.
- With the new lease agreement charging upwards of $360,000 per year, the rent has more than doubled.

HSA Denison MS:

- In 2006, Breeze bought the property for $2.2 million.
- From 2006-2015, the school incurred $4 million in rental fees. Note that the school

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is also responsible for all maintenance, renovation costs, and upkeep of the facilities.

- As a comparator, HSA Denison ES has paid less than a third of the rent HSA Denison MS has paid over the same time period to its unaffiliated third party landlord. The schools are roughly the same size in terms of square footage and student enrollment.

HSA Lorain:

- In 2011, NOG-Ohio bought the building for $1.4 million.
- From 2010-2011, the school paid approximately $100,000 per year in rent to an unaffiliated third party. After NOG-Ohio took control, the rent jumped to:
- 2012 - $264,000
- 2013 - $271,000
- 2014 - $461,000
- 2015 - $470,000
- The rent has more than quadrupled under New Plan Learning's management.

HSA Toledo:

- In 2011, OG-Ohio bought the building for $1.4 million.
- From 2013-2015, the school has already paid $1.9 million dollars, more than the purchase price alone.
- Note that this school is part of the New Plan Learning bond deal, meaning its non-cancelable lease will extend for the next thirty years at increasingly higher rents. In FY 2012, the last year that it paid rent to an outside party, HSA Toledo paid approximately $290,000 in rent. In 2013 under New Plan Learning, the rent jumped to $503,000, in 2014 to $662,000, and in 2015, HSA Toledo paid over $716,000 in rent.

New Plan Learning and its subsidiaries have made an **estimated total net profit of $18.75 million** in profit from its rental arrangements and property deals with the Ohio Concept schools. If the annual rental fees for 2015 stayed the same for 2016, which they would not due to rental escalation clauses, New Plan Learning will receive an additional $4.5M in rent for FY 2016. In our view, New Plan Learning perpetuates this highly suspect arrangement and apparent exploitation by installing one of its own three board members, Adem Cakmak, Savas Kaya, or Nuh Aydin, on the governing board of every school it leases to.

Bond Financing

In 2011 New Plan Learning expanded its capital significantly by applying for a bond for approximately $33 million dollars to purchase, refinance, and/or renovate four Concept schools, three of which are located in Ohio--HSA Dayton HS, HSA Toledo HS, and HSA Springfield.[75] Due to their inclusion in the bond, these schools are now subject to extremely high annual rents in non-cancelable leases set to expire in 2041.[76] The bond was issued by the Industrial Development Authority of the County of Pima, Arizona, the same organization that issued bonds for both the Sonoran (AZ) and Coral (NV) Gülen Organization networks.[77]

[75] New Plan Learning, Inc. 2011A Bond Official Statement, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

[76] *Id.*

[77] Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

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Excessive Use of the H-1B Visa Program

Like all Gülen Organization charter networks, Concept and their OH schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. The Concept (OH) network filed 657 H-1B applications from 2001-2016, while Concept itself filed 176 H-1B applications during the same time period.[78] While Concept Schools leadership states that these H-1Bs are only to fill shortage areas for math and science teachers,[79] these applications were filed for such positions as: business operations managers, assistant principals, P.E. teachers, accountants, treasurers, art directors, director of compensation, human resources directors, education administrators, financial managers, instructional coordinators, elementary teachers, English teachers, Turkish teachers, and IT network administrators.

Concept (OH) use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen. Concept (OH) used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)[80]

- David Nachman: Concept (OH) used Nachman, a New Jersey-based attorney, to file H-1B applications.[81] Nachman also filed H-1B applications for:
  - MilkyWay Education Center (NJ)
  - Paterson Charter School for Science and Technology (NJ)

- Nuzhat Hafeez: Concept (OH) schools used Hafeez, an Illinois-based attorney, to file numerous H-1B applications.[82] Hafeez also filed H-1B applications for:
  - Concept Schools, Inc.
  - Niagara Educational Services, Inc. (IL)

[78] In another example of strategic ambiguity, Concept and its schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of the Concept (OH) schools from 2001-2016 is 657, and the numbers supporting that total are located at the following links: 1) HSA Toledo 79 H-1Bs http://tinyurl.com/h2wzgxm and http://tinyurl.com/hvm6c3g 2) HSA Columbus MS 88 H-1Bs http://tinyurl.com/hm2huqp and http://tinyurl.com/zwh2dm3 3) HSA Lorain 40 H-1Bs http://tinyurl.com/jftczdy 4) HSA Cincinnati 119 H-1Bs http://tinyurl.com/z8rh67o 5) HSA Springfield 24 H-1Bs http://tinyurl.com/zcy5wbs 6) HSA Dayton HS 44 H-1Bs http://tinyurl.com/jk8v67g 7) HSA Dayton Downtown 14 H-1Bs http://tinyurl.com/h958de9 8) HSA Denison MS 10 H-1Bs http://tinyurl.com/ztxhlca 9) HSA Toledo Downtown (now closed) 12 H-1Bs http://tinyurl.com/hbfvk85 10) HSA Denison ES 16 http://tinyurl.com/hh6ph6j 11) HSA Cleveland MS 15 H-1Bs http://tinyurl.com/grttwzk 12) HSA Columbus 11 H-1Bs http://tinyurl.com/zjkpnhh 13) HSA Cleveland ES 1 H-1B http://tinyurl.com/hzaj227 14) Noble Cleveland 35 H-1Bs http://tinyurl.com/zvs68d3 and http://tinyurl.com/j76pnvs 15) Noble Columbus 25 H-1Bs http://tinyurl.com/zslwyng 16) Noble Academy (general, no other info) 11 H-1Bs http://tinyurl.com/hegbswl 17) HSA Cleveland HS 74 H-1Bs http://tinyurl.com/za497gb; http://tinyurl.com/jgkq4tp and http://tinyurl.com/jpye349 18) HSA Columbus HS 39 H-1Bs http://tinyurl.com/z5oyngk. Concept filed 176 H-1B applications 2001-2016. *See* http://tinyurl.com/j3whatt for Concept Schools, Inc.; http://tinyurl.com/zhgx3xl for Concept Schools Nfp.

[79] Article quoting Concept regarding H-1B use, available at: http://tinyurl.com/l7bw4zt (last checked 4/23/2017).

[80] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 3/21/2017).

[81] Nachman profile listing entities represented for H-1B visa work, available at http://tinyurl.com/ny5h3ty (last checked 4/13/2017).

[82] Hafeez profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/mvnttav (last checked 4/13/2017).

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- ▷ Niagara Foundation (IL)
- ▷ The Core Group (IL)

Scandals, Investigations & Notable Activities

The Ohio network of the Gülen Organization has been investigated multiple times, as discussed previously in this profile. One such investigation occurred when four former HSA employees testified to the Ohio State Board of Education regarding Concept's misuse of Title I funding by forging federal paperwork; bribing students to help change standardized assessment responses; discrimination against both female teachers, female students, and non-Turkish individuals at large; and improper discipline and lack of response to student sexual activity on campus.[83]

Furthermore, the U.S. Department of Labor has an ongoing investigation into Concept and its Illinois charter school, Chicago Math and Science Academy ("CMSA"). CMSA non-Gülenist employees complained to the American Federation of Teachers ("AFT") regarding CMSA and Concept's abuse of the H-1B program to hire unqualified Turkish teachers and discriminatory preferential pay to Turkish employees. The AFT presented these complaints to the U.S. Department of Labor, who initiated an investigation that is still ongoing.[84] The Department of Labor had already been investigating a Horizon Science Academy in Ohio due to a July 2008 complaint by Mustafa Emanet regarding the forced tithing payments to Concept.[85]

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalisms at the time and asked for a thorough investigation.[86]

Notable Turkish Vendors

- ► Concept Schools, Inc. Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and one in Minnesota.[87] The founders of the first OH charter schools in the Gülen Organization

[83] Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal *(*July 15, 2014) http://tinyurl.com/zsdkk35 ; *see also* Livingston, Doug, *Auditor Joins Invesigation of 19 Charter Schools,* Akron Beacon Journal *(*July 17, 2014) http://tinyurl.com/hevz2h8; Melissa Randolph testimony to the Ohio State Board of Education, available at http://bit.ly/1TaqRXP.

[84] Saul, Stephanie. Charter Schools Tied to Turkey Grow in Texas, The New York Times (June 6, 2011), available at: http://tinyurl.com/3ua255n (last checked 4/23/2017).

[85] Feds Question Schools' Visa Use, The Columbus Dispatch (May 20, 2011), available at: http://tinyurl.com/m2ssl9h (last checked 4/23/2017).

[86] Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

[87] *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

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formed Concept shortly thereafter.

- Breeze Inc./New Plan Learning: Breeze, Inc., was created in 2004 as a for-profit corporation to acquire properties for Concept Schools throughout the Concept Network.[88] New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned Ohio-based subsidiaries (250 Shoup Mill LLC, OG-Ohio LLC, NOG-Ohio LLC, and 2350 Morse LLC).[89] Together with its subsidiaries, New Plan Learning buys, renovates, leases, and sometimes sells properties to Concept-managed schools, allegedly as a supporting organization to those schools.

- The Core Group: The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept used to defraud the E-Rate program.[90] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[91] The Core Group also provided uniforms to the Fulton Science (GA) network at an excessive cost and amount, as noted by the forensic audits prior to the network's termination.[92]

- Advanced Solutions for Education: Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the defrauding of the E-Rate program.[93] The company served as an E-Rate funding consultant to the schools.

Gülenist Cultural Foundations

- Scioto Foundation/Turkish American Society of Ohio: Several of the Turkish charter school governing board members also belong to the Scioto Foundation, now d.b.a. as the Turkish American Society of Ohio, which is a cultural association affiliated with Fethullah Gülen.[94] Other notable members of the Scioto Foundation include Concept leadership; Concept's preferred Turkish vendors; Concept school employees; school landlords; lenders (private and institutional) that have provided capital to New Plan Learning and the Concept schools themselves; and members of the Niagara Foundation.[95] The Scioto Foundation organized dinners for legislators and Gülenists, including one such event whereby Alp Aslandogan of the Harmony (TX) network spoke to Ohio

88 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

89 New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, A-5, available at: http://tinyurl.com/zxoauxp (last checked 9/6/2016).

90 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

91 Id.

92 See Georgia profile; see also Georgia Forensic Audit of Gülen-affiliated Charter Schools (June 1, 2012), at 17-25, available at http://bit.ly/1TATHiy.

93 *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

94 This information was taken from a review of the 990 tax documents filed for the Scioto Foundation, available at: http://tinyurl.com/zgjb8dm (last checked 9/6/2016).

95 *Id.* For example, Scioto's membership includes Ben (Bunyamin) Koz, Concept's CFO; Ozgur Balsoy, former Concept employee and current Concept vendor and landlord; Oguz Kurt, Veysi Malkoc, Enver Ozer, Huseyin Coskun all Concept school board members; Cebrail Altindag, a Concept school employee; and Serkan Aykan, the president of the Niagara Foundation.

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state lawmakers, quoting Gülen's own teachings, and members of the Niagara Foundation attended as well.[96]

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[97] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science Academy of Chicago, a private Gülenist school. In 2007, the Niagara Foundation gave an extensive loan to Breeze Inc. to purchase new properties for Concept charter schools.[98] Several Concept employees as well as school employees are members of the Niagara Foundation. Niagara provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[99]

Individuals Caught in the Gülen Organization Web

It is quite common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with Turkish employees.

- Tolga Hayali: HSA Dean of Academics;[100] HSA founder and director of HSA Denison;[101] Vice President Apple Education Services – Gülenist CMO Northeastern region;[102] School director, Syracuse Academy of Science (NY);[103] Superintendent of Utica and Syracuse Academies of Science (NY);[104] Principal of Pioneer Academy of Science (NJ).[105]

- Gultekin "John" Aytekin: Teacher Wisconsin Career Academy (WI);[106] Teacher/Director HSA Columbus;[107] Principal Indiana Math and Science Academy (IN);[108] Superintendent for Concept (IN);[109] Implicated in alleged de-frauding of the E-Rate program and currently under investigation by the FBI;[110] Director of Accountability for Concept.[111]

- Emrah Ayhan: Math teacher, HSA Toledo;[112] Board member for HSA Toledo; Board member for HSA Denison; Co-Founder of Breeze, Inc.;[113] Incorporator

96 Event summary, available at: http://tinyurl.com/ny8zr3f (last checked 4/20/2017).

97 *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

98 Audit available at: http://tinyurl.com/haos4qu (last checked 9/8/2016).

99 For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017).

100 Linkedin profile, available at: http://tinyurl.com/n57ygsf (last checked 4/19/2017).

101 Id.

102 Id.

103 Id.

104 Id.

105 Article interviewing Hayali, available at: http://tinyurl.com/kxoqryt (last checked 4/19/2017).

106 Resume available pg 99 at: http://tinyurl.com/mytqkaj (last checked 4/19/2017).

107 Linkedin Profile available at: http://tinyurl.com/my9p3y2 (last checked 4/19/2017).

108 Id.

109 Id.

110 Search Warrant application, pg 40, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

111 Id.

112 Bio available at: http://tinyurl.com/k8zj2p3 (last checked 4/20/2017).

113 Corporate information available at: http://tinyurl.com/kn9xuzr (last checked 4/20/2017).

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of HSA Springfield;[114] Teacher at HSA Cleveland;[115] Principal of Paterson Charter School for Science (NJ).[116]

- Aydin Kara: Teacher, Director at HSA Columbus;[117] Director for HSA Cleveland MS;[118] Principal for Chicago Math and Science Academy (IL);[119] Director for HSA Toledo;[120] Author for The Fountain, a Gülenist magazine.[121]

- *Notable Articles regarding the Ohio Network*

- Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times, available at: http://tinyurl.com/jzmzevh (last checked 9/8/2016).

- Torres, Louie, *Teacher Accuses Chicago Charter School of Sexual Harassment*, Cook County Record (May 9, 2016) available at: http://tinyurl.com/hvo72py

- Mihalopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015) available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

- Pilcher, James. *Charter Schools Use Turkish Ties, Visas to Get Teachers.* Cincinnati!.com (October 6, 2014) available at: http://tinyurl.com/l7bw4zt

- Ravitch, Diane. *Concept Schools in Ohio Import Large Numbers of Turkish Teachers for Gülen Schools*, (October 14, 2014) available at: http://tinyurl.com/hcy34t9

- Livingston, Doug, *Auditor Joins Invesigation of 19 Charter Schools,* Akron Beacon Journal *(*July 17, 2014) available at: http://tinyurl.com/hevz2h8

- Livingston, Doug. *Former Teachers at Turkish-run charter school allege test-cheating, discrimination, sexual activity,* Akron Beacon Journal *(*July 15, 2014) available at: http://tinyurl.com/zsdkk35.

- Saul, Stephanie. *Charter Schools Tied to Turkey Grow in Texas,* The New York Times (June 6, 2011), available at: http://tinyurl.com/3ua255n (last checked 4/23/2017).

- *Feds Question Schools' Visa Use,* The Columbus Dispatch (May 20, 2011), available at: http://tinyurl.com/m2ssl9h (last checked 4/23/2017).

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114 HSA Springfield incorporation, listing Emrah Ayhan as one of three incorporators, available at: http://tinyurl.com/jk4ny7y (last checked 9/8/2016).

115 Educator Profile for Emrah Ayhan at www.ohio.gov, also available at: http://tinyurl.com/j7bxyhk (last checked 9/8/2016).

116 School profile available at: http://tinyurl.com/n95e9nc (last checked 4/20/2017).

117 http://tinyurl.com/mkvkmgs (last checked 4/20/2017).

118 http://tinyurl.com/m6obc3h (last checked 4/20/2017).

119 CMSA 990 tax forms 2012-2015, available at: http://tinyurl.com/hdu6gbe (last checked 4/20/2017).

120 Director's message, available at: http://tinyurl.com/kcc8v48 (last checked 4/20/2017).

121 http://tinyurl.com/lz3bwoz (last checked 4/20/2017).

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Wisconsin



QUICK FACTS ON GÜLEN CHARTER SCHOOLS WISCONSIN



NUMBER OF SCHOOLS	1
KNOWN AS	**Milwaukee Math and Science Academy,** Wisconsin Career Academy (closed)
TOTAL ENROLLMENT	**341**
CHARTER VENDOR	**Concept Schools, Inc.**
TOTAL REVENUES	**$2,666,070**
RELATED INSTITUTIONS	IL: Math and Science, Horizon MI, MN, IN: Math and Science MO: Gateway OH: Horizon, Noble

KEY PEOPLE


Y. Alp Aslandogan

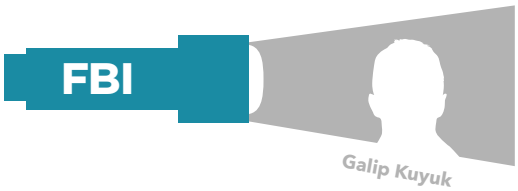

Ibrahim Duyar


Harun H. Solak


Zikeriya Baskal

FINANCIAL ISSUES

MMSA contracts with Concept Schools, Inc. ("Concept") for external charter management services. Concept is currently involved in an ongoing FBI investigation concerning the alleged collusion of Concept employees and their vendors to **defraud the federal E-Rate grant program of millions of dollars.** Research revealed that Galip Kuyuk, former board member of Wisconsin Career Academy and the owner of Sundance International, LLC ("Sundance"), is individually implicated.



SCANDALS



Both MMSA and Wisconsin Career Academywere placed on probation due to **extremely poor academic performance** and **poor financial condition**.

H-1B VISA ABUSES

59 H-1B **Wisconsin schools H-1B VISA APPLICATIONS 2000 to 2016**

176 H-1B **Concept H-1B VISA APPLICATIONS 2000 to 2016**

Evidence suggests that public funds were used to cover numerous visas



- Yasar Bora
- Ahmet Akyol
- Rauf Faik Tanriseven
- Ali Tanberk
- Tarik Celik
- Omer Yazganoglu
- Muhammet Yildiz

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Midwestern
- School Names (known as):
  - Milwaukee Math and Science Academy
  - Wisconsin Career Academy (closed)
- Total # of Schools in State: 1
- Total Student Enrollment 2015-16: 341[1]
- Charter Holder/Governing Board(s):
  - Milwaukee Math and Science Academy, Inc.
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school
- Charter Management Services Vendor: Concept Schools, Inc.
- Regional Gülen Organization Oversight Entity: Concept Schools, Inc.
- Regional Sister Networks: Math and Science (IL); Horizon (IL); Math and Science (IN); Math and Science (MN); Math and Science (MI); Gateway (MO); Horizon (OH); Noble (OH).
- Total State Revenues for the 2015-16 school year: $2,666,070[2]
- Network Founders:
  - Y. Alp Aslandogan: Founder, Wisconsin Career Academy; Board President, Institute Interfaith Dialog – Gülenist cultural association; Contributing Editor, Fountain Magazine – Gülenist publication; Secretary, The Gülen Institute; openly supports Fethullah Gülen; Landlord, Harmony (TX); CEO, North American University – Gülenist vendor to Harmony (TX); currently Official Spokesperson for Fethullah Gülen and Executive Director, Alliance for Shared Values – Gülen's foundation.[3]
  - Ibrahim Duyar: Founding Principal of Wisconsin Career Academy;[4] Founder, Little Scholars (AR);[5] currently Professor at University of Arkansas Little Rock.[6]
  - Harun H. Solak: founded Wisconsin Career Academy;[7] Senior Scientist Paul Scherrer Institute; current CEO and founder of Eulitha AG.[8]

1 Student enrollment and demographic information available at: http://tinyurl.com/o25t69e (last checked 4/21/2017).

2 Figure includes state revenue Milwaukee Math and Science Academy (MMSA), available at: http://tinyurl.com/kjceyja (last checked 4/23/2017). Wisconsin and the City of Milwaukee do not make audits publicly available, increasing the difficulty of determining total revenue. For comparison, MMSA reported total revenue of $3,149,589 on its 2015 tax return, available at: http://tinyurl.com/n5pqrps (last checked 4/23/2017).

3 Information gathered from: Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017); Yuksel Alp Aslandogan, Huffington Post, available at: http://tinyurl.com/l4laf4k (last checked 4/23/2017); The Gülen Institute, 2013 990, available at: http://tinyurl.com/msxhmmg (last checked 4/23/2017); Y. Alp Aslandogan, Twitter, available at: http://tinyurl.com/kooavoq (last checked 4/23/2017); Alliance for Shared Values, http://tinyurl.com/kz42gu5 (last checked 4/23/2017). For more information regarding Aslandogan's involvement with Harmony (TX), see the Greater Texas Regional Summary and Texas Profile.

4 Research Brief, Public Policy Form at 6 (Dec. 22, 2000), available at: http://tinyurl.com/kby7qak (last checked 4/23/2017).

5 Jennifer Barnett Reed & Max Brantley, What's the Point – The LISA Academy Succeeds with Students. But Does it Succeed in Meeting the Terms of State Charter School Law, Arkansas Times (Jan. 25, 2007), available at: http://tinyurl.com/lt5ukvn (last checked 4/23/2017).

6 Dr. Ibrahim Duyar, UA Little Rock available at: http://tinyurl.com/n25sfca (last checked 4/23/2017).

7 Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017).

8 Linkedin profile (graduated from University of Wisconsin-Madison in 1998), available at: http://tinyurl.com/k6lu4pl (last checked 4/19/2017).

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- Zikeriya Baskal: founded Wisconsin Career Academy;[9] potentially Visiting Lecturer University of Houston; Assistant Professor Gaziosmanpasa University; current Associate Professor at Ipek University.[10]

Overview

As of the 2016-17 school year, Wisconsin has only 1 Gülen Organization charter school in operation, the Milwaukee Math and Science Academy ("MMSA"). This school is overseen by Milwaukee Math and Science Academy Inc. ("MMSA, Inc."), a non-profit governing board of directors in operation since 2009. MMSA, Inc. is actually the second Gülenist education foundation in Wisconsin. Wisconsin Career Academy, Inc. was the first, operating the now-closed Wisconsin Career Academy ("WCA") between 2001 and 2012. WCA closed in 2013 after losing accreditation. Wisconsin Career Academy, Inc. merged into MMSA, Inc. in 2014, leaving MMSA, Inc. as the sole surviving governing board. Both schools and governing boards contracted with Concept Schools, Inc. ("Concept"), the corporate entity responsible for the Midwestern region of the Gülen Organization charter networks, allegedly for additional educational management services. MMSA serves 3% English Language Learners vs. 5% state average; 100% free and reduced lunch population vs. 58% state; 13% students with disabilities vs. 14% state; 96% African American students vs. 9% state; 1% Caucasian students vs. 71% state; and 2% Hispanic students vs. 11% state. As these numbers indicate, MMSA serves a large percentage of vulnerable student populations.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Milwaukee Math and Science Academy ("MMSA") 110 West Burleigh St. Milwaukee, WI 53212	K-8 2011-Present	03% ELL 100% FRL 13% SWD 96% African American 01% Caucasian 02% Hispanic	City of Milwaukee	Milwaukee Math and Science Academy, Inc.
Closed Schools and Failed Applications				
Wisconsin Career Academy/Wisconsin College Prep Academy (as voucher school) *4801 S. 2nd Street* *Milwaukee, WI 53207*	*6-12* *2001-2012 (charter school)* *2012-2013 (voucher school)* *Non-compliant financial audit, low student achievement*		*Milwaukee Public Schools*	*Wisconsin Career Academy, Inc.*

[9] Wisconsin Career Academy Charter School Contract, available at: http://tinyurl.com/n77x7g3 (page 13) (last checked 4/23/2017).

[10] Linkedin profile (attended University of Wisconsin-Madison 1998-2004), available at: http://tinyurl.com/m3rjwdb (last checked 4/23/2017).

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Academy of Milwaukee	*6-12 Failed Application*		*Board of Regents of the University of Wisconsin System*	*Academy of Milwaukee, Inc.*

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities*[11]

A History of Strategic Ambiguity and Conflicting Interests

In 2000, the Wisconsin Founders established the first Gülenist education foundation in Wisconsin, Wisconsin Career Academy, Inc. They applied for and received approval in 2000 to open Wisconsin Career Academy for a term from 2001-2005. The school was renewed once in 2005, but by the time the second renewal process began in 2010, Milwaukee Public Schools began to uncover problems with Wisconsin Career Academy's financial audits, delivery of special education services, and academic performance.[12] The school received a series of one-year extensions laced with conditions to get a clean audit and to raise student performance. After failing to receive a renewed charter in 2012, Wisconsin Career Academy changed its name to the Wisconsin College Prep Academy and re-opened as a voucher school.[13] The school shut down for good after losing accreditation due to its continuing poor performance in 2013.[14]

With the future of the Wisconsin Career Academy uncertain, the Gülen Organization rushed to open another school in the area under a different corporate entity. In 2010, the application for MMSA was approved, and the school opened in 2011 with new branding, but the same issues with academic performance and poor financial conditions as its doomed sister school, Wisconsin Career Academy. In 2014, Milwaukee Public Schools placed MMSA on probation due to these issues. This probation was lifted in 2016 when the school was renewed for an additional five-year term.[15] Surprisingly, no financial information appears to have been considered by the review committee in the decision to renew the school.

In 2014, Wisconsin Career Academy, Inc. merged into MMSA, Inc., leaving MMSA, Inc. as the surviving entity. By using various names for the two schools, and renaming the Wisconsin Career Academy after it lost its charter, the organizations have made it difficult to track the Gülenist presence in Wisconsin over time. The changes in names and branding also allowed MMSA to hide from the negative press surrounding Wisconsin Career Academy.

Like Wisconsin Career Academy, MMSA

11 Student enrollment and demographic information available at: http://tinyurl.com/o25t69e (last checked 4/23/2017); http://tinyurl.com/l7zhr4y (FRL) (last checked 4/23/2017).

12 Board of School Directors, Milwaukee, Wisconsin (Dec. 13, 2011), available at: http://tinyurl.com/nxvdooc (p. 651) (last checked 4/23/2017); see also Wisconsin Career Academy, Special Review (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017).

13 Erin Richards, Photo Appears to Show Milwaukee Teacher Sleeping at Defunct School, Milwaukee – Wisconsin Journal Sentinel (June 13, 2013), available at: http://tinyurl.com/hh95e4d (last checked 4/23/2017).

14 Meghan Dwyer, College Applicant Told Charter School Diploma Is Worthless, Fox6 (Aug. 18, 2013), available at: http://tinyurl.com/h99uwrj (last checked 4/23/2017).

15 Renewal documents, available at: http://tinyurl.com/kdzftyv (last checked 4/28/2017).

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also contracts with Concept Schools, Inc. ("Concept") for external charter management services. Concept is currently involved in an ongoing FBI investigation concerning the alleged collusion of Concept employees and their vendors to defraud the federal E-Rate grant program of millions of dollars.[16] According to the released FBI's search warrant application, Concept executives allegedly violated the competitive bidding rules of the E-Rate program by selecting a vendor complicit with Concept's purported plans to defraud E-Rate outside of the normal procurement process. Then, Concept's Chief Information Officer directed that vendor to divert hefty "subcontracts" to affiliated Turkish individuals and companies in exchange for a cut of the proceeds. The actual work was performed by Concept employees themselves, not by the complicit vendor who was approved by E-Rate to provide the work, or the so-named companies and Turkish vendors for the subcontracts.[17] Concept continues to award substantial business to the vendors under scrutiny and named in the search warrant application.[18]

The Wisconsin Gülen charter network is extensively involved in the Concept fraud investigation. Our research revealed that Galip Kuyuk, former board member of Wisconsin Career Academy and the owner of Sundance International, LLC ("Sundance"), is individually implicated. Kuyuk's business Sundance provided E-Rate services for the Wisconsin Career Academy, constituting a clear conflict of interest for Kuyuk.[19] MMSA also utilized Advanced Solutions for Educations and the Core Group for E-Rate funded work in 2014, both vendors heavily in the Concept E-Rate fraud investigation.[20] Even more troubling, Huseyin A. Akyurek, the vice president for Advanced Solutions for Education, served as the initial executive director of MMSA, another clear conflict of interest.[21] The FBI investigation is ongoing.

Amidst the pending closure of Wisconsin Career Academy, its executive director Ali Yilmaz denied that the school had any connections to Fethullah Gülen.[22] Yilmaz made this denial in spite of the fact that Fethullah Gülen, in court pleadings, took credit for founding numerous charter schools across the United States and Alp Aslandogan, the founder of the Wisconsin Career Academy, would go on to work and write for Gülenist institutions like The Gülen Institute, Fountain Magazine, and become Gülen's Official Spokesperson through his role as executive director of the Alliance for Shared Values.[23] Aslandogan has connections and relationships with Gülenist-controlled charter networks throughout the U.S., often seemingly personally profiting through his role as Gülen's right-hand man and charter liaison by acquiring properties from Gülenist organizations and selling them to other Gülenist organizations at a profit, as he did with the Oklahoma Gülenist charter network and its Gülenist cultural association, or by renting his properties to Gülenist charter schools at a profit, as he did with the Harmony (TX) network.

When Wisconsin Career Academy closed, it sold its property and equipment to other Concept charter schools at alarmingly high prices. For example, two Horizon (OH) schools paid a total of $4,750 for two iPad 2s. But Wisconsin Granite

16 Dan Mihalopoulos & Jon Seidel, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Dec. 16, 2015), available at: http://tinyurl.com/j3snbad (last checked 9/8/2016).

17 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

18 *See* Dan Mihalopoulos, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

19 Search Warrant application available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

20 Id.; FCC Form 471, MMSA, available at: http://tinyurl.com/k7q62t5 (last checked 4/25/2016).

21 Compare Advanced Solutions for Education, Inc. corporate documents available at: http://tinyurl.com/mv7qmro (last checked 4/27/2017) with MMSA 2011 990-EZ available at: http://tinyurl.com/lyuqakj (last checked 4/26/2017).

22 Eric Richards, Milwaukee Charter Schools Tied to Turkish Islamic Cleric?, Milwaukee – Wisconsin Journal Sentinel (May 14, 2012), available at: http://tinyurl.com/lz37d3u (last checked 4/23/2017).

23 See the brief biography of Y. Alp Aslandogan, supra.

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Depot received a much better deal; it paid only $4,000 for ten iPads. Other Concept schools purchased property at high prices: Indiana Math and Science Academy paid $51,418 for an unknown number of iPads, smart boards, and school supplies; MMSA paid $10,250 for a Ford van; and Chicago Math and Science Academy paid $2,000 for a portable stage.[24] Further investigation is needed to determine if these sales were reasonable.

Financial Issues

Wisconsin requires charter schools like MMSA to undergo annual audits, but the audits are not publicly available without a records request. As of the date of this paper's publication, the audits have not yet been released. This decreases charter school transparency and increases the ability of MMSA to obscure its actions in the state.

Despite the lack of publicly available audits, the information that is available shows the same issues endemic to all Gülen charter networks.[25] Findings from Wisconsin Career Academy and MMSA include:

- Inappropriate Use of Funds for Immigration Fees:
  - $24,568 in legal fees spent between July 1, 2006, and January 15, 2008, on immigration fees; and
  - $1,390 in legal fees for immigration expenses for one person never employed by the school.

- Lack of Compliance with Charter Contract:
  - Failure to comply with charter requirements pertaining to percentage of funds spent on instructional costs;
  - Failure to comply with charter requirements pertaining to immunizations; and
  - Failure to comply with charter requirements pertaining to asbestos management.

- Staff Concerns
  - Failure to secure required licensing and permits for instructional staff;
  - High principal turnover, three in three years;
  - Large drops in instructional staff return rate (from 76.9% to 31.6%);

- Financial Concerns:
  - Lack of current assets to satisfy current liabilities.

Due to these problems with the Wisconsin Career Academy and the lack of publicly available audits in Wisconsin, MMSA's audits should be disclosed and reviewed for potential conflicts of interest, related party transactions, lack of financial controls, and inappropriate use of funds due to the prevalence of these issues in Gülen charter schools nation-wide.

Bond Financing

Neither MMSA nor Wisconsin Career Academy has procured any known municipal bonds. Concept Schools and its affiliated real estate arm, however, have used bond financing for schools in other states.

[24] Wisconsin Career Academy 990s available at: http://tinyurl.com/mm89f7c (last checked 4/23/2017).

[25] Information taken from: Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017); MMSA Probabtion letter 2014, available at: http://tinyurl.com/kdzftyv (last checked 4/28/2017).

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Real Estate

Wisconsin Career Academy leased its building from unaffiliated third parties. MMSA leases its facility from Good Samaritan Schools, LLC, which purchased the facility in 2014. Good Samaritan Schools lacks any superficial connection to the Gülen organization, although this information is more difficult to ascertain for for-profit entities that are not required to post ownership or governance information publicly. As renting properties owned by Gülenist companies and/or individuals who then overcharge the school in rent is a prime method for the Gülen Organization to extract public funds from its charter schools (*see, e.g.,* Concept (OH), Dove Science (OK), and Harmony (TX)), more research is needed to rule out whether the owner of MMSA's location is unrelated to the Gülen Organization.[26]

Excessive Use of the H-1B Visa Program

Like all Gülen Organization charter networks, the Wisconsin Gülen charter schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. From 2001-2016, the Wisconsin schools have filed 59 H-1B visa applications for foreign workers.[27] Concept itself filed 176 H-1B applications during the same time period.[28] Although one MMSA official denied that any of its teachers were under a visa,[29] MMSA filed for ten visas after opening. While Gülen charter networks claim the H-1B program is necessary to recruit math and science teachers, the applications for MMSA and Wisconsin Career Academy were filed for positions including: assistant director, assistant principal, director of student affairs, high school teacher, network administrator, director of human resources, education administrator, ESL teacher, accountant, and director of human resources/college coordinator.

As previously mentioned, a special review of Wisconsin Career Academy by Milwaukee public schools found the school spent public funds for visa applications.[30] Our interpretation of the evidence suggests that public funds were used to cover the visas Omer Yazganoglu, Tarik Celik,

[26] Additionally, Wisconsin's corporate documents are behind a paywall and cannot be delivered electronically.

[27] The sum total of all of their organizations is 49, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/khfno3p (49); http://tinyurl.com/m9297yd (7). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (last checked 1/30/2017).

[28] In another example of strategic ambiguity, Concept and its schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of the Concept (OH) schools from 2001-2016 is 657, and the numbers supporting that total are located at the following links: 1) HSA Toledo 79 H-1Bs http://tinyurl.com/h2wzgxm and http://tinyurl.com/hvm6c3g 2) HSA Columbus MS 88 H-1Bs http://tinyurl.com/hm2huqp and http://tinyurl.com/zwh2dm3 3) HSA Lorain 40 H-1Bs http://tinyurl.com/jftczdy 4) HSA Cincinnati 119 H-1Bs http://tinyurl.com/z8rh67o 5) HSA Springfield 24 H-1Bs http://tinyurl.com/zcy5wbs 6) HSA Dayton HS 44 H-1Bs http://tinyurl.com/jk8v67g 7) HSA Dayton Downtown 14 H-1Bs http://tinyurl.com/h958de9 8) HSA Denison MS 10 H-1Bs http://tinyurl.com/ztxhlca 9) HSA Toledo Downtown (now closed) 12 H-1Bs http://tinyurl.com/hbfvk85 10) HSA Denison ES 16 http://tinyurl.com/hh6ph6j 11) HSA Cleveland MS 15 H-1Bs http://tinyurl.com/grttwzk 12) HSA Columbus 11 H-1Bs http://tinyurl.com/zjkpnhh 13) HSA Cleveland ES 1 H-1B http://tinyurl.com/hzaj227 14) Noble Cleveland 35 H-1Bs http://tinyurl.com/zvs68d3 and http://tinyurl.com/j76pnvs 15) Noble Columbus 25 H-1Bs http://tinyurl.com/zslwyng 16) Noble Academy (general, no other info) 11 H-1Bs http://tinyurl.com/hegbswl 17) HSA Cleveland HS 74 H-1Bs http://tinyurl.com/za497gb; http://tinyurl.com/jgkq4tp and http://tinyurl.com/jpye349 18) HSA Columbus HS 39 H-1Bs http://tinyurl.com/z5oyngk. Concept filed 176 H-1B applications 2001-2016. *See* http://tinyurl.com/j3whatt for Concept Schools, Inc.; http://tinyurl.com/zhgx3xl for Concept Schools Nfp.

[29] Lisa Kaiser, *Milwaukee's Charter Schools Don't Make the Grade*, Shepherd Express (Jan. 20, 2015), available at: http://tinyurl.com/mwdp8ed (last checked 4/25/2017).

[30] Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017).

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Yasar Bora, Ahmet Akyol, Muhammet Yildiz, Ali Tanberk, and Rauf Faik Tanriseven. Additionally, the Board of Alien Labor Certification Appeals found that Wisconsin Career Academy did not appropriately consider American candidates for the position of secondary math teacher in Mr. Bora's case.[31] When Wisconsin Career Academy closed, MMSA specifically agreed to fulfill all obligations related to workers on H-1B visas.[32]

MMSA and Wisconsin Career Academy use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- David Bloomfield: MMSA and Wisconsin Career Academy used Bloomfield, an Ohio-based attorney, to file numerous H-1B applications. Bloomfield also filed applications for:
  - Horizon (OH)
  - Math & Science Academy (IL)[33]

Scandals, Investigations & Notable Activities

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalisms at the time and asked for a thorough investigation.[34]

Before Wisconsin College Prep Academy (formerly Wisconsin Career Academy) closed, a student photographed Nehnet Camalan sleeping on the job. At the time, Camalat served as the school's business manager.[35]

Both MMSA and Wisconsin Career Academy were placed on probation due to extremely poor academic performance and poor financial condition, as discussed previously.

Notable Turkish Vendors

- Concept Schools, Inc. Concept is a comprehensive services vendor that controls human resources, fiscal management, school design, curriculum, accountability, compliance, and reporting for a twelve percent fee of each school's total revenues. Currently, Concept is the contracted nonprofit management services vendor for thirty such charter schools, with seventeen schools in Ohio, four in Illinois, three in Missouri, three in Indiana, one in Michigan, one in Wisconsin, and

31 Matter of Wisconsin Career Acad., 2008-INA-00100, 2008 WL 4013021 (Bd. Alien Lab. Cert. App. Aug. 27, 2008).

32 MMSA 2014 990, available at: http://tinyurl.com/ke62ykw (last checked 4/26/2017).

33 Bloomfield profile listing entities represented for H-1B visa work available at: http://tinyurl.com/k8tx62u (last checked 4/25/2017).

34 Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

35 Erin Richards, Photo Appears to Show Milwaukee Teacher at Defunct School, Milwaukee – Wisconsin Journal Sentinel (June 13, 2013), available at: http://tinyurl.com/hh95e4d (last checked 4/25/2017).

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one in Minnesota.[36] The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter. According to MMSA's tax returns, it has paid Concept $762,369.[37]

- The Core Group: MMSA lists The Core Group, Inc. as an E-Rate service provider in a 2014 FCC Form 471.[38] The Core Group, owned by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept purportedly used to defraud the E-Rate program.[39] The company and its subsidiaries have received over $3.2 million dollars from Concept schools.[40] The Core Group also provided uniforms to the Fulton Science (GA) network at an excessive cost and amount, as noted by the forensic audits prior to the network's termination.[41]

- Advanced Solutions for Education: MMSA lists the Advanced Solutions for Education as an E-Rate consultant in a 2014 FCC Form 471.[42] Advanced Solutions for Education, owned by former Concept employee Ozgur Balsoy, is also implicated in the ongoing FBI investigation regarding the alleged defrauding of the E-Rate program.[43]

Gülenist Cultural Foundations

- Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.[44] The current executive director for the Niagara Foundation Ohio taught at Wisconsin Career Academy.[45] Niagara Educational Services, Inc., oversees both the Niagara Foundation and the Science Academy of Chicago, a private Gülenist school. Several Concept employees as well as school employees are members of the Niagara Foundation. It maintains a presence in Wisconsin. It provides free/low-cost trips to Turkey for legislators, as well as hosting dialogue dinners and fundraisers.[46]

- Turkish American Federation of Midwest (TAFM): TAFM is a member of the Turkic American Alliance (TAA).[47] The TAA posts articles and op-eds written by Fethullah

[36] *See* Concept Schools network, available at: http://tinyurl.com/z3d8qsb (last checked 8/26/2016).

[37] MMSA 990s available at: http://tinyurl.com/kfnsfvr and http://tinyurl.com/mmf6dnq (last checked 4/26/2017).

[38] FCC Form 471, MMSA, available at: http://tinyurl.com/k7q62t5 (last checked 4/25/2016).

[39] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[40] Id.

[41] See Georgia profile; see also Georgia Forensic Audit of Gülen-affiliated Charter Schools (June 1, 2012), at 17-25, available at http://bit.ly/1TATHiy.

[42] FCC Form 471, MMSA, available at: http://tinyurl.com/k7q62t5 (last checked 4/25/2016).

[43] *See* Mihalopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times http://tinyurl.com/jzmzevh (last checked 9/8/2016).

[44] *See* http://www.niagarafoundation.org/ for information about the Niagara Foundation and http://tinyurl.com/d8tlv5c for information about Gülen as Honorary President (last checked 9/6/2016).

[45] Employee reports for Wisconsin Career Academy (2001-02) are available at: http://tinyurl.com/lcekw7l (last checked 4/23/2017); Linkedin Profile available at: http://tinyurl.com/mpuqot3 (last checked 4/19/2017).

[46] For a description of a legislator's trip to Turkey with the Niagara Foundation, see: http://tinyurl.com/mkfando (last checked 4/20/2017).

[47] Turkic American Alliance, available at: http://tinyurl.com/mm9ko3r (last checked 4/21/2017).

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Gülen.[48] TAFM has four member organizations in Wisconsin, two of which overlap with the Niagara Foundation: Niagara Foundation Madison, Niagara Foundation Milwaukee, Madison Turkish American Culture Center (a unit of the Turkish-American Cultural Foundation of Wisconsin Inc.), and Turkish American Society of Wisconsin (a unit of Harmony Foundation, Inc.).[49] TAFM provides year-round informational bulletins to members of Congress, sponsors congressional trips to Turkey, and provides a platform for Turkish American activism and advocacy.[50]

Individuals Caught in the Gülen Organization Web

Our research shows that it is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Concept. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with these schools' Turkish employees.[51]

- Tarik Celik: Wisconsin Career Academy sponsored H-1B visa; Proposed Executive Director for Academy of Milwaukee – failed application; Executive Director, Wisconsin Career Academy; Executive Director, American Turkic Business Council; Executive Director, Istanbul Center (GA) – Gülenist cultural association affiliated with Fulton Science (GA); Chairman of Advisory Board, Turkish American Chamber of Commerce of the Southeast US (GA) – Gülenist business association; President/CEO, Texas Turkish American Chamber of Commerce; Member, Alief District of Innovation Committee; CEO Star Learning, LLC – Gülenist vendor; Chairman for Turkey World Chamber of Commerce; Founder/Chairman World Chamber of Commerce of Texas; currently President/CEO Celik Enterprises, LLC.[52]
- Engin Karatas, a.k.a. Engin Blackstone: Co-founded Chicago Math and Science Academy; Assistant Principal HSA Denison Middle; Principal HSA Toledo; Principal Quest Charter Academy; Assistant Principal Wisconsin Career Academy;[53] visited Fethullah Gülen at the Golden Generation Retreat Center with Concept whistleblower Mustafa Emanet;[54] Superintendent Gateway Science Academy (MO).[55]

48 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

49 Turkic American Federation of Midwest, available at: http://tinyurl.com/lgz6odt (last checked 4/21/2017); see also Turkish American Cultural Center of Madison, About Us, available at: http://tinyurl.com/n6vey2z (last checked 4/26/2017); Turkish American Society of Wisconsin, available at: http://tinyurl.com/kzym3kb (last checked 4/26/2017).

50 Turkic American Federation of Midwest, available at: http://tinyurl.com/k7occf5 (last checked 4/21/2017).

51 Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

52 Information taken from: Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017); April 2006 Agenda, Board of Regents of the University of Wisconsin System, at 175, available at: http://tinyurl.com/mmpfvxc (last checked 4/23/2017); Wisconsin Charter Schools Yearbook 2008-2009 at 64, available at: http://tinyurl.com/mo446u5 (last checked 4/24/2017); American Turkic Business Council 990s available at: http://tinyurl.com/mhe32cp (last checked 4/23/2017); Linkedin profile, available at: http://tinyurl.com/k9f2xrm (last checked 4/23/2017).

53 Interview with Engin Blackstone, available at: http://tinyurl.com/mw9bey6 (last checked 4/23/2017).

54 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: http://tinyurl.com/mezzupx (last checked 4/20/2017).

55 Linkedin profile, available at: http://tinyurl.com/lylm33o (last checked 4/25/2017).

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- Cafer Cengiz: Employee, Wisconsin Career Academy; Principal, Michigan Math and Science Academy (MI); Principal, Horizon (OH); Principal, Horizon (IL).[56]

- Gultekin "John" Aytekin: Teacher, Wisconsin Career Academy (WI); Teacher/Director, HSA Columbus (OH); Principal, Indiana Math and Science Academy (IN); Superintendent for Concept (IN); Implicated in the alleged de-frauding of the E-Rate program and currently under investigation by the FBI; Director of Accountability for Concept.[57]

- Serkan Aykan: Employee, Wisconsin Career Academy; Organized political trips for Ohio political and community leaders; Executive Director, Niagara Foundation Ohio.[58]

- Musa Ayar: Secretary/Director, Wisconsin College Prep Academy; President/ Executive Director Turkish American Cultural Foundation of Wisconsin, Inc., which runs the Turkish American Cultural Center of Madison; currently Chairman of the Department of Business and Economics University of Wisconsin Colleges.[59]

- Ergun Sevilmis: Teacher/Assistant Principal, Horizon (OH); Principal, MMSA; currently Principal Horizon (OH); implicated in cheating scandal at Horizon Science Academy – Dayton prior to moving to MMSA; organizer of Mesale Educational Services, LLC (OH).[60]

- Yasar Bora: Wisconsin Career Academy sponsored H-1B visa; Founding Principal, Wisconsin Career Academy; Superintendent, Minnesota School of Science (Concept, Midwest Region); currently Superintendent, Horizon/Noble (OH).[61]

- Ahmet Akyol: Wisconsin Career Academy sponsored H-1B visa; Executive Director, Northern Lights Society/Turkish American Society of Minnesota; Founder, School of Science/Math and Science Academy (MN).[62]

- Huseyin Akyurek: Executive Director,

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56 Information taken from: Employee reports for Wisconsin Career Academy (2001-02) are available at: http://tinyurl.com/lcekw7l (last checked 4/23/2017); Linkedin profile, available at: http://tinyurl.com/l7al9rw (last checked 4/23/2017).

57 Information taken from: Resume available pg 99 at: http://tinyurl.com/mytqkaj (last checked 4/19/2017); Linkedin Profile available at: http://tinyurl.com/my9p3y2 (last checked 4/19/2017); Search Warrant application, pg 40, available at: http://tinyurl.com/jt9j4ed (last checked 9/8/2016).

58 Information taken from: Employee reports for Wisconsin Career Academy (2001-02) are available at: http://tinyurl.com/lcekw7l (last checked 4/23/2017); Serkan Aykan Honored by the State House of Ohio, Niagara Foundation (Apr. 1, 2012), available at: http://tinyurl.com/lh22uov (last checked 4/23/2017); Linkedin Profile available at: http://tinyurl.com/mpuqot3 (last checked 4/19/2017).

59 Information taken from: Turkish American Cultural Center of Madison, About Us, available at: http://tinyurl.com/n6vey2z (last checked 4/26/2017); Linkedin profile, available at: http://tinyurl.com/la7p7dc (last checked 4/23/2017).

60 Information taken from: Linkedin profile, available at: http://tinyurl.com/mgbcza6 (last checked 4/23/2017); Corporation Details, available at: http://tinyurl.com/mpmkq84 (last checked 4/26/2017); Josh Sweigart, Allegations Mount at Area Charter: Teachers Say School Tampered with Tests, Attendance Records, Dayton Daily News (July 27, 2014), available at: http://tinyurl.com/l4lwvd5 (last checked 4/26/2017).

61 Information taken from: Milwaukee Public Schools, School Selections, available at: http://tinyurl.com/koa4k6b (last checked 4/26/2017); Minnesota School of Science FCC Form 471 (Mar. 14, 2013), available at: http://tinyurl.com/l8egh2h (last checked 4/26/2017); Linkedin profile, available at: http://tinyurl.com/mky7cp8 (last checked 4/23/2017); Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017).

62 Information taken from: Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017); Minnesota School of Science Charter Application, available at: http://tinyurl.com/kqowjgm (last checked 4/26/2017).

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MMSA; Vice President, Advanced Solutions for Education.[63]

- Omer Yazganoglu: Wisconsin Career Academy sponsored H-1B visa; Board Member, MMSA.[64]
- Ali Yilmaz: Teacher/Administrator, Horizon (OH); Executive Director/Teacher, Chicago Math and Science Academy (IL); Executive Director/Teacher, Wisconsin College Prep Academy; currently Director of Human Resource Management Concept (Midwestern Region).[65]

Notable Articles regarding the Arizona Network

Lisa Kaiser, *Two City Charter Schools Will End Their Contracts at the End of the Academic Year*, Shepherd Express (Feb. 23. 2016) (discussing academic difficulties at MMSA).[66]

Lisa Kaiser, *Milwaukee's Charter Schools Don't Make the Grade*, Shepherd Express (Jan. 20, 2015) (discussing difficulties at MMSA, including the investigation in Concept's alleged E-Rate fraud, and citing an MMSA official as representing that no MMSA teachers were there on H-1B visas).[67]

Meghan Dwyer, *College Applicant Told Charter School Diploma is Worthless*, Fox6 (Aug. 18, 2013) (discussing name change of Wisconsin Career Academy and difficulties it caused former students).[68]

Erin Richards, *Photo Appears to Show Milwaukee Teacher Sleeping at Defunct School*, Milwaukee Journal-Sentinel (June 13, 2013) (discussing the history of Wisconsin Career Academy, pictures of a teacher sleeping on the job, and citing the executive director as denying any links to Gülen).[69]

[63] Information taken from: MMSA 2011 990-EZ available at: http://tinyurl.com/lyuqakj (last checked 4/26/2017); Advanced Solutions for Education, Inc. corporate documents available at: http://tinyurl.com/mv7qmro (last checked 4/27/2017).

[64] Information taken from: Wisconsin Career Academy, Special Review 2008-19 (Feb. 2008), available at: http://tinyurl.com/l74v4vt (last checked 4/23/2017); MMSA 990s available at: http://tinyurl.com/kfnsfvr (last checked 4/26/2017).

[65] Linkedin profile, available at: http://tinyurl.com/khuam2q (last checked 4/23/2017).

[66] http://tinyurl.com/jyj7epq (last checked 3/7/ 2017).

[67] http://tinyurl.com/jq6q67l (last checked 3/7/ 2017).

[68] http://tinyurl.com/h99uwrj (last checked 3/7/ 2017).

[69] http://tinyurl.com/hh95e4d (last checked 3/7/ 2017).

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MID-ATLANTIC REGION



Quick Facts

- Total # of Schools in Region: 7, plus 1 private school in Virginia.
- Total Regional Revenues for the 2015-16 school year: $33,373,440.59
- Regional Charter Networks:
  - Chesapeake (MD) – 4 schools
  - Triad Math and Science (NC) – 2 schools
  - Queen City (NC) – 1 school
- Total Student Enrollment 2015-16: 4,327 students
- Total # of H-1B applications filed from 2000-2016 in region by Mid-Atlantic charter networks: 103 applications at an estimated cost of $206,000 - $412,000 in public funds spent to immigrate Turkish Gülenists.[1]
- Regional Vendors:
  - Chesapeake Lighthouse Foundation ("CLF")
  - Washington Education Foundation ("WEF")
  - Triad Educational Services ("TES")
  - PERA Construction/Metropolis Group
- Regional Founders and Key Members:
  - Ozcan "Jon" Omural: Removed as school director of Chesapeake Science Point in 2006 by the Anne Arundel County School board due to allegations of sex discrimination;[2] Director of Business Development, Ebru TV – Gülenist Media organization;[3] VP Business Development, Everest International Distribution;[4] currently Managing Director, Central Park Films;[5] Executive Board Member, ABO Capital.[6]
  - Vural "Al" Aksakalli: Lecturer, Johns Hopkins University; Senior Consultant, Lityx, LLC (MD); Associate Professor & Chair, Istanbul Sehir University (Turkey); Faculty, RMIT University (Australia).[7]
  - Lutfi On: Owner/Registered Agent, Lutfi's International Hair Design, Inc. (MD);[8] Incorporator, Maryland Turkish American Inhabitants, Inc. (formerly Maryland Turkish Inhabitants, Inc./Maryland American Turkish Inhabitants, Inc./Maryland American-Turkish Inhabitants, Inc.);[9] Incorporator, American Turkish Friendship Association – Gülenist cultural association.[10]

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1 H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

2 Daniel de Vise, County Takes over School, Washington Post (Mar. 30, 2006), available at: http://tinyurl.com/lq4km7r (last checked 5/4/2017).

3 Ebru TV Honored with Three Mid-Atlantic Emmy Awards,PR News Wire (Sep. 30, 2009), available at: http://tinyurl.com/yakemch (last checked 4/30/2017); see also Federal Election Commission campaign contributions for Ozcan Omural searchable at http://tinyurl.com/fgdcj (last checked 4/28/2017).

4 Ramin Zahed, Malaysia Announces New Production Cash Rebate, Animation Magazine (Apr. 8, 2012), available at: http://tinyurl.com/k7lz5h7 (last checked 4/28/2017).

5 Jon Omural, Cinando, available at: http://tinyurl.com/mlwpuaj (last checked 4/30/2017); Linkedin profile, available at: http://tinyurl.com/k8gzopg (last checked 4/30/2017).

6 Linkedin profile, available at: http://tinyurl.com/k8gzopg (last checked 4/30/2017).

7 Linkedin profile, available at: http://tinyurl.com/lt68gwf (last checked 4/30/2017).

8 Maryland corporate documents for this entity are available at: http://tinyurl.com/kekl9gr (last checked 5/1/2017); Official Statement, Prince George's County, MD, Chesapeake Lighthouse Charter School Project Bonds, available at: http://tinyurl.com/n3xkq7g (last checked 5/1/2017).

9 Maryland corporate documents for this entity are available at: http://tinyurl.com/nx2z25d (last checked 5/1/2017).

10 Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (business ID number 06000038) (last checked 5/4/2017).

- Ali Bicak: Attempted founder, Loudoun Math & IT Academy (VA);[11] Advisory Board Member, Pinnacle Academy (VA, private Gülenist school);[12] Consultant, Baltimore IT Academy (MD); Systems Engineer, Telenix Corporation; Adjunct Faculty, Stratford University; Adjunct Faculty, Univ. of Maryland University College; Assistant/Adjunct Professor, Marymount University; Information System Security Officer, FDA.[13]
- Ali Tombak: Founding and Current Board President, Charlotte Education Foundation; Board Member and former Board President, Triad Math and Science Academy Company;[14] Former Board member, Horizon Science Academy (OH);[15] Principal Engineer, Technology Platforms Org - RF Micro Devices Inc;[16] Board Member, Turkish-American Scientists and Scholars Association;[17] Electrical Engineering, Middle East Technical University (Turkey).[18]
- Mustafa Atay: Member, Charlotte Education Foundation; Board Member, Triad Math and Science Academy Company;[19] Associate Professor of Computer Science, Winston-Salem State University.[20]
- Suzan Mertyurek: Board Member, Triad Math and Science Academy Company;[21] Board of Trustees, Virginia International University; Proposal Analyst, Pharmaceutical Product Development Inc.;[22] Applicant, Knoxville Charter Academy (TN) (attempt);[23] currently Public Relations Coordinator for Knoxville, TN, Turkish Center.[24]
- Mahfuz Sapan: Founder and Current Treasurer, Charlotte Education Foundation; CEO Ocean Trading, Inc.; Founder of Mobilworx (Istanbul, Turkey).[25]

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11 Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 4/30/2017).

12 Ali Bicak, Pinnacle Academy, available at: http://tinyurl.com/kh4nwyu (last checked 5/4/2017).

13 Linkedin profile, available at: http://tinyurl.com/kckfou6 (last checked 4/30/2017).

14 Founding Board Members - biography, Triangle Math and Science Academy Charter School application (Nov. 2011), available at: https://tinyurl.com/l9ymrtz (last checked 5/20/2017); IRS Form 990 for Triad Math and Science Academy Company, available from: http://tinyurl.com/lpasybv (last checked 6/5/17).

15 Board member information, Triad application for federal grant p. e35, United States Department of Education (Aug. 25, 2010), available at: http://tinyurl.com/y8o8ng5b (last checked 6/5/17).

16 Founding Board Members – biography, Queen City STEM School Charter Application (December 2013), available at: https://tinyurl.com/l7edscw (last checked 5/20/2017); Charlotte Education Foundation IRS 990 Form 2014, available at: https://tinyurl.com/y84c8r4w (last checked 5/29/2017).

17 Board member information, Triad Application for Grants, United States Department of Education (June 6, 2012), available at: https://tinyurl.com/y869328r (last checked 5/29/2017).

18 Founding Board Members - biography, Queen City STEM School Charter Application (December 2013), available at: https://tinyurl.com/l7edscw (last checked 5/20/2017); Charlotte Education Foundation IRS 990 Form 2014, available at https://tinyurl.com/y84c8r4w (last checked 5/29/2017).

19 Board Member biography, Triangle Math and Science Academy Charter School application (November 2011), available at: https://tinyurl.com/l9ymrtz (last checked 5/20/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/5/17).

20 Founding Board Members, Queen City STEM School Charter Application (December 2013), available at: https://tinyurl.com/l7edscw (last checked 5/20/2017); Charlotte Education Foundation IRS 990 Form 2014, available at https://tinyurl.com/y84c8r4w (last checked 5/29/2017)

21 Board member biography, Triad Math and Science Academy Charter School application, received from the North Carolina Department of Public Instruction May 12, 2017 in response to 2017 FOIA request.

22 Id.

23 Knoxville Charter Academy initial application, available at: https://tinyurl.com/m8zwttl (last checked 5/23/2017).

24 Constantine, Mary. Dishing with Suzan Mertyurek. Knox News (Sep. 16, 2010), available at: https://tinyurl.com/mku6zm9 (last checked 5/24/2017).

25 Founding Board Member - biography, Queen City STEM School Charter Application (December 2013), available at:

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- ▷ Numan Dogan: Vice President, Triad Math and Science Academy Company; Professor of Electrical Engineering, North Carolina A&T State University;[26] B.S. Karadeniz Technical University (Turkey).[27]
- ▷ Kenan Gundogdu: Founding member and current Board President of the Triad Math and Science Academy Company; Assistant Professor Department of Physics, North Carolina State University.[28]

- ► Regionally Active Turkish cultural associations: Rumi Forum, Divan Center (NC), Institute of Islamic and Turkish Studies – North Carolina, American Turkish Friendship Association, Maryland Turkish American Inhabitants, Inc. ("MARTI"), Mid-Atlantic Federation of Turkic American Associations ("MAFTAA")

The Origins of the Mid-Atlantic Region

When Fethullah Gülen relocated to the United States in 1999, it prompted a wave of charter schools opened by his followers. In the Mid-Atlantic region, Chesapeake Lighthouse Foundation, Inc. ("CLF") formed in 2003 in Maryland. It opened its first school, Chesapeake Science Point Charter School ("CSP"), in 2005. Frederick County Public Schools denied a second charter school application in 2006 due to the applicants' failure to propose a substantially unique educational program. In North Carolina, Triad Math and Science Academy Company ("TMSAC") formed in 2007 and opened its first school in 2008.[29]

Each network then continued to expand. In Maryland, CLF opened additional schools in 2010 and 2011. The first of these, the Baltimore IT Academy, closed in 2013. CLF opened two more schools in 2014. TMSAC opened its second school in 2012. Gülenists also formed the Charlotte Education Foundation ("CEF") in 2013, which opened its first school in 2015.[30] Seven other North Carolina charter petitions failed between 2009 and 2014.

Gülenists attempts to form networks in Virginia and Delaware during these time periods failed.[31] In Delaware, the First State Math and Science Academy application failed in 2011 and the Delaware Math & IT Academy application failed in 2014.The application for the Loudoun Math & IT Academy in Virginia failed in 2013. Thus, the fledgling Mid-Atlantic region remains largely confined to Maryland and North Carolina, although the Pinnacle Academy, a

https://tinyurl.com/l7edscw (last checked 5/20/2017); Charlotte Education Foundation IRS 990 Form 2014, available at: https://tinyurl.com/y84c8r4w (last checked 5/29/2017).

26 Board Member - biography; Triangle Math and Science Academy Charter School application (November 2011), available at: https://tinyurl.com/l9ymrtz (last checked 5/20/2017); IRS Form 990 for Triad Math and Science Academy Company, available from: http://tinyurl.com/lpasybv (last checked 6/5/17).

27 Id.

28 Board Member biography, Triangle Math and Science Academy Charter School application (November 2011), available at: https://tinyurl.com/l9ymrtz (last checked 5/20/2017); IRS Form 990 for Triad Math and Science Academy Company, available from: http://tinyurl.com/lpasybv (last checked 6/5/17).

29 Corporate documents for this entity are located at: http://tinyurl.com/ychvc8ql (last checked 6/16/2017).

30 Corporate documents for this entity are located at: http://tinyurl.com/y88y5e2p (last checked 6/16/2017).

31 See, e.g., Michael Alison Chandler, Loudoun County Appears Poised to Turn Down Charter School Application, Washington Post (Feb. 26, 2013), available at: http://tinyurl.com/l32f2f5 (last checked 5/5/2014); Delaware Math and IT Academy Application and Notification Letter, available at: http://tinyurl.com/kj7udcq (last checked (5/5/2017); First State Math & Science Application and Final Report (proposing to use a student information system supplied by WEF) available at: http://tinyurl.com/m7lsok5 (last checked 5/5/2017); see also Board Shoots Charter School Down, The Connection (Aug. 23, 2006) (discussing a denial of Blue Hills Foundation's application for Loudoun Science Academy in Virginia; a "Hasan Burk" served as Vice President of the Blue Hills Foundation near the same time as WEF's formation), available at: http://tinyurl.com/mfc2fhc (last checked 5/5/2017).

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Gülenist private school, is currently in operation in Virginia.[32]

CSP, the first school to open in Maryland, had an extremely rocky start. This potentially explains the slow growth of the Gülen charter network in Maryland. CSP's financial, operational, and academic difficulties generated a substantial amount of press. CSP also spent a significant period of time on probation due to ongoing issues with the school. As part of these problems, CSP's authorizer, Anne Arundel County Public Schools, removed two principals. The second principal removed, Fatih Kandil, would return to CSP and later serve as the Superintendent of TMSAC's schools beginning in 2013. Mr. Kandil currently works as the principal of Pinnacle Academy in Virginia.

Triad Math and Science Academy in North Carolina suffers from similar problems. Statements by parents and school board members at a board meeting in 2017 paint a picture of "curriculum chaos."[33] These problems include failures by the school to: provide services to students with special needs; provide a seventh grade advanced math class that meets the needs of students; teach programs aligned with North Carolina standards; prepare students for third and fifth grade science tests; and provide a rigorous and quality high-school education.

Schools in the Mid-Atlantic region contract, or have contracted, with the Washington Education Foundation ("WEF"). WEF is a District of Columbia created in 2005. WEF provided services to at least one Gülen charter school in Maryland and assisted the proposed Loudoun Math and IT Academy in Virginia.[34] It currently provides a Student Information System to Pinnacle Academy in Virginia in conjunction with Apple Educational Services, the Gülenist oversight entity for the Northeast region.[35] TMSAC schools contract with WEF for management and administrative services.[36] It is possible that Gülenists intended WEF to serve as a regional oversight entity in the Mid-Atlantic region, but those plans changed after the region failed to expand beyond Maryland and North Carolina.

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
Chesapeake (MD)		✓		
Triad Math and Science (NC)		✓		
Queen City (NC)		✓		

Of the three charter networks in the Mid-Atlantic region, Maryland has the largest and most developed network. The Chesapeake Lighthouse Foundation operates four charter schools, for which it also operates as a charter management organization. In North Carolina, the Triad network features two charter schools and the Queen City network features only one charter

[32] Principal's Welcome, Pinnacle Academy, available at: http://tinyurl.com/mk94yat (last checked 6/16/2017).

[33] Triad and Triangle Board Minutes (Feb 18, 2017; Feb 22, 2017; March 25, 2017); available from https://drive.google.com/drive/folders/0B4bZ_vcHPR5JZnd3RVNrUTUxbFE (last checked 6.4.17).

[34] Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 5/1/2014).

[35] Student Information System Login, Pinnacle Academy, available at: http://tinyurl.com/ke5j6dz (last checked 5/4/2017).

[36] Public Finance Authority Education Revenue Bonds Triad Educational Services – p. A-9; (11 March 2015); available from https://emma.msrb.org/IssueView/IssueDetails.aspx?id=ER366231 (last checked 6.3.17).

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school. Since Gülenist efforts in Delaware and Virginia stalled, none of the Mid-Atlantic networks may be able to reach Stage Three. With only seven schools in the Mid-Atlantic region, the network currently cannot support a large oversight entity like Harmony Public Schools in the Greater Texas region, Accord in the Western Region, or Concept Schools in the Midwestern Region. The Mid-Atlantic charter schools also do not appear to contract with WEF for charter management services: the Chesapeake Lighthouse Foundation provides management services to the schools in Maryland, and Triad Math and Science Academy provides back-office services to the other schools in North Carolina. This potentially limits the ability of WEF to expand in the Mid-Atlantic region since income is diverted to the Chesapeake Lighthouse Foundation and Triad Math and Science Academy instead of WEF. Gülen charter schools in other states, however, appear to contract with multiple entities for duplicative services, and the relationships between charter schools in the Mid-Atlantic region, WEF, and the Chesapeake Lighthouse Foundation should be investigated.

The Maryland and North Carolina networks have already received bond financing. In 2015, Triad Educational Services received $22.21 million in bond financing for the Triangle Math and Science and Triad Math and Science Academies. WEF received $249,610 in consulting fees from these bonds. In Maryland, Chesapeake Education Services and CLF received $35.35 million in bonds to acquire and renovate facilities for their charter schools. CLF received an additional $21.5 in bond financing in 2016 for the acquisition and construction of a high school for Chesapeake Math and IT Academy North.

Regional Vendors

Gülen charter schools in the Mid-Atlantic region contract with WEF. According to its website, WEF provides school startup services, academic services, business resources, and teacher resources. Ben Karaduman served as the executive director of WEF in 2011 prior to serving as the president of CLF from 2011 to 2013.[37] A 2012 charter application in Virginia revealed that WEF provided educational services to one school in the CLF network.[38] Given Karaduman's relationship with CLF and its vendor WEF, this behavior potentially constitutes a conflict of interest. Triad and Triangle Academies paid WEF a total of $667,925 from 2011 through 2014, the most recent year available.

CLF serves as both the governing board for the Maryland charter schools as well as a paid vendor. CLF provides IT, educational technology, curriculum, and outreach services for a fee of eight percent of each school's total revenues.

In North Carolina, the Triad Math and Science Academy provides back-office services other Gülen charter schools in the state.

Charter schools in both Maryland and North Carolina lease facilities from related organizations serving as landlords. In Maryland, three of the four Chesapeake schools lease facilities from Chesapeake Education Services, LLC ("CES"). Due to inclusion in bond financing obtained by CES and CLF, these schools will pay high rents to CLF/CES to finance the bond debt. By acting as a middleman for the schools, CLF/

[37] Karaduman served as CLF president from 2011-2013, and according to a 2012 petition filed for a VA charter school serviced by WEF and CLF, WEF is described as "providing educational services . . . to CSP." Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017); Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 5/1/2014).

[38] Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 5/1/2014).

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CES will potentially profit from the bond financing arrangement at the schools' expense.

In North Carolina, two of the Gülen charter schools lease facilities from Triad Educational Services ("TES"). Just like in Maryland, TES obtained bond financing for the acquisition and renovation for facilities for the two charter schools. As a result, the schools must pay high rents to service the bond debt. In both states, the Gülen charter schools will never own their facilities in spite of their rent payments. By using TES and CES as middlemen, Gülenists will be able to retain ownership over the schools' facilities even though the schools' public funds will pay the acquisition, construction, and renovation costs for their campuses. In addition to these rental agreements, Triad Math and Science Academy also made large payments to TES for building maintenance and other services. And in 2014, TES hired the Metropolis Group for a $1 million renovation project at the Triad Math and Science Academy elementary school. Gülenist construction companies in other states and regions have engaged in questionable conduct with Gülenist charter schools. For these reasons, these rental, maintenance, and construction agreements should be carefully scrutinized.

Regional Employee Overlap*

Employee	MD	NC	VA	Other States, Vendors, Cultural Associations
Hakan Orak	✓	✓		Harmony (TX); Fulton Science (GA)
Hakki Karaman		✓		Syracuse Academy of Science (NY); Magnolia Science (CA); Magnolia Educational and Research Foundation (CA)
Fatih Kandil	✓	✓	✓	Brooklyn Amity School (NY); Chicago Math and Science (IL); Wisconsin Career Academy (WI)
Mithat Karabulut		✓		Dove (OK); LISA (AR); Harmony (TX)
Atila Akyurek		✓		Harmony (TX); Dove (OK)
Bunyamin Karaduman	✓			WEF; Coral (NV); First State Math and Science (DE) (attempt)

*This is just a sampling of the employment overlap of the Southeastern Region's Turkish employees.

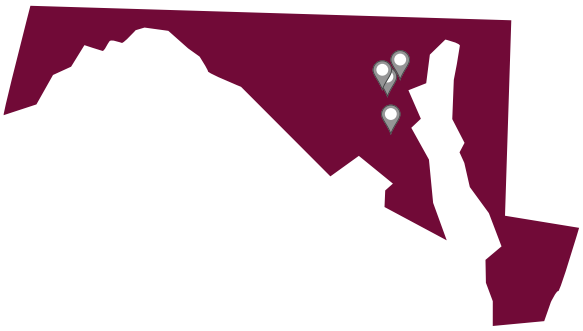
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Maryland



QUICK FACTS ON GÜLEN CHARTER SCHOOLS MARYLAND



NUMBER OF SCHOOLS	**4 (Open)** 1 (Closed)
KNOWN AS	**Chesapeake Science Point** **Chesapeake Math and IT**
TOTAL ENROLLMENT	**2,065**
CHARTER VENDOR	**Chesapeake Lighthouse Foundation**
TOTAL REVENUES	**$22,018,970**
RELATED INSTITUTIONS	**Attempted Networks**

VA — Loudoun Math and IT Academy

DE — First State Math and Science, Delaware Math and IT Academy

KEY PEOPLE



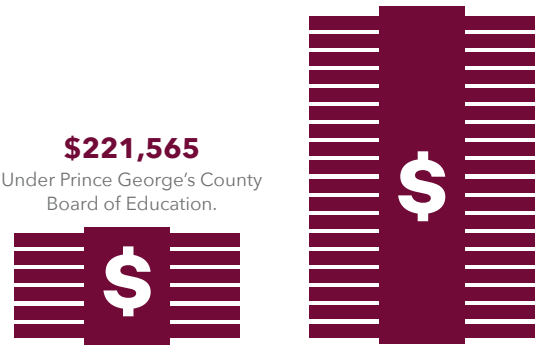
Ozcan "Jon" Omural | Vural "Al" Aksakalli | Lutfi On | Ali Bicak

REAL ESTATE

CMIT South paid $221,565 in rent to Prince George's County Board of Education. Under its new lease with CES (CLF's affiliated landlord entity) CMIT South's **rent tripled, jumping to $676,000.44.**

$676,000.44
Under the CLF affiliated landlord entity CES

$221,565
Under Prince George's County Board of Education.



By using bond financing, CLF/CES effectively builds in **million dollar profits** for themselves at the schools' expense.

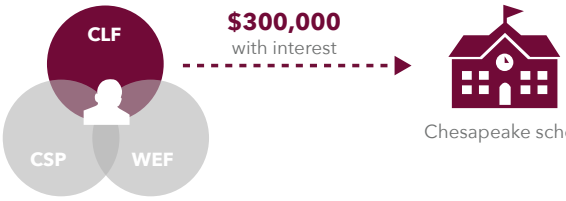


H-1B VISA APPLICATIONS

35 H-1B **H-1B VISA APPLICATIONS 2001 - 2016,**



CONFLICTING INTERESTS



One CLF board member loaned one of the Chesapeake schools $300,000 with interest. Also, Ben Karaduman served as the executive director of Washington Education Foundation ("WEF"), a Gulenist education services vendor that was providing services to CSP, at the same time as he served as the president of CLF. Given Karaduman's overlapping responsibilities with CLF and its vendor WEF, we believe this constitutes self-dealing behavior and an actionable conflict of interest. This is the **same behavior seen in the Fulton Science (GA) network that ultimately resulted in the termination of those charter schools.**

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Mid-Atlantic
- School Names (known as):
  - Chesapeake Science Point
  - Chesapeake Math and IT
- Total # of Schools in State: 4 charter schools open, 1 charter school closed
- Total Student Enrollment 2015-16: 2,065
- Charter Holder/Governing Board(s):
  - Chesapeake Lighthouse Foundation, Inc.
  - Organized as a non-profit with 501(c)(3) status
  - Operates 4 charter schools
- Charter Management Services Vendor: Chesapeake Lighthouse Foundation
- Regional Gülen Organization Oversight Entity: Chesapeake Lighthouse Foundation
- Regional Sister Networks: None as of date of report. Attempted Networks: Loudoun Math and IT Academy (VA); First State Math and Science (DE); Delaware Math and IT Academy (DE).
- Total Revenues for the 2015-16 school year: $22,018,970[1]
- Network Founders:
  - Ozcan "Jon" Omural: Removed as school director of Chesapeake Science Point in 2006 by the Anne Arundel County School board due to allegations of sex discrimination;[2] Director of Business Development, Ebru TV – Gülenist Media organization;[3] VP Business Development, Everest International Distribution;[4] currently Managing Director, Central Park Films;[5] Executive Board Member, ABO Capital.[6]
  - Vural "Al" Aksakalli: Lecturer, Johns Hopkins University; Senior Consultant, Lityx, LLC (MD); Associate Professor & Chair, Istanbul Sehir University (Turkey); Faculty, RMIT University (Australia).[7]
  - Lutfi On: Owner/Registered Agent, Lutfi's International Hair Design, Inc. (MD);[8] Incorporator, Maryland Turkish American Inhabitants, Inc. (formerly Maryland Turkish Inhabitants, Inc./Maryland American Turkish Inhabitants, Inc./Maryland American-Turkish Inhabitants, Inc.);[9]

1 Figure includes revenues of Chesapeake Science Point, Chesapeake Math and IT North, Chesapeake Math and IT South, and Chesapeake Math and IT Elementary. Figure available through audit of CLF and subsidiaries, available at: http://tinyurl.com/mqr9mvm (p. 114) (last checked 04/16/2017).

2 Daniel de Vise, County Takes over School, Washington Post (Mar. 30, 2006), available at: http://tinyurl.com/lq4km7r (last checked 5/4/2017).

3 Ebru TV Honored with Three Mid-Atlantic Emmy Awards, PR News Wire (Sep. 30, 2009), available at: http://tinyurl.com/yakemch (last checked 4/30/2017); see also Federal Election Commission campaign contributions for Ozcan Omural searchable at http://tinyurl.com/fgdcj (last checked 4/28/2017).

4 Ramin Zahed, Malaysia Announces New Production Cash Rebate, Animation Magazine (Apr. 8, 2012), available at: http://tinyurl.com/k7lz5h7 (last checked 4/28/2017).

5 Jon Omural, Cinando, available at: http://tinyurl.com/mlwpuaj (last checked 4/30/2017); Linkedin profile, available at: http://tinyurl.com/k8gzopg (last checked 4/30/2017).

6 Linkedin profile, available at: http://tinyurl.com/k8gzopg (last checked 4/30/2017).

7 Linkedin profile, available at: http://tinyurl.com/lt68gwf (last checked 4/30/2017).

8 Maryland corporate documents for this entity are available at: http://tinyurl.com/kekl9gr (last checked 5/1/2017); Official Statement, Prince George's County, MD, Chesapeake Lighthouse Charter School Project Bonds, available at: http://tinyurl.com/n3xkq7g (last checked 5/1/2017).

9 Maryland corporate documents for this entity are available at: http://tinyurl.com/nx2z25d (last checked 5/1/2017).

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Incorporator, American Turkish Friendship Association – Gülenist cultural association.[10]

- Ali Bicak: Attempted founder, Loudoun Math & IT Academy (VA);[11] Advisory Board Member, Pinnacle Academy (VA, private Gülenist school);[12] Consultant, Baltimore IT Academy (MD); Systems Engineer, Telenix Corporation; Adjunct Faculty, Stratford University; Adjunct Faculty, Univ. of Maryland University College; Assistant/Adjunct Professor, Marymount University; Information System Security Officer, FDA.[13]

Overview

As of the 2016-2017 school year, Maryland has four Gülen Organization charter schools in operation. These schools are overseen by the Chesapeake Lighthouse Foundation, Inc. ("CLF"), which incorporated in 2003. In 2011, CLF merged with two other Gülenist governing boards: Baltimore IT Academy, Inc., and Chesapeake Math & IT Academy, Inc. CLF survived those mergers. To fulfill a condition for the renewal of Chesapeake Science Point Charter School ("CSP"), CLF opened and controls Chesapeake Science Point Charter School, LLC, the entity overseeing CSP. CLF is the sole member of Chesapeake Science Point Charter School, LLC.

On average, these schools serve approximately 0% Limited English Proficient students vs. 8% state average; 27% free and reduced lunch population vs. 45% state; 1% special education vs. 11% state; 69% African American students vs. 34% state; 12% Caucasian students vs. 39% state; and 5% Hispanic students vs. 15% state.[14] As these numbers indicate, the Chesapeake MD network serves significantly less than the state average for vulnerable student populations, including students with disabilities, English language learners, and students eligible for free/reduced lunch.

[10] Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (business ID number 06000038) (last checked 5/4/2017).

[11] Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 4/30/2017).

[12] Ali Bicak, Pinnacle Academy, available at: http://tinyurl.com/kh4nwyu (last checked 5/4/2017).

[13] Linkedin profile, available at: http://tinyurl.com/kckfou6 (last checked 4/30/2017).

[14] Some percentages are only approximate due to data masking of low demographic counts by the Maryland Department of Education. Due to the nature of the data masking, all approximations would underestimate a particular population. All data taken from the 2016 year reports available at: http://tinyurl.com/lh8xc5w (last checked 5/1/2017).

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Chesapeake Science Point Charter School 7321 Parkway Drive South, Hanover, MD 21076	6-12 2005-Present	0% LEP (data masked) 25% FRL 2% Spec.Ed. (masked) 32% African American 40% Caucasian 07% Hispanic	Anne Arundel County Public Schools	CLF (2005-2015) Chesapeake Science Point Public Charter School, LLC (2015 – Present)
Chesapeake Math & IT Academy 6100 Frost Place, Laurel, MD 20707	6-12 2011 - Present	0% LEP (masked) 24% FRL 2% Spec.Ed. (masked) 79% African American 05% Caucasian 06% Hispanic	Prince George's County Public Schools	CLF
Chesapeake Math & IT Academy South 9822 Fallard Court Upper Marlboro, MD 20772	6-9 2014 - Present	0% LEP (masked) 25% FRL 0% Spec.Ed. (masked) 92% African American 0% Caucasian (masked) 02% Hispanic	Prince George's County Public Schools	CLF
Chesapeake Math & IT Academy Elementary 6151 Chevy Chase Drive Laurel, MD 20707	K-5 2014 - Present	0% LEP (masked) 36% FRL 0% Spec.Ed. (masked) 32% African American 40% Caucasian 07% Hispanic	Prince George's County Public Schools	CLF
Closed and/or Attempted Schools				
Baltimore IT Academy	6-7 2010 - 2013		Baltimore City Public Schools	Baltimore IT Academy Inc. (2010 – 2011) CLF (2011 – 2013)
Carroll Creek Public Charter School	Application Denied 2006, Failed to provide a substantially unique program		Frederick County Public Schools	Carroll Creek Foundation, Inc.

**Student demographic information was taken from the 2015-2016 school year. "LEP" indicates Limited English Proficient, "FRL" indicates students receiving free/reduced lunch, and "Spec. Ed." indicates special education students.[15] "Masked" indicates the number of students was too low to calculate.*

[15] Student enrollment and demographic information available through open records request responses from the Pennsylvania Department of Education.

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A History of Strategic Ambiguity and Conflicting Interests

The Chesapeake MD network began with the founding of Chesapeake Lighthouse Foundation, Inc. ("CLF") in 2003. Two years later, CLF opened its first school: Chesapeake Science Point ("CSP") authorized by Anne Arundel County Public Schools ("AACPS") in 2005. Due to immediate difficulties with the school, AACPS placed CSP on probation in its initial charter term, which lasted from 2006-2009.[16] CSP's financial, operational, and academic difficulties generated a substantial amount of press at the time, including articles in major newspapers like the *Washington Post* and the *Baltimore Sun,* and are discussed further below.[17]

With CLF and CSP's rocky beginnings, the Gülenists were unable to expand in Maryland again until 2010, and only after they created additional corporate entities to sponsor the charter applications. Both Baltimore IT Academy, Inc. and Chesapeake Math and IT Academy, Inc. were incorporated in 2009.[18] These entities operated Baltimore IT Academy (opened 2010) and Chesapeake Math and IT Academy ("CMIT" or "CMIT North") (opened 2011) respectively. Once these schools were open and operating, however, both Baltimore IT Academy, Inc. and Chesapeake Math and IT Academy, Inc. immediately merged into CLF.[19] We believe these new corporate entities were likely used to distance the new school initiatives from the bad press surrounding CSP and CLF in order to gain authorization.[20]

CLF operates simultaneously as the non-profit governing board and the paid services provider for the four Chesapeake MD charter schools, using the same model as Magnolia Public Schools (CA). This model calls into question whether a non-profit board of directors with fiduciary duties to each of the schools it governs can ethically contract with itself for paid services. To highlight the seriousness of this apparent self-dealing, CLF made over $3.6 million in profits off of the Chesapeake MD schools in 2016 alone.[21]

CLF's corporate structure came under fire by AACPS because its self-perpetuating nature denied parents and students a voice in the governance of CSP. As a condition of renewal, AACPS required CLF to reconstitute the CLF governing board to reflect the community it serves, stating that at a minimum, parents of CSP should elect the majority of members of the school's governing board.[22] Rather than give up its control, however, CLF created Chesapeake Science Point Charter School, LLC, to oversee CSP. Since CLF is the sole member of Chesapeake Science Point Charter School, LLC, the district's requirement for the CLF governing board to be both transparent and accountable to parents through board member elections has not truly been met.[23]

16 See "Scandals, Investigations & Notable Activities", infra.

17 See "Notable Articles regarding the Maryland Network", infra.

18 Maryland corporate documents for these entities are available at: http://tinyurl.com/kkv3fkz (Baltimore IT Academy, Inc.) and http://tinyurl.com/m7fwsnw (Chesapeake Math and IT Academy, Inc.) (last checked 5/3/2017).

19 Id.

20 Two of Baltimore IT Academy's incorporators, Vural Aksakalli and Ali Bicak, founded CLF. Maryland corporate documents for these entities are available at: http://tinyurl.com/kkv3fkz (Baltimore IT Academy, Inc.) and http://tinyurl.com/l2kr8qn (CLF) (last checked 5/3/2017). After merging with CLF, one of CMIT's incorporators, Mehmet Kurum, would continue to serve on the CLF board of directors. Compare Maryland corporate documents for CMIT available at: http://tinyurl.com/m7fwsnw with CLF's 990s available at: http://tinyurl.com/kdm8dyz (last checked 5/3/2017).

21 CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (p. 114) (last checked 5/2/2017).

22 Chesapeake Science Point Public Charter School Report on Compliance with Renewal Conditions (Mar. 26, 2013), available at: http://tinyurl.com/mj5jgjr (last checked 4/30/2017).

23 Chesapeake Science Point Public Charter School, LLC Financial Statement (June 30, 2016), available through public records request to AACPS.

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Also like Magnolia Public Schools (CA), CLF uses its wholly-owned subsidiary, Chesapeake Education Services, LLC ("CES"), to lease properties to CLF schools. By using public funds to acquire property but vesting the title in external, private entities, the Gülen Organization effectively finances its own private acquisition of property at the public's expense. While the Chesapeake MD schools' revenues pay the mortgages on the properties they rent, the property would remain in the hands of CES, CLF, and the Gülen Organization if the schools' charter contracts were to be revoked or non-renewed. This represents a lost investment opportunity for public funds.

Due to the string of failed charter applications affiliated with CLF, its founders, and its vendor Washington Education Foundation, our research indicates that the Gülen Organization likely intended Maryland to be the hub of a new Mid-Atlantic region. CLF appears to be playing the role of the governing-board-turned-CMO, as Magnolia Public Schools has in California and Harmony Public Schools has in Texas. Washington Education Foundation ("WEF"), one of CLF's vendors, appears to be playing the part of the external educational services provider, much like Accord has for Magnolia Public Schools in California and Sonoran Schools in Arizona. WEF was created in 2005 by Hasan Karaburk,[24] and according to its basic, bare bones website, WEF supposedly provides school startup services, academic services, and business resources as well as teacher resources.[25]

Like other networks, CLF has engaged in self-dealing behavior and questionable transactions. For example, one CLF board member loaned one of the Chesapeake schools $300,000 with interest.[26] Also, Ben Karaduman served as the executive director of Washington Education Foundation ("WEF"), a Gülenist education services vendor that was providing services to CSP, at the same time as he served as the president of CLF.[27] Given Karaduman's overlapping responsibilities with CLF and its vendor WEF, we believe this constitutes self-dealing behavior and an actionable conflict of interest. This is the same behavior seen in the Fulton Science (GA) network that ultimately resulted in the termination of those charter schools.

CLF and WEF have both attempted to open new charter schools in the states neighboring Maryland, however to date, these proposals have failed.[28] Thus, the fledgling Mid-Atlantic region remains largely confined to Maryland, although the Pinnacle Academy, a Gülenist private school, is currently in operation in Virginia.

Financial Issues

Maryland requires its charter schools to undergo annual audits. The audits are not made public, however, and must be requested from the institutions or the authorizers themselves. A

[24] WEF corporate documents are available at: http://tinyurl.com/l3qmocj (last checked 5/1/2014).

[25] Washington Education Foundation, available at: http://tinyurl.com/k8zex3x (last checked 5/5/2017).

[26] CLF's audits were made available through a public records request to Anne Arundel County Public Schools.

[27] Karaduman served as CLF president from 2011-2013, and according to a 2012 petition filed for a VA charter school serviced by WEF and CLF, WEF is described as "providing educational services . . . to CSP." Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017); Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 5/1/2014).

[28] See, e.g., Michael Alison Chandler, Loudoun County Appears Poised to Turn Down Charter School Application, Washington Post (Feb. 26, 2013), available at: http://tinyurl.com/l32f2f5 (last checked 5/5/2014); Delaware Math and IT Academy Application and Notification Letter, available at: http://tinyurl.com/kj7udcq (last checked (5/5/2017); First State Math & Science Application and Final Report (proposing to use a student information system supplied by WEF) available at: http://tinyurl.com/m7lsok5 (last checked 5/5/2017); see also Board Shoots Charter School Down, The Connection (Aug. 23, 2006) (discussing a denial of Blue Hills Foundation's application for Loudoun Science Academy in Virginia; a "Hasan Burk" served as Vice President of the Blue Hills Foundation near the same time as WEF's formation), available at: http://tinyurl.com/mfc2fhc (last checked 5/5/2017).

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public records request to Anne Arundel County Public Schools returned audits for CLF and its affiliates from 2013 through 2016, including audits of CSP done for Anne Arundel County Public Schools. CLF's 2010-2011 audit is available online, however,[29]and additional CLF audits and financial documents are available through bond documents associated with CLF.[30]

The lack of public disclosure makes it easier for entities like CLF to hide financial and procurement issues with the schools, which we believe is the case here. The available audits showcase a series of ongoing financial issues at the charter schools that are endemic to other Gülen Organization charter networks. The frequent inter-entity lending practices in particular—between schools and between schools and CLF—is a known warning sign for money laundering.[31] Similarly, there are issues with accurately documenting attendance, absences, and withdrawals of students throughout the Gülen Organization charter networks. Failure in this recordkeeping, intentional or not, may allow a school to garner the most public funds while educating the least number of students. If intentional, this method particularly takes advantage of "problem" students, whose truancy is purposefully unreported while the schools continue to collect their FTE funding. There are also issues with accurately documenting free and reduced meals for students throughout the Gülen Organization charter networks. Again, this method would be effective for garnering the most public funds while serving the least number of students. Lastly, the fact that these schools do not maintain accurate and complete immigration records for their numerous foreign employees, including state mandated fingerprint testing, is yet more evidence of the Gülen Organization's suspect and excessive use of the federal H-1B visa program.

The numerous audit findings for CLF and CSP occur across multiple years, including:

- Lack of Compliance with Required Financial Procedures and Accounting Standards:
  - Failure to record allowances for doubtful accounts receivable;
  - Failure to prevent or detect misstatements in the financial statements presented to auditors;
  - Lack of segregation of duties, which increases the possibility of fraud;
  - Lack of controls over the expense approval process;
  - Necessity of adjusting entries to reconcile local revenue appropriations to the financial statements; and
  - Failure to capitalize assets or record depreciation.

- Inappropriate Lending and Documentation Between Entities:
  - Interest-bearing loans to CLF from board members;
  - Failure to complete reconciliations and schedules for "intercompany" transactions;
  - Inter-company and school transactions were not recorded as receivables or payables for the appropriate entity; and
  - Lack of formal credit agreements for CSP with CLF for loans from CLF.

News reports offer additional clarity about financial abuse at CSP. The school's authorizer alleged that it inappropriately used construction grant funds to pay for operating expenses.[32] The school relied on significant gifts and donations

[29] Chesapeake Science Point Charter Renewal Application (Feb. 1, 2012), available at: http://tinyurl.com/knqfdl9 (last checked 5/21/2017).

[30] See official statements and other bond documents available at: http://tinyurl.com/n3hlflr (last checked 5/1/2017) and http://tinyurl.com/n3xkq7g (last checked 5/1/2017).

[31] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

[32] Aaron Koepper, Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System, Loudoun Times-Mirror (Dec. 13, 2012), available at: http://tinyurl.com/lbr85ym (last checked 5/4/2017).

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to fund operations.[33] In 2013, auditors identified missing checks for $7,648 in expenses.[34]

These problems have not gone entirely unnoticed. Anne Arundel County Public School, CSP's authorizer, has expressed concern about CSP's financial practices. Documents on the school district's website reflect numerous problems at CSP since 2005, including:

- Failure to enter accounts payable in a timely manner;
- Multiple changes made to reports after they are submitted;
- Concerns about accuracy of financial information;
- Concerns about the school's ability to operate;
- Inaccurate financial statements and delayed payments contractors to support the school's capacity to end the 2010-11 school year with a positive cash balance;
- Negative working capital and costs exceeding revenues;
- Deletion of checks from the accounting system;
- Financial statements that did not tie to the general ledger submitted with the financial statements;
- Failure to timely submit financial documents;
- Failure to comply with practices regarding invoice approval, reimbursement documentation, and purchase card use;
- Failure to comply with competitive procurement and bidding procedures.

Bond Financing

CLF has secured bond financing from Prince George's County Maryland. In 2015, CLF and its real estate arm Chesapeake Education Services, LLC ("CES") received $35,350,000 in bond financing. These bonds were used to (a) refund a prior 2015 bond issuance for the acquisition of CMIT South and the improvement of CMIT South and CSP;[35] (b) fund construction and renovation at CMIT Elementary; and (c) finance further construction at CMIT South.[36] Due to inclusion in this bond financing, CMIT South and CMIT Elementary are subject to fifteen-year lease agreements with high rents.

In 2016, CLF received an additional $21,500,000 in bond financing from Prince George's County Maryland. The funds are to be used for the acquisition and construction of a high school for CMIT North.[37] Due to inclusion in this bond financing, CMIT North's high school is subject to a fifteen-year lease agreement with high rents.

[33] Kimberly Marselas, Last Charter School Defends its Performance, The Baltimore Sun (Dec. 2, 2007), available at: http://tinyurl.com/mvx8ff4 (last checked 5/4/2017).

[34] Kelcie Pegher, Chesapeake Science Point to continue school, but won't expand, The Baltimore Sun (Feb. 5, 2015), available at: http://tinyurl.com/jkuaap5 (last checked 5/4/2017).

[35] Details for a prior issuance could not be found on EMMA, available at: http://tinyurl.com/k3mnqv2 (last checked 5/2/2017).

[36] Details for this issuance are available at: http://tinyurl.com/n3hlflr and http://tinyurl.com/lf22e63 (last checked 5/2/2017).

[37] Details for this issuance are available at: http://tinyurl.com/n3xkq7g (last checked 5/2/2017) and http://tinyurl.com/k6q58r3 (last checked 5/2/2017).

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Real Estate

The CLF network engages in the same type of suspect real estate transactions utilized by the Concept network and its affiliated real estate arm, New Plan Learning, throughout the Midwest; the Harmony network and its affiliated real estate arm, Charter School Solutions, in Texas; and the Dove Science network in Oklahoma. These questionable real estate deals depend on a related entity, also controlled by Turkish Gülenists, acquiring land and facilities and leasing it back to the Gülenist charter network at premiums. The Gülenist landlord entity is often included on major bond financing on behalf of the Gülen Organization charter network, as is the case with CLF and its affiliated landlord entity, Chesapeake Education Services, LLC ("CES").

Three of the four Chesapeake MD schools, CMIT South, CMIT Elementary, and the future CMIT North high school, are all leased from CES. Each school pays, or in CMIT North's case will pay, very high rent to CES due to their inclusion in the bond agreement and financing used to purchase and renovate these schools. Under the terms of the bond financing, CLF/CES will pay a total of $135,077,544.93 in principal and interest through 2046.[38] In exchange, CLF/CES will own and improve CMIT North's high school campus, CMIT Elementary, and CMIT South, as well as refinance prior bond debt and improvements at CSP, which it leases.[39] Based on the allocation of funds in the bond documents, these acquisitions and improvements will cost:

- CMIT South acquisition: $6,000,000.
- CMIT South renovation, and CSP renovation: $12,254,888.89.
- CMIT Elementary renovation: $11,101,138.06.
- CMIT South additional improvements: $4,361,969.89 (although the Gross Maximum Price for the construction contract is only $2,363,693).[40]
- CMIT North high school acquisition: $2,081,555 (although the purchase price was only $1,300,000).
- CMIT North high school renovation: $15,712,086.86 (though the Gross Maximum Price for the construction contract is only $13,879,580).[41]

Essentially, CLF will pay $135,077,544.93 from its public school revenues through 2046 to receive assets worth well less than half that amount. CLF will also pay over $1.7 million in costs for issuing the bonds.

Like Harmony Public Schools (TX) and its related landlord entity Charter School Solutions, the bond financing structure also provides CLF/CES with a healthy profit on these real estate transactions at the schools' expense. From 2018-2028, CLF will receive over $54 million in rent and pay approximately $48.5 million on the bonds. The difference—approximately $5.7 million—represents profit to CLF/CES simply by acting as a middle man for CMIT Elementary, CMIT South, and CMIT North's high school campus. By using bond financing, CLF/CES effectively builds in million dollar profits for themselves at the schools' expense.

The rent increase for CMIT South under the bond documents is particularly alarming.

[38] CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (last checked 5/2/2017); see also Candace Rojo Keyes, Planning board makes recommendations for new charter school in Laurel, The Sentinel (July 14, 2016), available at: https://tinyurl.com/h334djs (last checked 5/2/2017).

[39] CLF 2015 Bond Official Statement, available at: http://tinyurl.com/n3hlflr (last checked 5/2/2017); CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (last checked 5/2/2017).

[40] CLF 2015 Bond Official Statement, available at: http://tinyurl.com/n3hlflr (last checked 5/2/2017).

[41] CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (last checked 5/2/2017).

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Previously, CMIT South paid $221,565 in rent to Prince George's County Board of Education.[42] Under its new lease with CES, CMIT South's rent tripled, jumping to $676,000.[43]

The other two facilities—CMIT North's middle school and CSP—appear to be leased from unaffiliated entities, 1325 G Street Associates, LLP and FDS Parkway LLC respectively.

Excessive use of the H-1B Visa Program

Like other Gülen Organization charter networks, CLF utilizes the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools and network. From 2001-2016, CLF schools have filed 35 H-1B visa applications for foreign workers.[44] The Gülen Organization usually states this is due to a shortage of math and science teachers, but CLF has filed H-1B applications to fill such positions as: financial managers, instructional coordinators, foreign language curriculum specialists, financial specialists, IT directors and specialists, special education instructional coordinators, athletic coordinators, operations managers, social science teachers, and public relations managers.[45]

Further evidencing the presence of a national network, the Chesapeake MD schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations. For example:

- Christine Latsey: The Chesapeake MD network used Latsey, a Maryland-based attorney, to file numerous H-1B applications. Latsey also filed applications for:
  - Triad (NC)
  - American Turkish Friendship Association (DE, KY, MD, NC, VA)
  - Washington Education Foundation (D.C., MD)
  - Maryland American Turkish Inhabitants, Inc. (MD)
  - Pinnacle (VA)
  - Turkic American Alliance (National)
  - Rumi Forum (DE, KY, MD, NC, VA)
  - TUSKON – Gülenist association.[46]

- Cherie Cookorinis: the Chesapeake MD network used Cookorinis, a Georgia-based attorney, to file H-1B applications.[47] Cookorinis also filed applications for other Gülenist entities, including:
  - Fulton Science (GA)
  - Triad Math and Science (NC)
  - Charter Educational Services & Resources (GA, FL)
  - Grace Institute (GA, FL)
  - Florida network (including: Discovery, River City, New Springs, Neosprings, Stars Education, Galaxy)

In addition to these H-1B visas, the Washington Education Foundation filed for 10 H-1B visas between 2001 and 2016.[48] These visas were to fill positions such as: graphic designer, IT training

[42] Ovetta Wiggins, Prince George's school board approves charter school's new campus location, Washington Post (June 12, 2014), available at: http://tinyurl.com/zn64vod (5/4/2017).

[43] CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (last checked 5/2/2017).

[44] The sum total of all of their organizations (including closed schools) is 106, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/lyqtyvz (12); http://tinyurl.com/k48xp6w (19). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (4) (last checked 1/30/2017).

[45] Job descriptions for these teachers can be found at: http://tinyurl.com/m2y75k6; http://tinyurl.com/kxmc8yx; http://tinyurl.com/k6pvsju (last checked 5/4/2017).

[46] List of entities represented by Christine Latsey, available at http://tinyurl.com/kyxvh8z (last checked 5/4/2017).

[47] List of entities represented by Cherie Cookorinis, available at: http://tinyurl.com/m4e6cgl (last checked 4/27/2017).

[48] Washington Education Foundation, myvisajobs.com, available at: http://tinyurl.com/lukagyt (last checked 5/4/2017).

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specialist, training and development specialists, treasurers/controllers/CFOs, and financial analyst.[49] These hiring practices are particularly egregious in light of the complaints made by Anne Arundel County Public Schools regarding CSP's hiring practices.[50]

Scandals, Investigations & Notable Activities

Chesapeake Science Point Charter School's History: Anne Arundel County Public Schools has a long and well-documented list of problems with CSP. These documents reflect numerous problems since the school opened in 2005, including:

- Special Education Problems:
  - Lack of IEP and special education documentation;
  - Failure to provide appropriate services;
  - Failure to monitor special education progress; and
  - Failure to hire appropriately certified special education staff.

- Governance Problems:
  - Failure of CLF to operate in accord with the charter school application;
  - Evidence of discriminatory treatment of employees based on ethnicity and gender;
  - Failure to timely submit reports;
  - Failure to timely post board meeting dates; and
  - Failure of the governing board to reflect the community.

- Hiring Problems:
  - Lack of highly qualified and certified teachers;
  - Lack of consistently applied human resources processing practices;
  - Concerns about H-1B recruiting practices; and
  - Failure to comply with requirements for employing foreign nationals.

- Educational Problems:
  - Failure to provide an educational curriculum consistent with its mission;
  - Failure to timely and accurately maintain the student attendance database; and
  - Failure to maintain student schedules.

- Facility Concerns:
  - Concern about adequate facilities for the school.
  - Lack of developed science labs, media center, gymnasium, art and music rooms, and food and nutrition services.

AACPS has had to take drastic actions due to CLF's lack of effective governance over CSP, including the removal of two CSP principals and AACPS seizing control of the school in 2006. Police escorted Ozcan "Jon" Omural out of the building in 2006 due to allegations that he discriminated against female teachers. Female teachers filed a grievance alleging mistreatment by Omural, who then retaliated against them. An AACPS investigation found that CSP teachers had too many students, erratic hours, and inappropriate duties. AACPS also had to spend three days cleaning the school because it was dirty.[51]

Second, AACPS temporarily removed Fatih Kandil, Omural's replacement, in January 2008 due to concerns of illegal and inappropriate

[49] Washington Education Foundation, Jobs In Tech, available at: http://tinyurl.com/m7p3he7 (last checked 5/4/2017).

[50] See Anne Arundel County Public Schools Board of Education documents searchable at: http://tinyurl.com/mj5jgjr (last checked 4/30/2017).

[51] Daniel de Vise, County Takes over School, Washington Post (Mar. 30, 2006), available at: http://tinyurl.com/lq4km7r (last checked 5/4/2017).

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student discipline. The school also had numerous issues with finances, special education programming, and legal compliance.[52] Kandil was not permanently removed or replaced, however, and served as the principal of CSP from 2006 to 2011.[53]

CSP alleged that these problems were caused by AACPS's refusal to provide all of the school's mandated funding. For that reason, it sued AACPS for more than $700,000.[54] Calling the lawsuit an "ambush," AACPS demanded changes at CSP, including: hiring certified teachers, re-working the school's governing board of directors to ensure local representation, the use of AACPS software for record-keeping, and compliance with board policy on hiring foreign nationals.[55] The case settled confidentially in June 2013.[56]

In light of the ongoing and repeated difficulties, CSP has spent a significant amount of time on probation with its authorizer.[57]

Notable Turkish Vendors

- Chesapeake Lighthouse Foundation ("CLF"): CLF is both the governing board for the Chesapeake MD schools as well as a paid vendor.[58] CLF provides IT, educational technology, financial, curriculum, and outreach services for an eight percent fee of each school's total revenues.[59] According to its 2016 audit, CLF received $3,604,008 in profits, not including the revenues of the charter schools it controls.[60]

- Washington Education Foundation ("WEF"): WEF is a District of Columbia entity registered in 2005. It filed for two trade names: Discovery Education in 2009 and WEDUF in 2013.[61] WEF provides services to the Chesapeake MD schools, spear-headed the proposed Loudoun Math and IT Academy in Virginia,[62] and is currently listed as providing Pinnacle Academy's (VA, private school) Student Information System in conjunction with Apple Educational Services (the Gülenist oversight entity for the Northeast region).[63] Ben Karaduman served as the

52 Ruma Kumar, Charter School Head Ousted, Baltimore Sun (Jan. 9, 2008), available at: http://tinyurl.com/mjefexb (last checked 5/4/2017).

53 Aaron Koepper, Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System, Loudoun Times-Mirror (Dec. 13, 2012), available at: http://tinyurl.com/lbr85ym (last checked 5/4/2017).

54 Emma Brown, Math-Science Charter Proposed in Loudoun, Modeled on School with Turkish Connection, Washington Post (July 8, 2012), available at: http://tinyurl.com/lwl3qk4 (last checked 5/4/2017).

55 Tina Reed, Chesapeake Science Point Charter School Files Lawsuit Against Schools, Capital Gazette (June 21, 2012), available at: http://tinyurl.com/m5q6myd (last checked 5/4/2017).

56 Chesapeake Lighthouse Foundation v. Anne Arundel County Board of Education, No. 02-C-12170511 (Cir. Ct. Anne Arundel County Md. Aug. 20, 2013), searchable at: http://tinyurl.com/j89ng99 (last checked 5/4/2017).

57 See Anne Arundel County Public Schools Board of Education documents searchable at: http://tinyurl.com/mj5jgjr (last checked 4/30/2017).

58 CLF website available at: http://tinyurl.com/lldlxa9 (last checked 5/4/2017).

59 American Institutes for Research, Study of Funding Provided to Public Schools and Public Charter Schools in Maryland (Dec. 2016), available at: http://tinyurl.com/l24pu58 (last checked 5/4/2017); CLF website available at: http://tinyurl.com/lldlxa9 (last checked 5/4/2017).

60 CLF 2016 Bond Official Statement, available at: http://tinyurl.com/n3xkq7g (p. 114) (last checked 5/2/2017).

61 Corporate documents for this entity are available at: http://tinyurl.com/m6895a3 (last checked 5/1/2017).

62 Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 5/1/2014).

63 Student Information System Login, Pinnacle Academy, available at: http://tinyurl.com/ke5j6dz (last checked 5/4/2017).

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executive director of WEF in 2010 and 2011 at the same time as he served as the president of CLF.[64] Given Karaduman's overlapping responsibilities with WEF and CLF, there is a strong appearance that he engaged in self-enriching behavior while serving as the president of CLF. WEF has stated its mission was to launch charter schools in the D.C. area, and has also been involved in establishing the North Carolina Gülen network.[65]

Gülenist Cultural Foundations

- Rumi Forum: The Rumi Forum is openly Gülenist, with Fethullah Gülen named as the forum's honorary chairman.[66] It is affiliated with the Alliance for Shared Values, Gülen's official non-profit organization headed by Greater Texas Founder, Alp Aslandogan.[67] The forum hosts trips to Turkey, peace and dialogue awards, and intercultural dinners.[68] Maryland hosts a branch of the Rumi Forum.[69]

- American Turkish Friendship Association ("ATFA"): Lutfi On, a founder of CLF, served as an incorporator of ATFA in 2003.70 Mustafa Akpinar, CEO of the Rumi Forum, serves on ATFA's advisory board with Virginia state senator Chap Petersen.71 ATFA maintains three branches in Maryland.72 ATFA sponsors lawmakers' trips to Turkey.73 Loudoun County (VA) Board of Supervisors Chairman Scott York helped plan one such trip in November 2013 a few months after74 the Loudoun County School Board denied a Gülenist charter application in February 2013.75 Four other Virginia officials attended the trip.76 AFTA formerly conducted business as "Pinnacle Academy," a private school located at 2854 Hunter Mill Road, Oakton, Virginia.77 Pinnacle Academy still operates at that location under principal Fatih Kandil, who served as CSP's principal from 2006 to 2011.78 Currently, Pinnacle Academy is controlled

64 Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017).

65 Samiha Khanna, Questions Loom About Group Proposing Raleigh Charter School, Indy Week (Jan. 25, 2012), available at: http://tinyurl.com/o9zpgvv (last checked 5/5/2017).

66 Fethullah Gülen, Rumi Forum, available at: http://tinyurl.com/k5gunan (last checked 5/4/2017).

67 Id.

68 About Us, Rumi Forum, available at: http://tinyurl.com/lz5cxkj (last checked 5/4/2017).

69 Maryland, Rumi Forum, available at: http://tinyurl.com/mnsf7ww (last checked 5/4/2017).

70 Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (business ID number 06000038) (last checked 5/4/2017).

71 ATFA Advisory Board, available at: http://tinyurl.com/lhore3l (last checked 5/4/2017).

72 ATFA Baltimore, available at: http://tinyurl.com/k29pkb8; ATFA Rockville, available at: http://tinyurl.com/n4xec55; ATFA Hagerstown, available at: http://tinyurl.com/kxy22x6 (last checked 5/4/2017).

73 Liz Essley Whyte, Scores of State Lawmakers Took Trips Subsidized by Controversial Turkish Opposition Movement, The Center For Public Integrity (Feb. 9, 2017), available at: http://tinyurl.com/mul7baq (last checked 5/4/2017).

74 Jeremy Borden, Five Officials with Ties to Transportation Take Trip to Turkey, Raising Questions, Washington Post (Nov. 17, 2013), available at: http://tinyurl.com/m5lcoud (last checked 5/4/2017).

75 Alanna Dvorak, Loudoun County School Board Denies Charter School Application, Loudoun Times-Mirror (Feb. 26, 2103), available at: http://tinyurl.com/k9djatr (last checked 5/4/2017).

76 Jeremy Borden, Five Officials with Ties to Transportation Take Trip to Turkey, Raising Questions, Washington Post (Nov. 17, 2013), available at: http://tinyurl.com/m5lcoud (last checked 5/4/2017).

77 Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (business ID number 06000038) (last checked 5/4/2017).

78 Aaron Koepper, Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System, Loudoun Times-Mirror (Dec. 13, 2012), available at: http://tinyurl.com/lbr85ym (last checked 5/4/2017); Principal's Welcome, Pinnacle Academy, available at: http://tinyurl.com/mk94yat (last checked 5/4/2017); corporate documents for

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by Pinnacle Education Services, Inc.[79]

- Maryland Turkish American Inhabitants, Inc. ("MARTI"): Lutfi On, a founder of CLF, served as an incorporator of MARTI in 2003.[80] MARTI owes him $230,879 for loans to the organization dating back to 2009.[81] The entity has also gone through a seemingly needless series of name changes since its incorporation. Before assuming its current name, MARTI was known as (a) Maryland Turkish Inhabitants, Inc., (b) Maryland American Turkish Inhabitants, Inc., and (c) Maryland American-Turkish Inhabitants, Inc.[82] MARTI is affiliated with the Turkic American Alliance ("TAA") and the Mid-Atlantic Federation of Turkic American Associations.[83] The TAA posts articles and op-eds written by Fethullah Gülen.[84] MARTI hosts dinners and trips to Turkey for Maryland politicians.[85] MARTI has sponsored trips for Maryland Delegate Gail Bates, Secretary of State John McDonough, Sen. James Robey and other legislators with the Mid-Atlantic Federation of Turkic American Associations.[86] MARTI hosts dialogue and friendship events and dinners.[87]

- Mid-Atlantic Federation of Turkic American Associations ("MAFTAA"): MAFTAA is a member of the Turkic American Alliance (TAA).[88] The TAA posts articles and op-eds written by Fethullah Gülen.[89] MAFTAA is an umbrella organization for other cultural non-profits that has sponsored trips to Turkey for Maryland politicians with AFTA.[90] At the time of this report's publication, MAFTAA's website is inaccessible.[91]

Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as CLF or Washington Education Foundation. This is just a small number of individuals with these overlapping ties throughout the region and other regions, which further demonstrates the region's interconnections. Notably, this shuffling only occurs with these schools' Turkish employees.

- Bunyamin "Ben" Karaduman: Executive Director/Consultant, Coral (NV);[92] Loaned Coral (NV) school $40,000 at a high interest rate;[93] Executive Director,

this entity are searchable at: http://tinyurl.com/k36kg9l (business ID number 06982243) (last checked 5/4/2017).

79 Virginia corporate entry available at: http://tinyurl.com/ketvdpr (last checked 5/4/2017); corporate documents for this entity are searchable at: http://tinyurl.com/k36kg9l (business ID number 06982243) (last checked 5/4/2017).

80 Maryland corporate documents for this entity are available at: http://tinyurl.com/nx2z25d (last checked 5/1/2017).

81 MARTI 990s available at: http://tinyurl.com/k8wlcoa

82 Id.

83 MARTI, available at: http://tinyurl.com/kgt2nv6 (last checked 5/1/2017).

84 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

85 Larry Carson, Political Notebook: Howard's Elected Officials Head Overseas, Baltimore Sun (June 23, 2011), available at: http://tinyurl.com/knk5f84 (last checked 5/1/2017).

86 Id.

87 MARTI, available at: http://tinyurl.com/lgyn4hd (last checked 5/1/2017).

88 Turkic American Alliance, available at: http://tinyurl.com/ktly6nr (last checked 4/21/2017).

89 Turkic American Alliance, available at: http://tinyurl.com/ll5x8rd (last checked 4/21/2017).

90 Larry Carson, Political Notebook: Howard's Elected Officials Head Overseas, Baltimore Sun (June 23, 2011), available at: http://tinyurl.com/knk5f84 (last checked 5/1/2017).

91 MAFTAA, www.maftaa.org, unavailable at: http://tinyurl.com/kzqfc4w (last checked 5/4/2017).

92 Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017).

93 Coral Academy of Science Bond statement, pg 98, available at: http://tinyurl.com/mpuv4kb (last checked 3/30/2017).

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Washington Education Foundation, a Gülenist firm consulting the Chesapeake (MD) network;[94] President/CEO, Chesapeake Lighthouse Foundation;[95] Consultant on failed First State Math and Science Academy (DE) application;[96] now working in Turkey.[97]

- Yahyahan Kaya: COO, CLF; Business Manager, Baltimore City Public Schools; Business Office Manager, Washington Education Foundation.[98]

- Mustafa Akpinar: Founder, Advocates of Silenced Turkey;[99] Executive Director, American Turkish Friendship Association; Principal, Pinnacle Academy (VA); CEO, Rumi Forum.[100]

- Fatih Kandil: Teacher, Brooklyn Amity School; Teacher, Chicago Math & Science Academy (IL); Teacher, Wisconsin Career Academy (WI);[101] Founder/Principal, Horizon Science Academy Dayton (OH);[102] temporarily removed as principal from CSP;[103] Principal, Baltimore IT Academy; Applicant, Loudoun Math and IT Academy (VA);[104] Applicant, First State math and Science Academy (DE);[105] Principal, Pinnacle Academy (VA, private).[106]

- Birol Ozturk: Board Member, CLF;[107] Registered Agent, Dove Science Academy (OK) (Moore, Tulsa);[108] Associate Research Scientist, Northeastern University; currently Assistant Professor of Physics, Morgan State University.[109]

- Omer Ozmeral: Board Member, CLF;[110] Chief Internal Auditor, Harmony (TX);[111] Superintendent, LISA (AR).[112]

- Ali Gokce: Applicant, Loudoun Math

94 Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017).

95 Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017).

96 First State Math and Science Application, available at: http://tinyurl.com/kksvu9l (last checked 5/1/2017).

97 Ben Karaduman profile available at: http://tinyurl.com/lej98l3 (last checked 3/30/2017).

98 Yahyahan Kaya profile available at: http://tinyurl.com/kcepvz7 (last checked 3/30/2017).

99 Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (corporate ID number 08122459) (last checked 5/4/2017).

100 Linkedin profile, available at: http://tinyurl.com/mybzush (last checked 5/4/2017).

101 Loudoud Math & IT Academy Questionnaire, available at: http://tinyurl.com/mq6sxhs (last checked 5/4/2017).

102 Aaron Koepper, Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System, Loudoun Times-Mirror (Dec. 13, 2012), available at: http://tinyurl.com/lbr85ym (last checked 5/4/2017).

103 Ruma Kumar, Charter School Head Ousted, Baltimore Sun (Jan. 9, 2008), available at: http://tinyurl.com/mjefexb (last checked 5/4/2017).

104 Aaron Koepper, Charter School Committee Criticizes Applicants' Answers, Effort, Loudoun Times-Mirror (Nov. 30, 2012), available at: http://tinyurl.com/n4cytpy (last checked 5/4/2017); Aaron Koepper, Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System, Loudoun Times-Mirror (Dec. 13, 2012), available at: http://tinyurl.com/lbr85ym (last checked 5/4/2017).

105 First State Math and Science Academy Charter School Application, available at: http://tinyurl.com/y84aep7b

106 Demi Lee, Nobel Peace Prize Winner Speaks in Oakton, Fairfax Times (Oct. 3, 2016), available at: http://tinyurl.com/kxgwk43 (last checked 5/4/2017).

107 CLF 990s, available at: http://tinyurl.com/kdm8dyz (last checked 5/1/2017).

108 Oklahoma corporate documents for these entities are available at: http://tinyurl.com/mfm546l (Tulsa); http://tinyurl.com/mf8ur4l (Moore) (last checked 5/4/2017).

109 Linkedin profile, available at: http://tinyurl.com/ksh4uj9 (last checked 4/30/2017).

110 CLF 990s, available at: http://tinyurl.com/kdm8dyz (last checked 5/1/2017).

111 Request for Specific Use Permit, City of Dallas City Plan Commission (Dec. 15, 2011), available at: http://tinyurl.com/la5bb9s (last checked 5/14/2017).

112 Letter to Arkansas Department of Education (June 28, 2007), available at: http://tinyurl.com/n8pteq2 (last checked 5/4/2017).

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and IT Academy;[113] Director, Northern Virginia Education Foundation – Gülenist foundation;[114] Owner, Master Messenger Services;[115] Owner, Kayra Trading Company;[116] Project Engineer, Orbital Sciences Corporation; currently Senior Project Engineer, ATA Engineering.[117]

- Ahmet Gunay: Applicant, First State Math and Science Application; Founder, Rochester Academy of Science (NY);[118] Director, Hampden (MA);[119] Teacher, Putnam Science Academy (CT); Applicant, Hampden Charter School of Science West (MA);[120] currently Post-Doctoral Fellow, Worcester Polytechnic Institute.[121]

Notable Articles regarding the Maryland Network

- Keyes, Candace Rojo. *Planning board makes recommendations for new charter school in Laurel*. The Sentinel. (14 July 2016) (discussing new facilities for CMIT North's high school).[122]

- Huang, Cindy. *Chesapeake Science Point wants to open elementary school*. Capital Gazette. (12 April 2016) (discussing school board's decision to deny CSP the opportunity to open an elementary school and audits that revealed missing and incomplete financial data).[123]

- Cook, Chase and Kelcie Pegher. *Legislation could pave way for charter school expansion, but is the growth smart?* Capital Gazette. (15 March 2015) (discussing Maryland's attempt to decrease charter school restrictions, using CSP as a model, in spite of the documented problems with the school's finances and special education program).[124]

- Restivo, Patti. *Students blend science, art at Montpelier exhibit*. The Baltimore Sun. (10 February 2015) (stating Mehmet Gunes will take over as principal at CMIT North).[125]

- Pegher, Kelcie. *Chesapeake Science Point to continue school, but won't expand*. The Baltimore Sun. (5 February 2015) (discussing concerns with CSP's financials).[126]

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113 Loudoun County Public Charter School Application, Loudoun Math & IT Academy (Aug. 14, 2012), available at: http://tinyurl.com/kvd7crh (last checked 4/30/2017).

114 Virginia corporate documents are searchable at: http://tinyurl.com/k36kg9l (business ID number 07343528) (last checked 5/4/2017).

115 Trade name application available at: http://tinyurl.com/nyq5hcb (last checked 5/4/2017); see also corporate entity record for Master Messenger Service available at: http://tinyurl.com/ll6zmzl (last checked 5/4/2017).

116 Maryland corporate documents for this entity are available at: http://tinyurl.com/las9r2u (last checked 5/1/2017).

117 Linkedin profile, available at: http://tinyurl.com/m96lnth (last checked 4/30/2017).

118 First State Math and Science Academy Charter School Application, available at: http://tinyurl.com/mq2vh6n (last checked 5/4/2017).

119 This information is taken from the 2013-14 Annual Report for the Hampden Charter School of Science, available through open records request.

120 Hampden Charter School of Science West Application (Nov. 1, 2016), available at: http://tinyurl.com/mjea8bb (last checked 5/5/2017).

121 Linkedin profile, available at: http://tinyurl.com/mqehbcp (last checked 4/30/2017).

122 http://tinyurl.com/h334djs (last checked 5/4/2017).

123 http://tinyurl.com/gre39xz (last checked 5/4/2017).

124 http://tinyurl.com/zyb35b6 (last checked 5/4/2017).

125 http://tinyurl.com/huaxrv4 (last checked 5/4/2017).

126 http://tinyurl.com/jkuaap5 (last checked 5/4/2017).

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- Wiggins, Ovetta. *Prince George's school board approves charter school's new campus location*. The Washington Post. (12 June 2014) (discussing CMIT South's lease with its authorizing school board).[127]

- Wiggins, Ovetta. *Prince George's charter plans move to new location, sparks complaints from parents*. The Washington Post. (7 May 2014) (discussing facility concerns for CMIT South).[128]

- Burris, Joe. *Chesapeake Science Point cleared to move ahead with high school program*. The Baltimore Sun. (13 February 2014) (discussing decision to allow CSP to retain its high school).[129]

- Strauss, Valerie. *Islamic Cleric Linked to U.S. Chater Schools Involved in Turkey's Political Drama*. The Washington Post. (26 December 2013) (discussing issues at CSP, testimony that Gülen teachers must kick back large portions of salaries to the Gülen movement, and including comments of Loudoun Math and IT Academy applicant as denying a connection to Gülen).[130]

- Koepper, Aaron. *Uncharted, Part 3: Proposed School's Model Has Troubling Finances, Relationship with School System*. Loudoun Times-Mirror (13 December 2012).[131]

- Pratt, Tim and Tina Reed. *Board approves new Chesapeake Science Point contract*. Capital Gazette. (12 July 2012) (discussing relationship between CSP and its authorizing school district, including the need for CSP to use a transparent lottery, use county school software for grades and attendance, attend special education training, employ certified or licensed teachers, and create a governing board that represents students and parents).[132]

- Brown, Emma. *Math-Science Charter Proposed in Loudoun, Modeled on School with Turkish Connection*. Washington Post (8 July 2012) (discussing relationship of CSP with authorizer and CSP's lawsuit against its authorizer).[133]

- Reed, Tina. *Chesapeake Science Point Charter School Files Lawsuit Against Schools*. Capital Gazette (21 June 2012) (discussing concerns surrounding CSP's use of foreign nationals, record keeping, and detailing CSP's lawsuit against its authorizer).[134]

- Carson, Larry. *Political Notebook: Howard's Elected Officials Head Overseas*. Baltimore Sun (23 June 2011) (discussing Maryland politicians' trips to Turkey sponsored by Gülen organizations).[135]

- Burris, Joe. *Arundel school must comply with still-to-be-negotiated charter or be dissolved*. The Baltimore Sun. (10 June 2012) (discussing CSP's probation and revised charter).[136]

- Strauss, Valerie. *Should Chesapeake Science Point have its charter extended?* The Washington Post. (6 June 2012)

[127] http://tinyurl.com/zn64vod (last checked 5/4/2017).
[128] http://tinyurl.com/zsv88su (last checked 5/4/2017).
[129] http://tinyurl.com/gpwblgu (last checked 5/4/2017).
[130] http://tinyurl.com/n2okh27 last checked 1/26/2017).
[131] http://tinyurl.com/lbr85ym (last checked 5/4/2017).
[132] http://tinyurl.com/zkhkald (last checked 5/4/2017).
[133] http://tinyurl.com/lwl3qk4 (last checked 5/4/2017).
[134] http://tinyurl.com/m5q6myd (last checked 5/4/2017).
[135] http://tinyurl.com/knk5f84 (last checked 5/1/2017).
[136] http://tinyurl.com/zrkybtd (last checked 5/1/2017).

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(discussing issues at CSP and including comments denying connections to Gülen).[137]

- McKerrow, Joshua. *Battle Brews over Charter's Ability to Run School*, Capital Gazette (5 June 2012) (discussing problems at CSP, including its lottery, hiring practices, concerns about the school's financial practices and transcripts).[138]

- Kumar, Ruma. *Deadline nears for school on probation*. The Baltimore Sun. (27 January 2008) (discussing deficiencies at CSP).[139]

- Kumar, Ruma. *Charter School Head Ousted*. The Baltimore Sun. (9 January 2008) (discussing removal of principal Fatih Kandil at CSP and shaky records of finances of CSP).[140]

- Marselas, Kimberly. *Last Charter School Defends its Performance*. The Baltimore Sun (2 December 2007) (discussing history and financial problems with CSP).[141]

- de Vise, Daniel. *County Takes over School*. Washington Post (30 March 2006) (discussing removal of Ozcan Omural as principal of CSP, allegations of discrimination against female teachers, retaliation against female teachers, and dirty facilities).[142]

- Butler, Anica. *Charter decision stalled.* The Baltimore Sun. (23 June 2006) (discussing special education concerns with CSP).[143]

[137] http://tinyurl.com/hwvnvzv (last checked 1/26/2017).

[138] http://tinyurl.com/lwl3qk4 (last checked 5/4/2017).

[139] http://tinyurl.com/jo9t84q (last checked 1/26/2017).

[140] http://tinyurl.com/mjefexb (last checked 5/4/2017).

[141] http://tinyurl.com/mvx8ff4 (last checked 5/4/2017).

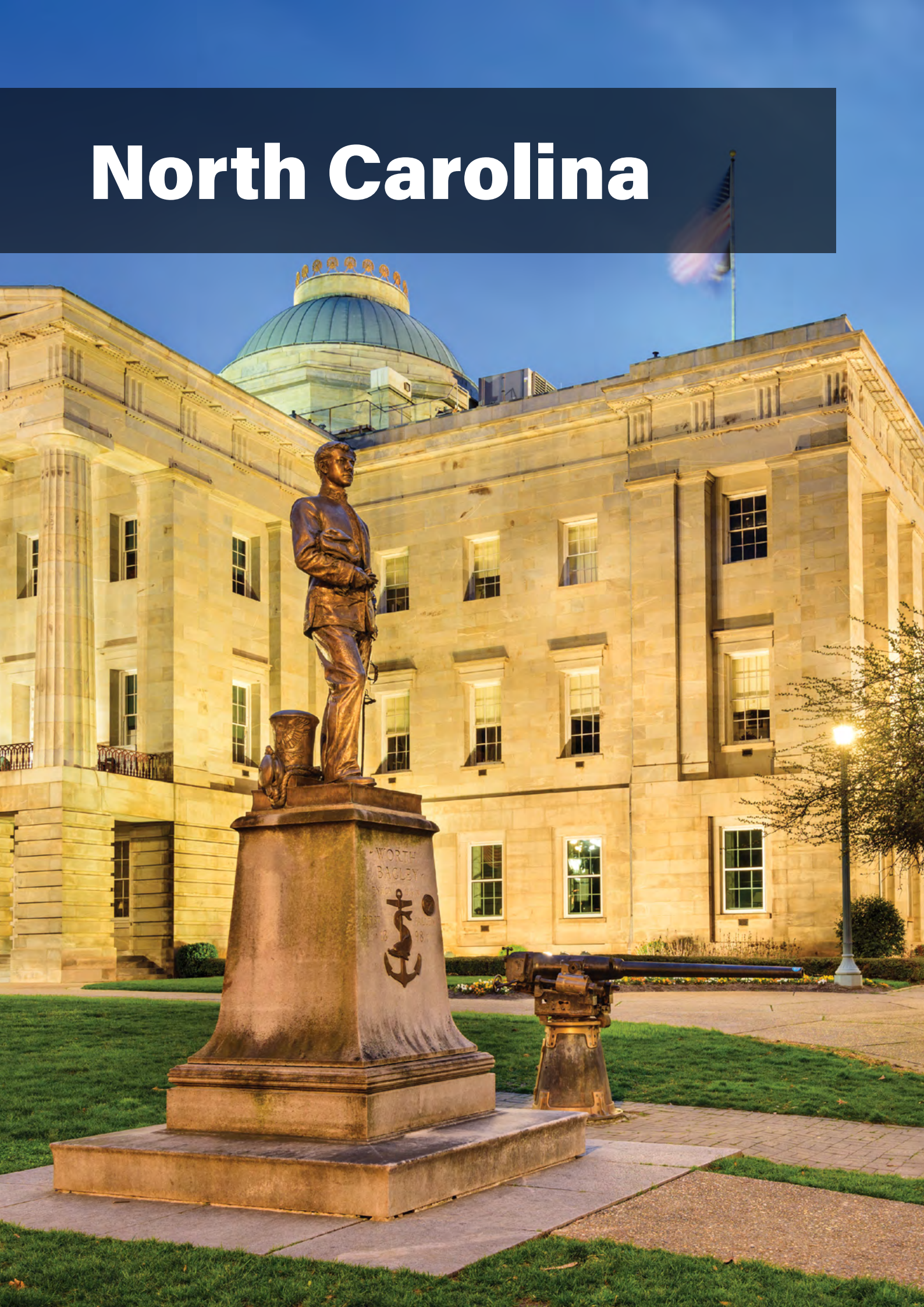
[142] http://tinyurl.com/lq4km7r (last checked 5/4/2017).

[143] http://tinyurl.com/jr84ru4 (last checked 5/4/2017).

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North Carolina



QUICK FACTS ON GÜLEN CHARTER SCHOOLS NORTH CAROLINA



NUMBER OF SCHOOLS	3
KNOWN AS	**Queen City** **Triad Math and Science** **Triangle Math and Science**
TOTAL ENROLLMENT	**2,262**
CHARTER VENDOR	**Washington Education Foundation**
TOTAL REVENUES	**$11,354,470.59**
RELATED INSTITUTIONS	MD Chesapeake (MD)

Attempted Networks

VA Loudoun Math and IT Academy

DE First State Math and Science, Delaware Math and IT Academy

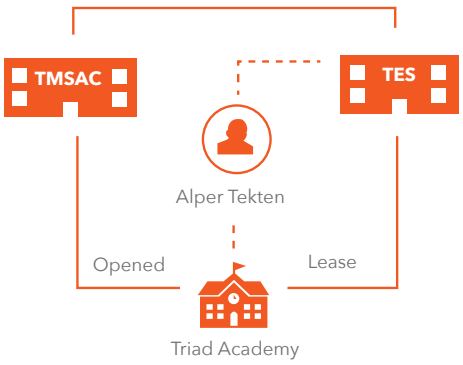
KEY PEOPLE



Ali Tombak · Mustafa Atay · Mahfuz Sapan · Amela Mekic · Numan Dogan · Kenan Gundogdu · Suzan Mertyurek · Diane Gunesgor

A WEB OF CONFLICTING INTERESTS

Triad Math and Science Academy Company (TMSAC) opened the Triad Math and Science Academy (Triad Academy) in Greensboro in 2008. Triad and Triangle Academies lease facilities from Triad Educational Services (TES), a nonprofit organization created in 2010 to provide facilities for its related charter schools in North Carolina. Alper Tekten, the principal of Triad Academy, served as the first President of the TES Board. TES purchased school facilities for the three TMSAC campuses and serves as the schools' landlord. **In 2015, TES borrowed $22.2 million in bonds to refinance the purchase and renovation of those campuses.**



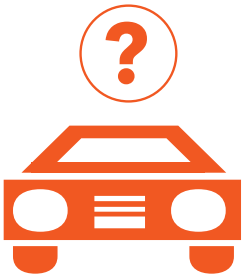
FINANCIAL ISSUES



Negative Cash Balance

-$146,424

Queen City is on shaky financial ground. It reported **a negative cash balance of $146,424** and a **deficit in net position of $213,209** in 2016. The auditor stated that "the negative cash balance and deficit in net position caused **uncertainties about the School's ability to continue as a going concern**."



TMSAC might have used public funds for an inappropriate purpose when they purchased a car for use by the central office. The central office was supposed to provide an analysis of need for the car, **but the analysis is not included in the Board minutes.**

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Mid-Atlantic
- School Names (known as):
  - Queen City
  - Triad Math and Science
  - Triangle Math and Science
- Total number of schools in state: 3
- Total student enrollment 2015-16: 2,262[1]
- Charter Holder/Governing Board(s):
  - Charlotte Education Foundation[2]
    - Organized as a non-profit 501(c)(3) organization
    - Oversees 1 School
  - Triad Math and Science Academy Company
    - Organized as a non-profit 501(c)(3) organization
    - Oversees 2 schools
  - Charter Management Services Vendor: Washington Education Foundation
  - Regional Gülen Organization Oversight Entity: Washington Education Foundation
  - Regional Sister Networks: Chesapeake (MD). Attempted Networks: Loudoun Math and IT Academy (VA); First State Math and Science (DE); Delaware Math and IT Academy (DE).
  - Total Revenues for FY 2016: $11,354,470.59[3]
- Key Network Founders:
  - Charlotte Education Foundation:
    - Ali Tombak: Founding and Current Board President, Charlotte Education Foundation (NC); Founding Board Member, President, Triad Math and Science Academy Company (NC); Former Board member, Horizon Science Academy (OH); Principal Engineer, Technology Platforms Org - RF Micro Devices Inc (NC); Board Member for Turkish-American Scientists and Scholars Association (DC); Electrical Engineering Middle East Technical University (Turkey).[4]
    - Mustafa Atay: Founding Board Member, Charlotte Education Foundation (NC); Founding Board Member, Triad Math and Science Academy Company (NC); Associate Professor of Computer Science, Winston-Salem State University (NC).[5]
    - Mahfuz Sapan: Founder and Treasurer, Charlotte Education Foundation (NC); CEO, Ocean Trading, Inc. (NC); Founder of Mobilworx (Istanbul, Turkey).[6]
    - Amela Mekic: Founder and Secretary

1 Enrollment data available through the North Carolina Department of public instruction Data and Reports, Statistical profile, chart 10 available at https://tinyurl.com/khwfczd (last checked 6/16/2017).

2 Governing Board Queen City, Queen City STEM School Charter Application (last checked 6/16/2017), available at: https://tinyurl.com/l7edscw (last checked 6/16/2017).

3 Revenue found at North Carolina Department of Public Instruction school allotment data, year to date allotment available at https://tinyurl.com/nx47lcs (last checked 6/16/2017).

4 Information taken from: Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/nx47lcs (last checked 6/16/2017); Triad Application for Grants, available at: https://tinyurl.com/y869328r (last checked 6/16/2017); Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017); Charlotte Education Foundation IRS 990 Form 2014, available at: https://tinyurl.com/y84c8r4w (last checked 6/16/2017).

5 Information taken from: Triangle Math and Science Academy Charter School Application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017); Charlotte Education Foundation IRS 990 Form 2014, available at: https://tinyurl.com/y84c8r4w (last checked 6/16/2017).

6 Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 5/20/2017); IRS Form 990 for Charlotte Education Foundation, available at: https://tinyurl.com/y84c8r4w (last checked 6/16/2017).

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of the Board, Charlotte Education Foundation (NC); Supervisor, Pfeiffer University (NC); B.A., University of Sarajevo (Sarajevo, Bosnia and Herzegovina).[7]

- ▷ Triad Math and Science Academy Company:
  - Ali Tombak: Founding Board President, Charlotte Education Foundation (NC); Founding Board Member, President, Triad Math and Science Academy Company (NC); Board Member, Horizon Science Academy (OH); Principal Engineer, Technology Platforms Org - RF Micro Devices Inc (NC); Board Member, Turkish-American Scientists and Scholars Association (DC); Electrical Engineering Student, Middle East Technical University (Ankara, Turkey).[8]
  - Numan Dogan: Founding Board Member, Vice President, Triad Math and Science Academy Company (NC); Professor of Electrical Engineering, North Carolina A&T State University (NC); B.S., Karadeniz Technical University (Trabzon, Turkey).[9]
  - Mustafa Atay: Founding Board Member, Charlotte Education Foundation (NC); Founding Board, Triad Math and Science Academy Company (NC); Associate Professor of Computer Science, Winston-Salem State University (NC).[10]
  - Kenan Gundogdu: Founding member and current Board President of the Triad Math and Science Academy Company (NC); Assistant Professor Department of Physics, North Carolina State University (NC).[11]
  - Suzan Mertyurek: Founding Board Member, Triad Math and Science Academy Company (NC); Board Member, Virginia International University (Gülenist university)(VA); Proposal Analyst, Pharmaceutical Product Development Inc.; Applicant, Knoxville Charter Academy (TN) (attempt); Public Relations Coordinator, Knoxville Turkish Cultural Center (TN); wife of Ugur Mertyurek.[12]
  - Diane Gunesgor: Founding Board Member, Reading Teacher, Triad Math and Science Academy Company (NC); wife of Yasar Gunesgor.[13]

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7 Id.

8 Information taken from: Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017); Triad application for federal grant p. e35, available at: http://tinyurl.com/y8o8ng5b (last checked 6/16/2017); Founding Board Members - biography, Queen City STEM School Charter Application , available at: https://tinyurl.com/l7edscw (last checked 6/16/2017); IRS Form 990 Charlotte Education Foundation IRS, available at https://tinyurl.com/y84c8r4w (last checked 6/16/2017); Application for Grants, available at: https://tinyurl.com/y869328r (last checked 6/16/2017).

9 Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

10 Information taken from: Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017); IRS Form 990 for Charlotte Education Foundation, available at https://tinyurl.com/y84c8r4w (last checked 6/16/2017); Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

11 Information taken from: Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

12 Information taken from: Triad Math and Science Academy Charter School application, received from the North Carolina Department of Public Instruction May 12, 2017 in response to 2017 FOIA request Knoxville Charter Academy initial application, available at: https://tinyurl.com/m8zwttl (last checked 6/16/2017); Constantine, Mary. Dishing with Suzan Mertyurek. Knox News (Sep. 16, 2010), available at: https://tinyurl.com/mku6zm9 (last checked 5/24/2017).

13 Information taken from: Real estate record, available at: http://tinyurl.com/ybpqjm5j (last checked 6/16/2017). Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked

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Overview

The Triad Math and Science Academy Company (TMSAC) and the Charlotte Education Foundation (CEF) are nonprofit organizations that operate three charter schools in North Carolina.[14] Although they are separate organizations, they are closely connected with overlapping leadership. Three of the five CEF board members also serve on the TMSAC board.[15] TMSAC schools contract with the Washington Education Foundation (WEF) to provide certain management and administrative services for a per student monthly fee.[16] WEF appears to operate as a quasi-regional oversight entity in the Mid-Atlantic region since it has also provided services to at least one Gülen charter school in Maryland and one proposed school in Virginia.[17] Triad Math and Science Academy also provides back office services to both Triangle Math and Science Academy and Queen City STEM School for four percent of the schools' revenue.[18]

School	Operation	Student Demographic Information[19]	Authorizer	Governing Board
Queen City STEM School[20] 8701 Mallard Creek Rd. Charlotte, NC 28262	Grades K-6[21] 2015-present[22]	Enrollment: 301 0% ELL 10% FRL 2.9% Indian 31.9% African American 18.6% White 6.9% Hispanic 26.2% Asian 2.7% Other	North Carolina Department of Public Instruction (NCDPI)[23]	Charlotte Education Foundation[24]

6/16/2017); IRS Form 990 for Triad Math and Science Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

14 Charter applications for Triad Math and Science Academy, Triangle Math and Science, and Queen City STEM. North Carolina Department of Public Instruction.

15 IRS Form 990 for Triad, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017); IRS Form 990 for Charlotte, available at: http://tinyurl.com/yc4ctj9a (last checked 6/16/2017).

16 Public Finance Authority Education Revenue Bonds Triad Educational Services, available from: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

17 Loudoun County Public Charter School Application, available at: http://tinyurl.com/kvd7crh (last checked 6/16/2017).

18 Triad and Triangle Board Minutes, available from: http://tinyurl.com/y8482rzs (last checked 6/16/2017).

19 Enrollment data available through the North Carolina Department of public instruction Data and Reports, Statistical profile, chart 10 available at: https://tinyurl.com/khwfczd (last checked 6/16/2017)) for Queen City STEM School; see https://tinyurl.com/khwfczd (last checked 5/20/2017) for Triad; see https://tinyurl.com/khwfczd (last checked 5/20/2017) for Triangle.

20 Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017).

21 Queen City STEM School Enrollment data, available at: https://tinyurl.com/kkx2y2z (last checked 6/16/2017).

22 Id.

23 Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017).

24 Id.

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School	Operation	Student Demographic Information[19]	Authorizer	Governing Board
Triad Math and Science Academy Middle/High School: 700 Creek Ridge Rd, Greensboro, NC 27406 Elementary: 600 Industrial Ave. Greensboro, NC 27406[25]	Grades K-12[26] 2008-present[27]	Enrollment: 1159 7% SWD 4.3% Asian 11.13% Hispanic 61.7% African American 17.9% White 4.9% Other	North Carolina Department of Public Instruction	Triad Math and Science Academy Company[28]
Triangle Math and Science Academy 312 Gregson Dr. Cary, NC 27511	Grades K-9[29] 2012- present[30]	Enrollment: 802 3.27%SWD 40.7% Asian 4.9% Hispanic 16.2% African American 33.2% White 4.9% Other	North Carolina Department of Public Instruction	Triad Math and Science Academy Company[31]
Charter Petition Denials				
Cabarrus STEM Academy	Denied 2014[32]			Petitioner: Ali Tombak
Cape Fear STEM School[33]	Denied 2011[34]			Petitioner: Cape Fear Education Services, Inc.[35]
Durham STEM Academy[36]	Denied 2013[37]			Petitioner: Ali Tombak[38]
IT Academy of Triangle[39]	Denied 2011[40]			IT Academy of Triangle Company Petitioner: Kenan Gundogdu[41]
Piedmont IT Academy[42]	resubmitted and denied 2012, 2013[43]			Piedmont IT Academy Petitioners: Alper Tekten, Kenan Caglar, Adem Kaya, Carlton Cammon[44]
Wake Math and Science Academy[45]	Denied 2009[46]			Wake Math and Science Academy Company Petitioner: Kenan Gundogdu[47]
Asheville Math and Science Academy[48]	Denied 2013-14[49]			AMS Educational Services Petitioner: Yavuz Koruk[50]

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A History of Strategic Ambiguity and Conflicting Interests

TMSAC opened the Triad Math and Science Academy (Triad Academy) in Greensboro in 2008, which now operates an elementary campus and a combined middle and high school campus. In 2012, TMSAC opened the Triangle Math and Science Academy (Triangle Academy) in Cary. CEF opened the Queen City STEM School (Queen City) in Charlotte in 2015.

These schools' transactions with each other, affiliated vendors, and other vendors should be closely scrutinized. For example, Triad and Triangle Academies lease facilities from Triad Educational Services (TES), a nonprofit organization created in 2010 to provide facilities for its related charter schools in North Carolina.[51] Alper Tekten, the principal of Triad Academy, served as the first President of the TES Board.[52] TES purchased school facilities for the three TMSAC campuses and serves as the schools' landlord.

25 Triad Math and Science Academy, available at: https://tinyurl.com/mc62ebs (last checked 6/16/2017).

26 Triad Math and Science Enrollment data, available at: https://tinyurl.com/kkx2y2z (last checked 6/16/2017).

27 Id.

28 Triad Math and Science Academy Charter School application received from the North Carolina Department of Public Instruction; an email sent on May 12, 2017 in response to 2017 FOIA request.

29 Triangle Math and Science Enrollment data available through the North Carolina Department of public instruction Data and Reports, available at: https://tinyurl.com/kkx2y2z (last checked 6/16/2017).

30 Triangle Math and Science Academy website, available at: https://tinyurl.com/k2mp9e3 (last checked 6/16/2017)

31 Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017).

32 Cabarrus STEM Academy application denial, available at: https://tinyurl.com/ker2n72 (last checked 6/16/2017).

33 Cape Fear STEM School charter application, available at; https://tinyurl.com/lh8gztz (last checked 6/16/2017).

34 Cape Fear STEM School absent from list of operative charter schools in the state, available at: https://tinyurl.com/n3xf7hu (last checked 6/16/2017).

35 Cape Fear STEM School charter application, available at: https://tinyurl.com/lh8gztz (last checked 6/16/2017).

36 Durham Stem Academy Letter of Intent, available at: https://tinyurl.com/lqdxast (last checked 6/16/2017).

37 Durham STEM Academy absent from list of operative charter schools in the state, available at: https://tinyurl.com/n3xf7hu (last checked 6/16/2017).

38 Lead petitioner; Durham Stem Academy Letter of Intent, available at: https://tinyurl.com/lqdxast (last checked 6/16/2017).

39 IT Academy of Triangle Charter School application, available at: https://tinyurl.com/l37s32v (last checked 6/16/2017).

40 IT Academy of Triangle absent from list of operative charter schools in the state, available at: https://tinyurl.com/n3xf7hu (last checked 6/16/2017)

41 IT Academy of Triangle Charter School application , available at: https://tinyurl.com/l37s32v (last checked 6/16/2017)

42 Piedmont IT Academy Charter School Application, available at: https://tinyurl.com/ly4eky2 (last checked 6/16/2017).

43 Piedmont IT Academy Charter school application, available at: https://tinyurl.com/kl752lj (last checked 6/16/2017) but absent from list of approved charter schools.

44 Piedmont IT Academy Charter School Application, available at: https://tinyurl.com/ly4eky2 (last checked 6/16/2017).

45 Non-profit company information for Wake Math and Science Academy, available at: https://tinyurl.com/mcx9dgn (last checked 6/16/2017).

46 Wake Math and Science Academy absent from list of operative charter schools in the state; the North Carolina Department of Public Instruction Educational Directory, available at: https://tinyurl.com/n3xf7hu (last checked 6/16/2017).

47 Non-profit company information for Wake Math and Science Academy formed in 2008, available at: https://tinyurl.com/mcx9dgn (last checked 6/16/2017).

48 Ashville Math and Science Academy initial application, available at: https://tinyurl.com/y7tfq738 (last checked 6/16/2017).

49 Asheville Math and Science Academy missing from list of operative Charter Schools, available at: http://tinyurl.com/n3xf7hu (last checked 6/16/2017).

50 Petitioner information; Asheville Math and Science Academy initial application, available at: https://tinyurl.com/y7tfq738 (last checked 6/16/2017).

51 IRS Form 990 for Triad Education Services, available at: http://tinyurl.com/yarwx7wj (last checked 6/16/2017).

52 IRS Form 990 for Triad Education Services, available at: http://tinyurl.com/yarwx7wj (last checked 6/16/2017).

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In 2015, TES borrowed $22.2 million in bonds to refinance the purchase and renovation of those campuses.

Triad Academy provides back office services to both Triangle Academy and Queen City for four percent of the schools' revenue.[53] TMSAC schools also contract with the Washington Education Foundation (WEF) to provide management and administrative services for a per student monthly fee.[54] WEF appears to operate as a quasi-regional oversight entity in the Mid-Atlantic region since it has also provided services to at least one Gülen charter school in Maryland and one proposed school in Virginia.[55] These agreements should be carefully scrutinized for conflicts of interest and acceptable business terms based on events we have researched in other states. In Georgia, for example, forensic auditors of one Gülen charter school in the Fulton Science network questioned whether the Grace Institute, the regional oversight entity and charter management organization for the Southeast, provided any services at all to its Gülen charter school client. The Fulton County School System initiated the audit due to significant overlap between the leaders of the Fulton Science network and the Grace Institute and the school's failure to adhere to appropriate procurement practices.[56]

Financial Issues

Many Gülen charter networks lend money between the schools and other organizations operating in the state.[57] Frequent inter-entity lending practices are a known warning sign for money laundering.[58] The directors that serve on both the Queen City and TMSAC boards owe fiduciary duties to each entity. Shuffling funds between schools could be indicative of a breach of fiduciary duty to the school.

In North Carolina, the Triad Academy loaned the Triangle Academy $107,000 in 2012 for a renovation project and $155,150 in 2014 for construction expenses. As of June 30, 2016, Triangle Academy still owed Triad Academy $142,701. Triangle Academy also paid Triad Academy a total of $117,831 for various services in 2015 and paid $14,400 to TES.[59]

Triad Academy also loaned Queen City $60,000 in 2015 and $120,000 in 2016 for operational needs. In addition, Queen City owes Triad Academy $87,000 for the administrative services that Triad Academy performs for Queen City.[60] In total, Queen City owes Triad Academy $267,000. Queen City also owes Triad Education Services $226,000 for equipment acquisition.[61]

53 Triad and Triangle Board Minutes, available at: http://tinyurl.com/y8482rzs (last checked 6/16/2017).

54 Public Finance Authority Education Revenue Bonds Triad Educational Services – p. A-9, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

55 Loudoun County Public Charter School Application, available at: http://tinyurl.com/kvd7crh (last checked 6/16/2017).

56 See the Georgia state profile for more information.

57 See, e.g., the Arizona and Ohio State Profiles.

58 The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 6/16/2017).

59 All loans and payments regarding Triangle and Triad Academy reported on Financial Statements for Triad Math and Science Academy, and Triangle received from North Carolina Department of Public Instruction through 2017 FOIA request. Triangle Academy's financial statement lists two different balances Triangle Academy owed to Triad Academy as of June 30, 2016: $142,701 and $131,415.

60 All loans from Triad Academy to Queen City STEM reported on Financial Statements for Triad Math and Science Academy, received from North Carolina Department of Public Instruction through 2017 FOIA request.

61 Queen City STEM loan from Triad Educational Services; Financial Statements Queen City STEM Academy, received from North Carolina Department of Public Instruction through 2017 FOIA request.

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Queen City is also on shaky financial ground. It reported a negative cash balance of $146,424 and a deficit in net position of $213,209 in 2016. The auditor stated that "the negative cash balance and deficit in net position caused uncertainties about the School's ability to continue as a going concern." In response, the school's management stated that Queen City will borrow additional funds from related parties in order to continue operation.[62]

Finally, TMSAC might have used public funds for an inappropriate purpose when they purchased a car for use by the central office. The central office was supposed to provide an analysis of need for the car, but the analysis is not included in the Board minutes.[63] This purchase should be investigated to ensure that the schools spent public funds for appropriate purposes.

Bond Financing

Triad Educational Services borrowed $22,210,000 in bonds from the Public Finance Authority Wisconsin in March 2015 to refinance debt incurred to purchase, construct, improve, and equip the school facilities for Triad Academy (both campuses) and Triangle Academy. The bonds will be repaid over 30 years. TES will continue to serve as the landlord for the three campuses under new lease terms, and the bonds will be repaid solely from the rent paid to TES, and it expects to acquire school facilities for the Queen City STEM School in the future.[64] WEF received $249,610 as a consulting fee from the Series 2015 Bonds.[65] TES will pay $46,649,548 in principal and interest on the bonds over their 30-year life.[66]

Real Estate

The Gülen organization in North Carolina engages in the same type of questionable real estate transactions found in other Gülenist charter school networks across the country. Our research indicates that, first, the charter networks create a related third-party organization to purchase property, often through a bond issue, and then lease the property to a school. Rental payments are paid from the school's public funds and are the sole source of revenue to repay the third-party loans. In many cases, the rental payments may be more than the monthly mortgage or bond service payments. When the mortgage debt is repaid in full, the schools do not own the school building. For that reason, the schools continue to lease facilities using public funds and often pay for the school building many times over. Connections between the schools and landlords raise questions about whether the real estate transactions are conducted at arm's length or constitute conflicts of interest. Similar real estate deals involving Gülen-affiliated schools and third-party organizations have been identified in states such as Ohio, Illinois, New Jersey, New York, South Carolina, Florida, Texas, Oklahoma, Pennsylvania, and Arkansas. In North Carolina, Triad Educational Services (TES) purchased school facilities for Triad

62 Queen City STEM loan from Triad Educational Services; Financial Statements Queen City STEM Academy, received from North Carolina Department of Public Instruction through 2017 FOIA request.

63 Triad and Triangle Board Minutes, available at http://tinyurl.com/y8482rzs (last checked 6/16/2017).

64 Bond issue - Public Finance Authority Wisconsin, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

65 Public Finance Authority Education Revenue Bonds Triad Educational Services, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

66 The terms of bond are discussed on the Official Statement - p. 33; Public Finance Authority Wisconsin, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

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Academy and Triangle Academy.[67] A Triad Academy principal, Alper Tekten, served as the first President and registered agent of TES.[68] TES purchased three properties for the Triad and Triangle Academies,[69] financing the acquisitions and renovations with loans later refinanced through a bond issuance.[70] Rental payments from the Triad and Triangle Academies appear to be the main sources of funds to repay the loans and the bonds.[71] The initial loans for the three school properties include:

Loan 1[72]:
2010: $4.2 million from Self-Help Ventures Fund
2011: $400,000 from Self-Help Ventures Fund
Total: $4.6 million

Loan 2[73]:
2013: $7,013,894 loan from Church Loans and Investment Trust
2014: $2,928,120 additional draw on loan[74]
Total: $9,942,014

Loan 3[75]:
2014: $2,894,342 borrowed from Church Loans and Investment Trust against a $7.5 million limit
Total: $2,894,342
Total TES loans: $17,436,356

TES's financial statements do not disclose the total repayments on these initial loans TES made during this time period. But TES's 2014 financial statements reveal that TES repaid only $56,235 against the second loan in 2014 and paid nothing against the principal of the third loan in 2014.[76] Yet Triad and Triangle Academies paid TES almost $2.2 million in rent for 2013 and 2014, raising questions about whether the rental payments were applied to the mortgage debt.[77] From July 2010 through June 2015, the Triad and Triangle Academies paid approximately $4.5 million in occupancy costs to TES.[78]

In 2015, TES borrowed $22,200,000 in bonds from the Public Finance Authority Wisconsin to refinance the debt used to acquire, renovate, and equip the three TMSAC campuses. TES will pay $46,649,548 in principal and interest on the bonds over their 30-year life.[79]

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67 IRS Form 990 for Triad Educational Services – 2009, available at: http://tinyurl.com/yarwx7wj (last checked 6/16/2017).

68 IRS Form 990 for Triad Educational Services, available at: http://tinyurl.com/yarwx7wj (last checked 6/16/2017).

69 See property ownership by TES; Guilford county real property search for Triad Math and Science (middle and high school) 700 Creek Ridge, Greensboro and Triad Math and Science (elementary) 600 industrial Ave, Greensboro, available at: https://tinyurl.com/ybugjhao (last checked 6/16/2017); Wake County property search for Triangle Math and Science Academy, 312 Gregson Dr. Cary available from https://tinyurl.com/yavv47cw (last checked 6/16/2017); Charlotte Mecklenburg real estate lookup for Queen City STEM School, 8701 Mallard Creek, Charlotte, available at: http://tinyurl.com/ommlueh (last checked 6/16/2017).

70 TES loans are described the 2012, 2013, 2014, and 2016 TES Financial Statements that are included in Appendix C-1 of the bond Official Statement and in the Continuing Disclosure documents, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

71 Repayment of loans discussed in the bond Official Statement and in the TES annual financial statements in Appendix C-1 of the Official Statement, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

72 TES Financial Statement 2012 – p. 9; included in Appendix C-1 of the bond Official Statement, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

73 TES Financial Statement 2013 – p. 10; included in Appendix C-1 of the bond Official Statement, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

74 TES Financial Statement 2014 – p. 10; included in Appendix C-1 of the bond Official Statement, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

75 Id.

76 Id.

77 Triad Math and Science Academy Company IRS Form 990 for 2013 and 2014, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

78 Triad Math and Science Academy Company;IRS Form 990 for 2011, 2012, 2013, and 2014, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017); Triad Math and Science Academy Company IRS Form 990 for 2015, available at: http://tinyurl.com/ybvcpc7t (last checked 6/16/2017).

79 The terms of bond are discussed on the Official Statement, available at: http://tinyurl.com/y88m6hek (last checked 6.4.17).

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In total, the schools will pay an estimated $51,216,964 for the three school properties: the $4.5 million in occupancy costs between 2010 and 2015 and the bond repayment of $46.6 million. Even after the bond debt is repaid, the schools will not own the properties.

Triad Academy also paid TES a high monthly fee of $20,833 for building maintenance in 2015-2016,[80] and additional "cash" payments of $218,178 for services, membership, fundraising, gifts, and/or capital contributions adding to the total state dollars that go to TES.[81]

Given the amounts involved in these transactions, the transactions should be carefully reviewed to ensure that public tax dollars are spent appropriately. In particular, the arrangements with TES possibly constitute conflicts of interest since Alper Tekten has worked with both Triad Academy and TES.

Excessive Use of the H1-B Visa Program

Like other Gülen Organization charter networks, the North Carolina Gülen charter schools utilize the H1-B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools. The North Carolina charter networks have filed a total of 68 H-1B visa requests between 2001 and 2016.[82] It is not known whether TMSAC or CEF paid for immigration costs with public funds, but further investigation is recommended.

Although Gülen-affiliated schools commonly state that the visas are necessary to fill shortages for math and science teachers, positions are also filled for a wide range of positions, including: Spanish teachers, special education teachers, assistant principals, middle school deans of academics, middle/secondary school principal, education administrators, curriculum coordinators, principals, instructional coordinators, business managers, and a dean of advanced studies program.[83]

North Carolina's Gülen charter schools use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Cherie Cookorinis: The North Carolina network used Cookorinis, a Georgia-based attorney, to file numerous H-1B applications.[84] Cookorinis also filed applications for:
  - Fulton Science (GA)
  - Chesapeake Lighthouse Foundation (MD)
  - Discovery (FL)
  - River City (FL)
  - New Springs (FL)
  - Neosprings (FL)
  - Starts Education (FL)
  - Galaxy (FL)
  - Charter Educational Services & Resources (GA, FL)
  - Grace Institute (GA, FL)

- Christine Latsey: The North Carolina network used Latsey, a Maryland-based

[80] Triad Educational Services Financial Statements – Continuing Disclosure, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

[81] IRS Form for Triad Science and Math Academy Company, available at: http://tinyurl.com/lpasybv (last checked 6/16/2017).

[82] The North Carolina charter schools' H-1B applications from 2001-2016 are available at: http://tinyurl.com/ya85j7jr (Triad Math and Science Academy Company) (10); http://tinyurl.com/ybwxrab4 (Triad Math and Science Academy Co.) (53); http://tinyurl.com/yaxd5zgy (Charlotte Education Foundation) (5) (last checked 7/16/2017).

[83] Jobs in Tech Website, available at: https://tinyurl.com/kn74ygo (last checked 6/16/2017)

[84] List of entities represented by Cherie Cookorinis, available at: http://tinyurl.com/m4e6cgl (last checked 6/16/2017).

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attorney, to file numerous H-1B applications.[85] Latsey also filed applications for:

- ▷ American Turkish Friendship Association
- ▷ Chesapeake Lighthouse Foundation (MD)
- ▷ Pinnacle Education Services
- ▷ Washington Education Services
- ▷ Maryland American Turkish Inhabitants
- ▷ Rumi Forum
- ▷ Turkic American Alliance
- ▷ Institute of Islamic and Turkish Studies
- ▷ Delaware American Turkish Cultural and Educational Foundation

Scandals, Investigations, & Notable Activities

Numerous statements made by parents and school board members at a Triad Academy board meeting in 2017 paint a picture of "curriculum chaos."[86] These problems include failures by the school to: provide teachers with adequate professional development; communicate with students and parents; provide services to students with special needs; provide a seventh grade advanced math class that meets the needs of students; maintain "control and order;" teach programs aligned with North Carolina standards; prepare students for third and fifth grade science tests; adopt courses in a consistent manner; and provide a rigorous and quality high-school education. The board meeting also addressed concerns about teachers who did not communicate well in English and teacher inexperience. The school has also received complaints regarding its provision of special education services. One parent, who also works as a teacher at Triad Academy, complained about the school's failure to provide special education services for her son and other students at a school board meeting. She expressed concern about the number of special education teachers at the school, the credentials and professionalism of the current special education teacher, and on-going issues for other students with special needs. The parent has also filed two state complaints about the school's treatment of students with special needs. The North Carolina Department of Public Instruction conducted an audit of the special education services at the school, but the audit was not available at the time of publication.[87] Another parent expressed similar concerns in 2016 about the lack of a reading specialist. Because of the lack of a reading specialist, this parent felt that the school failed the student, whose reading skills decreased while at the school.[88]

An environmental assessment prepared for all three TMSAC campuses discovered conditions at the Triad Academy elementary campus that pose a moderate potential for a past or present release of hazardous substances. Prior owners of the school campus used hazardous chemicals at or near the site, and traces of an industrial chemical were present in groundwater due to a drum containing the chemical discovered near the school. Although there is no evidence the chemical migrated to the campus, an environmental consultant found a recognized "environmental condition" with respect to the school property due to the chemical's proximity. The school management has not conducted a follow-up to the initial environmental assessment.[89]

[85] List of entities represented by Christine Latsey, available at https://tinyurl.com/kyxvh8z (last checked 6/16/2017)

[86] Triad and Triangle Board Minutes for February 18, 2017; February 22, 2017; and March 25, 2017, available at: http://tinyurl.com/y8482rzs (last checked 6/16/2017).

[87] Triad and Triangle Board Minutes for Feb 18, 2017, available at: http://tinyurl.com/y8482rzs (last checked 6/16/2017).

[88] Triad and Triangle Board Minutes for April 23, 2016, available at: http://tinyurl.com/y8482rzs (last checked 6/16/2017).

[89] Bond issue - Public Finance Authority Wisconsin, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

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Notable Turkish Vendors

- Washington Education Foundation ("WEF"): WEF is a District of Columbia entity registered in 2005. It has filed for two trade names: Discovery Education and WEDUF.[90] WEF has stated its mission was to launch charter schools in the D.C. area but has also been involved in establishing the North Carolina Gülen network.[91] WEF provided services to at least one Gülen charter school in Maryland and assisted the proposed Loudoun Math and IT Academy in Virginia.[92] It currently provides a Student Information System to Pinnacle Academy, a Virginia private school, in conjunction with Apple Educational Services, the Gülenist oversight entity for the Northeast region.[93] Triad and Triangle Academies contract with WEF for management and administrative services.[94] Triad and Triangle Academies paid WEF a total of $667,925 from 2011 through 2014, the most recent year available. WEF also received $249,610 as a consulting fee for the bond issuance involving the TMSAC network.[95]
- Triad Educational Services ("TES"): TES is a nonprofit organization created to purchase properties for the Gülen charter schools in North Carolina and serve as their landlord. Triad Academy paid fees to TES for school maintenance and made "cash" payments for other services that were not specifically described.
- PERA Construction/Metropolis Group ("PERA" and "Metropolis"): Talha Sarac serves as the registered agent for Metropolis and the President for PERA, and PERA and Metropolis share an address.[96] Sarac founded the Institute of Islamic and Turkish Studies[97] and serves as the chair for the Turkish American Business Network (Turkish American Alliance), Gülen-affiliated organizations.[98] In 2014, TES hired the Metropolis Group as the contractor for a $1 million renovation project at Triad Academy elementary school.[99]

Gülenist Cultural and Business Organizations Active in State

- Rumi Forum: The Rumi Forum is openly Gülenist, with Fethullah Gülen named as the forum's honorary chairman.[100] It is affiliated with the Alliance for Shared Values,

90 Corporate documents for this entity are available at: http://tinyurl.com/m6895a3 (last checked 6/16/2017).

91 Samiha Khanna, Questions Loom about Group Proposing Raleigh Charter School, Indy Week (Jan. 25, 2012), available at: http://tinyurl.com/o9zpgvv (last checked 6/16/2017).

92 Loudoun County Public Charter School Application for Loudoun Math & IT Academy, available at: http://tinyurl.com/kvd7crh (last checked 6/16/2017).

93 Student Information System Login for Pinnacle Academy, available at: http://tinyurl.com/ke5j6dz (last checked 6/16/2017).

94 Public Finance Authority Education Revenue Bonds Triad Educational Services, available at: http://tinyurl.com/y88m6hek (last checked 6/16/17).

95 Id.

96 Virginia Secretary of State Business Entities, available at: http://tinyurl.com/y8ja2k4x (last checked 6/16/2017).

97 IRS Form 990 for Institute of Islamic and Turkish Studies, available at: http://tinyurl.com/yby2xkzb (last checked 6/16/2017).

98 Organization affiliations discussed in article from Daily Caller, available at: http://tinyurl.com/pk957tq (last checked 6/16/2017).

99 See Monthly building permits for Greensboro, available at: http://tinyurl.com/7kfvxzn (last checked 6/16/2017).

100 Fethullah Gülen biography on Rumi Forum, available at: http://tinyurl.com/k5gunan (last checked 56/16/2017).

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Gülen's official non-profit organization headed by Greater Texas Founder, Alp Aslandogan.[101] The forum hosts trips to Turkey, peace and dialogue awards, and intercultural dinners.[102] North Carolina hosts a chapter of the Rumi Forum.[103]

- Divan Center (Divan): Divan's website recommends the Turkic American Alliance and the Rumi Forum, other Gülenist cultural organizations.[104] Divan promotes Turkish culture through language and cooking classes, festivals, and local events including "friendship" dinners.[105] It has sponsored dialogue trips to Turkey.[106] Divan has branches in Cary and Greensboro.[107]

- Institute of Islamic and Turkish Studies – North Carolina (IITS NC): Talha Sarac, the President of PERA Construction, founded IITS NC. IITS supports interfaith dialogue and provides information to the public about Islam to increase knowledge and understanding of the faith. IITS hosts events related to Fethullah Gülen and reviews of articles from The Fountain, a Gülen publication.[108]

Individuals Caught in the Gülen Organization Web

It is common for the charter networks within a region to shuffle their Turkish H1-B visa employees, both teachers and administrators, among schools, states, and education management vendors in different types of jobs. The individuals listed below are examples of the overlap of employees among these organizations, further demonstrating the interconnections and affiliation between the networks.

- Ugur Zengince: Superintendent, Triad Math and Science Academy (NC); Superintendent, (2013-2015) and Director, (2005-2013) for Concept Schools (OH); B.S., Bogazici University (Istanbul, Turkey).[109]

- Ali Tombak: Founding Board President, Charlotte Education Foundation (NC); Founding Board Member, President, Triad Math and Science Academy Company(NC); Board member, Horizon Science Academy (OH); Lead petitioner, for the failed Cabarrus STEM Academy (NC); Principal Engineer, Technology Platforms Org – RF Micro Devices Inc (NC);Board Member, Turkish-American Scientists and Scholars Association (DC); Electrical Engineering, Middle East Technical University (Ankara, Turkey).[110]

- Alper Tekten: Former Headmaster, Assistant Principal, Triad Math and

[101] Id.

[102] About Us, Rumi Forum, available at: http://tinyurl.com/lz5cxkj (last checked 6/16/2017).

[103] Maryland, Rumi Forum, available at: http://tinyurl.com/mnsf7ww (last checked 6/16/2017).

[104] Trip to Turkey, Divan Center, available at: http://tinyurl.com/y84nfcje (last checked 6/16/2017).

[105] See Divan Cultural Center website, available at: http://tinyurl.com/ybtrccs8 (last checked 6/16/2017).

[106] Trip to Turkey, Divan Center, available at: http://tinyurl.com/y84nfcje (last checked 6/16/2017).

[107] Contact Us, Divan Center, available at: http://tinyurl.com/yblengfr (last checked 6/16/2017).

[108] See IITS NC website, available at: http://tinyurl.com/ycwv8zn3 (last checked 6/16/2017).

[109] Ugur Zengince LinkedIn profile, available at: https://tinyurl.com/kjcze93 (last checked 6/16/2017).

[110] Information taken from: Triangle Math and Science Academy Charter School application, available at: https://tinyurl.com/l9ymrtz (last checked 6/16/2017); Triad application for federal grant – p. e35, available at: http://tinyurl.com/y8o8ng5b (last checked 6/16/2017); Pacek, Jessica Groover; Three more charter schools proposed for Cabarrus; Independent Tribune (Jan. 11, 2014), available at: https://tinyurl.com/yahtemap (last checked 6/16/2017); Queen City STEM School Charter Application, available at: https://tinyurl.com/l7edscw (last checked 6/16/2017); IRS Form 990 for Charlotte Education Foundation, available at: https://tinyurl.com/y84c8r4w (last checked 6/16/2017); Triad Application for Grants, available at: https://tinyurl.com/y869328r (last checked 6/16/2017).

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Science Academy (NC); Petitioner, failed charter school Piedmont IT Academy (NC); President, Triad Educational Services (NC); Intern, Teacher, Math Olympiad Coach, Fulton Science Academy (GA); Petitioner for Gülen charter schools in Florida.[111]

- Hakan Orak: Headmaster, Triad Math and Science Academy (NC); Director of Operations, Harmony Public Schools (TX); Chief Academic Officer, Chesapeake Lighthouse Foundation (MD); Math Teacher, Fulton Science Academy (GA); B.S., Istanbul Technical University (Istanbul, Turkey).[112]

- Suzan Mertyurek: Public Relations Coordinator, Knoxville Turkish Center (TN); Lead Applicant on the failed charter, Knoxville Charter Academy (TN); Board Member, Triad Math and Science Academy Company (NC).[113]

- Hakki Karaman: Director of Internal Control, Triad Schools (NC); Former Principal, Syracuse Academy of Science (NY); Principal, Magnolia Science Academy (CA); Board Member, Magnolia Properties Management (CA); CEO, Director of Education, Magnolia Educational and Research Foundation (CA); CMO, Magnolia schools (CA); MBA Coordinator, Doga Private Schools (Turkey); B.A., Bogazici University (Istanbul, Turkey).[114]

- Fatih Kandil: Principal, Superintendent, Triad Academies (NC); Principal, Chesapeake Science Point (MD); Principal, Baltimore IT Academy (MD); Teacher, Brooklyn Amity School (private Gülenist school) (NY); Teacher, Chicago Math and Science Academy (IL); Teacher, Wisconsin Career Academy (WI); Applicant, failed application for Loudoun Math and IT Academy Charter School (VA).[115]

- Mithat Karabulut: Principal, Triangle Math and Science Academy (NC); Head of Science Department, Assistant Principal, Dove Science Oklahoma City (OK); Assistant Principal, LISA Academy (AR); Superintendent, Principal, School of Science and Technology (TX); Assistant

111 Information taken from, Piedmont IT Initial application, available at: https://tinyurl.com/yd6rqxvo (last checked 6/16/2017); IRS Form 990 for Triad Math and Science Academy, available at: https://tinyurl.com/lpasybv (last checked 6/16/2017); IRS Form 990 for Triad Educational Services, available at: https://tinyurl.com/y9cyra4x (last checked 6/16/2017); Federal planning grant application from 2010, available at: http://tinyurl.com/y8o8ng5b (last checked 6/16/2017).

112 IRS Form 990 for Triad Math and Science Academy, available at: https://tinyurl.com/lpasybv (last checked 6/16/2017); LinkedIn profile, available at: https://tinyurl.com/y92c2brx (last checked 6/16/2017).

113 Information taken from: Knoxville Charter Academy initial application, available at https://tinyurl.com/m8zwttl (last checked 6/16/2017); Suzan Mertyurek and the Turkish Cultural Center; Constantine, Mary; Dishing with Suzan Mertyurek; Knox News;,(Sept. 16, 2010), available at: https://tinyurl.com/mku6zm9 (last checked 6/16/2017)Suzan Mertyurek and the Turkish Cultural Center; Constantine, Mary; Dishing with Suzan Mertyurek; Knox News;,(Sept. 16, 2010), available at: HYPERLINK "https://tinyurl.com/mku6zm9" https://tin

114 Information taken from: Maturity Schedule for Triad Math and Science Academy Education Revenue Bonds, available at: https://tinyurl.com/yadjz4n8 (last checked 6/16/2017); Charter School Facilities Program document, available at http://tinyurl.com/yd4pypsv (last checked 6/16/2017); Magnolia Foundation Board Minutes from November 12, 2015, available at: https://tinyurl.com/y8nqprhy (last checked 6/16/2017); San Diego Unified School District School Accountability Report Card, available at: https://tinyurl.com/y78y3wxc (last checked 6/16/2017); The New York State School Report Card for Syracuse Academy of Science, available at: https://tinyurl.com/y8hh2nyr (last checked 6/16/2017).

115 Information taken from: Maturity Schedule for Triad Math and Science Academy Education Revenue Bonds, available at: https://tinyurl.com/yadjz4n8 (last checked 6/16/2017); Baltimore City Public Schools School Performance Plan, available at: https://tinyurl.com/ybzqybws (last checked 6/16/2017); Loudoun County School Board Select Committee questions posed to Loudoun Math and IT, available at: https://tinyurl.com/y746yh4o (last checked 6/16/2017); Brown, Emma, Math-science charter proposed in Loudoun, modeled on school with Turkish connections, The Washington Post (July 8, 2012), available at: https://tinyurl.com/yd6d67uk (last checked 6/16/2017).

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Superintendent, College Readiness, Harmony Public Schools (TX).[116]

- Atila Akyurek: Former Principal Queen City STEM School; current Principal Harmony School of Fine Arts and Technology; former principal School of Science and Technology, Gülen school in San Antonio; former Testing Coordinator and Physics Teacher for Dove Science Academy; Oklahoma City; Former teacher MEF International School (Turkey), Yahya Kemal College (Macedonia), Tarsus American College (Turkey), Ferikoy Armenian Elementary School (Turkey).[117]
- Guray Taysever: Director, Triad Math and Science Academy (NC); Director, Science Academy of Chicago (IL); Director of Professional Development, Charter Schools USA (FL); Director, Horizon Schools (OH).[118]

Notable Press Coverage and Research Regarding the California Gülenist Network

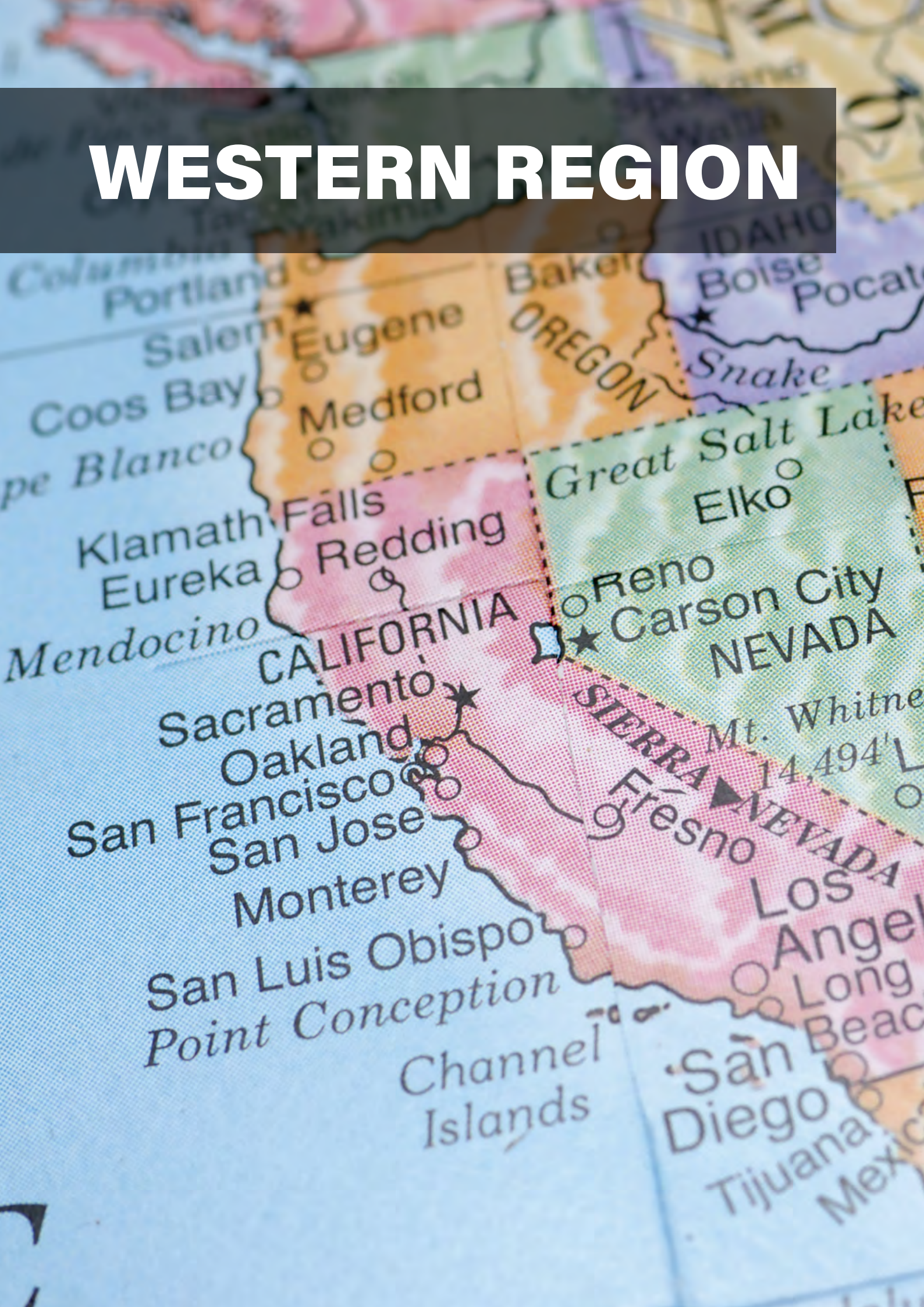
- Khanna, Samiha; Questions Loom About Group Proposing Raleigh Charter School. Indy Week, January 25, 2012. Available at: http://tinyurl.com/yd52fhqh (last checked 6/16/2017).
- Whyte, Liz Essley; Turkish opposition subsidizes scores of state lawmakers' trips. USA Today, February 9, 2017. Available at: http://tinyurl.com/kxdhxol (last checked 6/16/2017).
- Dunn, Andrew; 3 new Charlotte Charter School approved to open this fall. Charlotte Observer, January 9, 2015. Available at: http://tinyurl.com/y823gzuz (last checked 6/16/2017).
- Schultz, Courtney; New STEM-Centered charter school to arrive in Charlotte. The Charlotte Weekly, September 26, 2014. Available at: http://tinyurl.com/y7dg9o2o (last checked 6/16/2017).

[116] Information taken from: Maturity Schedule for Triad Math and Science Academy Education Revenue Bonds (2015) p. 74 available at https://tinyurl.com/yadjz4n8 (last checked 6/16/2017); Karabulut biography; Bond issue - Public Finance Authority Wisconsin, available at: http://tinyurl.com/y88m6hek (last checked 6/16/2017).

[117] LinkedIn profile available at https://tinyurl.com/ya4tfqoj (last checked 6/16/2017); Texas School Directory from 2012-2013 available at: https://tinyurl.com/y9gos7lm (last checked 6/16/2017); Harmony Fine Arts and Technology letter from principal, available at: https://tinyurl.com/y7zlwmp2 (last checked 6/16/2017).

[118] Linkedin profile, available at: http://tinyurl.com/yarnsmnq (last checked 6/16/2017).

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WESTERN REGION
Portland
Salem
Eugene
Coos Bay
Medford
Baker
OREGON
Boise
Snake
Great Salt Lake
Elko
Klamath Falls
Redding
Eureka
Mendocino
Reno
Carson City
NEVADA
CALIFORNIA
Sacramento
Oakland
San Francisco
San Jose
Monterey
SIERRA NEVADA
Mt. Whitney
14,494'
Fresno
Los Angeles
Long Beach
San Luis Obispo
Point Conception
Channel Islands
San Diego
Tijuana

Quick Facts

- Total # of Schools in Region: 28

- Total Regional Revenues for the 2015-16 school year: $99,140,545[1]
  - Regional Charter Networks:
  - Magnolia (CA) - 10 schools
  - Bay Area Technology (CA) - 1 school
  - Sonoran (AZ) - 6 schools, 1 pre-k
  - Coral (NV) – 8 campuses
  - Lotus (CO) – 1 school
  - Beehive (UT) – 1 school
  - *Pioneer (OR) attempted*
  - *Sonoran (HI) attempted*
  - *Coral (WA) attempted*

- Total Student Enrollment 2015-16: 9,875 students[2]

- Total # of H-1B applications filed from 2000-2016 in region by charter networks: 924 applications at an estimated cost of $1,848,000 - $3,696,000 in public funds spent.[3]

- Regional Vendors:
  - Accord Institute for Education Research ("Accord")
  - Apex Systems & Technology Solutions (*formerly Apex Educational Services*)("Apex")
  - Ramson Contractors ("Ramson")
  - Promotion & Beyond

- Regional Founders and Key Members:

Huseyin "Joseph" Hurmali: Magnolia Science Academy-1's first principal[4]; CEO Magnolia 2002-2008 (CA); Petitioner for Pac Tech charter district 2009 (CA); Petitioner for failed Pioneer charter school (OR)[5]; Chairman of the West American Turkic Council; Vice President of the Journalists and Writers Foundation[6] in Turkey, Gülen's public relations arm.[7]

  - Suleyman Bahceci: Cosmos/ Harmony (TX) Founder[8]; Founder of Willow Education and Board President[9]; Accord founder; Magnolia CEO; Accord CEO;[10] loaned Beehive $30,000;[11] now VP of Student Affairs at Virginia International University, a Gülen-inspired university.[12]
  - Timur "Tim" Saka: Openly Gülenist,[13] founder and start-up coordinator for Lotus School for Excellence (CO),[14]

1 $19,543,637(NV); $47.7 million Magnolia, $3,008,614 Bay Area Tech (CA); $7.6 million (CO); $18,983,866 (AZ); $2,312,428 (UT). Information regarding revenues is contained in each state profile.

2 2733 (NV); 3,714 (CA); 839 (CO); 2292 (AZ); 297 (UT). Student enrollment and demographic information available in each state profile.

3 15 (NV); 40 (UT); 54 (CO); 358 (AZ); 457 (CA). H-1B information taken from state profiles. Estimated costs to file an H-1B application range from $2,000-$4,000, which forms the basis of this estimate.

4 See MERF/Dialog 990 form for 2002, available at: http://tinyurl.com/z33bpsv (last checked 2/14/2017).

5 Minutes listing Hurmali, available at: http://tinyurl.com/l9kscwl (last checked 4/12/2017).

6 http://tinyurl.com/zo8rd7m (last checked 2/14/2017).

7 The New York Times described the JWF as "an Istanbul-based public-relations arm for Gülen's followers." Article available at: http://tinyurl.com/hk3zueh (last checked 2/14/2017).

8 First Harmony charter petition, listing Bahceci as petitioner, available at: http://tinyurl.com/mhkeovf (last checked 3/25/2017).

9 See Willow 2004 990 form, available at: http://tinyurl.com/zvl5372 (last checked 2/14/2017).

10 Summary of Bahceci's experience listed in the 2015 California State audit at pg 40, available at: http://tinyurl.com/zen2cb7 (last checked 2/14/2017).

11 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

12 McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* LA Weekly. (1 December 2016). Available at: http://tinyurl.com/jxceqp7

13 http://tinyurl.com/jhdrwhq (last checked 2/9/2017).

14 Aurora Public Schools board meeting minutes 2005, available at: http://tinyurl.com/zynyejb (last checked 2/9/2017).

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then left to found and teach at the Beehive charter network (UT),[15] became principal in the Magnolia (CA) network,[16] and now serves as the events coordinator for the Gülenist cultural association Peace Islands Institute and director of the Turkish Cultural Center in Syracuse, NY leading junkets to Turkey for local politicians.[17]

- ▷ Zhandos Utegulov: Founder and board member of Lotus (CO) from 2003-2008, founder of Horizon Science Academy Dayton and Horizon Science Academy Cincinnati, both Concept (OH) schools in 2004,[18] contributing author to *The Fountain Magazine,* a known Gülenist publication,[19] member of the Gülenist Niagara Foundation,[20] and now serves as a professor at Nazarbayov University in Kazakhstan.[21]
- ▷ Hakan Kaya: Key Gülenist Accountant for the Western Region's vendors, with Power of Attorney for Accord;[22] and serving as Accountant for Promotion & Beyond; Ramson Contractors; and Westwood Production, Inc.[23]
- ▷ Regionally Active Turkish cultural associations: Pacifica Institute, West American Turkic Council (WATC).

The Origins of the Western Region

In 1997, the Magnolia Education Research Foundation ("MERF") formed in California under its original name, the Dialog Cultural, Scientific, & Educational Foundation. Arizona's founding non-profit, Daisy Education Corporation, formed a few years later in 1999. The two charter networks that resulted, Magnolia (CA) and Sonoran (AZ) respectively, are the two largest charter networks in the Western Region. The first wave of the Western Region charter schools opened shortly thereafter—Daisy opened Sonoran Science Academy-Tucson in 2001; Coral Academy of Science Reno opened in 2001; and MERF opened Magnolia Science Academy-1 in 2002. The Lotus School for Excellence ("Lotus") board formed in 2003 in Colorado, with their only school opening in 2006. Beehive Education Services ("Beehive") formed in 2005 in Utah, opening their only school that same year.

Of the five charter networks operating in the Western Region, all five have been documented by external entities for lack of transparency, financial impropriety, and misuse of public funds. All five use the same regional vendors, are managed by Accord, and display the other markers common to all Gülen Organization charter networks. Lotus (CO) and Beehive (UT) are under particularly close scrutiny in their states due to early exposure of their financial mismanagement. This close scrutiny has stymied their expansion, but has not affected their ability to hire Gülenist administrators who in turn purchase services at the Gülen Organization's premium from Gülenist

15 Pictures from 2006 event with Tim Saka's class from Beehive, available at: http://tinyurl.com/kngjyhf (last checked 3/23/2017).

16 Saka was the principal at MSA-Santa Clara, see annual report submitted by Saka, available at: http://tinyurl.com/mruej3s (last checked 3/23/2017).

17 For discussion of Saka, see Ed Griffin-Nolan, Exerting Influence, The Syracuse New Times (June 25, 2014), available at: http://tinyurl.com/zp264kc (last checked 2/9/2017).

18 HSA Dayton's articles of incorporation available at: http://tinyurl.com/ztq68n9 (last checked 2/9/2017); HSA Cincinnati's articles of incorporation available at: http://tinyurl.com/judd99q (last checked 2/9/2017).

19 For an article by Utegulov in The Fountain, see http://tinyurl.com/h6sxueo (last checked 2/9/2017).

20 For an article discussing Utegulov's membership, see http://tinyurl.com/jqmdz7e (last checked 2/9/2017).

21 http://tinyurl.com/hxcdt88 (last checked 2/9/2017).

22 Accord 2008 990 form, available at: http://tinyurl.com/modrcuf (last checked 4/13/2017).

23 Information available by searching these entities at the California Secretary of State, available at: http://tinyurl.com/ksbk52p (last checked 4/13/2017).

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vendors. Of the five networks, Coral (NV) and Sonoran (AZ) appear to have drawn the least controversy and have experienced the least amount of resistance to their expansion.

Three of the five Western networks have experienced major investigations from state or federal authorities, while all have received audit findings signaling the financial misuse and impropriety endemic to the Gülen Organization. Highlights of these investigations include:

Magnolia (CA)

- **LAUSD Forensic Audit:** LAUSD commissioned forensic audits of three of its Magnolia schools. The audits uncovered widespread abuse of public funds, publicly financed immigration through the H-1B program, and conflicts of interest with its affiliated vendor Accord. Magnolia took over five million dollars in taxpayer funds from its public charter schools with budget surplus from 2011-2014 to hide the insolvency of its corporate office. Magnolia later claimed these hidden transfers were "loans," but there were no interest rates, terms of repayment, or even documentation to protect the lending schools. Magnolia only paid back the schools after the 2014 LAUSD forensic audit uncovered the illegal transfers. LAUSD required that Magnolia cease using Accord for all LAUSD-based Magnolia schools.

- **State of California Audit Reports:** The State of California audited Magnolia after the forensic audits were released and found a staggering 69% of transactions were not properly documented, authorized, or both, a violation of both state and federal law. Both the State Auditors and LAUSD expressed doubt that Accord provided any meaningful services to the schools that Magnolia did not offer already.

- **LAUSD Office of the Inspector General Investigation:** The LAUSD Inspector General has been investigating Magnolia for two years due to its forensic audit findings and continued concerns regarding the schools' use of public funds. However, Magnolia has repeatedly failed to provide requested financial documents after numerous requests. LAUSD recently voted to non-renew three of the Magnolia charters due to this ongoing failure of transparency.[24]

Beehive (UT)

- **Utah State Charter School Board Investigation:** An American board member of Beehive began questioning Accord's involvement in local personnel decisions when the school had not engaged Accord to provide human resource management and notified the State Charter Board of his suspicions regarding Beehive's affiliation with the Gülen Organization. The State Charter Board found no evidence of proselytizing, but they did find significant evidence of financial mismanagement. Over 1/3 of Beehive's teaching staff were on active H-1B visas paid for by the school. Beehive spent fifty cents of every dollar it spent on textbooks to pay for immigration costs, or approximately $46,000 over the four-year period. When the school was up for renewal, it was initially denied but eventually allowed to stay open upon the reconstitution of the school's governing board. Now, Beehive is one of the only Gülen Organization charter schools without a Gülenist-controlled governing board, though it retained its Gülenist administration and still hires Gülenist vendors.

- **Utah State Audit of the State Charter School Board:** We believe Beehive's political cronies initiated an audit of the State Charter School Board after it attempted

[24] Article describing the LAUSD OIG investigation, available at: http://tinyurl.com/hn8wz6j (last checked 4/12/2017).

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to non-renew Beehive. While the audit indicated that the State Charter Board's financial standards were vague, and thus, Beehive should not be held to them, the audit enforced that Beehive was grossly mismanaged financially. Further, the school operated at a deficit every year until it its governing board was forcibly reconstituted, which we believe is another indicator that the Gülenist-controlled governing board was complicit in spending out the school's limited resources. Due to this increased scrutiny, Beehive has not been able to expand in Utah.

Lotus (CO)

- **Aurora Public Schools Monitored Spending Plan:** Lotus School for Excellence was in extremely bad financial condition in its early years, apparently depending on numerous loans from its Gülenist governing board members and employees to remain solvent. Its authorizer required the school to go on a monitored spending plan with increased financial transparency after discovering its repeated misuse of federal funds and poor financial management. Due to this increased scrutiny, Lotus has not been able to expand throughout Colorado despite its attempts to do so.

Sonoran (AZ)

- **Annual Audits:** Sonoran schools received numerous negative audit findings, including failure to observe financial standards of recordkeeping; inaccuracies in general ledger as opposed to actual funds spent; supporting documentation did not match expenditures; failure to monitor disbursements and reimbursements; inflated student attendance records which increased funding; lack of immigration documentation for employees; lack of fingerprint records; and lending practices between the governing board members, vendors, employees, and schools.

- **US Department of Education Audit:** In 2003, the US Department of Education performed a special audit and uncovered that Sonoran Science Academy-Tucson (at that time named Daisy Science Academy) misused $20,519 in federal funds by using the money for unallowable expenses.[25] One of these expenses was for hiring foreign employees. The audit also found that $5,407.79 of federal funds was paid to Daisy board member and founder, Nasuhi Yurt, allegedly as a reimbursement.

Coral (NV)

- **Annual Audits:** Coral schools received negative findings as well on its annual audits, including: failure to comply with state requirements for teacher certification and qualification; failure to conduct fingerprinting and criminal background checks; failure to serve vulnerable student populations, as seen by its failure to stay within 10% of the district average for minority student populations and vulnerable student populations, such as students with disabilities, English language learners, and students eligible for free/reduced lunch; failure to amend or adjust budget when variances occurred; inability to create accurate financial statements; misuse of federal funds; and failure to gain board approval for salary changes before salary changes were made.

- **Parent Alliance Investigation:** Coral received a series of parent complaints regarding a lack of transparency on the

[25] Audit report available at: http://tinyurl.com/jboyhc3 (last checked 1/25/2017).

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use of school funding and insistence on expanding before the school was financially sound. An investigation followed by this parent alliance, who shared its findings with Coral's authorizer.

Regional Network Comparison

Network	Stage One: Setting the Stage	Stage Two: Creating the Customer	Stage Three: Creating the Boss	Stage Four: Too Big to Fail
Magnolia (CA)			✓	
Sonoran (AZ)			✓	
Coral (NV)		✓		
Beehive (UT)		✓		
Lotus (CO)		✓		

None of the Western Region charter networks have reached Stage Four as of yet, likely due to the increased scrutiny on these networks due to numerous scandals. While Magnolia (CA) had the greatest potential to hit Stage Four, the LAUSD forensic audits, the State of California Audits that followed, and the LAUSD's nonrenewal of several of Magnolia's flagship charter schools in the greater Los Angeles areas has earned the network a suspect reputation. In 2016, Magnolia withdrew all eight of its submitted charter applications throughout California in the face of multiple recommendations for denial. Only by extensive expansion and securing significant bond financing can a charter network reach Stage Four, whereby the network is simply too large to fail. While Magnolia (CA), Sonoran (AZ), and Coral (NV) all have bond issuances, they have not reached Harmony (TX) proportions, which is responsible for over $452 million in bond debt in Texas alone.[26]

Notably, both Sonoran (AZ) and Coral (NV) have secured bond financing from the same bond issuer, the Industrial Development Authority of Pima County, Arizona.[27] This trend of reusing small bond outfits across the U.S. can be seen throughout the Gülen Organization's regions.

Failed Expansion Attempts

In 2006, Rose Education Center filed a charter application in Oregon to start Pioneer Technology Charter School, which was later denied due to lack of support, evidence that it could meet the needs of academically challenged students, and evidence of a sound financial plan.[28] One of Magnolia's founders, Joseph Hurmali, was involved with the attempted expansion in Oregon,[29] as well as Mustafa Keskin, an employee of Accord and both Magnolia (CA) and Beehive (UT), further evidencing the interconnectedness of the Western Region.[30] Interestingly, in the responses to the denial, the proposed charter school is referred to as a "Dialog school,"[31] because Pioneer intended to hire MERF, at that time known as the Dialog

[26] Summary of bond debt, available at: http://tinyurl.com/lz83yjp (last checked 4/24/2017).

[27] Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

[28] Application with rationale for denial available at: http://tinyurl.com/kmtodbo (last checked 4/12/2017).

[29] Minutes listing Hurmali, available at: http://tinyurl.com/l9kscwl (last checked 4/12/2017).

[30] Rose Education Center information available at: http://tinyurl.com/mltwv8x (last checked 4/12/2017).

[31] Charter School Sponsorship 3, pg 2, available at: http://tinyurl.com/lbz9xh3 (last checked 4/12/2017). This website includes multiple documents submitted in relation to this charter application.

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Foundation, as its charter management organization. The responses included references to Magnolia as the basis for its educational model. Suleyman Karaman, the lead petitioner for the Oregon application, had previously submitted a charter application in 2005 that was later denied. After the Oregon denial, he worked as a principal for Magnolia (CA).

Sonoran and Accord attempted to expand to Hawaii by applying to open Mokapu STEM charter school, to be located on the Marine Corps military base in Kaneohe Bay.[32] The petition, submitted in 2010, was later denied. Kazim Gumus, a former Harmony (TX) teacher, was on the school's governing board, and Adem Oksuz, former Sonoran (AZ) employee, Accord employee, and more recently an employee of the Northeastern Region's Apple Education Services, was involved on behalf of Sonoran and Accord.

Coral Academy of Science attempted to expand to Washington after the state passed its first charter school authorization legislation. Its foundation, the Quantum Leap Educational Foundation, was incorporated in 2013. Notably, a key Washington state representative critical in getting the charter school legislation passed had been tapped to serve on the school's advisory board, demonstrating the political relationships the Gülen Organization had already established in the area.[33] The charter application was submitted that same year, but was denied due to failure to establish educational program and financial comptency.[34]

Regional Vendors

Accord Institute for/of Education Research ("Accord") was formed as a non-profit 501(c)(3) corporation to provide educational management services to Gülen Organization charter networks by Suleyman Bahceci, a major founder of the Gülen Organization nationwide. Prior to his arrival in California, Bahceci helped found the Harmony (TX) network as one of its original board members in 1999. Immediately thereafter, he founded Willow Education (CA) in 2003, the charter holder for the Bay Area Technology charter school in California. In 2007, he created Accord, serving first on its board of directors. Bahceci was then hired in 2009 to be Magnolia's CEO. While working as CEO for Magnolia, Bahceci signed a contract for Accord's services for over $700,000.00 for the 2011-2012 school year. Before that year was up, he left Magnolia to become Accord's CEO and served in that role until April of 2015.[35]

This example clearly demonstrates one of the primary tactics to maintain control and decrease transparency of the Gülen Organization's operations—the creation of an external, private charter management organization ("CMO") that can handle the Gülen Organization's highly suspect activities on behalf of the region. According to Yunus Avcu, a former employee of Accord and the Gülen Organization, Accord's true function in the Western Region is to collect the monthly *tuzuk* funds in cash from the region's H-1B employees, orchestrate the hiring of Turkish Gülenists being groomed in Gülenist schools and universities in Turkey through the H-1B program, and orchestrate vendor fraud. Avcu stated that he as a hired "accountant" for Accord personally gathered tuzuk funds from the Lotus (CO) network, which he delivered to California in a suitcase monthly to Accord's headquarters. Avcu himself was forced to tithe back as much as 40% of his salary to the Gülen Organization, and identified Magnolia's current IT officer as the individual responsible for maintaining security of the tithing records. Avcu also worked with Sonoran (AZ) during his time at Accord, stating that he helped the network forge

[32] Using the internet archive, the school's former website www.mokapustemschool.org can be accessed. Sonoran involvement available at: http://tinyurl.com/mpetrwq (last checked 4/12/2017).

[33] The charter application is available at: http://tinyurl.com/l4jtzf5 (last checked 4/12/2017).

[34] Resolution to deny Coral Academy of Science application, available at: http://tinyurl.com/mjm7sxd (last checked 4/12/2017).

[35] *Id.*

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fake invoices to cover the network's real use of federal grant funds.

Avcu stated that Accord dictated to each of its member networks which vendors they should hire and for what prices, goods, and services. This information explains and corroborates the fact that each of the five networks use the same major regional vendors, all apparently Gülenist-owned and operated. While each network uses local Gülen-affiliated vendors, and sometimes Gülenist vendors from other regions, they all use Accord as their CMO, Apex for their federally funded E-Rate technology improvements, and Promotion & Beyond for their uniforms. Additionally, Lotus (CO), Beehive (UT), and Magnolia (CA) have used Ramson Contractors, but due to lack of detailed publicly available financial records, Sonoran (AZ) and Coral (NV) have not been connected to Ramson as of yet. All of these vendors have utilized the same Gülenist accountant, Hakan Kaya, as well, which is documented on their corporate disclosure forms and tax documents.

The use of Apex as the contractor for E-Rate funding proposals by Western Region charter networks deserves particular scrutiny. Apex appears only to serve networks within the Gülen Organization, with applications filed on behalf of Magnolia (CA), Beehive (UT), Lotus (CO), Sonoran (AZ), and Coral (NV). The Gülen Organization has already come under federal investigation by the FBI and the USDOE for its allegedly fraudulent use of the federal E-Rate program in the Midwestern Region, orchestrated by Concept Schools, the Gülenist CMO there. The FBI raided several Concept-sponsored charter schools and offices in OH and IL 2014, and the application for the search warrant to justify these raids, now publicly available, detailed the system of kickbacks, fraudulent invoices, and misuse of funds received from the E-Rate program. This alleged fraud was perpetrated by Concept and its version of "Apex," the Core Group, a Gülenist IT vendor operated by a former Concept employee and current Gülenist landlord. Apex operates in the same way as the Core Group, serving only charter networks within the Gülen Organization, maintaining a suspiciously small staff that somehow meets the needs of each of its regional networks.

Promotion & Beyond provides uniforms to the Western Region charter networks. While this type of good may not seem rife for financial exploitation, the Gülen Organization seemingly uses uniform vendors as a routine spending item that on its face appears justified. In reality, the charter networks apparently are forced to maintain significant uniform overstock each year, ranging from $25,000 worth of polo shirts to $60,000 on site. This tactic was first documented in 2012 in the forensic audits conducted on the Fulton Science (GA) network schools. Those schools were found to maintain approximately $35,000 in unused uniform stock purchased from an offshoot of the Core Group, the same IL vendor named in the FBI search warrant for exploiting the E-Rate program. The auditors noted the unusual amount of unused uniform shirts and also the selection of a vendor located in Illinois, which charged an extremely high premium that did not appear to be wholesale prices. The school's official claimed that the vendor was found randomly on the internet. Like Fulton Science (GA), Coral (NV) and other Western Region networks have also been found to carry thousands of dollars of uniform stock each year.

Ramson Contractors apparently fulfills the role of the Gülenist construction company for the Western Region, providing an easy cover for what we believe is the networks' systematic overpayment due to "unforeseen" project costs, delays, materials, and issues that can commonly occur on construction jobs. Avcu stated that Ramson Contractors provided construction services cheaply by hiring undocumented laborers from Turkmenistan on the projects paid for by Lotus (CO), but that the school purposefully overpaid on all of this work, a fact which was noticed that year by the school's authorizer since it resulted in the school ending that year at a significant deficit.

Regional Employee Overlap*

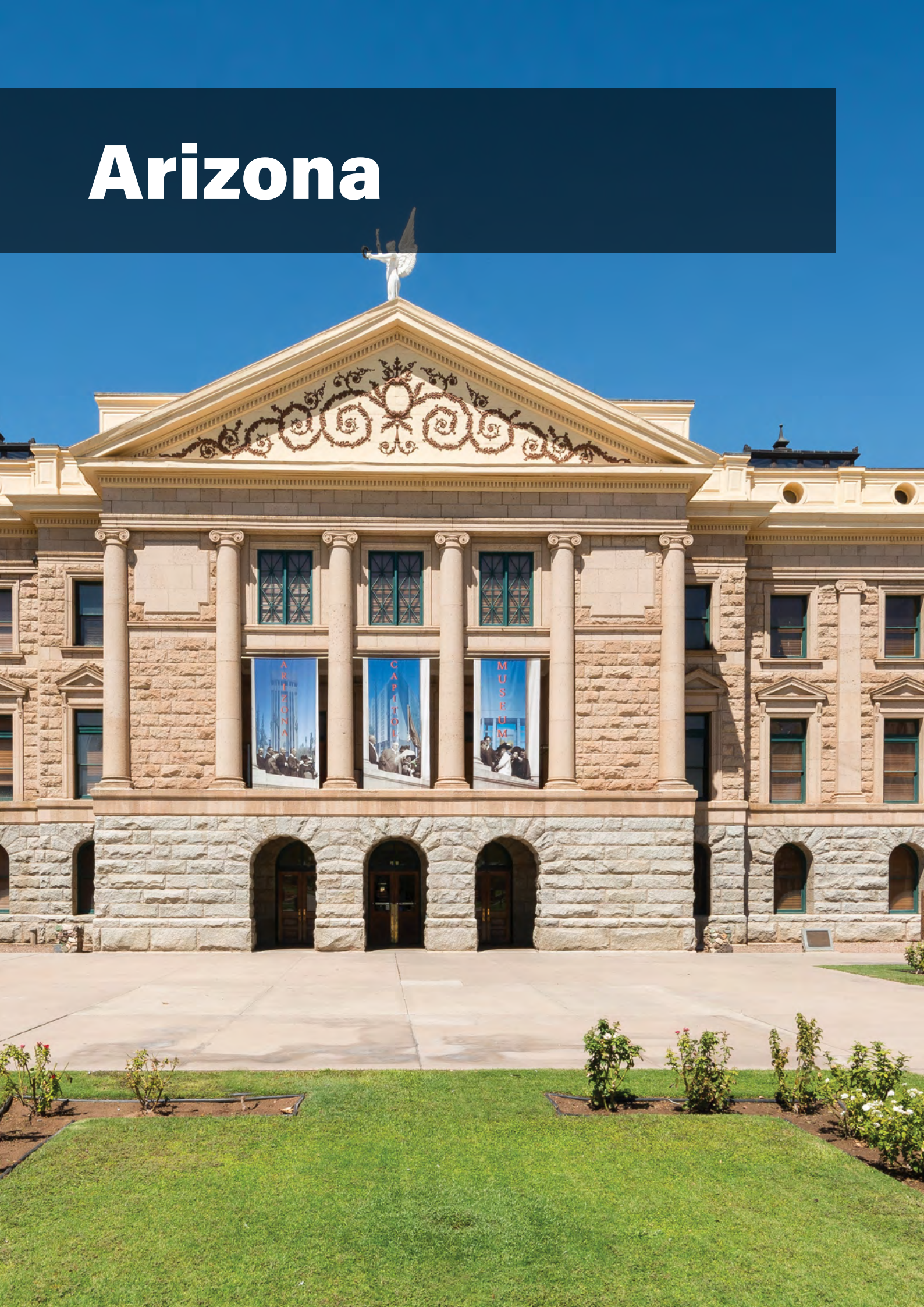
Employee	CA	AZ	NV	CO	UT	Other States, Vendors, Cultural Associations
Ercan Aydoglu	✓	✓	✓			Petitioner/Principal for 2 of the Gülen Military base charter schools
Eray Idil			✓	✓		
Erdinc Acar	✓		✓			Accord; Proposed Executive Director for Coral (WA)
Ali Unver		✓	✓			

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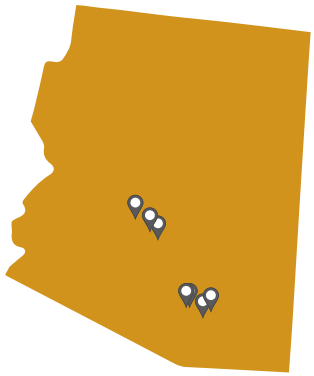
Employee	CA	AZ	NV	CO	UT	Other States, Vendors, Cultural Associations
Hanifi Oguz			✓		✓	
Mehmet Argin	✓	✓				HI
Varol Gurler	✓	✓		✓		NY
Ozkur Yildiz	✓	✓				HI; WATC
Adnan Doyuran	✓	✓		✓		
Murat Biyik	✓	✓			✓	Accord
Umit "Matt" Yapanel	✓			✓		Accord; Pacifica
Mustafa Keskin	✓				✓	OR; Accord
Timur "Tim" Saka	✓			✓	✓	NY
Adem Oksuz		✓				PA; HI; Accord; Apple
Muhammet "Frank" Erdogan	✓				✓	

**This is just a sampling of the employment overlap of the Western Region's Turkish employees.*

Arizona



QUICK FACTS ON GÜLEN CHARTER SCHOOLS ARIZONA



NUMBER OF SCHOOLS	7
KNOWN AS	Sonoran Science Academy Paragon Science Academy
TOTAL ENROLLMENT	2,292
CHARTER VENDOR	Sonoran Schools, Inc.
TOTAL REVENUES	$18,983,866

RELATED INSTITUTIONS



KEY PEOPLE



Feyzi Tandogan · Eray Idil · Bunyamin "Ben" Karaduman · Volkan Akbas · Fatih Ozer

Attempted Networks



- Lack of Compliance with Required Financial Procedures and Accounting Standards
- Improper Student Attendance Records which lead to Increased Funding
- Insufficient Employee Records
- Inappropriate Lending Between Entities

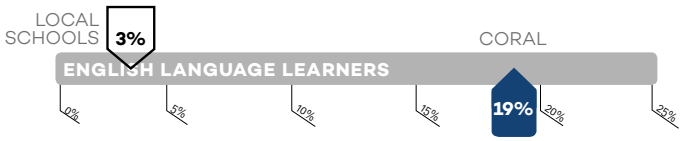
H-1B VISA APPLICATIONS

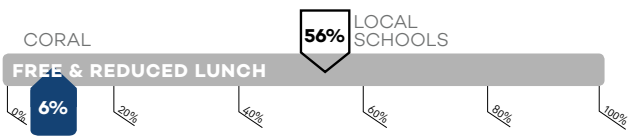
358 H-1B

H-1B VISA APPLICATIONS 2001-2016

STUDENT DIVERSITY

CASLV **violated the requirement to stay within 10% of the district average for minority student populations** and vulnerable student populations, such as students with disabilities, English language learners, and students eligible for free/reduced lunch.





CONGRESSIONAL CONCERN

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen.

All figures based on available data for 2015-2016 academic year.

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Quick Facts

- Region: Western
- School Names (known as):
  - Sonoran Science Academy
  - Paragon Science Academy
- Total # of Schools in State: 6 charter schools open, 1 charter school closed, 1 pre-kindergarten academy
- Total Student Enrollment 2015-16: 2,292[1]
- Charter Holder/Governing Board(s):
  - Daisy Education Foundation
    - Organized as a non-profit with 501(c)(3) status
    - Operates 5 charter schools and 1 pre-kindergarten academy
  - Sonoran Science Academy-Broadway
    - Organized as a non-profit with 501(c)(3) status
    - Operates 1 charter school
- Charter Management Services Vendor: Sonoran Schools, Inc.
- Regional Gülen Organization Oversight Entity: Accord Institute for Education Research
- Regional Sister Networks: Magnolia (CA), Coral (NV); Lotus (CO); Beehive (UT). Attempted Networks: Pioneer (OR); Sonoran (HI); Coral (WA)[2].
- Total Revenues for the 2015-16 school year: $18,983,866.[3]
- Network Founders:
  - Nasuhi Yurt: now works at Ebru TV, a Gülenist television station in NJ
  - Abdullah Yilmaz: still runs Daisy & Sonoran Schools.
  - Turgay Korkmaz: now serves as board president of Riverwalk Education Foundation, the governing board of the Gülenist School of Science and Technology (SST) charter network in Texas.
  - Metin Yildirim: later served as board member for Mokapu Stem School, a failed Gülenist charter school in Hawaii also partnering with Accord and Daisy.
  - Ozkur Yildiz: CEO of Daisy/Sonoran, connections to Bay Area Technology School (CA), now President of West American Turkic Council, Director of Turkic American Alliance; lobbied members of Hawaiian legislature to expand charter network there.
  - Mehmet Argin: began as Daisy/Sonoran principal, then became CEO of Daisy/Sonoran, then CEO of Magnolia, served on board of Mokapu STEM School, a failed Gülenist charter school in Hawaii also partnering with Accord and Daisy.

Overview

As of the 2016-2017 school year, Arizona has six Gülen Organization charter schools in operation and one pre-kindergarten academy. These schools are overseen by the Daisy Education Foundation ("Daisy"), a non-profit governing board of directors in operation since 1999. Daisy

[1] Demographic information available at: http://tinyurl.com/gwa7aoc (last checked 3/24/2017).

[2] Coral Academy of Science Application that was later denied by the Washington State Charter Commission available at: http://tinyurl.com/hvytvse (last checked 2/1/2017).

[3] Figure includes Daisy Early Learning Academy, taken from adding the revenues of both Daisy Education Corporation as well as SSA-Broadway, audits available at: http://tinyurl.com/kpumzfd (last checked 3/24/2017).

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initially operated the schools for a fee, but later created Sonoran Schools, Inc. to serve as its charter management company and then contracted with it to provide services to its schools for a percentage of total school revenues. Daisy also contracts with Accord Institute for Education Research ("Accord"), the corporate entity responsible for the western region of the Gülen Organization charter networks, allegedly for additional educational management services for the Arizona schools. On average, these schools serve 8% English Language Learners vs. 5% state average; 45% free and reduced lunch population vs. 47% state; 3% students with disabilities vs. 11% state; 15% African American students vs. 5% state; 41% Caucasian students vs. 39% state; and 26% Hispanic students vs. 45% state.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Paragon Science Academy 2975 W. Linda Lane Chandler 85224	K-12 2008-Present	04% ELL 34% FRL 4% SWD 19% African American 37% Caucasian 12% Hispanic	Arizona State Board for Charter Schools	2013: Paragon Education Corporation 2013-Present: Daisy
Sonoran Science Academy- Broadway 6880 E. Broadway Blvd. Tucson, AZ 85710	K-8 2008-Present	07% ELL 48% FRL 08% SWD 08% African American 40% Caucasian 35% Hispanic	Arizona State Board for Charter Schools	Sonoran Science Academy-Broadway (same board members as Daisy, though)
Sonoran Science Academy-Davis Monthan 5741 E. Ironwood St. Tucson, AZ 85709	6-12 2009-Present	N/A% ELL 29% FRL N/A% SWD 08% African American 40% Caucasian 39% Hispanic	Arizona State Board for Charter Schools	Daisy
Sonoran Science Academy-Peoria (originally known as SSA-Phoenix Metro) 17667 N. 91st Ave Peoria, AZ 85382	K-8 2011-Present	09% ELL 49% FRL N/A% SWD 00% African American 54% Caucasian 22% Hispanic	Arizona State Board for Charter Schools	Daisy
Sonoran Science Academy-Phoenix 4837 E. McDowell Rd. Phoenix, AZ 85008	K-12 2003-Present	29% ELL 79% FRL N/A% SWD 51% African American 24% Caucasian 20% Hispanic	Arizona State Board for Charter Schools	Daisy
Sonoran Science Academy-Tucson 2325 W. Sunset Rd. Tucson, AZ 85741 (Originally known as Daisy Science Academy)	K-12 2001-Present	N/A% ELL 33% FRL 05% SWD 06% African American 48% Caucasian 30% Hispanic	Arizona State Board for Charter Schools	Daisy

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Sonoran Science Academy-Ahwatukee (originally known as Paragon Science Academy-Elementary) 14647 S. 50th Street, Building 1, Suite 125, Phoenix, AZ 85044	*K-5 2008-2016 Closed due to inability to renegotiate lease or find facility*		*Arizona State Board for Charter Schools*	*Daisy*
Daisy Early Learning Academy 2325 W. Sunset Rd. Tucson AZ 85741	*Pre-K Not Charter*			
Sonoran Science Academy-Flagstaff	*Registration filed*			
Sonoran Science Academy-Oro Valley	*Registration filed*			

**Student demographic information was taken from the 2015-2016 school year. "ELL" indicates English Language Learners, "FRL" indicates students receiving free/reduced lunch, and "SWD" indicates students with disabilities.*[4]

A History of Strategic Ambiguity and Conflicting Interests

The Arizona Gülen charter schools and their management entities have undergone a series of name changes and corporate mergers over the last fifteen years which make it difficult to trace the evolution of the Gülenist presence in the state. Daisy first incorporated in 1999, and since then, varying combinations of its board members have appeared on a number of subsidiary boards that govern the charter schools as well as its hired educational services provider, Sonoran Schools, Inc.

In the beginning, Daisy opened and operated its schools itself, beginning with SSA-Tucson in 2001 and the pre-k Daisy Early Learning Academy in 2003. The charter schools which came after that—SSA-Phoenix (2003), SSA-Broadway (2008), Paragon Science Academy- Elementary/ SSA-Ahwatukee[5] (2008-2016), and SSA-Davis Monthan (2009)—had their own incorporated governing boards, but with members that overlapped with Daisy. SSA- Phoenix Metro (2008), which became SSA-Peoria in 2011, appears to have been governed directly by Daisy's governing board and corporate entity. Daisy also has overlap with Arizona's other Gülenist board, Paragon Education Foundation. Paragon formed in 2005 with two directors—Mehmet Argin, the future CEO of Daisy/Sonoran in Arizona and CEO of Magnolia in California, and Ali Unver, who has appeared on Paragon and/or Sonoran's governing boards since 2005. Paragon opened and operated Paragon Science Academy (2008) in Phoenix (distinct from Daisy's Paragon Science Academy-Elementary).

From 2001-2012, Daisy operated as both a governing board for its charter schools as well as a paid charter management corporation for the schools. It received 10% of each school's total revenues in this capacity, including those schools that technically had separate governing

[4] Demographic information available at: http://tinyurl.com/gwa7aoc (last checked 3/24/2017).

[5] Paragon Science Academy-Elementary changed its name in 2009 to SSA-Ahwatukee. Transfer application available at http://tinyurl.com/z33vfva (last checked 3/13/2017).

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boards (though the directors were identical to Daisy's board members). In 2012, however, Daisy created Sonoran Schools, Inc., to serve as the charter management corporation for all of its schools, including Paragon Science Academy. After that, Daisy forwarded the multi-million dollars in payments it was receiving to provide services to the schools to Sonoran Schools, Inc. While the numerous corporate entities at this point were separate on paper, the evidence would suggest that all of these entities were basically controlled by the same group of Turkish individuals. Sonoran Schools describes its history as that of Daisy's on its website, further cementing the lack of true distinction between these entities.[6]

In 2014, Daisy merged with Paragon Education Corporation, SSA-Phoenix Metro/SSA-Peoria, and SSA-Davis Monthan, with Daisy remaining as the surviving corporate entity. SSA-Broadway remains a legally separate entity, though its board is comprised of the same individuals as Daisy's and Sonoran's board. SSA-Flagstaff and SSA-Oro Valley are currently registered corporations in Arizona, though no charter has been approved for either location to date.

Daisy pays two entities for arguably duplicative services—Sonoran Schools, Inc. and Accord Institute for Education Research. Sonoran serves as the management entity in charge of the schools and is paid a hefty fee each year, with $1.6 million in fees from Daisy to Sonoran in 2016,[7] and $1.4 million in 2015.[8] Being that SSA-Broadway is a technically separate entity, it pays its own hefty fees to Sonoran. In addition to the fees Daisy schools pay to Sonoran, the schools also pay amounts undisclosed on their annual audits to Accord, which were uncovered by a local reporter's public record requests.[9] Whether these fees are for duplicative services as Accord and Sonoran provide similar services is difficult to ascertain due to the secretive nature of Daisy/Sonoran's relationship with Accord and should be investigated as Gülen Organization charter networks have been caught paying funds to sham entities for duplicative services before.[10]

Financial Issues

Arizona requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues at the Daisy/Sonoran charter schools that are endemic to other Gülen Organization charter networks. Our research suggests that these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks. The frequent inter-entity lending practices in particular—from school to school, from schools to their governing board Daisy, from Daisy to its hired management vendor Sonoran, and even from schools to Sonoran—is a known warning sign for money laundering.[11] There are also issues with accurately documenting attendance, absences, and withdrawals of students throughout the Gülen Organization charter networks. Failure in this recordkeeping, intentional or not, may allow a school to garner the most public funds while educating the least number of students. If intentional, this method particularly takes advantage of "problem" students, whose

6 Sonoran Schools, Inc., About Us History Section, available at: http://tinyurl.com/grskxft (last checked 1/26/2017).

7 Daisy's 2016 financial statements, available at: http://tinyurl.com/jbwwswt (last checked 2/2/2017).

8 Daisy's 2015 financial statements, available at: http://tinyurl.com/h5opusm (last checked 2/2/2017).

9 Tim Steller, *Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools*, Arizona Daily Star (Oct. 22, 2010) available at: http://tinyurl.com/ht36ax6 (last checked 2/1/2017).

10 See, e.g., the Georgia chapter.

11 The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

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truancy is purposefully unreported while the schools continue to collect their FTE funding. Similarly, there are issues with accurately documenting free and reduced meals for students throughout the Gülen Organization charter networks. Again, this method would be effective for garnering the most public funds while serving the least number of students. Lastly, the fact that these schools do not maintain accurate and complete immigration records for their numerous foreign employees, including state mandated fingerprint testing, is yet more evidence of the Gülen Organization's suspect and excessive use of the federal H-1B visa program.

The numerous audit findings occur across multiple years and at multiple schools, including:

- Lack of Compliance with Required Financial Procedures and Accounting Standards:
  - lack of completed financial statements;
  - failure to file affidavits of publication of notice of the public hearing to adopt the budget;
  - journal entries not prepared on proper forms;
  - lack of approval by administrator before recording journal entries;
  - entries without auditable trails;
  - budgets published before meeting held to vote on budget;
  - deposits not monitored;
  - incomplete capital asset schedule;
  - insufficient unrestricted cash reserves;
  - subsidiary ledgers and quarterly tax returns did not match the general ledger;
  - incorrect overbillings for school lunches to the federal program;
  - administrators at one campus approving and paying for goods and services at other campuses;
  - untimely posting invoices;
  - lack of income verification for students for school lunch program purposes;
  - lack of authorization for disbursements; and
  - cash disbursements did not match supporting documentation.

- Improper Student Attendance Records which lead to Increased Funding:
  - lack of dates on enrollment forms;
  - incorrect withdrawal dates in the attendance systems;
  - incorrect reporting of absences;
  - incorrect attendance reports;
  - lack of proof of residency;
  - and late attendance submissions.

- Insufficient Employee Records:
  - lack of attendance registers for teachers;
  - lack of immigration documentation for employees; and
  - lack of fingerprint records for employees.

- Inappropriate Lending Between Entities:
  - loans to schools from governing board members;
  - loans to Daisy from schools;
  - loans between Daisy and Sonoran;
  - loans from schools to Sonoran;
  - loans between Daisy and Paragon; and
  - inter-school lending and borrowing.[12]

[12] These findings were taken from a review of school and Daisy audits from the years 2009-2015, searchable at: http://tinyurl.com/zg5enfs (last checked 1/26/2017). Instructions for searching for annual audits can be found at http://tinyurl.com/zd7obgu.

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Bond Financing

Daisy/Sonoran has taken out at least two bonds, 1) in 2006, for the SSA-Phoenix campus in the amount of 2,085,000[13]; and 2) in 2006, for the construction of SSA-Tucson's school campus in the amount of $10,605,000.[14] Notably, these bonds were issued by the Industrial Development Authority of the County of Pima, Arizona, the same bond authorizer utilized by two other Gülen Organization charter networks—the Coral Science Academy network in Nevada and the Concept Schools network in the Midwest.

Real Estate

Of the six schools Daisy/Sonoran runs, two schools (SSA Phoenix and SSA Tucson) own their own buildings and appear to have purchased the buildings from unaffiliated third parties. The remaining four schools appear to lease their buildings from unaffiliated third parties.



Excessive use of the H-1B Visa Program

Like other Gülen Organization charter networks, Daisy/Sonoran and their schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the Daisy/Sonoran schools. From 2001-2016, Daisy, Sonoran, Paragon, and their six schools have filed 358 H-1B visa applications for foreign workers.[15] While former

[13] SSA-Tucson Bond Official statement, pg3 available at: http://tinyurl.com/zbnvqes (last checked 1/30/2017).

[14] SSA-Tucson Bond Official statement available at: http://tinyurl.com/zbnvqes (last checked 1/27/2017).

[15] In another example of strategic ambiguity, Daisy/Sonoran and its schools use several different versions of their names to make it difficult to aggregate how many H-1B applications they are filing. The sum total of all of their organizations is 314, and the numbers supporting that total are located at the following links: from 2001-2015, http://tinyurl.com/zwe6xlc (113); http://tinyurl.com/h5z4g92 (18); http://tinyurl.com/hj4l4x6 (5); http://tinyurl.com/j763az8 (4); http://tinyurl.com/jpr84xk (42); http://tinyurl.com/z2v9ycu (92) http://tinyurl.com/h2x7jh9 (14); http://tinyurl.com/ht34ntu (13); http://tinyurl.com/hpqvvjz (44). For 2016, refer to the 2016 data on the US DOL website, available at: http://tinyurl.com/zm5dvec (last checked 1/30/2017).

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Daisy/Sonoran CEO Ozkur Yildiz has stated that these H-1Bs are only to fill shortage areas for math and science teachers,[16] these applications were filed for such positions as: accountants, education administrators, financial managers, financial operations, instructional coordinators, elementary teachers, English teachers, Turkish teachers, and IT network administrators.

Daisy/Sonoran use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Joshua Surowitz: Daisy/Sonoran used Surowitz, a California-based attorney, to file numerous H-1B applications. Surowitz also filed applications for:
  - Magnolia (CA)
  - Accord (Western Region)
  - Coral (NV)
  - Willow Education (CA charter holder for Bay Area Technology)[17]

- Catherine Garcia: Daisy/Sonoran used Garcia, a Calfornia-based attorney, to file numerous H-1B applications. Garcia also filed applications for:
  - Magnolia (CA)
  - Paragon (AZ)
  - Lotus (CO)[18]

- Nancy Robinett. Daisy/Sonoran used Robinett, a Minnesota-based attorney, to file numerous H-1B applications. Robinett also filed applications for:
  - Paragon Education Foundation (AZ)
  - Magnolia (CA)
  - Foundation for Inter-Cultural Dialogue (AZ)[19]

Scandals, Investigations & Notable Activities

In 2015, two Arizona Members of Congress, U.S. Representative Raul Grijalva and U.S. Representative Ruben Gallego, wrote letters urging the U.S. Department of Education and the Government Accountability Office respectively to urge an investigation of charter schools affiliated with Gülen. These letters were sent in light of the recent raids of the Concept Schools network located in Ohio, Illinois, and other Midwestern states for suspected defrauding of the federal E-Rate program by Concept's Turkish administrators and vendors. Both Grijalva and Gallego were concerned about the connections between Concept and the Sonoran network in Arizona uncovered by investigative journalisms at the time and asked for a thorough investigation.[20]

Yunus Avcu, formerly employed by Accord first in Arizona to work with SSA-Phoenix, and then later in Colorado, provided testimony regarding Accord's true purpose and his work with both SSA-Phoenix and Lotus. As an accountant employed by Accord, Avcu stated that he gathered *tuzuk* funds from each of Lotus's Turkish H-1B employees in cash each month and delivered them to Accord's headquarters in California. Despite what Accord alleges it provides in the manner of educational services, Avcu stated that Accord was more focused on arranging trips to Turkey for American dignitaries, ensuring that its Gülenist charter schools maintained Turkish leadership at the school level, and requiring that Turkish leadership regularly hire H-1B Turkish teachers in order

16 Steller, Tim. *Foreigners fill ranks of local charter-school chain*. Arizona Daily Star. (25 April 2010) http://tinyurl.com/h9cnwxa (last checked 1/30/2017).

17 Surowitz profile listing entities represented for H-1B visa work available at: http://tinyurl.com/gva9h7t (last checked 1/31/2017).

18 Garcia profile listing entities represented for H-1B visa work available at: http://tinyurl.com/h4vxfkx (last checked 1/31/2017).

19 List of entities represented by Nancy Robinett, available at: http://tinyurl.com/jcr9rru (last checked 1/31/2017).

20 Representative Grijalva's letter is available at: http://tinyurl.com/hnhcbq5 (last checked 3/14/2017). Representative Gallego's letter is available at: http://tinyurl.com/zyrhf3u (last checked 3/14/2017).

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to keep the cash flow from these teachers' forced tithing through *tuzuk* payments high. As an H-1B employee recruited from Turkey, Avcu himself had to turn over as much as 40% of his salary, which he said went to fund Gülen himself.[21]

In 2003, the US Department of Education performed a special audit and uncovered that Sonoran Science Academy-Tucson (at that time named Daisy Science Academy) misused $20,519 in federal funds by using the money for unallowable expenses.[22] One of these expenses was for hiring foreign employees. The audit also found that $5,407.79 of federal funds were paid to Daisy board member and founder, Nasuhi Yurt, allegedly as a reimbursement. Mr. Yurt claimed that he had loaned the school money to pay for construction costs covered by the grant, though there was no record of this loan made by Mr. Yurt to the school. The audit also declared material weaknesses in the school's financial controls.

The Arizona State Board for Charter Schools placed Daisy/Sonoran on a corrective plan due to numerous failures to implement appropriate employee fingerprinting protocols to ensure student safety.[23]

Notable Turkish Vendors

Accord Institute for Education Research (Accord): Like Daisy/Sonoran, Accord contracts with each of the western Gülen Organization charter networks and allegedly provides them with educational and operational services, including financial services, for a fee. Accord has the greatest overlap in ties with Magnolia (CA) as they are both headquartered in the same state, but Accord also provides services to Daisy/Sonoran (AZ)[24], Coral (NV), Lotus (CO), Beehive (UT), and was listed as a partner for failed schools/regions, as well, including Pioneer (OR) and Mokapu STEM (HI). Yunus Avcu, a Turkish Accord employee first hired to work for SSA-Phoenix, provided detailed information about how Accord functions as a regional oversight entity primarily focused with operating the Gülen Organization.

Apex Systems & Technology Solutions (Apex) (*formerly Apex Educational Services*): Daisy has utilized Apex for IT services paid for by the federal E-Rate grant program. Magnolia (CA) also utilizes Apex for IT services paid for through E-Rate, and Concept Schools (Midwest) is currently under federal investigation for allegedly defrauding the E-Rate program by using affiliated vendors with a system of kickbacks to Concept's management. Apex may also be an affiliated vendor with Daisy/Sonoran; a reporter found tax documentation linking Apex as an owned property/asset of Daisy and Sonoran, though this could not be independently verified.[25]

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21 Jason McGahan, Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly (Dec. 1, 2016), available at: https://tinyurl.com/jxceqp7 (last checked 2/9/2017).

22 Audit report available at: http://tinyurl.com/jboyhc3 (last checked 1/25/2017).

23 http://tinyurl.com/zzqozd2 (last checked 1/31/2017).

24 SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at http://tinyurl.com/j34uhb3 (last checked 2/1/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation dba Sonoran Science Academy – Phoenix, Sonoran Schools (Mar. 3, 2016), available at http://tinyurl.com/hprollg (last checked 2/1/2017); Tim Steller, ***Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools***, Arizona Daily Star (Oct. 22, 2010), ***available at*** http://tinyurl.com/ht36ax6 (last checked 2/1/2017) (discussing payments of over $350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at http://tinyurl.com/z9ft448 (last checked 2/1/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, ***Hidden Agenda?***, Tucson Weekly, (Dec. 31, 2009), ***available at*** http://tinyurl.com/zgwjkak; Magnolia Educational and Research Foundation, ***Magnolia Science Academy – Santa Clara: Countywide Charter School Petition***, Santa Clara County Office of Education , at 17, ***available at*** http://tinyurl.com/hwg8jj8 (last checked 2/1/2017). The Accord Education website even includes a promotional blurb from the CFO of "Sonoran Schools" with other Gülen schools. Accord Education, ***available at*** http://tinyurl.com/gkpvelo (last checked 2/1/2017).

25 http://tinyurl.com/kfl5oar (last checked 1/25/2017).

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Gülenist Cultural Foundations

- West American Turkic Council (WATC)
  - Former Daisy/Sonoran CEO Ozkur Yildiz is now the President of the WATC, a Gülenist cultural organization under the umbrella of the Turkic American Alliance.

- Pacifica Institute
  - The Pacifica Institute is a member of the WATC, which is in turn under the leadership of the Turkic American Alliance. The Pacifica Institute is openly Gülenist and is active throughout the western Gülen Organization region, with branches in California, Arizona, Colorado, Hawaii, Utah, Nevada, and Washington.[26] The Pacifica Institute works closely with the Gülen Organization charter networks to advocate with legislators on their behalf and also to coordinate junkets to Turkey. The Pacifica Institute operates Turkish Olympiads, which the Daisy/Sonoran schools participate in.[27]

- Sema Foundation (AZ)
  - Arizona Founder Metin Yildirim's wife, Elif Yildirim, has served on the board of the Sema Foundation, an Islamic religious foundation based in Tempe, Arizona affiliated with Gülen.[28]

- Foundation for Inter-cultural Dialogue (AZ)
  - A Gülenist religious non-profit organization based in Tempe, Arizona.

Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors such as Accord and Daisy/Sonoran. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections. Former Daisy/Sonoran CEO Yildiz stated that these interconnections were a natural result of the schools going to the same charter conferences, however, this does not explain why this shuffling only occurs with these schools' Turkish employees.[29]

- Mehmet Argin: Principal Daisy/Sonoran (AZ)[30]; Daisy board member (AZ)[31]; CEO at Magnolia (CA)[32]; currently Lecturer at California Polytechnic, Pomona campus.[33]

- Ozkur Yildiz: Principal Daisy/Sonoran (AZ)[34]; Superintendent Daisy/Sonoran

[26] http://tinyurl.com/hkng49u (last checked 1/30/2017).

[27] http://tinyurl.com/zgwjkak (last checked 1/30/2017).

[28] http://tinyurl.com/j2dej8c (last checked 1/30/2017).

[29] Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

[30] Article quoting Argin during his tenure as SSA principal, available at: http://tinyurl.com/lcbxuff (last checked 2/15/2017).

[31] See 2012 Daisy Education 990 tax form, available at: http://tinyurl.com/jjcrxh9 (last checked 2/15/2017).

[32] Article quoting Argin during his tenure as Magnolia CEO, available at: http://tinyurl.com/mbj72a3 (last checked 2/15/2017).

[33] According to Argin's Linkedin profile, available at: http://tinyurl.com/jsdqztz (last checked 2/15/2017).

[34] Article quoting Yildiz during his tenure as Vice Principal at SSA-Tucson, available at: http://tinyurl.com/j5msxcy (last checked 2/15/2017).

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(AZ)[35]; Principal Bay Area Technology (CA)[36]; President of the West American Turkic Council.[37]

- Adem Oksuz: Daisy/Sonoran CEO (AZ)[38]; CEO at Accord (Western Region)[39]; tied to failed Mokapu STEM charter school (HI); Lancaster Science Academy proposal (PA)[40]; Regional Director of Apple Education Services (Northeast Region)[41]; CEO of Vision Academy Charter School (PA).[42]

- Ibrahim Bayraktar: SSA-Tucson teacher (AZ)[43], now works at Accord (Western Region).[44]

- Omer Guvener: Board member of Paragon Education Corporation (AZ), also board member of Foundation for Inter-cultural Dialogue (AZ).[45]

- Ali Unver: Board member of Paragon Education Corporation (AZ), also board member for Coral Academy Las Vegas (NV).

- Adnan Doyuran: Momentum Middle School (Now Magnolia Science Academy San Diego) Principal (CA)[46]; Lotus Academy of Excellence Principal (CO); SSA-Tucson Principal (AZ); Sonoran Associate Superintendent (AZ).

- Murat Biyik: Math teacher at SSA; Vice Principal at Beehive (UT)[47]; then Magnolia (CA); then Accord (CA), and now is back at Beehive (UT).[48]

Notable Articles regarding the Arizona Network

- David Safier, *Turkey's Failed Coup Attempt: The Charter School Connection*, Tucson Weekly (July 19, 2016, 3:09 PM) (discussing potential links between Gülen and the Sonoran Science Academies, which the schools deny, and the use of the H-1B visa program to hire teachers).[49]

- ADI News Services, *Grijalva Contacts Feds on Misuse Funds by Gülenist Schools,* Arizona Daily Independent (November 15, 2015) (discussing contents of Grijalva letter requesting investigation of Sonoran School network due to connections to Concept Schools currently under FBI

35 Article quoting Yildiz during his tenure as Sonoran Superintendent, available at: http://tinyurl.com/h6ancpq (last checked 2/15/2017).

36 Oakland Unified directory listing Yildiz as Principal of Bay Area Technology, available at: http://tinyurl.com/zjhsu34 (last checked 2/15/2017).

37 According to Yildiz's Linkedin profile, available at: http://tinyurl.com/h87ukmf (last checked 2/15/2017).

38 See 2003 Daisy Education 990 tax form, available at: http://tinyurl.com/jjcrxh9 (last checked 2/15/2017).

39 Accord Business profile listing Oksuz as CEO, available at: http://tinyurl.com/hc7v9lm (last checked 2/15/2017).

40 Article discussing petition and Oksuz, available at: http://tinyurl.com/hxsmlvw (last checked 2/15/2017).

41 Oksuz resume available at page196, http://tinyurl.com/hrzqv5r (last checked 1/30/2017).

42 Oksuz resume available at page196, http://tinyurl.com/hrzqv5r (last checked 1/30/2017).

43 http://tinyurl.com/ze77zwn (last checked 1/30/2017).

44 http://tinyurl.com/j2kmusu (last checked 1/30/2017).

45 Check the 2007 990 form for Foundation for Inter-cultural Dialogue, available at: http://tinyurl.com/junrwh3 (last checked 1/30/2017).

46 Pg 15 of Magnolia application, available at: http://tinyurl.com/hcfjhep (last checked 1/31/2017).

47 See 2008 990 form for Beehive listing Biyak as the vice principal, available at: http://tinyurl.com/zjoq9nx (last checked 2/14/2017).

48 Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

49 http://tinyurl.com/zykgfp8 (last checked 2/1/2017).

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investigation for E-Rate fraud).[50]

- Tim Steller, *Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools*, Arizona Daily Star (Oct. 22, 2010) (discussing four Daisy schools that paid over $364,000 to the Accord Institute for Education Research, an alleged hub for Gülen-inspired schools, and questioning whether the services provided by Accord were worth the expense).[51]

- Elizabeth Stuart, *Islamic Links to Utah's Beehive Academy Probed*, Deseret News Utah (June 1, 2010, 12:00 AM) (discussing the number of H-1B visas received by Sonoran Science schools and the Gülen practice requiring teachers to devote a percentage of their paycheck to the movement, and the payment of management fees to Accord to squeeze money out of schools).[52]

- Tim Steller, *Sr. Reporter: More on Sonoran Science, on Gülen*, Arizona Daily Star, (Apr. 26, 2010) (publishing a letter from Mr. Fatih Karatas denying any ulterior motive and affiliations with non-educational organizations, and publishing letters from Ozkur Yildiz discussing the schools' use of the H-1B visa program for seemingly unnecessary job positions, transfer of teachers between Gülen schools, discrimination against non-Turkish individuals, the relationship with Accord, and denying any affiliation with the Gülen movement. The article also discusses the history of Gülen schools in Arizona and the origins of the schools' employees).[53]

- Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) (highlighting the disproportionately high number of H-1B visas obtained by Daisy and Sonoran Science Academy Schools, the schools' emphasis on Turkish culture, overlap of teachers and founders with other Gülen, misuse of resources, and the long-term goal of Gülenists to create a powerful Turkish community in America. The article also discusses Gülenist links of the Daisy founders, even while the superintendent denied formal Gülenist links but admitted to knowledge of Fethullah Gülen.).[54]

- Fatih Karatas, *Letter*, Tucson Weekly (Jan. 28, 2010) (Fatih Karatas denies allegations that Sonoran Science Academy schools have any links to any religious or nationalist movements).[55]

- Tim Vanderpool, *Hidden Agenda?*, Tucson Weekly, (Dec. 31, 2009) (highlighting concerns of parents who feared reprisal if they discussed ties to the Gülen movement and quoting Fatih Karatas as denying a link between Accord and Gülen).[56]

- Saxon Burns, *Police Dispatch*, Tucson Weekly, (July 24, 2003) (students at Sonoran Science Academy complained a teacher repeatedly shut them in the closet).[57]

50 http://tinyurl.com/jqqkesa (last checked 3/14/2017).

51 http://tinyurl.com/ht36ax6 (last checked 2/1/2017).

52 http://tinyurl.com/2b7dmlc (last checked 2/1/2017).

53 http://tinyurl.com/z5hynep (last checked 2/1/2017).

54 http://tinyurl.com/h9cnwxa (last checked 2/1/2017).

55 http://tinyurl.com/zs2s76e (last checked 2/1/2017).

56 http://tinyurl.com/zgwjkak (last checked 2/1/2017).

57 http://tinyurl.com/gl2ru9u (last checked 2/1/2017).

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California



QUICK FACTS ON GÜLEN CHARTER SCHOOLS CALIFORNIA



NUMBER OF SCHOOLS	11
KNOWN AS	**Magnolia Science Academy** **Bay Area Technology Charter School** **Pacific Technology Charter School**
TOTAL ENROLLMENT	**3,714**
CHARTER VENDOR	**MERF** **Magnolia Public Schools**
TOTAL REVENUES	**MERF: $47.7 million** **Willow: $3,008,614**

RELATED INSTITUTIONS

Sonoran, Paragon — AZ
Coral — NV
Lotus — CO
Beehive — UT

Attempted Networks

Pioneer — OR
Sonoran — HI
Coral — WA

KEY PEOPLE

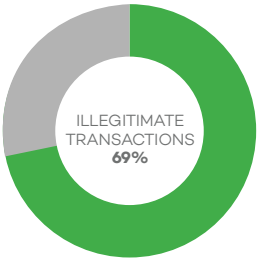


Huseyin "Joseph" Hurmali
Ertan Salik
Remzi Oten
Suleyman Bahceci

INSUFFICIENT FINANCIAL CONTROLS

"We have done some looking into that allegation and there is some evidence that some **members of the Magnolia organization do have ties with the Gülen movement**..."
–LAUSD Inspector General, March 2015

Audits in 2014, 2015, and 2016 revealed that **over 69% of the transactions** reviewed were either unauthorized or had no evidence indicating their legitimacy as a transaction in the public benefit.



According to the 2016 update from the State of California, Magnolia had only implemented **seven out of twelve required findings** for improvement.



H-1B VISA APPLICATIONS

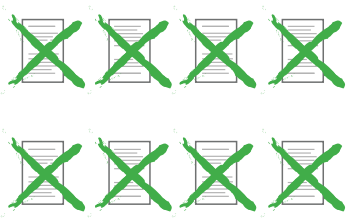
457 H-1B

H-1B VISA APPLICATIONS 2001-2016

Magnolia spent from **$126,000.00 to $200,000.00** in legal and registration fees to secure H-1B visas for Turkish nationals.

CHARTER SCHOOL PETITIONS

MERF filed eight charter petitions last year, but all were withdrawn after recommendations for denial.



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Western
- School Names (known as):
  - Magnolia Science Academy
  - Bay Area Technology Charter School
  - Pacific Technology Charter School
- Total # of Schools in State: 11
- Total Student Enrollment 2015-2016: 3,714[1]
- Charter Holder/Governing Board(s):
  - Magnolia Education & Research Foundation ("MERF")
    - Organized as a Non-profit with 501(c)(3) status
    - Runs 10 schools
  - Willow Education ("Willow")
    - Organized as a Non-Profit with 501(c)(3) status
    - Runs 1 school
- Charter Management Services Vendor: MERF/Magnolia Public Schools
- Regional Gülen Organization Oversight Entity: Accord Institute for Education
- Regional Sister Networks: Sonoran (AZ), Paragon (AZ); Coral (NV); Lotus (CO); Beehive (UT). Attempted Networks: Pioneer (OR); Sonoran (HI); Coral (WA)[2].
- Total Revenues for FY 2016:
  - MERF - $47.7 million[3]
  - Willow - $3,008,614[4]
- California Network Founders:
  - Huseyin "Joseph" Hurmali: MSA-1's first principal[5]; CEO Magnolia 2002-2008 (CA); Petitioner for Pac Tech charter district 2009 (CA); Petitioner for failed Pioneer charter school (OR); Chairman of the West American Turkic Council; Vice President of the Journalists and Writers Foundation[6] in Turkey, Gülen's public relations arm.[7]
  - Ertan Salik: Dialog/MERF board member; Accord employee; contributor to known Gülenist magazine *The Fountain*.[8]
  - Remzi Oten: Dialog/MERF board member; donated $700,000 to MERF in 2012/13[9]; donated $20,000 to Beehive (UT)[10]; served on California Turkish Chamber of Commerce[11] which is under the Turkish American Alliance/West American Turkic Council.[12]
  - Suleyman Bahceci: Cosmos/Harmony (TX) Founder[13]; Willow

1 Student demographic information available at: http://tinyurl.com/mqo5otd (last checked 3/24/2017).

2 Coral Academy of Science Application that was later denied by the Washington State Charter Commission available at: http://tinyurl.com/hvytvse (last checked 2/1/2017).

3 MERF audit 2016, available at: http://tinyurl.com/zpkywpu (last checked 2/14/2017).

4 Bay Area Technology School Budget Statement, available at: http://tinyurl.com/kfusquq (last checked 3/22/2017).

5 See MERF/Dialog 990 form for 2002, available at: http://tinyurl.com/z33bpsv (last checked 2/14/2017).

6 http://tinyurl.com/zo8rd7m (last checked 2/14/2017).

7 The New York Times described the JWF as "an Istanbul-based public-relations arm for Gülen's followers." Article available at: http://tinyurl.com/hk3zueh (last checked 2/14/2017).

8 Listing of Salik's articles available at: http://tinyurl.com/gvgjjrn (last checked 2/14/2017).

9 LAUSD forensic audit at pg 27, available at: http://tinyurl.com/l36xlws (last checked 3/20/2017).

10 Beehive 990 2008 form, available at: http://tinyurl.com/l5dg6wz (last checked 3/21/2017).

11 http://tinyurl.com/n2c3jso (last checked 3/20/2017).

12 http://tinyurl.com/lsaqg73 (last checked 3/21/2017).

13 First Harmony charter petition, listing Bahceci as petitioner, available at: http://tinyurl.com/mhkeovf (last checked 3/25/2017).

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Education President[14]; Accord founder; Magnolia CEO; Accord CEO;[15] loaned Beehive $30,000;[16] now VP of Student Affairs at Virginia International University, a Gülen-inspired university.[17]

Overview

As of the 2016-2017 school year, California has 11 Gülen Organization charter schools in operation. 10 of these schools are overseen by MERF, a non-profit governing board of directors in operation since 1997. MERF serves as the charter holder and corporate head of Magnolia Public Schools, a charter management services provider that serves its own schools for a percentage fee of each Magnolia school's total revenues. MERF/Magnolia also contracts with Accord Institute for Educational Research ("Accord"), the corporate entity responsible for the Western region of the Gülen Organization charter networks, allegedly for additional educational management services for the Magnolia schools. Outside of the official Magnolia network, Bay Area Technology Charter School is operated by its charter holder Willow Education, but it is under the oversight of both Magnolia and Accord as well. Magnolia has attempted to expand its network significantly, submitting eight charter petitions throughout California in the 2015-2016 school year. All eight were denied.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Magnolia Science Academy ("MSA") -1 Reseda 18238 Sherman Way Reseda, CA 91335-4550	2002-2017-LAUSD 2017-Los Angeles County	12% ELL 91% FRL 01% African American 07% Caucasian 84% Hispanic	Originally: Los Angeles Unified School District ("LAUSD"), Now: Los Angeles County	MERF
MSA-2 Valley 17125 Victory Blvd. Van Nuys, CA 91406	2007-2017 LAUSD 2017-Los Angeles County	13% ELL 80% FRL 03% African American 09% Caucasian 82% Hispanic	Originally: LAUSD, Now: Los Angeles County	MERF
MSA-3 Carson 1254 East Helmick St. Carson, CA 90746	2008-2017 LAUSD 2017-Los Angeles County	05% ELL 81% FRL 44% African American 02% Caucasian 49% Hispanic	Originally: LAUSD, Now: Los Angeles County	MERF
MSA-4 Venice 11330 West Graham Pl., B-9 Los Angeles, CA 90064	2008-present	09% ELL 76% FRL 10% African American 08% Caucasian 78% Hispanic	LAUSD	MERF

[14] See Willow 2004 990 form, available at: http://tinyurl.com/zvl5372 (last checked 2/14/2017).

[15] Summary of Bahceci's experience listed in the 2015 California State audit at pg 40, available at: http://tinyurl.com/zen2cb7 (last checked 2/14/2017).

[16] http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

[17] McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* LA Weekly. (1 December 2016). Available at: http://tinyurl.com/jxceqp7

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
MSA-5 Los Lobos 18230 Kittridge Street Reseda, CA 91335	2008-present	28% ELL 95% FRL 05% African American 08% Caucasian 82% Hispanic	LAUSD	MERF
MSA-6 Palms 3754 Dunn Dr. Los Angeles, CA 90034	2009-present	15% ELL 84% FRL 10% African American 03% Caucasian 85% Hispanic	LAUSD	MERF
MSA-7 Northridge/Van Nuys 18355 Roscoe Blvd. Northridge, CA 91325	2010-present	32% ELL 74% FRL 05% African American 19% Caucasian 66% Hispanic	LAUSD	MERF
MSA-8 Bell 6411 Orchard Ave. Bell, CA 90201-1023	2010-present	14% ELL 94% FRL 00% African American 06% Caucasian 93% Hispanic	LAUSD	MERF
MSA Santa Ana 2840 West 1st St. Santa Ana, CA 92703	2014-present	13% ELL 61% FRL 00% African American 32% Caucasian 55% Hispanic	Denied by Santa Ana Unified, Denied by Orange County Board of Education, reversed by State Advisory Commission—now authorized by Orange County.	MERF
MSA San Diego (formerly known as Momentum Middle School) 6365 Lake Atlin Ave. San Diego, CA 92119-3206	2005-present	03% ELL 22% FRL 04% African American 56% Caucasian 27% Hispanic	San Diego Unified	MERF
Bay Area Technology Charter School 8251 Fontaine St. Oakland, CA 94605	2004-present	20% ELL 96% FRL 40% African American 11% Caucasian 45% Hispanic	Oakland Unified	Willow Education
Closed/Abandoned Schools				
MSA-San Diego 2 *6365 Lake Atlin Ave.* *San Diego, CA 92119-3206*	*2010-2011* *Low enrollment*		*San Diego Unified*	*MERF*
MSA-San Diego 3	*Abandoned 2013* *No facility*		*San Diego Unified*	*MERF*

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
MSA-Santa Clara 14271 Story Road Santa Clara, CA 95127	*2010-2016 Voluntary Closure due to fiscal concerns*		*Santa Clara County Board of Education*	*MERF*
Pacific Technology Charter School- Santa Ana 102 Baker St. East, Costa Mesa CA 92626	*2009-2014 Withdrew its charter renewal request when faced with denial due to enrollment and financial issues.*		*State Board of Education*	*MERF*
Pacific Technology Charter School-Orangevale 6550 Filbert Ave. Orangevale, CA 95662	*2009-2013*		*State Board of Education*	*MERF*
	2015-2016 Charter Petition Denials			
MSA-Anaheim Elementary	*Denied*		*Anaheim City School District*	*MERF*
MSA-Anaheim			*Anaheim Union School District*	*MERF*
MSA-Garden Grove	*Denied*		*Garden Grove Unified School District*	*MERF*
MSA-Fremont	*Denied*		*Fremont Unified School District*	*MERF*
MSA-9	*Denied*		*LAUSD*	*MERF*
MSA-10	*Denied*		*LAUSD*	*MERF*
MSA-11	*Denied*		*LAUSD*	*MERF*
MSA-Oceanside	*Denied*		*Oceanside Unified School District*	*MERF*

**Data taken from 2015-16 school year. "FRL" indicates students eligible for free/reduced lunch, and "ELL" indicates English language learners. No data was available for students with disabilities.*[18]

[18] Student demographic information available at: http://tinyurl.com/mqo5otd (last checked 3/24/2017).

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A History of Strategic Ambiguity and Conflicting Interests

"We have done some looking into that allegation and there is some evidence that some members of the Magnolia organization do have ties with the Gülen movement..."

LAUSD Inspector General, Ken Bramlett, March 2015[19]

MERF, originally known as the Dialog Cultural, Scientific, & Educational Foundation,[20] was incorporated in 1997 and opened its first charter school, Magnolia Science Academy ("MSA")-1, in 2002. Since then, MERF has applied for and opened MSA locations across the state of California, focusing heavily on the greater Los Angeles area. MERF serves as the non-profit governing board for both Magnolia Public Schools, the corporate entity that provides management services to the Magnolia schools for a fee, as well as each of the charter schools in the Magnolia network. This arrangement essentially allows MERF to create its own customer base by starting new Magnolia charter schools, which are then forced by MERF to employ Magnolia for a hefty cut of the school's annual revenues. For example, MSA-2 paid $1.1 million of its $5 million annual revenues in management fees.[21] The schools are also required to pay significant fees to Accord for services deemed duplicative to what Magnolia corporate allegedly provides by state.[22] In one case, a Magnolia charter was required to pay Accord 30% of its total revenues for that year.

While Accord is involved with all of the Gülen Organization charter networks located in its Western region, it is most entrenched in MERF/Magnolia. Magnolia has signed a contract with Accord for these "duplicative" services every year that the two organizations have both been operational. Accord and Magnolia shuffle employees and board members back and forth between organizations, raising significant

[19] Romo, Vanessa. New Chief of Troubled Magnolia, LA School Report, January 9, 2015, available at: http://tinyurl.com/mca47ea (last checked 3/20/2017).

[20] See early 990 tax forms (2001, etc) identifying the organization as Dialog, available at: http://tinyurl.com/z33bpsv (last checked 2/14/2017).

[21] See MERF 2016 financial statements, pg 32, available at: : http://tinyurl.com/zpkywpu (last checked 2/14/2017).

[22] 2015 State Audit at 56, available at: http://tinyurl.com/zen2cb7 (last checked 2/14/2017).

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concern of nepotism and conflicting interest transactions between them. The most prominent example is with regards to Suleyman Bahceci, who founded Accord. Bahceci left Accord when he was hired in 2009 to be Magnolia's CEO. While working as CEO for Magnolia, Bahceci signed a contract for Accord's services for over $700,000.00 for the 2011-2012 school year. He then left Magnolia to become Accord's CEO at the end of the 2011-2012 fiscal year and served in that role until April of 2015. This outrageous conduct alone establishes that a Magnolia officer engaged in a transaction that directly benefited him financially within the same year.[23] Further, it also shows that Magnolia is failing to adhere to open and competitive bidding practices and instead granted major contracts to an affiliated corporation, paying Accord approximately $3 million between 2010-2014.[24]

LAUSD became suspicious of MERF's operation of the Magnolia charter schools in its district due to their periodic insolvency and launched a series of forensic audits in 2012-2014. LAUSD released its findings in 2014, which documented significant financial issues, potential fraud, abuse of the H-1B visa program, and inappropriate dealings with its related vendor Accord. As a result, LAUSD required MERF to sever its relationship with Accord for the Magnolia charters located in LAUSD in order to gain renewal for MSA-4, MSA-5, and MSA-6 in 2015. According MERF's board minutes in May of 2015, there was discussion of potential litigation by Accord, perhaps due to the terms of the settlement forcing their contractual relationship.[25] No litigation resulted.

Meanwhile, the Inspector General of LAUSD continued to investigate Magnolia, and because Magnolia delayed or ignored LAUSD's repeated requests for documentation regarding its finances, LAUSD voted to deny renewal for three MSA charters, MSA-1, MSA-2, MSA-3, in the fall of 2016. MERF appealed the denial to the Los Angeles County Board of Education, who voted to authorize these three schools to continue under its jurisdiction.

In 2009, MERF received approval from the State Board of Education to open ten statewide benefit charter schools under the name *Pacific Technology.*[26] Only two were ever opened, and both closed. The petition efforts were led by Huseyin "Joseph" Hurmali, CEO of Magnolia from 2002-2008 and instrumental member of the Gülen Organization throughout the Western region.

Currently, MERF operates ten MSA charter schools throughout California. It filed eight charter petitions last year throughout California, but all were withdrawn after recommendations for denial and pressure from the districts where they sought authorization to back up suspicious information they had provided regarding community support and the names of anticipated teacher hires in the petitions.

Willow Education incorporated in 2003, and operates only one charter school—the Bay Area Technology Charter school. Though Willow attempted to open additional branches, the charter petitions were all denied. Notable founders of Willow, such as Suleyman Bahceci, went on to run both Accord and Magnolia in turn. Like Magnolia, Willow contracted with Accord for services, however as of January 2016, Willow was at least considering the termination of its agreement with Accord.[27]

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[23] See 85 Ops. Cal. Att'y Gen. 176 (2002) (providing a similar analysis and stating that the prohibition in Cal. Gov. Code § 1090 on financially interested contracts would be implicated if a city council voted to extend a grant to a nonprofit that later hired one of the city council members for a salaried executive director role); see also 89 Ops. Cal. Att'y Gen. 258 (2006) (outlining guidelines for assessing whether an individual has a direct financial interest in contracting that would apply to Bahceci's actions).

[24] See Letter from Los Angeles Unified School District to Magnolia Public Schools, at 5, (June 27, 2014), available at http://www.scribd.com/doc/233404441/Report-of-audit-from-LAUSD-to-Magnolia-Science-Academy-outlining-fiscal-audit#scribd (hereinafter "LAUSD Letter") (outlining LAUSD's forensic audit findings).

[25] Board minutes, available at: http://tinyurl.com/lx45gr6 (last checked 3/22/2017).

[26] 2009 Board meeting minutes discussing "PacTech" available at: http://tinyurl.com/j8dlk24 (last checked 2/14/2017).

[27] Board agenda, available at: http://tinyurl.com/kcs8wqh (last checked 3/22/2017).

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Financial Issues

The Magnolia network has been audited by both LAUSD in 2014 and the State of California in 2015 and 2016 due to severe concerns with a serial lack of financial transparency and ongoing periodic insolvencies by the Magnolia schools. The LAUSD forensic audits and State Audits uncovered systemic financial abuse at the Magnolia charter schools that are endemic to other Gülen Organization charter networks. Like the other Gülen Organization charter networks that have been audited and investigated, the Magnolia network's pattern of financial abuse allows the Gülen Organization effectively to siphon public funds out of the network's charter schools and funnel it into the hands of related Turkish vendors for use by the Gülen Organization. The frequent inter-entity lending practice utilized by Magnolia—from school to school, from schools to their governing board MERF, from MERF to its hired management vendor Accord, and even from schools to Magnolia-Corporate—is a known warning sign for money laundering and is indicative of periodic insolvency.[28]

The numerous audit findings uncovered by the LAUSD and State of California audits[29] include:

- Insufficient Financial Controls and Lack of Transparency
  - Over 69% of the transactions reviewed were either unauthorized or had no evidence indicating their legitimacy as a transaction in the public benefit;
  - Magnolia orchestrated numerous inter-school "loans" that were not properly recorded and were never paid back to the lending schools;
  - Magnolia held over $5 million dollars that belonged to its schools and was not able to provide LAUSD auditors an explanation;
  - Major discrepancies between the amount of Magnolia's management fee reported as paid by the schools and what Magnolia recorded as paid;
  - Numerous issues with Magnolia's recordkeeping, both at its central office as well as within the schools;
  - Lack of financial controls to regulate check signing and distribute check signing authority appropriately;
  - Inadequate truancy data reporting that results in inflated state funding;

- Improper Relationships with Affiliated Vendors
  - Magnolia and its charter schools utilized affiliated vendors whose overlapping ties present a conflict of interest;
  - Magnolia utilized poor vendor selection processes that allowed for nepotism and conflicts of interest;
  - Magnolia and its vendor Accord entered into a lease together for office space;
  - MERF and Accord provided each other with interest-free loans;
  - Magnolia and Accord had overlapping leadership which led to the signing of a contract for business between the two entities by an individual who ultimately was on both sides of the transaction;

[28] The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation list numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at http://tinyurl.com/zb56xel (last checked 9/7/2016).

[29] For the LAUSD audits, the 2015 California Audit, and the 2016 State Audit Update, see Vicenti, Lloyd & Stuzman, Report of Magnolia Science Academy 6 & 7 Forensic Auditing, Los Angeles Unified School District (June 12, 2014), available at http://bit.ly/1RVtkSE (hereinafter "2014 LAUSD Audit"); Cal. State Auditor, Magnolia Science Academies, Report 2014-135R (May 2015), available at http://tinyurl.com/zen2cb7 ; Cal. State Auditor, Implementation of State Auditor's Recommendations, Report 2016-406A (Feb. 2016), available at http://tinyurl.com/zu97ftb (last checked 2/14/2017).

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- ▷ Magnolia paid for the H-1B visa fees of Accord employees;
- ▷ Auditors questioned the value of Accord's multi-million dollar arrangement with Magnolia as it appeared Accord provided duplicative services;

- ► Extensive and Undocumented Use of the H-1B visa program
  - ▷ Magnolia maintained inadequate human resources documentation to justify extensive use of H-1B process; and
  - ▷ Magnolia spent from $126,000.00 to $200,000.00 in legal and registration fees to secure H-1B visas for Turkish nationals.

According to the 2016 update from the State of California, Magnolia had only implemented seven out of twelve required findings for improvement.[30] Magnolia still had not implemented a stronger system for monitoring use of public funds, vendor agreements, vendor selection procedures, human resources documentation to justify use of the H-1B program, or reporting of truancy data.

Bond Financing

MERF received $6 million in bonds issued by the California School Finance Authority in 2014 to fund the MSA-1 Reseda project.[31] Approximately $4.5 million was slated for the acquisition of the MSA-1 building, $1 million for improvements, with the remaining money used to pay bond costs and fund reserves. The bonds received a BB rating, which is low and resulted in higher interest penalties paid for the funds received.

Like Harmony in Texas and Concept in the Midwest, MERF created two affiliated entities operated by MERF and Magnolia staff to receive the bond proceeds and own the properties to rent back to Magnolia. This structure allows the parties to maintain control over both sides of the property transaction and utilize it to funnel public funds to private entities. In MERF's case, MERF created Magnolia Properties Management Sherman Way ("MPM-SW") LLC to serve as the Borrower of the bond debt and also owner of the MSA-1 facility. MPM-SW is operated by the Sole Member, Magnolia Properties Management, Inc., ("MPM, Inc.") a non-profit designed to support MERF and its schools with facilities services. MERF pays MPM-SW rent to lease the MSA-1 facility, the revenues of which are used to pay the bond debt. The price of this rent is currently unknown, but the lease itself is likely 30 years in length as that is the term of the bond debt and fits the suspected Gülen Organization bond exploitation model repeated in other states. While the lease and rental amounts are unknown in Magnolia's example, this information is available with Harmony and Concept, and in both cases, these Gülen Organization charter networks pay their affiliated landlord entities significantly more than the bond debt service on the rented properties and the bond reserve requirements in thirty-year leases with abusive terms. We believe that using affiliated entities controlled by the charter network to hold the property and bond proceeds, like MPM-SW, enables the charter network to overpay in rent and effectively extract public funds from public oversight to place into the Gülen Organization. How much Magnolia pays its for-profit arm MPM-SW for renting the MSA-1 building is critical information that authorities should examine upon investigation of Magnolia to determine if it, too, is using bonds to orchestrate additional profit for the Gülen Organization.

The bond's official statement also discloses that MERF borrows money from its schools and transfers funds between schools. The bond states that these transfers must be evidenced

[30] 2016 update at 34-35, available at: http://tinyurl.com/zu97ftb (last checked 3/21/2017).

[31] See 2014 series bond statement, available at: http://tinyurl.com/hqg5ba2 (last checked 2/14/2017).

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in notes payable,[32] however, both the LAUSD and State audits discovered these "inter-company loans" were not recorded properly as notes payable, nor paid back to the lending accounts. According to the bond statement, MERF owed MSA-1 over $1.1 million from loans it had taken,[33] but the LAUSD and State audits uncovered over $5.2 million of the schools' funds wrongfully held by MERF from 2011-2014 due to these "loans."[34]

The bond statement also includes a significant disclaimer regarding MERF and MPM, Inc. in two areas: 1) whether MERF and MPM, Inc. truly qualified as 501(c)3 organizations was "subject to a number of qualifications and limitations" from their legal counsel, Musick Peeler & Garrett, LLP; and 2) whether MERF and MPM, Inc. were in compliance with the "unrelated trade or business activities" requirements of 513(a) was unconfirmed by independent legal counsel.[35] This latter provision requires organizations with tax exempt status to perform only trade or business activities related to their charitable purposes. In light of what we believe to be the Gülen Organization's model of using public funds to enrich private actors, these organizations may be in violation of their federal tax designations.



Real Estate

Of the ten schools operated by MERF, MERF (or its affiliate MPM-SW) owns only two of the schools' buildings—MSA-1 and MSA-Santa Ana. The rest of the Magnolia schools' buildings appear to be rented from third parties or shared school district space under Proposition 39.

While MSA-1 was purchased with proceeds from the $6 million bond discussed above, the MSA-Santa Ana building was purchased and renovated through a $17.4 million grant/loan from the State of California's Charter School Facilities Program.[36] This grant was highly

[32] See id, at pg 47.

[33] See id., at Appendix 1, pg 9.

[34] See Cal. State Auditor, Magnolia Science Academies, Report 2014-135R, at 19-2, available at http://tinyurl.com/zen2cb7 (last checked 3/16/17).

[35] See bond statement at pg 51.

[36] See MERF's 2016 financial statements at pg 18, available at: http://tinyurl.com/zpkywpu (last checked 2/14/2017).

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contentious in light of MSA-Santa Ana's inability to gain approval of its charter contract from the local school district or the county board of education due to its poor financial condition during its previous incarnation, Pacific Technology School Santa Ana. After local and county denial, the State Advisory Commission of Charter Schools ultimately reversed the county's decision to deny, and MSA-Santa Ana's charter was approved, allowing the construction of the state-funded facility to go forward.

A notable anomaly occurred during the first round of bids for the construction and design of the MSA-Santa Ana building, which ultimately resulted in an award to Saiful/Bouquet, a structural engineering firm and former employer of MERF board member Metin Oguzmert. The project was first bid out in July 2014,[37] and bids were received in mid-September. At the time, the Magnolia CEO and CFO had just been dismissed seemingly in light of the damning findings of the LAUSD audits and the growing concern that Magnolia would not pass the California School Finance Authority (CSFA) financial soundness test. As a result, the project was delayed after the receipt of the bids, which were opened but allegedly never considered by the MERF board.

While the $17.4 million grant was conditionally approved in December 2015 contingent upon Magnolia passing the CSFA financial soundness test, Magnolia would not pass the test unless and until LAUSD renewed the schools that were currently being recommended for non-renewal due to the results of the 2014 forensic audits. Thus, MERF's financial soundness, the $17.4 million grant, and Magnolia's substantial footprint within LAUSD were all at risk. As a result, MERF sued LAUSD for its non-renewal of the three Magnolia charters. The case settled in May 2015, requiring LAUSD to renew the schools because of a rushed non-renewal process, but also requiring MERF to cease using H-1Bs and its affiliated vendor Accord within LAUSD.

With the three LAUSD MSAs renewed, MERF passed the CSFA financial soundness test, and the $17.4 million award was finalized. Magnolia then decided to conduct a new round of bidding,[38] and this time, a different construction company with suspected ties to the new Magnolia CFO at the time was chosen, along with Saiful/Bouquet as the project's structural engineers. Metin Oguzmert, longtime MERF board member and California network founder, was employed by Saiful/Bouquet from 2005-2011[39] before he moved to GA and joined the board of a Gülenist charter there.

This kind of "failed" bidding process often gives rise to allegations that the bidding entity, in this case Magnolia, was able to view bids and illegally subvert the procurement process to hand-pick a different, preferred bidder. In light of the connections between Saiful Bouquet and Magnolia leadership, as well as potential connections between Neff Construction and the Magnolia CFO hired to replace the dismissed individual, these relationships should be examined as well as the overall bidding process to ensure that the CSFA's requirements for bidding were actually followed.

MERF has attempted to purchase other buildings, including the MSA-San Diego, although these deals did not ultimately succeed. In San Diego, MERF wanted to acquire a school district building for its school and hired a member of the San Diego Unified board a month after he left office to negotiate the land sale deal between MERF and San Diego Unified. Because the board member was deemed to have or potentially have insider information regarding the land, the school district's legal counsel became involved, and the deal failed.[40] This was not the first time MERF hired a former school board member to negotiate with its authorizers—after

[37] Bid notice, available at: http://tinyurl.com/mv4pjes (last checked 3/20/2017).

[38] Bid sheet available at: http://tinyurl.com/lodf2kg (last checked 3/20/2017).

[39] http://tinyurl.com/lj2m339 (last checked 3/20/2017).

[40] Koran, Mario. Scott Barnett vs. San Diego Unified Is the Least Surprising Fight Ever, Voice of San Diego, January 27, 2015, available at: http://tinyurl.com/mgezsuf (last checked 3/16/2017).

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the scandal regarding Magnolia's finances, MERF recruited Caprice Young, former LAUSD board member, to steer the organization out of trouble with LAUSD and the state.[41]

Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, both MERF and Willow and their schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools. From 2001-2016, MERF filed at least 402 H-1B visa applications for foreign workers,[42] while Willow filed 55 H-1B applications for its one school.[43] While Magnolia's leadership has stated that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such positions as: English teachers, compliance managers, budget analysts, internship coordinating teachers, career counselors, ESL, AP, administrators, business manager, facilities managers, counselors, and finance directors, largely from Turkey.[44]

MERF and Willow use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Owais Qazi: MERF used Qazi, a California-based attorney, to file numerous H-1B applications. Qazi's other clients include:
  - Lotus (CO)
  - Accord (CA)
  - Westwood Production (CA)
  - Coral (NV)
  - Apex (CA)[45]

- Joshua Surowitz: MERF used Surowitz, a California-based attorney, to file numerous H-1B applications. Surowitz also filed applications for:
  - Daisy/Sonoran (AZ)
  - Accord (Western Region)
  - Coral (NV)
  - Willow Education (CA)[46]

- Nancy Robinett. MERF used Robinett, a Minnesota-based attorney, to file numerous H-1B applications. Robinett also filed applications for:
  - Paragon Education Foundation (AZ)
  - Daisy/Sonoran (AZ)
  - Foundation for Inter-Cultural Dialogue (AZ)[47]

- Nadadur Kumar: MERF used Kumar, a California-based attorney, to file numerous H-1B applications. Kumar also filed applications for:
  - Willow (CA)
  - Apex (CA vendor)[48]

41 Romo, Vanessa. New Chief of Troubled Magnolia, LA School Report, January 9, 2015, available at: http://tinyurl.com/mca47ea (last checked 3/20/2017).

42 This number was taken by adding the H-1B applications from MERF's numerous names used to increase ambiguity, including: Magnolia Educational & Research Foundation (276) http://tinyurl.com/z5nkmdz, Magnolia Education & Research Foundation (12) http://tinyurl.com/z5kw4pf, Dialog Foundation (39) http://tinyurl.com/j2mn3nr , Dialog Foundation DBA MSA (1) http://tinyurl.com/jay67ft, Magnolia Science Academy-San Diego (1) http://tinyurl.com/zbnzv3f; Magnolia Science Academy (47) http://tinyurl.com/zpr388u; and Momentum Middle School (26) http://tinyurl.com/j9vuxyt. (last checked 2.13.2017).

43 http://tinyurl.com/jdnj9s8 (last checked 2/13/2017).

44 See charts available at: http://tinyurl.com/zkux2b6 (last checked 2/13/2017) for information regarding MERF's H-1B visa filing by subject matter, country, entry level, and year.

45 Qazi profile listing H-1B clients, available at: http://tinyurl.com/juefgh8 (last checked 2/9/2017).

46 Surowitz profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/gva9h7t (last checked 1/31/2017).

47 List of entities represented by Nancy Robinett, available at: http://tinyurl.com/jcr9rru (last checked 1/31/2017).

48 Kumar profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/zlanaw5 (last checked 2/13/2017).

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Scandals, Investigations, & Notable Activities

Magnolia has had a number of scandals and investigations which have already been discussed, including the LAUSD forensic audits, the State of California audits, the improper withholding by MERF of over $5 million in public funds from the Magnolia schools, the attempted non-renewal of several MSA charters in LAUSD and subsequent law suit, and the failed bidding process for MSA-Santa Ana.

> ***"Accord engages in systematic exploitation of Turkish H1-B visa employees through the tuzuk."***

An additional scandal recently emerged when a Turkish whistleblower named Yunus Avcu came forward and provided interviews to both the media and Amsterdam & Partners regarding his work with Accord. Avcu, formerly employed by Accord first in Arizona to work with SSA-Phoenix, and then later in Colorado, provided testimony regarding Accord's true purpose and his work with both SSA-Phoenix and Lotus. While this testimony primarily concerned wrongdoing in Arizona and Colorado, Avcu also implicated current Magnolia and Accord employees in the wrongdoing and discussed liberally what Accord's true purpose for the Western region of the Gülen Organization was.

Avcu stated that as an accountant employed by Accord he gathered *tuzuk* funds from each of Lotus's Turkish H-1B employees in cash each month and delivered them in a briefcase to Accord's headquarters in California. Despite what Accord alleges it provides in the manner of educational services, Avcu stated that Accord was more focused on arranging trips to Turkey for American dignitaries, ensuring that its Gülenist charter schools maintained Turkish leadership at the school level, and requiring that Turkish leadership would regularly hire H-1B Turkish teachers in order to keep the cash flow from these teachers' forced tithing through *tuzuk* payments high. As an H-1B employee recruited from Turkey himself, Avcu stated that he was required to turn over as much as 40% of his salary, which he said went to fund Gülen himself.[49] Avcu's account of Accord's true operations, the systemic exploitation of Turkish H-1B visa employees through the *tuzuk*, and the system rigged in favor of hiring Turkish nationals through the H-1B visa program to ensure more manpower and funding for the Gülen Organization's hidden agenda is substantiated by the testimony of other Turkish individuals who have left the Gülen Organization, such as Mustafa Addi in the Concept network.

Notable Turkish Vendors

- **Accord Institute for Education Research (Accord):** In addition to MERF/Magnolia, Accord contracts with each of the Western Gülen Organization charter networks and allegedly provides them with the same educational and operational services, including financial services, for a fee. Accord has the greatest overlap in ties with Magnolia as they are both headquartered in the same

[49] Jason McGahan, Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly (Dec. 1, 2016), available at: https://tinyurl.com/jxceqp7 (last checked 2/9/2017).

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state, but Accord also provides services to Daisy/Sonoran (AZ)[50], Coral (NV), Lotus (CO), Beehive (UT), and was listed as a partner for failed schools/regions, as well, including Pioneer (OR) and Mokapu STEM (HI). Yunus Avcu, a Turkish Accord employee first hired to work for SSA-Phoenix, provided detailed information about how Accord functions as a regional oversight entity primarily focused with operating the Gülen Organization.

- **Apex Educational Services (Apex):** Magnolia has utilized Apex for IT services paid for by the federal E-Rate grant program. Daisy also utilizes Apex for IT services paid for through E-Rate, and Concept Schools (Midwest) is currently under federal investigation for allegedly defrauding the E-Rate program by using affiliated vendors with a system of kickbacks to Concept's management. Apex may also be an affiliated vendor with Daisy/Sonoran (AZ); a reporter found tax documentation linking Apex as an owned property/asset of Daisy and Sonoran, though this fact could not be independently verified.[51]

- **Westwood Production:** Westwood is a multi-media design group that provides services to many of the other California-based Gülen-affiliated entities, including the Pacifica Institute for their Anatolian Food and Cultures festival, the West American Turkic Council, and the California Turkish American Chamber of Commerce.[52] The owner of this business, Kemal Cem Gur,[53] has been identified by Turkish whistleblowers as the Imam or head of the Western region of the Gülen Organization. Gur emigrated from Turkey to the United States as an H-1B teacher and founding board member of the Georgia Gülen charter schools that were later shut down for fraud. As a prime example of Westwood's connections to the Gülenist web, former Westwood employee Ozgur Koca lists on his curriculum vitae former positions with both the Pacifica Institute and Magnolia Science Academy. Koca is currently a professor of Islamic Studies and has written numerous publications regarding Gülen and has organized several conferences specifically focused upon Gülen.[54]

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50 SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at http://tinyurl.com/j34uhb3 (last checked 2/1/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation dba Sonoran Science Academy – Phoenix, Sonoran Schools (Mar. 3, 2016), available at http://tinyurl.com/hprollg (last checked 2/1/2017); Tim Steller, ***Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools***, Arizona Daily Star (Oct. 22, 2010), ***available at*** http://tinyurl.com/ht36ax6 (last checked 2/1/2017) (discussing payments of over $350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at http://tinyurl.com/z9ft448 (last checked 2/1/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, ***Hidden Agenda?***, Tucson Weekly, (Dec. 31, 2009), ***available at*** http://tinyurl.com/zgwjkak; Magnolia Educational and Research Foundation, ***Magnolia Science Academy – Santa Clara: Countywide Charter School Petition***, Santa Clara County Office of Education , at 17, ***available at*** http://tinyurl.com/hwg8jj8 (last checked 2/1/2017). The Accord Education website even includes a promotional blurb from the CFO of "Sonoran Schools" with other Gülen schools. Accord Education, ***available at*** http://tinyurl.com/gkpvelo (last checked 2/1/2017).

51 http://tinyurl.com/kfl5oar (last checked 1/25/2017).

52 Portfolio available at: http://tinyurl.com/hthdu49 (last checked 2/15/2017).

53 Business profile available at: http://tinyurl.com/hjr9jgc (last checked 2/15/2017).

54 Ozgur Koca C.V., available at: http://tinyurl.com/h5horwt (last checked 2/15/2017).

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Gülenist Cultural and Business Organizations Active in State

- **Pacifica Institute:** Global Cultural Connections is a non-profit organization d.b.a. the Pacifica Institute, which is the main Gülen Organization cultural association in charge of California.[55] The Pacifica Institute sponsors talks and conferences on Fethullah Gülen and his teachings,[56] and also organizes Turkish cultural events, such as the Anatolian Cultures and Foods Festival, which Apex sponsors, Westwood advertises, and the Magnolia schools participate in.[57] Even the new Magnolia CEO, Caprice Young, hired in response to the controversy over Magnolia's non-renewals in LAUSD, served as a keynote speaker for the Pacifica Institute prior to being hired for her new role.[58] Pacifica is the main Gülenist cultural association in California responsible for organizing and paying for trips for California lawmakers to Turkey.[59] Pacifica VP Attila Kahveci told USA Today that the trips were intended to serve as a bridge between Americans and Turks, and that they had no ulterior motive despite the fact that the Gülen Movement has sponsored thousands of trips costing millions of dollars across the U.S.[60] Suat Utku Ay, former Magnolia board member and now Accord board member, has donated to the Pacifica Institute. Suleyman Bahceci also donated $164,644.00 to Pacifica, which comprised an outrageous 70% of his stated salary from Magnolia that year.[61] New branches of the Pacifica Institute have been established throughout the Gülen Organization's Western region, including Oregon, Washington, Nevada, Arizona, Hawaii, and Utah.

- **Turkish American Alliance/West American Turkic Council (TAA/WATC):** This organization is a non-profit umbrella organization over several subsidiary Turkish organizations. Several key leaders in Magnolia have also served in leadership positions of this organization, including former Magnolia CEO Ozkur Yildiz and Magnolia Founder Huseyin "Joseph" Hurmali. TAA/WATC uses the same Turkish vendors noted above as Magnolia, and like Pacifica, has also organized and paid for congressional trips to Turkey. In fact, under Yildiz as CEO, TAA/WATC sponsored the 2013 trip to Azerbaijan that resulted in a Congressional Ethics investigation alongside the Turquoise Council for Americans and Eurasians (TCAE) headed by Harmony (TX) vendor, Kemal Oksuz.[62]

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55 *See* information regarding Global Cultural Connections d.b.a. Pacifica Institute, also available at: http://pacificainstitute.org/mission-vision-statement/.

56 *See* Global Cultural Connections 990 form listing events, available at: http://tinyurl.com/j8ae3xp (last checked 3/14/17).

57 *See* Information on Anatolian Festival, also available at: http://pacificainstitute.org/festivals/.

58 *See* Information regarding Caprice Young's speaking at Pacifica, also available at: http://pacificainstitute.org/2015/05/12/ceo-kc-distance-learning-caprice-young-speaks-at-pi-los-angeles/.

59 Richman, Josh. *Mike Honda took Trip to Turkey on Iffy Group's Dime,* San Jose Mercury News, 30 October 2015 (Discussing Honda's trips to Turkey funded by Pacifica). Available at: http://tinyurl.com/z94od74 (last checked 3/14/17).

60 Whyte, Liz E. Turkish Opposition Subsidizes Scores of State Lawmakers' Trips, USA Today, February 9, 2017, available at: http://tinyurl.com/ky5be2q (last checked 3/20/2017).

61 *See* 2012 990 for Magnolia showing Bahceci's salary at $120,000.00, also available at: http://tinyurl.com/z33bpsv and the 2012 990 for Global Cultural Connections showing Bahceci's donations in toto and for the year 2012 as $83,546.00, available at: http://tinyurl.com/j8ae3xp (last checked 3/14/17).

62 Singer, Paul. Group Linked to Ongoing Probe Paid for House Travel This Year, USA Today, June 24, 2015, available at: http://tinyurl.com/l24qrjc (last checked 3/20/2017).

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Friends of Gülen Spotlight: Loretta Sanchez

Sanchez was a U.S. Congresswoman from the 46th District of California from 1997-2017, and her territory covered areas targeted by Magnolia for expansion, including Santa Ana, Garden Grove, Orange, and Anaheim. Sanchez has been extensively involved with the California Gülenist network. She took a trip to Turkey paid for by the Pacifica Institute in 2011[63]; received political donations from Gülenists Hakan Kaya (Westwood Productions); Remzi Oten (Magnolia founder); and Michelle Oten (Remzi Oten's wife and Pacifica employee); attended and presented at the 2012 Accord Education Conference; attended the groundbreaking of MSA Santa Ana; gave Bahceci, former CEO of Accord, a certificate of congressional recognition; spoke at the California Turkish American Chamber of Commerce; sat on the congressional caucus for US-Turkey relations; and signed a letter to Secretary of State John Kerry protesting arrests of Gülenists in Turkey.[64] Our interpretation of the evidence at hand suggests that Sanchez's long-time loyalty to California Gülenists and their business and political interests is a testament to the efficacy of the paid trips to Turkey and continued donations to local politicians by Gülenists.

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors. This is just a small number of individuals with these overlapping ties throughout the Western region, which further demonstrates the region's interconnections.

- Mehmet Argin: Principal Daisy/Sonoran (AZ)[65]; Daisy board member (AZ)[66]; CEO at Magnolia (CA)[67]; currently Lecturer at California Polytechnic, Pomona campus.[68]
- Ozkur Yildiz: Principal Daisy/Sonoran (AZ)[69]; Superintendent Daisy/Sonoran (AZ)[70]; Principal Bay Area Technology (CA)[71]; President of the West American Turkic Council.[72]
- Varol Gurler: Principal Lotus Academy of Excellence (CO)[73]; Principal Sonoran Science Academy-Phoenix (AZ)[74]; Principal Magnolia Science Academy

63 http://tinyurl.com/ld9wqnj (last checked 3/20/2017).

64 http://tinyurl.com/ksrb5kx (last checked 3/20/2017).

65 Article quoting Argin during his tenure as SSA principal, available at: http://tinyurl.com/lcbxuff (last checked 2/15/2017).

66 See 2012 Daisy Education 990 tax form, available at: http://tinyurl.com/jjcrxh9 (last checked 2/15/2017).

67 Article quoting Argin during his tenure as Magnolia CEO, available at: http://tinyurl.com/mbj72a3 (last checked 2/15/2017).

68 According to Argin's Linkedin profile, available at: http://tinyurl.com/jsdqztz (last checked 2/15/2017).

69 Article quoting Yildiz during his tenure as Vice Principal at SSA-Tucson, available at: http://tinyurl.com/j5msxcy (last checked 2/15/2017).

70 Article quoting Yildiz during his tenure as Sonoran Superintendent, available at: http://tinyurl.com/h6ancpq (last checked 2/15/2017).

71 Oakland Unified directory listing Yildiz as Principal of Bay Area Technology, available at: http://tinyurl.com/zjhsu34 (last checked 2/15/2017).

72 According to Yildiz's Linkedin profile, available at: http://tinyurl.com/h87ukmf (last checked 2/15/2017).

73 Gurler is listed as Lotus Principal in this directory published by the Colorado Department of Education, available at: http://tinyurl.com/hlw28pe (last checked 2/9/2017).

74 Gurler is still listed as site contact on the AZ Department of Education for SSA-Phoenix, available at: http://tinyurl.com/jygdkoq (last checked 2/9/2017).

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Santa Ana (CA)[75]; Principal of Brooklyn Amity School (NY)[76]; now various leadership positions at Magnolia (CA)[77].

- Adnan Doyuran: Momentum Middle School (Now Magnolia Science Academy San Diego) Principal (CA)[78]; Lotus Academy of Excellence Principal (CO)[79]; SSA-Tucson Principal (AZ); Sonoran Associate Superintendent (AZ)[80].

- Murat Biyik: Math teacher at Sonoran Science Academy (AZ); Vice Principal at Beehive (UT)[81]; then Magnolia (CA); then Accord (CA), and now is back at Beehive (UT).[82] Biyak made a $61,000 donation to Beehive while Vice Principal, comprising twice his entire salary,[83] and appears to have forgiven the amount before being made Principal.

- Umit "Matt" Yapanel: Board president of Lotus (CO) while simultaneously employed by Accord, Lotus's vendor[84]; MERF/Magnolia board member (CA); outreach coordinator for the Pacifica Institute (CA). Yapanel has admitted to his conflicting employment with Accord as well as following Gülen.[85]

- Mustafa Keskin: Board Member Dialog/MERF Magnolia (CA); 2008 Pioneer Technology Charter School Petitioner (OR)[86]; Board Secretary of Accord Education (CA); Board Member of Beehive, loaned Beehive (UT) $49,000.[87]

- Timur "Tim" Saka: Openly Gülenist,[88] founder and start-up coordinator for Lotus School for Excellence (CO),[89] then left to found and teach at the Beehive charter network (UT),[90] became principal in the Magnolia (CA) network,[91] and now serves as the events coordinator for the Gülenist cultural association Peace Islands Institute and director of

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75 Listed as principal, available at: http://tinyurl.com/z5xv6ha (last checked 2/9/2017).

76 Gurler is listed as principal as of the 2013-14 school year, available at: http://tinyurl.com/haq2sy3 (last checked 2/9/2017).

77 Gurler is currently Magnolia COO according to his LinkedIn profile, available at: http://tinyurl.com/j3pukmw (last checked 2/9/2017); formerly Magnolia CAO as listed in this Magnolia 2010 newsletter, available at: http://tinyurl.com/zy75jt8 (last checked 2/9/2017).

78 Pg 15 of Magnolia application, available at: http://tinyurl.com/hcfjhep (last checked 1/31/2017).

79 Aurora Public Schools listed Doyuran as Lotus Principal on page 8 of this directory, available at: http://tinyurl.com/jmqtgu9 (last checked 2/9/17).

80 Doyuran's LinkedIn profile still lists him as a principal, available at: http://tinyurl.com/zcaomq7 (last checked 2/9/2017); but is listed as associate superintendent on Sonoran's central office webpage, available at: http://tinyurl.com/hxhyvod (last checked 2/9/2017).

81 See 2008 990 form for Beehive listing Biyak as the vice principal, available at: http://tinyurl.com/zjoq9nx (last checked 2/14/2017).

82 Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

83 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

84 See Yapanel's LinkedIn information, available at: https://www.linkedin.com/in/umit-yapanel-98b4b011, and the conference agenda from Accord's conference showing Yapanel as an Accord employee in 2010, also available at: http://accordeducationconference.org/wp-content/uploads/2010/07/Accord_2010_Schedule.pdf.

85 For an article featuring comments by Yapanel, see http://tinyurl.com/z5yw94z, (last checked 2/9/2017).

86 Petition available at: http://tinyurl.com/lz9vn8y (last checked 3/20/2017).

87 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

88 http://tinyurl.com/jhdrwhq (last checked 2/9/2017).

89 Aurora Public Schools board meeting minutes 2005, available at: http://tinyurl.com/zynyejb (last checked 2/9/2017).

90 Pictures from 2006 event with Tim Saka's class from Beehive, available at: http://tinyurl.com/kngjyhf (last checked 3/23/2017).

91 Saka was the principal at MSA-Santa Clara, see annual report submitted by Saka, available at: http://tinyurl.com/mruej3s (last checked 3/23/2017).

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the Turkish Cultural Center in Syracuse, NY leading junkets to Turkey for local politicians.[92]

Notable Press Coverage and Research Regarding the California Gülenist Network

- Gazzar, Brenda. *3 Magnolia charter schools facing closure 'vindicated' after winning appeal*. (The county's Board of Education authorized three Magnolia schools that were non-renewed by LAUSD, acting against the recommendation of the L.A. County Superintendent of Schools and her staff as well as LAUSD). Los Angeles Daily News. 22 December 2016.[93]

- Blume, Howard. *County board overrules LAUSD to keep the embattled Magnolia charter schools open*. Los Angeles Times. 22 December 2016.[94]

- McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* (Containing interview with Yunus Avcu, Accord whistle blower). LA Weekly. 1 December 2016.[95]

- Gazzar, Brenda. *Magnolia charter schools fight to stay open after LAUSD 'death sentence'*. (Reviewing Magnolia's ongoing refusal to provide or respond to document requests from the LAUSD Office of Inspector General regarding its finances). Los Angeles Daily News. 20 October 2016.[96]

- Blume, Howard. *Three L.A. charter schools could be shut down, largely because of their practice of bringing in teachers from Turkey*. (Reviewing H-1B issues at Magnolia schools). Los Angeles Times. 10 October 2016.[97]

- Blume, Howard. *Charter school leader draws inspiration from a Turkish cleric embroiled in controversy*: (Interviewing Magnolia Board President Umit Yapanel who admitted he is a follower of Gülen's teachings, stating 'He inspired me to serve'). Los Angeles Times. 31 August 2016.[98]

- *Magnolia charter school to close*. (Discussing MSA Santa Clara's property issues and closure due to low enrollment). Mercury News. 30 June 2016.[99]

- Blume, Howard. *Charter schools say L.A. Unified is unfairly scrutinizing their campuses*. (Covering Magnolia's decision to drop eight charter petition attempts throughout CA allegedly due to lack of required teacher signatures and low student enrollment/community support rather than connections to Gülen). Los Angeles Times. 9 February 2016.[100]

- Parr, Rebecca. *Fremont school district denies Magnolia charter application*. (Discussing District's reasons for denying the application because Magnolia failed

[92] For discussion of Saka, see Ed Griffin-Nolan, Exerting Influence, The Syracuse New Times (June 25, 2014), available at: http://tinyurl.com/zp264kc (last checked 2/9/2017).

[93] Available at: https://tinyurl.com/gsn44gs (3 March 2017).

[94] Available at: https://tinyurl.com/grmhc2n (3 March 2017).

[95] Available at: http://tinyurl.com/jxceqp7 (3 March 2017).

[96] Available at: https://tinyurl.com/hn8wz6j (3 March 2017).

[97] Available at: https://tinyurl.com/zv7lzp3 (3 March 2017).

[98] Available at: https://tinyurl.com/z5yw94z (3 March 2017).

[99] Available at: https://tinyurl.com/hdr95ks (3 March 2017).

[100] Available at: https://tinyurl.com/hbc387t (3 March 2017).

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to submit valid signatures). The Mercury News. 27 January 2016.[101]

- Parr, Rebecca. *Turkey wants Fremont school board to reject charter school*. (Discussing possible ties to Gülen) Mercury News. 25 January 2016.[102]

- Kwong, Jessica. *Santa Ana has become a nucleus for county charter schools*. (Discussing MSA Santa Ana's rejection at the district level). The Orange County Register. 26 August 2015.[103]

- Romo, Vanessa. *State audit criticizes Magnolia charters and also LA Unified*. (Discussing findings of State Audit and Magnolia's financial issues). LA School Report. 7 May 2015.[104]

- Richman, Josh. *Mike Honda took Trip to Turkey on Iffy Group's Dime,* San Jose Mercury News, 30 October 2015 (Discussing Honda's trips to Turkey funded by Pacifica).[105]

- Blume, Howard. *Former L.A. board member to head embattled Magnolia schools*. (Discussing Magnolia's move to hire Caprice Young to serve as CEO). The Los Angeles Times. 8 January 2015.[106]

- Romo, Vanessa. *Magnolia schools remain open but relationship with Accord changes*. (Discussing judge's requirement for Magnolia's LAUSD schools to sever relationship with Accord due to issues found in audits). LA School Report. 31 July 2014.[107]

- Romo, Vanessa*. LAUSD expands probe into Magnolia charter schools*. LA School Report. 17 July 2014.[108]

- James, Elysse and Jessica Terrell. *County board denies charter school appeal*. (Discussing $18M facility loan/grant and MSA Santa Ana's need to get approved by the state to keep it). The Orange County Register. 12 February 2014.[109]

Stewart, Kristen. *Utah charter school's ties to Turkey draw scrutiny*. (Noting ties between Utah's Beehive network and Magnolia). The Salt Lake Tribune. 17 July 2009.[110]

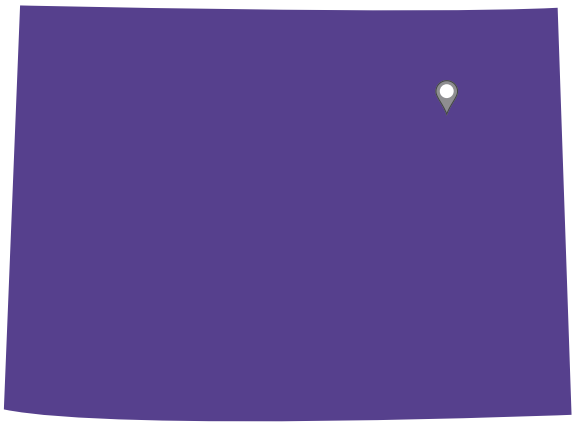
101 Available at: https://tinyurl.com/jf75okt (3 March 2017).
102 Available at: https://tinyurl.com/hv5gub9 (3 March 2017).
103 Available at: https://tinyurl.com/hqnoba8 (3 March 2017).
104 Available at: https://tinyurl.com/h3xm86v (3 March 2017).
105 Available at: http://tinyurl.com/z94od74 (14 March 2017).
106 Available at: https://tinyurl.com/gorvvca (3 March 2017).
107 Available at: https://tinyurl.com/j6z4kyj (3 March 2017).
108 Available at: https://tinyurl.com/jlcwadc (3 March 2017).
109 Available at: https://tinyurl.com/hveq9j3 (3 March 2017).
110 Available at: https://tinyurl.com/hknxz36 (3 March 2017).

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Colorado



QUICK FACTS ON GÜLEN CHARTER SCHOOLS COLORADO



NUMBER OF SCHOOLS	1
KNOWN AS	**Lotus School for Excellence**
TOTAL ENROLLMENT	**839**
CHARTER VENDOR	**Accord Institute for Education**
TOTAL REVENUES	**$7,600,000**

RELATED INSTITUTIONS



Magnolia | Sonoran, Paragon | Coral | Beehive

Attempted Networks



Pioneer | Sonoran | Coral

KEY PEOPLE



Bilal Temel | Umit (Matt) Yapanel | Alptekin Kavi | Tufan Hakan Batan | Timur "Tim" Saka | Zhandos Utegulov

SCANDAL

In 2014 LSE and its principal at the time were sued for illegal employment discrimination on the basis of national origin and for retaliation. They had noticed that the school's faculty comprised nearly **half Turkish individuals on H-1B visas**, and that these individuals **were paid substantially more** per year despite having less experience, less qualifications, and more parent complaints.



SCHOOL CLOSURES



LSE got off to an extremely rocky start with its authorizer, Aurora Public Schools. LSE failed to obtain a certificate of occupancy prior to moving into its facility. As a result, **the state closed the school, and the school was relocated.**

FINANCIAL ISSUES

Colorado requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues at LSE that are endemic to other Gülen Organization charter networks. The numerous audit findings occur across multiple years, including:



Overspending



Failure to use federal funds appropriately



Loans to related parties



Overpayment to related construction companies



Liabilities exceeding assets



Purchase of a facility prior securing charter renewal

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Western
- School Names (known as): Lotus School for Excellence
- Total # of Schools in State: 1 operating, at least 2 failed attempts.
- Total Student Enrollment 2015-2016: 839[1]
- Charter Holder/Governing Board(s):
  - Lotus School for Excellence, Inc.
    - Organized as a Non-profit with 501(c)(3) status
    - Runs 1 school
- Charter Management Services Vendor: Accord Institute for Education
- Regional Gülen Organization Oversight Entity: Accord Institute for Education
- Regional Sister Networks: Magnolia (CA), Sonoran (AZ), Paragon (AZ); Coral (NV); Beehive (UT). Attempted Networks: Pioneer (OR); Sonoran (HI); Coral (WA)[2].
- Total Revenues for the 2015-2016 school year: $7.6 million.[3]
- Colorado Network Founders:
  - Bilal Temel: Founder and board member for Lotus from 2003-2008. Now, Temel lives in Irvine, California and is affiliated with the Gülenist Pacifica Institute,[4] Magnolia's main cultural association partner, and has advocated for Magnolia's Santa Clara campus.[5]
  - Umit (Matt) Yapanel: Served on the Lotus board from 2006-2012 while simultaneously working for LSE's vendor, Accord Institute, a clear conflict.[6] From 2012 to present, Yapanel has served on the Magnolia board (CA). Yapanel has admitted to his conflicting employment with Accord as well as following Gülen.[7]
  - Alptekin Kavi: Founder and board member for Lotus from 2003-2006, loaned school approximately $145,000 with interest, attended Gülenist university in Turkey.[8] Forced to resign from Lotus board by authorizer.
  - Tufan Hakan Batan: Founder and board member for Lotus from 2003-2006, loaned school approximately $130,000 with interest.
  - Timur "Tim" Saka: Openly Gülenist,[9] founder of Lotus in 2003, start-up coordinator for Lotus School for Excellence,[10] then left to found and teach at the Beehive charter

1 Student demographic information available at: http://tinyurl.com/n3aeduz (last checked 3/24/2017)

2 Coral Academy of Science Application that was later denied by the Washington State Charter Commission available at: http://tinyurl.com/hvytvse (last checked 2/1/2017).

3 Annual 2015-16 audit available at: http://tinyurl.com/z3wzapd (last checked 3/24/2017).

4 Bharath, Deepa, "Breaking bread, building bridges: Muslim and Jewish communities share Shabbat and Ramadan" The Orange County Register (July 2, 2016) available at: http://tinyurl.com/gqwq339 (last checked 2/8/2017).

5 Bilal Temel logged a supporter comment on a petition to keep Magnolia's Santa Clara campus open, available at: http://tinyurl.com/j9732no (last checked 2/9/2017).

6 See Yapanel's LinkedIn information, available at: https://www.linkedin.com/in/umit-yapanel-98b4b011, and the conference agenda from Accord's conference showing Yapanel as an Accord employee in 2010, also available at: http://accordeducationconference.org/wp-content/uploads/2010/07/Accord_2010_Schedule.pdf.

7 For an article featuring comments by Yapanel, see http://tinyurl.com/z5yw94z, (last checked 2/9/2017).

8 Kavi resume listing Middle East Technical University, available at: http://tinyurl.com/hksh57p (last checked 2/9/2017).

9 http://tinyurl.com/jhdrwhq (last checked 2/9/2017).

10 Aurora Public Schools board meeting minutes 2005, available at: http://tinyurl.com/zynyejb (last checked 2/9/2017).

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network (UT),[11] became principal in the Magnolia (CA) network,[12] and now serves as the events coordinator for the Gülenist cultural association Peace Islands Institute and director of the Turkish Cultural Center in Syracuse, NY leading junkets to Turkey for local politicians.[13]

- Zhandos Utegulov: Founder and board member of Lotus from 2003-2008, founder of Horizon Science Academy Dayton and Horizon Science Academy Cincinnati, both Concept (OH) schools in 2004,[14] contributing author to *The Fountain Magazine,* a known Gülenist publication,[15] member of the Gülenist Niagara Foundation,[16] and now serves as a professor at Nazarbayov University in Kazakhstan.[17]

Overview

As of the 2016-2017 school year, Colorado has only one known Gülen Organization charter school in operation. Lotus School for Excellence ("LSE") is based in Aurora, Colorado and is governed by Lotus School for Excellence, Inc., ("Lotus") a non-profit governing board of directors in operation since 2003. Lotus pays rent to the Lotus School for Excellence Foundation ("Lotus Foundation"), a separate non-profit entity that serves as its landlord entity but is comprised of the same Turkish leadership as the Lotus governing board. Lotus contracts with the Gülen Organization's Western regional oversight entity, Accord Institute for Education ("Accord") to provide services to its schools for a portion of the school's revenues.

School	Operation	Student Demographic Information*	Authorizer	Governing Board
Lotus School for Excellence 11001 E. Alameda Ave. Aurora, CO 80012	2006-Present	67% FRL 39% African American 19% Caucasian 38% Hispanic	Aurora Public Schools (local school district)	Lotus School for Excellence, Inc.
Lotus School for Excellence - Longment Campus	*Denied 2010 due to inadequate facilities, insufficient community support, lack of success at LSE, and conflict of interest concerns re: board members selling services to school.*		*St. Vrain Valley School District*	*Lotus School for Excellence, Inc.*

[11] Pictures from 2006 event with Tim Saka's class from Beehive, available at: http://tinyurl.com/kngjyhf (last checked 3/23/2017).

[12] Saka was the principal at MSA-Santa Clara, see annual report submitted by Saka, available at: http://tinyurl.com/mruej3s (last checked 3/23/2017).

[13] For discussion of Saka, see Ed Griffin-Nolan, Exerting Influence, The Syracuse New Times (June 25, 2014), available at: http://tinyurl.com/zp264kc (last checked 2/9/2017).

[14] HSA Dayton's articles of incorporation available at: http://tinyurl.com/ztq68n9 (last checked 2/9/2017); HSA Cincinnati's articles of incorporation available at: http://tinyurl.com/judd99q (last checked 2/9/2017).

[15] For an article by Utegulov in The Fountain, see http://tinyurl.com/h6sxueo (last checked 2/9/2017).

[16] For an article discussing Utegulov's membership, see http://tinyurl.com/jqmdz7e (last checked 2/9/2017).

[17] http://tinyurl.com/hxcdt88 (last checked 2/9/2017).

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School	Operation	Student Demographic Information*	Authorizer	Governing Board
Lotus School for Excellence II	*Denied 2009 due to inadequate parent support, governance issues, lack of success at LSE, and poor/incomplete budget.*		*Jefferson School District*	*Lotus School for Excellence, Inc.*

**Data is for 2015-16 school year. "FRL" indicates students eligible for free/reduced lunch. No data available for English language learners or students with disabilities.*

A History of Strategic Ambiguity and Conflicting Interests

Lotus Education Services, the predecessor entity to Lotus School for Excellence, Inc. ("Lotus"), was incorporated in 2003 by Bilal Temel, Tufan Hakan Batan, Timur Saka, Alptekin Kavi, and Serap B. Kavi. In 2005, the entity was renamed Lotus School for Excellence, Inc., and by 2006, the new Lotus governing board had received authorization from Aurora Public Schools to open their first charter school in Colorado, the Lotus School for Excellence-Aurora ("LSE").

> ***LSE has taken numerous loans from its Turkish governing board, which it then had to pay back with interest.***

In 2005, the Lotus School for Excellence Foundation ("Lotus Foundation") was incorporated as a nonprofit in Colorado. In 2008, its articles were amended to state that its purpose was to support LSE, facilitate its operations, hold property in its name, or to promote charter education. Lotus board members Kavi and Yapanel filed the Lotus Foundation's annual reports initially, indicating overlap and intermingling between Lotus and the Lotus Foundation. Later, these reports were filed by Yunus Avcu, a Turkish individual employed by Accord who later provided testimony regarding the Gülen Organization, Accord, Lotus, and the collection of improper *tuzuk* payments by Lotus's Turkish H-1B employees, discussed below in *Scandals & Investigations.* The Lotus Foundation board is historically constituted by individuals also serving on the Lotus board, such as Yapanel, Doyuran (Lotus Principal),Nurzhan Ustemirov, and others.[18] In 2008, Lotus Foundation bought a building and began leasing it to LSE for an annual rent that they allege is at fair market value.

Lotus contracted with regional oversight entity Accord Institute for Education to provide LSE with teaching programs, math competitions, character education, assessment and data analyses, business and financial services, evaluations, and support services for a fee. Lotus board member

[18] Board overlap is noted in the IRS 990 tax documentation for the Lotus School for Excellence, Inc., available at: http://tinyurl.com/z7nrw2a (last checked 2/9/2017).

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and president of Lotus, Umit "Matt" Yapanel, was a paid employee for Accord while he served on the governing board of Lotus, a paying client of his employer. We would suggest, this constitutes a clear conflict of interest, a conflict that was further exploited as Yapanel contracted with his employer Accord for both of Lotus's other charter school attempts, discussed below.

The Lotus board thereafter submitted a charter application to the Jefferson County School District to open Lotus School for Excellence ("LSE-II") there in 2009. The District denied the application, citing lack of parental support, problematic governance structure that prevents parents from participating, lack of evidence supporting LSE-Aurora as successful, poor graduation rates at LSE-Aurora, and incomplete and poor budget planning. Lotus appealed the decision to deny to the State Board of Education, which upheld the District's decision.

Yapanel later submitted an application to the St. Vrain Valley School District to open a Lotus campus in Longmont in September of 2010. The District denied the charter application in December 2010, citing numerous issues with both the application, the design of the school, and the lack of evidence that LSE in Aurora was performing adequately to warrant replication. The St. Vrain Valley School Board also noted conflicts of interest—Lotus board members were allowed to sell their services to the school for profit, per the terms of Lotus policy, and that gift cards were given to families at open houses to increase support for the application. Lotus appealed the denial to the State Board of Education, which later upheld the District's decision to deny. In Lotus's briefing to the State Board, Lotus bragged that its ability to gain a $5 million loan from Self Help Credit Union in its second year of operation indicated that the Aurora school was strong in spite of its numerous financial issues. However, their contact at Self Help that approved these loans for LSE is a Turkish woman who was educated at a known Gülenist university in Turkey.[19]

Financial Issues

Colorado requires its charter schools to undergo annual audits, which are made public. These audits showcase a series of ongoing financial issues at LSE that are endemic to other Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that we believe are critical to obscuring the true use of state and federal funds by Gülen Organization charter networks. While LSE does not engage in borrowing and loaning between itself and other schools, a practice seen in other more developed Gülen charter networks, LSE has taken numerous loans from its Turkish governing board members, which it then had to pay back with interest. LSE has also given out loans to related parties.

The numerous audit findings occur across multiple years, including:

- Overspending;
- Failure to post transactional records;
- Failure to use federal funds appropriately;
- Purchase of a facility prior securing charter renewal;
- Untimely financial reporting;
- Loans to related parties;
- Overpayment to related construction companies;
- Liabilities exceeding assets.[20]

[19] The Lotus reply briefing includes a letter of support from Ozlem Tanik, their Self Help contact, who according to LinkedIn (Ozlem Tanik Ponarin) attended Middle East Technical University.

[20] Audits available at: http://tinyurl.com/z3wzapd (last checked 2/9/2017).

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Bond Financing

To date, there are no bond issuances for Lotus in Colorado. This is likely due to the Gülen Organization's difficulty in expanding the number of Lotus charter schools in Colorado.

Real Estate

The Lotus Foundation bought the current LSE building in 2008 for $6.2 million and began leasing it to LSE shortly thereafter. To finance the building purchase, the Lotus Foundation took out a loan from Self Help Credit Union for $4.9 million. LSE and the Lotus Foundation secured the loan agreement with Ozlem Tanik at Self Help, a Turkish woman educated in a Gülenist university in Turkey. While the original mortgage was due in 2013, the Lotus Foundation refinanced the mortgage through 2018. The Lotus Foundation has a balloon payment of $4 million due on the building loan in 2018 to Self Help Credit Union.[21]

Lease payments from LSE to the Lotus Foundation vary each year, and have ranged from $350,000 to $450,000. Why these lease payments vary from year to year so significantly is unknown.

How the Lotus Foundation and LSE will deal with the $4 million balloon payment in 2018 will be interesting to observe. When the Chicago Math and Science Academy, part of the Midwestern region, approached a similar balloon payment, it sold its building at a loss to a related Gülenist landlord entity that proceeded to charge the school excessive rents in an 35-year non-cancelable lease.[22]

Excessive use of the H-1B Visa Program

Like other Gülen Organization charter networks, Lotus utilizes the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools. From 2001-2016, Lotus filed 54 H-1B visa applications for foreign workers.[23] While Gülen Organization charter networks typically state that these H-1Bs are only to fill shortage areas for math and science teachers, these applications were filed for such easily fillable positions as: English teachers, principals, accountants, auditors, and administrative service managers.

Lotus use the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Catherine Garcia: Lotus used Garcia, a California-based attorney, to file numerous H-1B applications. Garcia's other clients include:
  - Magnolia (CA)
  - Paragon (AZ)
  - Sonoran (AZ)[24]

- Owais Qazi: Lotus used Qazi, a California-based attorney, to file numerous H-1B applications. Qazi's other clients include:
  - Magnolia (CA)
  - Accord (CA)
  - Westwood Production (CA)
  - Coral (NV)
  - Apex (CA)[25]

[21] See 2016 LSE Audit, available at: http://tinyurl.com/z3wzapd (last checked 2/9/2017).

[22] See the Illinois profile for more information.

[23] H-1B information available at: http://tinyurl.com/h6b984w (last checked 2/9/017).

[24] Garcia profile listing H-1B clients, available at: http://tinyurl.com/h4vxfkx (last checked 1/31/2017).

[25] Qazi profile listing H-1B clients, available at: http://tinyurl.com/juefgh8 (last checked 2/9/2017).

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Scandals, Investigations, & Notable Activities

LSE got off to an extremely rocky start with its authorizer, Aurora Public Schools. LSE failed to obtain a certificate of occupancy prior to moving into its facility. As a result, the state closed the school, and the school was relocated. The District was also extremely concerned that Lotus board members gave $174,000 in loans to the school due to its dire financial straits.[26] As a result, founder Alptekin Kavi was forced to resign from the Lotus board. The District noted issues with LSE's federal spending compliance, as well as its service to English Language Learners. When LSE purchased a facility before it had secured renewal for an additional charter term, the District agreed to renew them contingent on LSE meeting defined conditions, including that LSE meet heightened standards for financial transparency due to its ongoing misuse and overspending of school funds.[27] In 2010, due to additional overspending by LSE, the District placed LSE on a monitored spending plan.[28]

Yunus Avcu, formerly employed by Accord first in Arizona, and then in Colorado, provided testimony regarding Accord's true purpose and his work with Lotus. As an accountant employed by Accord, Avcu stated that he gathered *tuzuk* funds from each of Lotus's Turkish H-1B employees in cash each month and delivered them to Accord's headquarters in California. Despite what Accord alleges it provides in the manner of educational services, Avcu stated that Accord was more focused with arranging trips to Turkey for American dignitaries, ensuring that its Gülenist charter schools maintained Turkish leadership at the school level, and requiring that Turkish leadership to regularly hire H-1B Turkish teachers in order to keep the cash flow from these teachers' forced tithing through *tuzuk* payments high. As an H-1B visa recruit from Turkey,

[26] Aurora Public Schools board minutes 5/22/2007, available at: http://tinyurl.com/gmsjseo (last checked 2/9/2017).

[27] Aurora Public Schools board minutes 2/17/2009, available at: http://tinyurl.com/gmsjseo (last checked 2/9/2017).

[28] Id. 2/16/2010 minutes.

Avcu stated that he personally had to turn over as much as 40% of his salary to Accord, which he said went to fund Gülen himself.[29]

Two American teachers, Heidi Anderson and Amanda Scott, sued Lotus School for Excellence and its principal at the time, Adnan Doyuran, in 2014 for illegal employment discrimination on the basis of national origin and for retaliation. Scott and Anderson noticed that the school's faculty comprised nearly half Turkish individuals on H-1B visas, and that these individuals were paid substantially more per year despite having less experience, less qualifications, and more parent complaints. When Scott and Anderson saw a special on the Gülen movement on 60 Minutes that mentioned Accord, the school's vendor, they asked Principal Doyuran to address their questions regarding the school's ties with the Gülen movement. Doyuran put them on a mentorship plan, despite the teachers having exemplary evaluations for that year, and later terminated Anderson's employment when she asked whether the Turkish teachers were being paid more than American employees.[30] This account supports many of Avcu's statements about Lotus and Accord, and their preference for Turkish H-1B employees that they can overpay in order to deduct larger tithes from their salaries.

Notable Turkish Vendors

- Accord Institute for Education Research (Accord): Like other Western Gülen Organization charter networks, Lotus contracts with Accord for educational and operational services, including financial services, for an annual fee. Accord has the greatest overlap in ties with Magnolia (CA) as they are both headquartered in the same state, but Accord also provides services to Daisy/Sonoran (AZ)[31], Coral (NV), Beehive (UT), and was listed as a partner for failed schools/regions, as well, including Pioneer (OR) and Mokapu STEM (HI). As discussed previously, Yapanel served as board president of Lotus, a paying client of Accord, at the same time as he received a salary from Accord. Further, for each of Lotus's failed application attempts which Yapanel orchestrated, new agreements were signed with Accord for those schools as well.

- Apex Educational Services (Apex): Lotus has utilized Apex for IT services,[32] and perhaps utilized Apex specifically for IT services paid for by the federal E-Rate grant program as Lotus has received E-Rate funding previously.[33] Magnolia (CA) also utilizes Apex for IT services

[29] Jason McGahan, Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly (Dec. 1, 2016), available at: https://tinyurl.com/jxceqp7 (last checked 2/9/2017).

[30] *See* Scott v. Lotus School for Excellence, Case 1:14-cv-00231-RPM (D.C. Colo 2014).

[31] SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at http://tinyurl.com/j34uhb3 (last checked 2/1/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation dba Sonoran Science Academy – Phoenix, Sonoran Schools (Mar. 3, 2016), available at http://tinyurl.com/hprollg (last checked 2/1/2017); Tim Steller, ***Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools***, Arizona Daily Star (Oct. 22, 2010), ***available at*** http://tinyurl.com/ht36ax6 (last checked 2/1/2017) (discussing payments of over $350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at http://tinyurl.com/z9ft448 (last checked 2/1/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, ***Hidden Agenda?***, Tucson Weekly, (Dec. 31, 2009), ***available at*** http://tinyurl.com/zgwjkak; Magnolia Educational and Research Foundation, ***Magnolia Science Academy – Santa Clara: Countywide Charter School Petition***, Santa Clara County Office of Education , at 17, ***available at*** http://tinyurl.com/hwg8jj8 (last checked 2/1/2017). The Accord Education website even includes a promotional blurb from the CFO of "Sonoran Schools" with other Gülen schools. Accord Education, ***available at*** http://tinyurl.com/gkpvelo (last checked 2/1/2017).

[32] See Lotus check register from 2012-2015 showing payments to Apex, available at: http://tinyurl.com/kjlrzmg (last checked 3/22/2017).

[33] FY 2015 E-Rate funding report, available at: https://tinyurl.com/h8ehy4q (last checked 2/9/2017).

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paid for through E-Rate, and Concept Schools (Midwest) is currently under federal investigation for allegedly defrauding the E-Rate program by using affiliated vendors with a system of kickbacks to Concept's management. Apex may also be an affiliated vendor with Daisy/Sonoran; a reporter found tax documentation linking Apex as an owned property/asset of Daisy and Sonoran, though this could not be independently verified.[34]

- Ramson Contractors: Ramson is a Turkish-owned and operated construction vendor utilized by both Magnolia (CA) and Lotus (CO).[35] Like the Gülen Organization charter schools, Gülen Organization vendors also shuffle their employees around the networks. For example, Levent Elibal worked first for Ramson Contractors, then left to work as a director for Quality Builders of Midwest, the construction vendor that works primarily with Concept Schools in the Midwestern Gülen Organization region.[36] According to testimony provided by Yunus Avcu, former Accord employee in Colorado, Accord required Lotus to use Ramson despite the fact it was based in California for construction so that Ramson could purposefully overcharge Lotus to skim money from the school. This statement can be substantiated from reviewing Lotus's spending—in 2007, Lotus's authorizer noted that Lotus overpaid its construction company—paying $340,000 instead of the budgeted $120,000.[37] Avcu also reported that Ramson utilized undocumented workers in the area from Tajikistan.

- Promotion and Beyond: This Turkish-owned company provides school uniforms and has the same registered agent, Hakan Kaya, as Ramson Contractors.[38] Lotus uses Promotion and Beyond for its school polo shirts,[39] as does Beehive (UT),[40] Coral (NV),[41] and Paragon (AZ).[42] According to Avcu, Lotus was also forced to use this company by Accord so that the company could purposefully overcharge Lotus to put more money into the Gülen Organization.

Gülenist Cultural Foundations

- Multicultural Mosaic Foundation, Denver: Connection: Two of Lotus's founders and board members, Yapanel and Utegulov, belonged to the Multicultural Mosaic Foundation, an openly Gülenist cultural association.[43]

34 http://tinyurl.com/kfl5oar (last checked 1/25/2017).

35 See payment to Ramson from Lotus for renovations, 2013, available at: https://tinyurl.com/zzpbav6 (last checked 2/9/2017).

36 See Linkedin profile for Levent Elibal, available at http://tinyurl.com/zu3r3nv (last checked 11/23/2016).

37 See Aurora board minutes from the May 22, 2007 meeting, available at: http://tinyurl.com/gmsjseo (last checked 2/15/2017).

38 Agent information available at: https://tinyurl.com/jupss5g and https://tinyurl.com/hm3l9ey (last checked 2/9/2017).

39 Checks to Promotion and Beyond are seen throughout Lotus's check registers, see e.g. December 2012, available at: http://tinyurl.com/hecpmbz (last checked 2/9/2017).

40 http://tinyurl.com/jszcdq3 (last checked 2/9/2017).

41 http://tinyurl.com/jtp85lc (last checked 2/9/2017).

42 http://tinyurl.com/zgjq5u5 (last checked 2/9/2017).

43 For an article discussing Mosaic's position on Gülen and the recent coup attempt http://tinyurl.com/hnbl942

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Individuals Caught in the Gülen Organization Web

- It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers and principals from school to school, as well as between education management vendors. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections.

- Varol Gurler: Principal Lotus Academy of Excellence (CO)[44]; Principal Sonoran Science Academy-Phoenix (AZ)[45]; Principal Magnolia Science Academy Santa Ana (CA)[46]; Principal of Brooklyn Amity School (NY)[47]; now various leadership positions at Magnolia (CA)[48].

- Adnan Doyuran: Momentum Middle School (Now Magnolia Science Academy San Diego) Principal (CA)[49]; Lotus Academy of Excellence Principal (CO)[50]; SSA-Tucson Principal (AZ); Sonoran Associate Superintendent (AZ)[51].

Notable Articles regarding the Lotus Network

- McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* LA Weekly. (1 December 2016). Available at: http://tinyurl.com/jxceqp7 (26 January 2017).

- Haarer, Ryan. *Colorado group defends Turkish cleric accused in coup*. KUSA. (18 July 2016). Available at: http://tinyurl.com/hnbl942 (26 January 2017).

- Camron, Victoria A.F. *Lotus appeals charters denial*. Longmont Times-Call. (19 January 2011). Available at: http://tinyurl.com/gteuctl (26 January 2017).

- Engdahl, Todd. *Jeffco rejection of Lotus charter stands*. Chalkbeat. (10 February 2010). Available at: http://tinyurl.com/z3hluuw (26 January 2017).

- *AP Centerpiece: Officials complained for years about inspections*. The Associated Press. (10 August 2007). Available at: http://tinyurl.com/jybfrjr (26 January 2017).

- *AP Impact: Fire inspector says school open despite violations*. The Associated Press. (15 June 2007). Available at: http://tinyurl.com/z9cdpnj (26 January 2017).

[44] Gurler is listed as Lotus Principal in this directory published by the Colorado Department of Education, available at: http://tinyurl.com/hlw28pe (last checked 2/9/2017).

[45] Gurler is still listed as site contact on the AZ Department of Education for SSA-Phoenix, available at: http://tinyurl.com/jygdkoq (last checked 2/9/2017).

[46] Listed as principal, available at: http://tinyurl.com/z5xv6ha (last checked 2/9/2017).

[47] Gurler is listed as principal as of the 2013-14 school year, available at: http://tinyurl.com/haq2sy3 (last checked 2/9/2017).

[48] Gurler is currently Magnolia COO according to his LinkedIn profile, available at: http://tinyurl.com/j3pukmw (last checked 2/9/2017); formerly Magnolia CAO as listed in this Magnolia 2010 newsletter, available at: http://tinyurl.com/zy75jt8 (last checked 2/9/2017).

[49] Pg 15 of Magnolia application, available at: http://tinyurl.com/hcfjhep (last checked 1/31/2017).

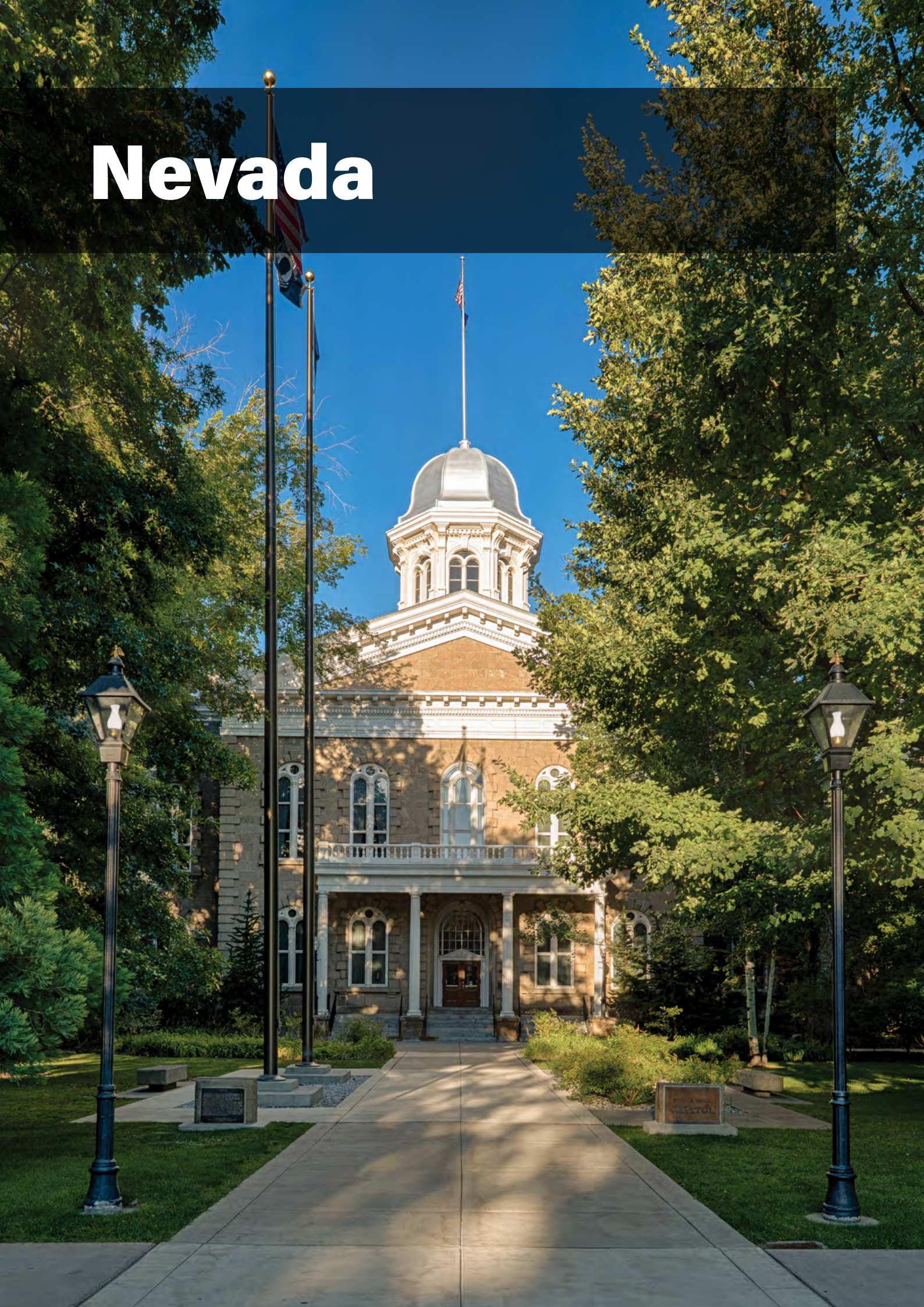
[50] Aurora Public Schools listed Doyuran as Lotus Principal on page 8 of this directory, available at: http://tinyurl.com/jmqtgu9 (last checked 2/9/17).

[51] Doyuran's LinkedIn profile still lists him as a principal, available at: http://tinyurl.com/zcaomq7 (last checked 2/9/2017); but is listed as associate superintendent on Sonoran's central office webpage, available at: http://tinyurl.com/hxhyvod (last checked 2/9/2017).

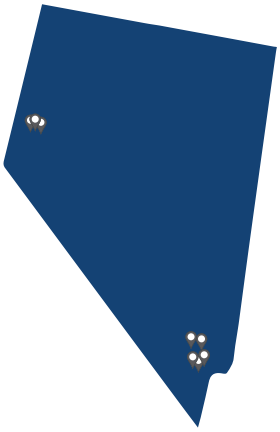
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Nevada



QUICK FACTS ON GÜLEN CHARTER SCHOOLS NEVADA



NUMBER OF SCHOOLS	8
KNOWN AS	**Coral Academy of Science**
TOTAL ENROLLMENT	**2,733**
CHARTER VENDOR	**Coral Academy of Science Central Office** **Coral Education Corp. (real estate)**
TOTAL REVENUES	**$19,543,637**
RELATED INSTITUTIONS	Sonoran, Paragon (AZ); Magnolia (CA); Lotus (CO); Beehive (UT)

KEY PEOPLE



Feyzi Tandogan; Eray Idil; Bunyamin "Ben" Karaduman; Volkan Akbas; Fatih Ozer

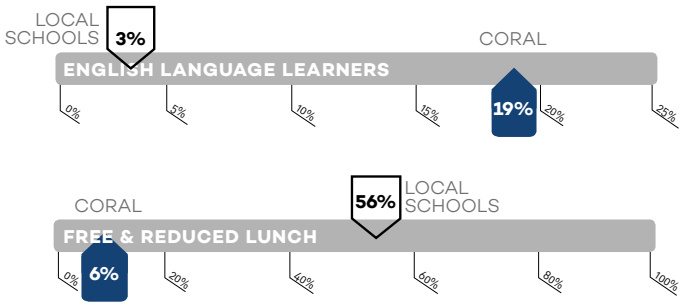
Attempted Networks

Pioneer (OR); Sonoran (HI); Coral (WA)

The repeated attempts by Gülen Organization charter networks to open campuses and schools on U.S. military bases is particularly concerning in light of Gülen's infiltration of Turkey's own military, which led at least in part to the attempted coup of the Turkish government in July 2016 by Gülenists within the Turkish military.

STUDENT DIVERSITY

CASLV **violated the requirement to stay within 10% of the district average for minority student populations** and vulnerable student populations, such as students with disabilities, English language learners, and students eligible for free/reduced lunch.



H-1B VISA APPLICATIONS

15 H-1B

H-1B VISA APPLICATIONS 2001-2016

This lower number is likely a result of Nevada's somewhat rare legal requirement that charter schools only hire certified teachers, which the individuals hired from Turkey are typically unable to possess prior to immigrating to the U.S.

PARENT CONCERN

Parent complaints regarding **lack of transparency from their governing board, high teacher turnover, hiring of unqualified Turkish teachers, lack of staff listings posted, expansion to new campuses before financially sound, under-enrollment, and connections to the Gulen Organization** spurred the creation of a Parent-Teacher Alliance The Alliance, led by the former president of the school's PTO, conducted an investigation into these concerns after CASR Executive Director Feyzi Tandogan forced the PTO to disband. The investigation appears to be ongoing.

All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Western
- School Names (known as): Coral Academy of Science
- Total # of Schools in State: 8 campuses under 2 charters
- Total Student Enrollment 2015-16: 2,733[1]
- Charter Holder/Governing Board(s):
  - Coral Academy of Science Las Vegas Board of Trustees
    - Organized as a tax exempt non-profit under NV state law
    - Not required to file IRS form 990
    - Operates 5 schools/campuses
  - Coral Academy of Science Reno Board of Trustees
    - Organized as a tax exempt non-profit under NV state law
    - Not required to file IRS form 990
    - Operates 3 schools/campuses
  - Coral Education Foundation
    - Organized as a non-profit with 501(c)(3) status
    - Oversees all Coral Academy of Science schools
    - Serves primarily as the landlord entity of the Nevada Coral network
- Charter Management Services Vendor:
  - Coral Academy of Science Central Office
  - Coral Education Corporation (real estate)
- Regional Gülen Organization Oversight Entity: Accord Institute for Education Research
- Regional Sister Networks: Sonoran (AZ), Paragon (AZ); Magnolia (CA); Lotus (CO); Beehive (UT). Attempted Networks: Pioneer (OR); Sonoran (HI); Coral (WA)[2].
- Total Estimated Revenues in the 2015/2016 school year: $19,543,637[3]
- Network Founders:
  - Feyzi Tandogan: Founding board member of CASR[4]; Executive Director CASLV[5]; Executive Director CASR[6]; CASLV board member[7]; Coral Education Corporation board member.[8]
  - Eray Idil: Board Member for Coral Education Corporation (NV)[9]; Teacher, College Advisor, & Dean of Academics at CASR[10]; Principal Lotus School of Excellence (CO)[11].
  - Bunyamin "Ben" Karaduman: CASR

1 Student enrollment and demographic information for CASLV is available at: http://tinyurl.com/mtjbmcs (last checked 3/28/2017); for CASR at: http://tinyurl.com/lp3cdmf (last checked 3/28/2017).

2 Coral Academy of Science Application that was later denied by the Washington State Charter Commission available at: http://tinyurl.com/hvytvse (last checked 2/1/2017).

3 CASLV 2015-16 revenues, pg 8, available at: http://tinyurl.com/kd2t8jk (last checked 3/28/2017); CASR 2015-16 revenues, pg 3, available at: http://tinyurl.com/kfm6vgy (last checked 3/28/2017).

4 CASR Bond statement, pg A-14, available at: http://tinyurl.com/mpuv4kb (last checked 3/30/2017).

5 Tandogan's Linkedin profile showing employment at both CASLV and CASR, available at: http://tinyurl.com/mw57v86 (last checked 3/25/2017).

6 Zoning document prepared for Tandogan while Executive Director of CASR, available at: http://tinyurl.com/l6ltxke (last checked 3/28/2017).

7 CASLV Board member listing, available at: http://tinyurl.com/lcv79uy (last checked 3/28/2017).

8 Coral Education Corporation IRS 990 form documentation, 2007, available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

9 Coral Education Corporation IRS 990 form documentation, 2007-09, available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

10 Eray Idil LinkedIn profile available at: http://tinyurl.com/lg63tzz (last checked 3/28/2017).

11 Eray Idil LinkedIn profile available at: http://tinyurl.com/lg63tzz (last checked 3/28/2017).

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Principal[12]; Loaned CASR $40,000 at a high interest rate[13]; Founder of Washington Education Foundation, a Gülenist CMO overseeing the Chesapeake (MD) network[14]; Executive Director of Chesapeake Point Science Academy (MD);[15] now working in Turkey.

- Volkan Akbas: Board Member for Coral Education Corporation (NV)[16]; Director of the Sierra Foundation (NV)[17]; Chicago Math and Science board member Concept (IL).[18]
- Fatih Ozer: CASLV (NV) founder and board member[19]; Math teacher at Lotus (CO)[20]; CASLV Academic Officer[21]; Elementary Director at Lotus (CO).[22]

Overview

As of the 2016-2017 school year, our view of the evidence suggests that Nevada has eight Gülen Organization charter school campuses in operation. These schools are overseen by two governing boards—Coral Academy of Science Las Vegas ("CASLV") and Coral Academy of Science Reno ("CASR"). These schools contract with Accord Institute for Education Research, the corporate entity responsible for the Western region of the Gülen Organization charter networks, allegedly for additional educational management services for the Nevada schools. Both branches are affiliated with and fund Coral Education Foundation, a Turkish-operated landlord entity.

CASR's campuses are located in a fairly affluent school district and on average serve a much smaller percentage of vulnerable populations (such as students eligible for free/reduced lunch, English language learners, and students with disabilities) than the overall district. CASR on average serves 1% African-American students as opposed to its district Washoe County School District, which serves 2% on average; 46% Caucasian students vs. 45% district; 27% Hispanic students vs. 40% district; 8% English language learners vs. 16% district; 13% students eligible for free/reduced lunch vs. 30% district; and 5% students with disabilities vs. 14% district.

CASLV campuses similarly serve a privileged student population in comparison to its surrounding school district. CASLV on average serves 5% African American students vs. 13% district; 45% Caucasian students vs. 26% district; 15% Hispanic students vs. 46% district; 3% English language learners vs. 19% district; 6% students eligible for free/reduced lunch vs. 56% district; and 3% students with disabilities vs. 11% district. In 2015, CASLV's authorizer noted that CASLV was in violation of the requirement to serve within 10% of the district's average of the students from across these populations.[23]

12 Ben Karaduman profile available at: http://tinyurl.com/jwf35t8 (last checked 3/30/2017).

13 CASR Bond statement, pg 98, available at: http://tinyurl.com/mpuv4kb (last checked 3/30/2017).

14 Ben Karaduman profile available at: http://tinyurl.com/lmssffe (last checked 3/30/2017).

15 Ben Karaduman profile available at: http://tinyurl.com/jwf35t8 (last checked 3/30/2017).

16 Coral Education Corporation IRS 990 form documentation listing Akbas, 2008-13, available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

17 Akbas profile available at: http://tinyurl.com/mklxpg7 (last checked 3/30/2017).

18 CMSA 990 form listing Akbas, available at: http://tinyurl.com/n5gfj8p (last checked 3/30/2017).

19 CASLV bond statement, pg A-4, available at: (last checked 3/25/2017).

20 Lotus press release, available at: http://tinyurl.com/mpefna2 (last checked 3/30/2017).

21 CASLV bond statement, pg A-4, available at: (last checked 3/25/2017).

22 Lotus press release, available at: http://tinyurl.com/mpefna2 (last checked 3/30/2017).

23 State Public Charter Authority minutes, pg 8-9, October 26, 2015, available at: http://tinyurl.com/mz7jnpt (last checked 3/29/2017).

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School	Operation	Student Demographic Data*	Authorizer	Governing Board
Coral Academy of Science –Reno Elementary Campus 1701 Valley Road, Reno, NV 89512	2001-present	08% ELL 13% FRL 05% SWD 01% African American 46% Caucasian 27% Hispanic	Washoe County School District	Coral Academy of Science Reno Board of Trustees
Coral Academy of Science –Reno Middle School Campus 1350 East Ninth St., Reno, NV 89512	2015-present			
Coral Academy of Science –Reno High School Campus 6275 Neil Road, Reno, NV 89511	2010-present			
Coral Academy of Science-Las Vegas Centennial Hills Campus 7951 Deer Springs Way, Las Vegas, NV 89131	2007-present	03% ELL 06% FRL 03% SWD 05% African American 45% Caucasian 15% Hispanic	State Public Charter School Authority	Coral Academy of Science Las Vegas Board of Trustees
Coral Academy of Science-Las Vegas Windmill Campus 2150 Windmill Pkwy., Henderson, NV 89074	2010-present			
Coral Academy of Science-Las Vegas Nellis Air Force Base Campus 72 Baer Dr., NAFP, Las Vegas, NV 89115	2016-present			
Coral Academy of Science-Las Vegas Tamarus Campus 8185 Tamarus St., Las Vegas, NV 89123	2007-present			
Coral Academy of Science-Las Vegas Sandy Ridge Campus 1051 Sandy Ridge Ave., Henderson, NV 89052	2010- present			

**Data taken from the 2015-16 school year, which was only available on a charter basis as opposed to a campus basis. "ELL" indicates English language learners, "FRL" indicates students eligible to receive free/reduced lunch, and "SWD" indicates students with disabilities.*[24]

[24] Student enrollment and demographic information for CASLV is available at: http://tinyurl.com/mtjbmcs (last checked 3/28/2017); for CASR at: http://tinyurl.com/lp3cdmf (last checked 3/28/2017).

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A History of Strategic Ambiguity and Conflicting Interests

Unlike most states with charter school legislation, Nevada does not require the governing boards of its charter schools to incorporate as non-profit entities in order to receive state tax exempt status. As a result, CASLV and CASR do not have non-profit governing boards required to file articles of incorporation with the state of Nevada or IRS tax documentation for non-profit corporations (form 990). This makes a historical review of the Coral Nevada network difficult as information regarding the individuals involved in the schools' genesis, leadership, and operations is not publicly reported on a regular basis.

CASLV has received parent complaints regarding lack of transparency from their governing board, high teacher turnover, hiring of unqualified Turkish teachers, lack of staff listings posted, expansion to new campuses before financially sound, under-enrollment, and connections to the Gülen Organization.[25] In fact, a Parent-Teacher Alliance formed due to these concerns, which they have made public along with their requests for increased transparency and answers from the school's leadership.[26] The Alliance, led by the former president of the school's PTO, conducted an investigation into these concerns after CASR Executive Director Feyzi Tandogan forced the PTO to disband.[27] The investigation appears to be ongoing.

CASLV opened the second Gülen Organization charter school located on a U.S. Air Force base. The Nellis campus opened for the 2016 school year. Like the Gülen Organization's first charter school on a U.S. Air Force Base, Sonoran

[25] See parent concerns listed in email to Feyzi Tandogan at CASLV, available at: http://tinyurl.com/mpxyox7 (last checked 3/25/2017).

[26] See Parent-Teacher Alliance for CAS website, available at: http://tinyurl.com/lx2oz2c (last checked 3/25/2017).

[27] Id. At http://tinyurl.com/ldsnhsd (last checked 3/25/2017).

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Science Academy Davis-Monthan, CASLV-Nellis is also operated by Accord, and its petitioner was Ercan Aydoglu, the same individual who represented the SSA-Davis Monthan petition.[28] Accord and Sonoran (AZ) attempted to open another charter school, Mokapu STEM charter, in Hawaii on the Kaneohe Marine Corps Base, but that attempt failed.[29]

Furthermore, like Concept in the Midwest region and Harmony in Texas, the Coral network uses an affiliated Gülenist landlord entity, Coral Education Foundation.[30] Coral Education Foundation is controlled by a Turkish governing board and enters into bond financing with CASR to purchase and renovate properties, which it then rents to CASR. Coral Education Foundation has also paid for trips to Turkey for Coral students.[31]

Financial Issues

While Nevada requires its charter schools to undergo annual audits, these audits are made publicly available only through public records requests to the organizations—yet another favorable charter requirement that decreases charter school transparency and increases the ability of the Gülen Organization to obscure its actions in the state. However, because both CASLV and CASR have ongoing bond issuances, audits and financial statements are available as part of their routine disclosures.[32] These audits showcase a series of ongoing financial issues at the Coral charter network that are endemic to other Gülen Organization charter networks. On the whole, these issues demonstrate a lack of financial controls, documentation, and transparency that are critical to obscuring the true use of public funds by Gülen Organization charter networks.

The numerous audit findings[33] occur across multiple years and at multiple schools, including:

- Insufficient Financial Controls and Lack of Transparency
  - CASR board failed to approve salary changes before the changes were made.
  - Payroll information was not verified prior to entry.
  - CASR did not have the capacity to prepare financial statements.
  - CASR board failed to amend or adjust budget when variances occurred.
  - Spending and use of federal awards were not adequately protected or monitored.

[28] Daisy Education Corporation dba. Sonoran Science Academy. Sonoran Science Academy-Davis Monthan Replication Application. Submitted to the Arizona State Board for Charter Schools in April 2009, available at: http://tinyurl.com/kjkhadc (last checked 3/28/2017); see also Nevada State Public Charter School Authority, "Minutes of the Meeting." June 12, 2015, available at: http://tinyurl.com/mplt473 (last checked 3/28/2017).

[29] Mokapu School Community Council Agenda, October 13, 2010, Retrieved from the Hawaii Department of Education's School Documents Online Public Website, available at: http://tinyurl.com/l7dumvj (last checked 3/28/2017).

[30] Coral Education Foundation IRS 990 tax documentation available at: available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

[31] Coral Education Foundation IRS 990 tax documentation, 2007-10, available at: available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

[32] CASLV bond statement available at: (last checked 3/25/2017); CASR bond statement available at: http://tinyurl.com/mpuv4kb (last checked 3/25/2017).

[33] These findings are from the CASR annual audit, available at: http://tinyurl.com/m4gyg4g (last checked 3/30/2017); WSCD Board minutes, June 2015, available at: http://tinyurl.com/mz89pja (last checked 3/30/2017); WCSD Board minutes, June 2014, available at: http://tinyurl.com/kjwzuk4 (last checked 3/30/2017); State Charter Board minutes, available at: http://tinyurl.com/lbluxry (last checked 3/30/2017);
Bond documents, available at: http://tinyurl.com/kap9wkr (last checked 3/30/2017).

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- ▷ Insufficient payroll protocol could result in incorrect paychecks.
- ▷ CEC failed to provide quarterly financial statements as required by the terms of the CASR bond.
- ▷ Failure to comply with state employment law
- ▷ CASR failed to comply with state requirements for teacher certification and qualification.
- ▷ Failure to conduct fingerprinting and criminal background checks.
- ▷ Failure to employ qualified paraprofessionals.

- ► Failure to enroll a diverse student population
  - ▷ CASLV violated the requirement to stay within 10% of the district average for minority student populations and vulnerable student populations, such as students with disabilities, English language learners, and students eligible for free/reduced lunch.

Furthermore, the audits for both CASR and CASLV show that each school maintains an inventory of school uniforms ranging from $25,000-65,000.[34] Being that the uniforms are purchased from a related Gülenist vendor used throughout the Western region, Promotion & Beyond, this excessively high amount of uniform inventory is indicative of the Gülen Organization's apparent propensity for its charter schools to overpay certain Gülenist vendors. The testimony of Turkish whistleblower Yunus Avcu, a former employee of Accord, supports this conclusion.[35] Avcu stated that Accord required Lotus (CO) to over-pay Promotion & Beyond for excess school uniform inventory. Fulton Science Academies (GA), now closed, were also found to overpay a related Gülenist vendor from the Midwest region for school uniforms, holding excessive inventory.[36]

Bond Financing

Like its regional sister network Sonoran (AZ), the Coral network has secured bond financing from the Industrial Development Authority of Pima County, Arizona.[37] CASR and its affiliated landlord entity, Coral Education Corporation, received $7.7 million in bond financing for the purchase and renovation of the CASR elementary and CASR middle school buildings in 2008.

CASLV secured $9 million in bond financing for the purchase and renovation of its Sandy Ridge campus from the Public Finance Authority of Wisconsin in 2014.[38] One year later, the Gülenist charter network in North Carolina (Triad, Research Triangle) secured bond financing from the Public Finance Authority of Wisconsin, as well.[39] This is typical of Gülen Organization bond financing—they tend to use the same bond issuers across the country.

[34] CASR audits available at: http://tinyurl.com/n8a478j (last checked 3/29/2017); CASLV audits available at: http://tinyurl.com/k5hakw7 (last checked 3/29/2017).

[35] *See* Avcu testimony, available at: http://tinyurl.com/jxceqp7 (last checked 3/30/2017).

[36] See Georgia profile for more information.

[37] Pima County bond issuances, available at: http://tinyurl.com/kards94 (last checked 3/30/2017).

[38] CASLV bond statement, available at: http://tinyurl.com/mjnl3pu (last checked 3/30/2017).

[39] Public Finance Authority of Wisconsin bond issuances, available at: http://tinyurl.com/kqxzgeh (last checked 3/30/2017).

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Real Estate

The Coral Nevada network engages in the same type of suspect real estate transactions utilized by the Concept network and its affiliated real estate arm, New Plan Learning, throughout the Midwest; the Harmony network and its affiliated real estate arm, Charter School Solutions, in Texas; and the Dove Science network in Oklahoma. This model depends on a related entity, also controlled by Turkish Gülenists, acquiring land and facilities and leasing it back to the Gülenist charter network at unjustified premiums. The Gülenist landlord entity is often included on major bond financing on behalf of the Gülen Organization charter network, as is the case with the Coral Academy of Science network and their affiliated landlord entity, Coral Education Corporation ("CEC").

As discussed in the previous section, CASR and CEC received bond financing in 2008 to purchase and renovate two campuses—CASR elementary and CASR middle school. According to the deeds, CEC purchased the elementary building for $2.7 million with a planned renovation of an additional $1.9 million, and the middle school for $1.9 million with a planned renovation of $900,000. CEC used the bond financing to fund those purchases and renovate, with the total amount arising to approximately $7.7 million inclusive of additional financing.[40]

According to the CEC audit submitted as part of its bond disclosure requirements, CEC collects $900,000 in rent from CASR for these two facilities. The thirty-year lease requires CASR to be responsible for substantially all costs related to the property and buildings.[41] Additionally, the $900,000 rent includes a 5% management fee to pay for CEC's operations.[42]

Using 2016 as a model year, CEC was only required to pay $630,900 of the $900,000 in rent towards the bond debt and interest for those facilities.[43] The remaining amount, approximately $269,000, was essentially public funds that CASR could have saved by purchasing the property outright in its own name rather than creating a middleman. Over 30 years, these model numbers show that CASR will pay an additional $8 million of public funds in fees to support CEC's operations. This seems particularly egregious in light of CEC's numerous failures to service the bond's requirements and provide quarterly financial statements.[44]

CASLV, however, does not currently utilize CEC for its bond financing and real estate ventures. CASLV borrowed its bond financing in its own name, and as a result, pays significantly less than CASR on its bond debt for the Sandy Ridge campus. While CASLV does not use CEC specifically, CASLV may be using an affiliated entity to rent the new Centennial Hills campus. The buyer of that property is listed as "Charter School Solutions Coral LLC," and is registered in Nevada as a foreign corporation. Its business address is in Minnesota, and no directors or ownership information is publicly available. As a result, it is difficult to ascertain whether this entity is related to CASLV, the Gülen Organization, or perhaps the Gülenist landlord entity utilized by Harmony (TX), which also goes by the name "Charter School Solutions." The lease agreement for this campus is not available, and thus, the amount paid by CASLV and whether it is reasonable cannot be determined at this time. Further research is necessary, some of which will be publicly available after the conclusion of the 2016-17 school year when the rental terms of this campus should be available from CASLV's annual audit.

40 Details of the lease, pg 8, available at: http://tinyurl.com/m2e5xaq (last checked 3/29/2017).

41 Id. at pg 7.

42 Id.

43 CASR Bond statement, pg 38, available at: http://tinyurl.com/mpuv4kb (last checked 3/30/2017).

44 CEC's notice of failure to submit statements, available at: http://tinyurl.com/kap9wkr; http://tinyurl.com/mqut4wx; http://tinyurl.com/n4cnlyr; http://tinyurl.com/lmayddv.

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Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, the Coral Nevada network and their schools utilize the H-1B visa program to immigrate Turkish Gülenists into the United States for employment in the schools. From 2001-2016, CASLV and CASR filed at least 15 H-1B visa applications for foreign workers (this figure does not include green card applications).[45] All things considered, the Coral network has a much smaller number of H-1B applications than a typical Gülen charter network. This is likely a result of Nevada's somewhat rare legal requirement that charter schools only hire certified teachers, which the individuals hired from Turkey are typically unable to possess prior to immigrating to the U.S. While Gülen Organization charter schools generally state that these H-1B applications are necessary to fill shortage areas for math and science teachers, the Coral network filed these applications for positions such as: regulatory compliance consultants, school administrators, business managers, human resource managers, and principals.[46]

Coral uses the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Owais Qazi: Coral used Qazi, a California-based attorney, to file numerous H-1B applications. Qazi's other clients include:
  - Lotus (CO)
  - Accord (CA)
  - Westwood Production (CA)
  - Magnolia (CA)
  - Apex (CA)[47]

[45] Coral Academy of Science profile available at: http://tinyurl.com/kkeovw2 (last checked 3/28/2017); Coral Academy of Science Las Vegas H-1B 2016 application available at: http://tinyurl.com/m4jmct3 (last checked 3/28/2017).

[46] Coral profile, available at: http://tinyurl.com/kkeovw2 (last checked 3/28/2017).

[47] Qazi profile listing H-1B clients, available at: http://tinyurl.com/juefgh8 (last checked 2/9/2017).

- Joshua Surowitz: Coral recently used Surowitz, a California-based attorney, to file a H-1B application. Surowitz also filed applications for:
  - Magnolia (CA)
  - Sonoran (AZ)
  - Accord (Western Region)
  - Bay Area Technology (CA)[48]

Scandals, Investigations & Notable Activities

A scandal affecting the entire Western region of the Gülen Organization recently emerged when a Turkish whistleblower named Yunus Avcu came forward and provided interviews to both the media and Amsterdam & Partners regarding his work with Accord. Avcu, formerly employed by Accord first in Arizona to work with SSA-Phoenix, and then later in Colorado, provided testimony regarding Accord's true purpose and his work with both SSA-Phoenix and Lotus. While this testimony primarily concerned apparent wrongdoing in Arizona and Colorado, Avcu also implicated current Magnolia and Accord employees, as well as Western region Gülenist vendors used throughout in the suspect activity and discussed liberally what Accord's true purpose for the Western region of the Gülen Organization was.

> ***"Accord was more focused with arranging trips for American dignitaries than on providing educational services."***

As an accountant employed by Accord, Avcu stated that he gathered *tuzuk* funds from each of Lotus's Turkish H-1B employees in cash each month and delivered them in a briefcase to Accord's headquarters in California. Despite what Accord alleges it provides in the manner of educational services, Avcu stated that Accord was more focused with arranging trips to Turkey for American dignitaries, ensuring that its Gülenist charter schools maintained Turkish leadership at the school level, and requiring that Turkish leadership to regularly hire H-1B Turkish teachers in order to keep the cash flow from these teachers' forced tithing through *tuzuk* payments high. As an H-1B employee recruited from Turkey himself, Avcu stated that he had to turn over 40% of his salary, which he said went to fund Gülen himself.[49] Avcu's account of Accord's true operations, the systemic exploitation of Turkish H-1B visa employees through the *tuzuk*, and the system rigged in favor of hiring Turkish nationals through the H-1B visa program to ensure more manpower and funding for the Gülen Organization's hidden agenda is substantiated by the testimony of other Turkish individuals who have left the Gülen Organization, such as Mustafa Addi in the Concept network.

CASLV began receiving complaints from a parent group regarding its lack of transparency and insistence on expanding before the school was financially sound. These complaints stemmed from members in the current PTO, which CASLV Executive Director and network founder Feyzi Tandogan forced to disband. The parents formed an alliance, led by the former president of the school's PTO, to conduct an

[48] Surowitz profile listing entities represented for H-1B visa work, available at: http://tinyurl.com/gva9h7t (last checked 1/31/2017).

[49] Jason McGahan, Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly (Dec. 1, 2016), available at: https://tinyurl.com/jxceqp7 (last checked 2/9/2017).

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investigation into these concerns.[50] The investigation appears to be ongoing.

A local private Christian school opposed and successfully blocked CASLV's expansion to its neighborhood when CASLV was expanding the Henderson area campus.[51]

In October 2015, CASLV was noted by its authorizer that it was in violation of the requirement that it serve within 10% of the district's average for minority student populations and vulnerable student populations, such as English language learners, students with disabilities, and students eligible for free/reduced lunch.[52] At the end of that school year, records we reviewed revealed that CASLV was still in violation, serving significantly less students with needs and minorities than the district.

CASLV was sued for violation of a student's First Amendment rights.[53] The student recited the poem "The More Loving One" by W.H. Auden in a poetry contest in the school cafeteria. Because the poem contains the words "hell" and "damn," the CASLV Dean of Students complained about the language. The student's teacher was reprimanded for not prohibiting the poem's recitation. The Court found that the recitation of the poem could not be prohibited under the First Amendment, and the school had to pay the student's attorney's fees for bringing the claim.

Notable Turkish Vendors

- Accord Institute for Education Research (Accord): Like all of the other Western Gülen Organization charter networks, Coral contracts with Accord for educational and operational services, including financial services, for an annual fee. Accord has the greatest overlap in ties with Magnolia (CA) as they are both headquartered in the same state, but Accord also provides services to Daisy/Sonoran (AZ)[54], Lotus (CO), Beehive (UT), and was listed as a partner for failed schools/regions, as well, including Pioneer (OR) and Mokapu STEM (HI). Additionally, Yunus Avcu, a Turkish individual formerly employed by Accord as an accountant has provided testimony regarding the Gülen Organization's inner workings, discussed later in this section.

- Apex Educational Services/Apex Systems & Technology Solutions (Apex): Like other charter networks within the Western region of the Gülen Organization, Coral Academy of Science utilizes Gülenist-owned and operated Apex for IT services

50 See Parent-Teacher Alliance for CAS website, available at: http://tinyurl.com/ldsnhsd (last checked 3/25/2017).

51 http://tinyurl.com/z4526c8 (last checked 3/25/2017).

52 State Public Charter Authority minutes, pg 8-9, October 26, 2015, available at: http://tinyurl.com/mz7jnpt (last checked 3/29/2017).

53 Behymer-Smith ex rel. Behymer v. Coral Acad. of Sci., Steven West, Ben Karduman, and Cheryl Garlock, 427 F. Supp. 2d 969 (D. Nev. 2006).

54 SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at http://tinyurl.com/j34uhb3 (last checked 2/1/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation dba Sonoran Science Academy – Phoenix, Sonoran Schools (Mar. 3, 2016), available at http://tinyurl.com/hprollg (last checked 2/1/2017); Tim Steller, ***Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools***, Arizona Daily Star (Oct. 22, 2010), ***available at*** http://tinyurl.com/ht36ax6 (last checked 2/1/2017) (discussing payments of over $350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at http://tinyurl.com/z9ft448 (last checked 2/1/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, ***Hidden Agenda?***, Tucson Weekly, (Dec. 31, 2009), ***available at*** http://tinyurl.com/zgwjkak; Magnolia Educational and Research Foundation, ***Magnolia Science Academy – Santa Clara: Countywide Charter School Petition***, Santa Clara County Office of Education , at 17, ***available at*** http://tinyurl.com/hwg8jj8 (last checked 2/1/2017). The Accord Education website even includes a promotional blurb from the CFO of "Sonoran Schools" with other Gülen schools. Accord Education, ***available at*** http://tinyurl.com/gkpvelo (last checked 2/1/2017).

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paid for by the federal E-Rate grant program.[55] Coral's regional sister networks also utilize Apex for IT services paid for through E-Rate, which is notable due to the Gülen Organization's suspect use of the E-Rate program currently being investigated. Concept Schools (Midwest) is under ongoing federal investigation for allegedly defrauding the E-Rate program by using affiliated vendors with a system of kickbacks to Concept's management.[56] Our interpretation of the evidence suggests that Apex is the Gülenist vendor of choice for the Western region and may be perpetuating the same system of overcharging, underserving, with kickbacks to management, as alleged in the Concept investigation. Also, a reporter found tax documentation that stated Apex was an owned property/asset of Daisy and Sonoran, though this could not be independently verified.[57]

- Promotion & Beyond: This Turkish-owned company provides school uniforms and has the same registered agent and accountant, Hakan Kaya, as other Gülenist vendors used throughout the Western region, Ramson Contractors, Accord, and Westwood Production.[58] Coral (NV) uses Promotion & Beyond for its school polo shirts[59], as does Beehive (UT),[60] Lotus (CO)[61], and Paragon (AZ).[62] According to Yunus Avcu, a Turkish whistleblower formerly employed by Accord, Gülenist charter schools were forced to use this company by Accord so that the company could purposefully overcharge them to put more money into the Gülen Organization.[63] Both the audits for CASR and CASLV show that they maintained between $25,000-65,000 in uniform inventory every year, which is excessively high.[64] The repetitious over-purchasing of uniform inventory from an affiliated Turkish vendor was also noted in the forensic audits of the now-closed Fulton Science Academies (GA) with the Core Group (IL), one of Concept's Gülenist-owned vendors.[65]

Gülenist Cultural Foundations and Business Associations Active in State

- Sierra Foundation
  - Our interpretation of the evidence suggests that the Sierra Foundation is the Gülenist cultural association responsible for organizing Gülenist inter-faith dinners where judges, politicians, and notable community leaders are invited to speak and learn more about Gülen. Such a dinner was held whereby many notable Nevada

55 2007 E-rate funding application available at: http://tinyurl.com/gmsrwag (last checked 2/20/2017); 2006 E-Rate funding application available at: http://tinyurl.com/juhee8h (last checked 2/20/2017).

56 See the Midwest Regional narrative, the Ohio narrative; and the Illinois narrative within this paper for more information regarding Concept's fraudulent use of the E-Rate funding program.

57 http://tinyurl.com/kfl5oar (last checked 1/25/2017).

58 Agent information available at: https://tinyurl.com/jupss5g and https://tinyurl.com/hm3l9ey (last checked 2/9/2017).

59 http://tinyurl.com/jtp85lc (last checked 2/9/2017).

60 http://tinyurl.com/jszcdq3 (last checked 2/9/2017).

61 Checks to Promotion and Beyond are seen throughout Lotus's check registers, see e.g. December 2012, available at: http://tinyurl.com/hecpmbz (last checked 2/9/2017).

62 http://tinyurl.com/zgjq5u5 (last checked 2/9/2017).

63 See Avcu testimony, available at: http://tinyurl.com/jxceqp7 (last checked 3/30/2017).

64 CASR audits available at: http://tinyurl.com/n8a478j (last checked 3/29/2017); CASLV audits available at: http://tinyurl.com/k5hakw7 (last checked 3/29/2017).

65 See Georgia profile for more information.

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judges and politicians, including the Governor, attended.[66] CASLV Founder and employee Eray Idil was a member of the Sierra Foundation.

- Suzer Group
  - A known Gülenist banking institution in Turkey paid for former Lt. Governor Brian Krolicki to travel to Turkey for economic development.[67] The Hizmet Movement's blog mentions how students attending the Turkish Olympiad competitions in Turkey (many of which are from the U.S. Gülen charter schools) visit with the Suzer Group's honorary president, Mustafa Suzer, during their trip.[68]

Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between affiliated vendors. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region's interconnections.

- Ercan Aydoglu: Petitioner and founding Principal for Sonoran Science Academy-Davis Monthan Air force base (AZ)[69]; Principal at Bay Area Technology School-Willow (CA)[70]; Executive Director of Coral Academy of Science Las Vegas[71]; CASR board member[72]; Petitioner for Coral Academy of Science Nellis Air Force Base campus.[73]
- Murat Yuksel: Petitioner for failed Gülenist charter school Capital Academy Charter School (NY); CASR board president[74]; Thesis Advisor to Hasan Aydin for his thesis, "Educational Success of Gülen-Inspired Schools: The Case of Nigeria" while Yuksel was a professor at University of Nevada-Reno[75]; Author for The Fountain Magazine, a known Gülenist website.[76]
- Eray Idil: Coral Education Corporation board member[77]; Teacher, College Advisor, & Dean of Academics at CASR[78]; Principal Lotus School of Excellence (CO).[79]

66 Dinner recap, available at: http://tinyurl.com/m2cc98e (last checked 3/28/2017).

67 Gift disclosure form, available at: http://tinyurl.com/n557pwe (last checked 3/29/2017).

68 Post discussing Suzer's involvement with Turkish Olympiad, available at: http://tinyurl.com/kppq87x (last checked 3/29/2017).

69 Daisy Education Corporation dba. Sonoran Science Academy. Sonoran Science Academy-Davis Monthan Replication Application. Submitted to the Arizona State Board for Charter Schools in April 2009, available at: |http://tinyurl.com/kjkhadc (last checked 3/28/2017).

70 Tom Stellar, "Foreign fills ranks of local charter-school chain," Arizona Daily Star, April 25, 2010, available at: http://tinyurl.com/h6ancpq (last checked 3/28/2017).

71 Ercan Aydogdu Linkedin profile, available at: http://tinyurl.com/kgzv9rm (last checked 3/28/2017).

72 See minutes from CASR March 2013 listing Aydoglu, available at: http://tinyurl.com/lk3fnzb (last checked 3/29/2017).

73 Nevada State Public Charter School Authority, "Minutes of the Meeting." June 12, 2015, available at: http://tinyurl.com/mplt473 (last checked 3/28/2017).

74 See minutes from CASR March 2013 listing Yuksel, available at: http://tinyurl.com/lk3fnzb (last checked 3/29/2017).

75 Murat Yuksel Curriculum Vitae, available at: http://tinyurl.com/n25h5n4 (last checked 3/28/2017).

76 Yuksel author listings, available at: http://tinyurl.com/mmszozb (last checked 3/28/2017).

77 Coral Education Corporation IRS 990 form documentation, 2007-09, available at: http://tinyurl.com/m6jll4z (last checked 3/28/2017).

78 Eray Idil LinkedIn profile available at: http://tinyurl.com/lg63tzz (last checked 3/28/2017).

79 Eray Idil LinkedIn profile available at: http://tinyurl.com/lg63tzz (last checked 3/28/2017).

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- Erdinc Acar: CASR Executive Director[80]; Magnolia (CA) Principal & Regional Director[81]; Accord CAO/COO.[82]
- Ali Unver: Board President of Paragon (AZ) and noted Gülenist[83]; CASLV (NV) computer teacher[84]; author for the known Gülenist publication, The Fountain Magazine.[85]
- Hanifi Oguz: CASR Academic Dean[86]; CASLV Principal[87]; CASR board member[88]; Executive Director Beehive (UT).[89]
- Ismail Fidan: CAS; Board member for Fulton Science (GA);

Notable Local Articles regarding the Coral Network

- McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* (Containing interview with Yunus Avcu, Accord whistle blower). LA Weekly. 1 December 2016.[90]
- Sapienza, Vince. *Las Vegas school keeps child in class with broken elbow*. KVVU/CNN. 28 September 2016. Available at: http://tinyurl.com/go4cv6q (23 February 2017).
- Mortan, Neal. *Elementary school prepares for 'final flight' at Nellis*. Las Vegas Review-Journal. 13 February 2016. Available at: http://tinyurl.com/hgbg2ym (23 February 2017).
- Schaffhauser, Dian. *Charter STEM schools growing in Nevada*. THE Journal. 1 September 2016. Available at: http://tinyurl.com/hgm3frj (23 February 2017).
- Hartley, Eric. *Henderson charter school delayed to 2016*. Las Vegas Review-Journal. 24 April 2015. Available at: http://tinyurl.com/j5zqzbm (23 February 2017).
- *Local Charter School Expanding Into Old Reno Bank Building*. KTVN-TV. 12 February 2015. Available at: http://tinyurl.com/m7r2so8 (23 February 2017).
- Milliard, Trevon. *Washoe's largest charter school expands*. Reno Gazette-Journal. 10 February 2015. Available at: http://tinyurl.com/jl8s7jh (23 February 2017).
- Chen, Angela. *Mom Claims Daughter Was Inappropriately Touched in School*. KOLO-TV. 17 December 2013. Available at: http://tinyurl.com/loyueqw (23 February 2017).
- Twitchell, Jeremy. *Green Valley Christian School gets OK to expand*. Las Vegas Sun. 16 October 2009. (Discussing conflict between Christian School and proposed CASLV expansion.) Available at: http://tinyurl.com/j2hx827 (23 February 2017).

80 Erdinc Acar Linkedin profile available at: http://tinyurl.com/mzwx5jf (last checked 3/28/2017).

81 Id.

82 Id.

83 Article discussing Unver's statements regarding Gülen while Paragon board president, available at: http://tinyurl.com/h6ancpq (last checked 3/29/2017).

84 Resume available at: http://tinyurl.com/kl4za42 (last checked 3/29/2017).

85 Credits for The Fountain, available at: http://tinyurl.com/mpa2xg4 (last checked 3/29/2017).

86 Oguz Linkedin profile, available at: http://tinyurl.com/k23nha4 (last checked 3/29/2017).

87 Id.

88 CASR minutes, available at: http://tinyurl.com/kzgqljn (last checked 3/29/2017).

89 Oguz Linkedin profile, available at: http://tinyurl.com/k23nha4 (last checked 3/29/2017).

90 Available at: http://tinyurl.com/jxceqp7 (last checked 3/30/2017).

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Utah



QUICK FACTS ON GÜLEN CHARTER SCHOOLS **UTAH**



NUMBER OF SCHOOLS	1
KNOWN AS	**Beehive Science & Technology Academy**
TOTAL ENROLLMENT	**297**
CHARTER VENDOR	**N/A**
TOTAL REVENUES	**$2,312,428**

KEY PEOPLE


Murat Ozoglu


Bekir Gur


Abdullah Tulek


Mehmet Ali Dogan


Zekeriya "Zack" Kiyma


Murat Biyik


Timur "Tim" Saka

RELATED INSTITUTIONS



Lotus



Sonoran, Paragon



Magnolia



Coral

Attempted Networks



Pioneer

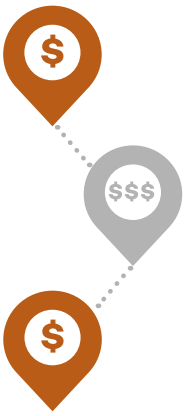


Sonoran



Coral

LOCATION ISSUES



BTSA has **changed its location three times** over the course of its charter. The second location proved to be extremely detrimental to BTSA's ability to operate in the black, largely because the lease's rent was high and escalated continuously. The lease also required BTSA to pay for expensive safety systems the building was lacking. One of the conditions of the State Charter Board's renewal in 2010 was that BTSA find a more affordable location, which required BTSA to incur a hefty financial penalty to break the second location's lease.

H-1B VISA APPLICATIONS

40 H-1B

H-1B VISA APPLICATIONS 2001 to 2016



2005-2009: Over **1/3** of Beehive's teaching staff were on active H-1B visas paid for by the school.



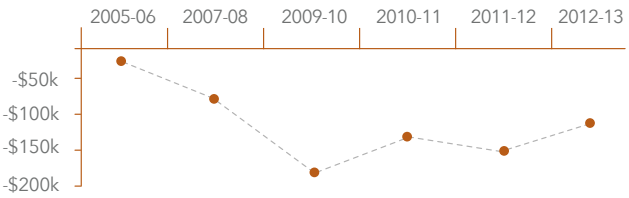
Fifty cents on every dollar was spent on textbooks paying for immigration costs, or approximately **$46,000** over the four-year period.

FINANCIAL ABUSE

Audits and investigations uncovered **systemic financial abuse** at BTSA that is endemic to other Gülen Organization charter networks.



FINANCIAL DEFICITS



All figures based on available data for 2015-2016 academic year.

Quick Facts

- Region: Western
- School Names (known as): Beehive Science & Technology Academy
- Total # of Schools in State: 1
- Total Student Enrollment 2015-2016: 297[1]
- Charter Holder/Governing Board(s):
- Beehive Educational Services
  - Organized as a Non-profit with 501(c)(3) status
  - Runs 1 school
- Charter Management Services Vendor: N/A
- Regional Gülen Organization Oversight Entity: Accord Institute for Education
- Regional Sister Networks: Sonoran (AZ), Paragon (AZ); Coral (NV); Lotus (CO); Magnolia (CA). Attempted Networks: Pioneer (OR); Sonoran (HI); Coral (WA)[2]
- Total Revenues for 2015-2016 school year: $2,312,428[3]
- Utah Network Founders:
  - Murat Ozoglu: Ozoglu received his PhD at Utah State, along with Bekir Gur, in education. Gur and Ozoglu have collaborated on many papers and have both since returned to Turkey.[4] Ozoglu now works at Tubitak, a known Gülenist organization within Turkey.[5]
  - Bekir Gur: While Gur was affiliated with the Gülen Organization within the United States during his tenure on the Beehive board. He has changed his affiliations since leaving Utah for Turkey, where he regularly writes and provides interviews on the dangers of the Gülen Organization within the U.S., in Turkey, and around the world.[6] Gur has recently written articles discussing Gülen's links to the July 2016 coup attempt, Gülen terrorist organization FETO, and President Erdogan's efforts for Gülen's extradition. Gur currently works for the anti-Gülen SETA Foundation in Turkey.[7]
  - Abdullah Tulek: Tulek, like Gur, Dogan, and Ozoglu, has since returned to Turkey and was recently employed at Aselsan, a Turkish defense contractor.[8] In early March of 2017, 84 individuals were arrested from Aselsan due to affiliation with Gülen and the attempted July 2016 coup.[9]
  - Mehmet Ali Dogan: Beehive founding board member Dogan was later tried and imprisoned for his membership in Gülen's terrorist organization within Turkey in 2015.[10]

1 Student enrollment and demographic data available at: http://tinyurl.com/mo6qf3f(last checked 3/24/2017).

2 Coral Academy of Science Application that was later denied by the Washington State Charter Commission available at: http://tinyurl.com/hvytvse (last checked 2/1/2017).

3 Total revenues available at: http://tinyurl.com/jws3cxh (last checked 3/24/2017).

4 Ozoglu's Curriculum Vitae, available at: http://tinyurl.com/mduaw7t (last checked 3/24/2017).

5 Article discussing Tubitak, available at: http://tinyurl.com/ljkbdrx (last checked 3/24/2017).

6 For a fascinating interview in Spanish with Gur regarding the Gülen Organization within the U.S. and how it uses American schools, see http://tinyurl.com/lqa4ous (last checked 3/24/2017) (translated with Google).

7 See Gur's personal webpage with articles written about Gülen, available at: http://tinyurl.com/mdtzeno (last checked 3/24/2017).

8 See Tulek work information, available at: http://tinyurl.com/mmq4yr9 (last checked 3/24/2017).

9 Article discussing Aselsan arrests, available at: http://tinyurl.com/mo3tcc9 (last checked 3/24/2017).

10 See article listing Dogan as a suspect in FETO, available at: http://tinyurl.com/lkdysza (last checked 3/24/2017) (translated with Google).

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- Zekeriya "Zack" Kiyma: Principal at BTSA (UT); loaned Beehive $25,000 in 2006; now affiliated with Gülenist research institution Tubitak,[11] like fellow board member Ozoglu, and a professor within Turkey.
- Murat Biyik: Math teacher at Sonoran Science Academy (AZ); Vice Principal at Beehive (UT)[12]; then Magnolia (CA); then Accord (CA), and now is back at Beehive (UT).[13] Biyak made a $61,000 donation to Beehive while Vice Principal,[14] comprising almost twice his salary, and appears to have forgiven that debt prior to being hired as principal in 2010.
- Timur "Tim" Saka: Openly Gülenist,[15] founder and start-up coordinator for Lotus School for Excellence,[16] then left to found and teach at the Beehive charter network (UT),[17] became principal in the Magnolia (CA) network,[18] and now serves as the events coordinator for the Gülenist cultural association Peace Islands Institute and director of the Turkish Cultural Center in Syracuse, NY leading junkets to Turkey for local politicians.[19]

Overview

As of the 2016-2017 school year, Utah has only 1 Gülen Organization charter school in operation. Beehive Science & Technology Academy ("BSTA") is overseen by Beehive Educational Services ("Beehive"), a non-profit governing board of directors in operation since 2005. Beehive also contracts with Accord Institute for Educational Research ("Accord"), the corporate entity responsible for the Western region of the Gülen Organization charter networks, allegedly for additional educational management services for the school. Beehive attempted to expand its network in 2007-2008 by filing a petition for a BTSA satellite campus in West Valley City, but the petition was denied.[20]

School	Operation	Student Demographic Data*	Authorizer	Governing Board
Beehive Science & Technology Academy 830 E 9400 S, Sandy, UT 84094	2005-present	02% ELL 39% FRL 16% SWD 01% African American 70% Caucasian 12% Hispanic	Utah Board of Education	Beehive Educational Services

**Data taken from 2015-16. "ELL" indicates English language learners, "FRL" indicates students eligible for free/reduced lunch, and "SWD" indicates students with disabilities.*[21]

11 List of Tubitak journal editors listing Kiyma, available at: http://tinyurl.com/lqlq2sj (last checked 3/24/2017).

12 See 2008 990 form for Beehive listing Biyak as the vice principal, available at: http://tinyurl.com/zjoq9nx (last checked 2/14/2017).

13 Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

14 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

15 http://tinyurl.com/jhdrwhq (last checked 2/9/2017).

16 Aurora Public Schools board meeting minutes 2005, available at: http://tinyurl.com/zynyejb (last checked 2/9/2017).

17 Pictures from 2006 event with Tim Saka's class from Beehive, available at: http://tinyurl.com/kngjyh (last checked 3/23/2017).

18 Saka was the principal at MSA-Santa Clara, see annual report submitted by Saka, available at: http://tinyurl.com/mruej3s (last checked 3/23/2017).

19 For discussion of Saka, see Ed Griffin-Nolan, Exerting Influence, The Syracuse New Times (June 25, 2014), available at: http://tinyurl.com/zp264kc (last checked 2/9/2017).

20 State Agenda, available at: http://tinyurl.com/lpdo2ce (last checked 3/21/2017); Beehive Minutes, available at: http://tinyurl.com/m56uled (last checked 3/21/2017).

21 Student enrollment and demographic data available at: http://tinyurl.com/mo6qf3f (last checked 3/24/2017).

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A History of Strategic Ambiguity and Conflicting Interests

Beehive Educational Services ("Beehive") was formed in 2005 as a non-profit organization whose charitable purpose was to operate Beehive Science & Technology Academy ("BTSA"), which also opened in 2005. Before Beehive had the chance to replicate BTSA and open additional campuses throughout the state, Kelly Wayment, the one non-Turkish board member on the Beehive board, began asking questions about the school's connections to Gülen.[22] Wayment became concerned when he noticed that the governing board was dominated by Turkish men who voted together in a bloc, that the school's administration was 100% Turkish, and that over 50% of the school's teaching staff were Turkish at the time.[23] When a highly regarded American teacher lost his job without reason, Wayment discovered that the Turkish principal had not made the decision, but rather BTSA's vendor, Accord.[24] Accord had been hired to provide curriculum services and professional development, and so Accord's unexpected control over BTSA's staffing decisions caused Wayment to probe further.[25] Wayment's personal investigation uncovered Beehive's extensive connections to other Gülenist entities, as well as the markers we identify in our research for a Gülen Organization charter school, which led him to contact the Utah State Charter Board, BTSA's authorizer. By this time, Wayment had been removed from the Beehive board. The State Charter Board conducted an investigation to ensure that BTSA was not proselytizing or preaching Islam to its students,[26] its chief concern, but found no evidence of direct proselytization.

While the State Charter Board claimed that BTSA's ties to Gülen were based on circumstantial evidence, it did find evidence of chronic financial mismanagement.[27] The State Charter Board found that BTSA utilized its limited funds to pay for the immigration of Turkish individuals instead of needed textbooks and classroom materials and operated at a continuous deficit. BTSA subsisted on extensive loans from its staff (principal Zekeriya Kiyma and vice principal Murat Biyik), board members, its vendor Accord's CEO Suleyman Bahceci, and other Turkish individuals associated with Magnolia (CA).[28] In fact, one year Vice Principal Biyik loaned the school over $61,000, almost double his annual salary of $34,000.[29] Based on the school's chronic financial distress, the State Charter Board voted to non-renew BTSA's charter in 2010, which Beehive then appealed.[30]

> ***"BTSA utilized its limited funds to pay for the immigration of Turkish individuals instead of needed textbooks."***

22 For an account of Wayment's statements regarding BTSA, see Stuart, Elizabeth, Islamic Links to Utah's Beehive Academy Probed, Deseret News, June 15, 2010, available at: http://tinyurl.com/2b7dmlc (last checked 3/23/2017).

23 Id.

24 Id.

25 Id.

26 Id.

27 Id.

28 Loan information taken from Beehive's IRS 990 forms, available at: http://tinyurl.com/zjoq9nx (last checked 3/23/2017).

29 Biyik loan and salary information available from Beehive 990 forms for the years 2007 and 2008, available at id.

30 Winters, Rosemary. *State charter board votes to close Beehive academy*. 29 April 2010. Available at: http://tinyurl.com/j8fmet4 (last checked 3/14/2017).

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Political backlash at the State Charter Board's denial resulted in a legislative audit of the State Charter Board's own policies and procedures, particularly with regards to its handling of the BTSA non-renewal. The audit found that the State Charter Board's standards for its authorized charters' financial management were vague, and that it did not properly apply consequences to Beehive for its issues with financial performance.[31] The State Charter Board ultimately reversed its decision despite BTSA's objectively poor financial performance and reinstated BTSA's charter contract with extensive conditions.[32]

Prior to 2010, Beehive was like most Gülen charter school governing boards we researched and documented throughout the U.S., with Turkish Gülenists occupying every seat. After the State's conditional renewal, the Beehive governing board composition changed drastically, with the State requiring longstanding Gülenist board members to be replaced by a mix of parents and members of the community. As a result, Beehive has not had a Gülenist Turkish supermajority or majority on the governing board since its 2010 renewal, and its financial conditions have significantly improved. However, while the Beehive governing board is no longer under direct Gülenist control, the school itself retained its Gülenist administration, who continue to contract on the school's behalf with the Western region's key Gülenist vendors, such as Accord, Apex, Ramson Contractors, Promotion & Beyond, and others.[33] While BTSA is under more scrutiny than other Gülenist charter schools due to the controversy surrounding its charter renewal in 2010, our research shows that BTSA is still able to serve the Gülen Organization in two key ways: 1) as a willing customer for the what we believe to be purposefully overpriced Gülenist vendors; and 2) as an employer and haven for Gülenist teachers and administrators on H-1B visas.

The Gülen Organization has been largely unable to grow in Utah due to Beehive's rocky beginnings, which is why the network in Utah is underdeveloped in comparison to its regional sister networks Magnolia in California and Sonoran in Arizona. Utah, like Colorado, should be watched closely to ensure that new Gülenist charter school petitions are not put forward under separate governing boards with new branding.

Financial Issues

Beehive/BTSA is audited annually as required by Utah state law, and the school's finances were additionally scrutinized during the investigation leading up to the State Charter Board's initial non-renewal and the legislative audit. These audits and investigations uncovered systemic financial abuse at BTSA that is endemic to other Gülen Organization charter networks. Like other Gülen Organization charter networks, we believe BTSA's pattern of financial abuse allows the Gülen Organization the opportunity effectively to siphon public funds out of the network's charter schools and funnel them into the hands of related Turkish vendors for suspected use by the Gülen Organization. Unfortunately, the State Charter School Board only started collecting financial documentation and annual audits routinely in 2010 onward, which were conducted after the Gülenists lost control of the Beehive governing board. There is some additional information for BTSA from its first charter term (2005-2010) due to the State Charter Board's investigations and the state legislative audit, however. From BTSA's inception in 2005 forward, our examination and research of the reports lead us to the findings of financial abuse and impropriety include:[34]

[31] Utah State Audit of the State Charter School Board, available at: http://tinyurl.com/k63p87a (last checked 3/24/2017).

[32] Feb 2010 board meeting of the State Charter Board, minutes available at: http://tinyurl.com/kknwxb5 (last checked 3/24/2017).

[33] BTSA's transactions, which include amounts paid to these vendors over the years, are available at: http://tinyurl.com/kjjntyx (last checked 3/24/2017).

[34] BTSA's 2010, 2011, 2012, 2013, 2014, 2015, and 2016 audits are available at: http://tinyurl.com/nyqc8oh (last checked

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- Insufficient Financial Controls and Lack of Transparency
  - 2005-06: Expenditures were not tracked by function
  - 2005-09: Failure to turn in monthly or quarterly financial reports to State Charter Board
  - 2005-09: Failure to account for enrollment fluctuations in budgeting
  - 2005-09: BTSA received financial condition notes each audited year that required State Charter Board attention
  - 2009-10: Checks received were not documented regularly
  - 2013-14: Failure to implement a Government Records Access Management Act (GRAMA) policy
  - Failure to Meet Enrollment Targets
  - 2006-10: Beehive's four-year average of the percent achieved of projected enrollment targets is 64%, meaning BTSA only hit, on average, 64% of the enrollment numbers they projected and budgeted for.

- Poor Use of Resources
  - 2005-09: Excessive spending resulted in ongoing deficits
  - 2005-10: Excessive facility costs
  - 2005-06: Ended first year of operations at a $27,226 net deficit
  - 2007-08: Ended year at a $70,532 net deficit
  - 2008-09: Ended year at a $186,442 net deficit
  - 2009-10: Ended year at a $128,229 net deficit
  - 2010-11: Ended year at a $151,599 net deficit
  - 2011-12: Ended year at a $116,772 net deficit
  - 2011-12: Terminated its lease prior to its expiration and paid a $127,500 penalty
  - 2012-13: Ended year at a $127,378 net deficit

- Dependence on Loans from Staff, Board Members, Vendors
  - 2005-09: Dependence on high interest personal loans from individuals and staff members
  - 2005-06: $24,000 loan from Principal Zekeriya Kiyma
  - 2009-10: $58,000 loan "forgiven" from an unnamed former employee, perhaps Biyik who became principal the following year
  - 2009-10: $184,210 loan from the Utah State Office of Education

- Extensive Use of the H-1B visa program
  - 2005-2009: Over 1/3 of Beehive's teaching staff were on active H-1B visas paid for by the school. Beehive spent fifty cents on every dollar it spent on textbooks paying for immigration costs, or approximately $46,000 over the four-year period.

Bond Financing

Beehive and BTSA do not have any known municipal bonds.

3/24/2017). Other information was taken from Beehive's IRS 990 forms, available at: http://tinyurl.com/zjoq9nx (last checked 3/23/2017); BTSA's 2006 financial statement, available at: http://tinyurl.com/m2v7taa (last checked 3/24/2017); the Utah Legislative Audit, available at: http://tinyurl.com/k63p87a (last checked 3/24/2017); and Stuart, Elizabeth, Utah's Beehive Science & Technology charter school shut down because of financial problems; appeal is planned. Deseret News. 2 May 2010, available at: http://tinyurl.com/gwmu5kz (last checked 3/24/2017).

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Real Estate

BTSA has changed its location three times over the course of its charter. The second location proved to be extremely detrimental to BTSA's ability to operate in the black, largely because the lease's rent was high and escalated continuously. The lease also required BTSA to pay for expensive safety systems the building was lacking. One of the conditions of the State Charter Board's renewal in 2010 was that BTSA find a more affordable location, which required BTSA to incur a hefty financial penalty to break the second location's lease. BTSA's financial condition has gradually improved under its new board leadership and in its new facility.

None of the three locations utilized by BTSA over its charter terms appear to be owned by members of the Gülen Organization, although this information is admittedly more difficult to ascertain for for-profit entities that are not required to post ownership or governance information publicly.[35] As renting properties owned by Gülenist companies and/or individuals who then overcharge the school in rent is a prime method for the Gülen Organization to extract public funds from its charter schools (*see, e.g.,* Concept (OH), Dove Science (OK), and Harmony (TX)), more research is needed to rule out whether the owners of BTSA's three locations are truly unrelated to the Gülen Organization.

[35] The first location, 3098 South Highland Drive, Suite 100, Salt Lake City, UT 84106, was owned by Highland Park Plaza Condominium Association, Inc. The second location, 1011 East Murray Holladay Road, Salt Lake City, UT 84117, was owned by RSLM 1011, LLC, which is the entity with the least information about it publicly available. The third and current location, 830 E 9400 S, Sandy, UT 84094, is owned by FPA Sandy Mall Associates, LLC.

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Excessive Use of the H-1B Visa Program

Like other Gülen Organization charter networks, Beehive utilizes the H-1B visa program to immigrate Turkish Gülenists into the United States for employment in the schools. From 2001-2016, Beehive filed at least 40 H-1B visa applications for foreign workers.[36] While Beehive's leadership has stated that these H-1Bs are only to fill shortage areas for math and science teachers,[37] these applications were filed for such positions as: Instructional coordinators, English language teachers, Administrators, and a Physical Education teacher.

Beehive uses the same immigration attorneys to file and process their H-1B applications as other known Gülen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

- Remzi Kulen. Beehive used Kulen, a New York-based attorney, to file numerous H-1B applications. Kulen also filed applications for:
  - Concept Schools (OH, IL, MO, IN, MI, MN)
  - Horizon Science (OH, IL)
  - Noble Academy (OH)
  - Gateway (MO)
  - Pioneer (MA)
  - Niagara Foundation (IL)
  - Young Scholars (PA)
  - Golden Generation Workshop Center (PA)
  - Blue Ocean Construction (FL)
  - Academy of Science, Syracuse, Buffalo (NY)
  - Arts and Science, Bergen, Passaic (NJ)[38]

Scandals, Investigations, & Notable Activities

Like the rest of the Western region, Beehive is implicated by the information released from a Turkish whistleblower named Yunus Avcu that came forward and provided interviews to both the media and Amsterdam & Partners regarding his work with Accord. Avcu, formerly employed by Accord first in Arizona to work with SSA-Phoenix, and then later in Colorado, provided testimony regarding Accord's true purpose and his work with both SSA-Phoenix and Lotus. While this testimony primarily concerned wrongdoing in Arizona and Colorado, Avcu also implicated current Accord employees in the wrongdoing and discussed liberally what Accord's true purpose for the Western region of the Gülen Organization was.

Avcu stated that as an accountant employed by Accord, he gathered *tuzuk* funds from each of Lotus's Turkish H-1B employees in cash each month and delivered them in a briefcase to Accord's headquarters in California. Despite what Accord alleges it provides in the manner of educational services, Avcu confirmed that Accord was more focused with arranging trips to Turkey for American dignitaries, ensuring that its Gülenist charter schools maintained Turkish leadership at the school level, and requiring that Turkish leadership to regularly hire H-1B Turkish teachers in order to keep the cash flow from these teachers' forced tithing through *tuzuk* payments high. As an H-1B employee recruited from Turkey himself, Avcu stated that he had to turn over as much as 40% of his salary, which he said went to fund Gülen himself.[39] Avcu's account of Accord's true operations, the systemic

[36] Beehive filed H-1B applications under a variety of names, collectively filing 40 H-1B applications: http://tinyurl.com/m8nlbag (2); http://tinyurl.com/lkful4w (12); http://tinyurl.com/k7ze8by (1); http://tinyurl.com/k4esj9h (25).

[37] See article for comments by Beehive's Business Manager regarding H-1B usage, available at: http://tinyurl.com/2b7dmlc (last checked 3/23/2017).

[38] List of entities represented by Remzi Kulen, available at http://tinyurl.com/gptwx5x (last checked 3/21/2017).

[39] Jason McGahan, Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government? LA Weekly (Dec. 1, 2016), available at: https://tinyurl.com/jxceqp7 (last checked 2/9/2017).

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exploitation of Turkish H-1B visa employees through the *tuzuk*, and the system rigged in favor of hiring Turkish nationals through the H-1B visa program to ensure more manpower and funding for the Gülen Organization's hidden agenda is substantiated by the testimony of other Turkish individuals who have left the Gülen Organization, such as Mustafa Addi in the Concept network.

Notable Turkish Vendors

- Accord Institute for Education Research (Accord): In addition to Beehive, Accord contracts with each of the Western Gülen Organization charter networks and allegedly provides them with the same educational and operational services, including financial services, for a fee. Accord has the greatest overlap in ties with Magnolia as they are both headquartered in the same state, but Accord also provides services to Daisy/Sonoran (AZ)[40], Coral (NV), Lotus (CO), Magnolia (CA), and was listed as a partner for failed schools/regions, as well, including Pioneer (OR) and Mokapu STEM (HI). Yunus Avcu, a Turkish Accord employee first hired to work for SSA-Phoenix, provided detailed information about how Accord functions as a regional oversight entity primarily focused with operating the Gülen Organization.

- Apex Educational Services/Apex Systems & Technology Solutions (Apex): Magnolia has utilized Apex for IT services paid for by the federal E-Rate grant program. Daisy also utilizes Apex for IT services paid for through E-Rate, and Concept Schools (Midwest) is currently under federal investigation for allegedly defrauding the E-Rate program by using affiliated vendors with a system of kickbacks to Concept's management. Apex may also be an affiliated vendor with Daisy/Sonoran (AZ); a reporter found tax documentation linking Apex as an owned property/asset of Daisy and Sonoran, though this could not be independently verified.[41]

- Ramson Contractors: Ramson is a Turkish-owned and operated construction vendor utilized by Beehive, as well as Magnolia (CA) and Lotus (CO).[42] Like the Gülen Organization charter schools, Gülen Organization vendors also shuffle their employees around the networks. For example, Levent Elibal worked first for Ramson Contractors, then left to work as a director for Quality Builders of Midwest, the construction vendor that works primarily with Concept Schools in the Midwestern Gülen Organization region.[43] According to testimony provided

[40] SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at http://tinyurl.com/j34uhb3 (last checked 2/1/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation dba Sonoran Science Academy – Phoenix, Sonoran Schools (Mar. 3, 2016), available at http://tinyurl.com/hprollg (last checked 2/1/2017); Tim Steller, ***Sr. Reporter: What does $364k in Tax Money Buy These Charter Schools***, Arizona Daily Star (Oct. 22, 2010), ***available at*** http://tinyurl.com/ht36ax6 (last checked 2/1/2017) (discussing payments of over $350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at http://tinyurl.com/z9ft448 (last checked 2/1/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, ***Hidden Agenda?***, Tucson Weekly, (Dec. 31, 2009), ***available at*** http://tinyurl.com/zgwjkak; Magnolia Educational and Research Foundation, ***Magnolia Science Academy – Santa Clara: Countywide Charter School Petition***, Santa Clara County Office of Education , at 17, ***available at*** http://tinyurl.com/hwg8jj8 (last checked 2/1/2017). The Accord Education website even includes a promotional blurb from the CFO of "Sonoran Schools" with other Gülen schools. Accord Education, ***available at*** http://tinyurl.com/gkpvelo (last checked 2/1/2017).

[41] http://tinyurl.com/kfl5oar (last checked 1/25/2017).

[42] See payment to Ramson from Lotus for renovations, 2013, available at: https://tinyurl.com/zzpbav6 (last checked 2/9/2017).

[43] See Linkedin profile for Levent Elibal, available at http://tinyurl.com/zu3r3nv (last checked 11/23/2016).

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by the Accord whistleblower Yunus Avcu, Accord required Lotus to use Ramson despite the fact it was based in California for construction so that Ramson could purposefully overcharge Lotus to skim money from the school. This statement can be substantiated from reviewing Lotus's spending—in 2007, Lotus's authorizer noted that Lotus overpaid its construction company—paying $340,000 instead of the budgeted $120,000.[44] Avcu also reported that Ramson utilized undocumented workers in the area from Tajikistan for its jobs. Authorities should investigate whether earlier payments to Ramson in 2010 by Beehive were also in excess of the services received.

- Promotion and Beyond: This Turkish-owned company provides school uniforms and has the same registered agent, Hakan Kaya, as Ramson Contractors.[45] Beehive uses Promotion and Beyond for its school polo shirts,[46] as does Lotus (CO),[47] Coral (NV),[48] and Paragon (AZ).[49] According to the Accord whistleblower Avcu, Lotus was also forced to use this company by Accord so that the company could purposefully overcharge Lotus to put more money into the Gülen Organization.

- Bizwe Travel: Beehive paid $7,945 in 2010 to Bizwe, presumably for international travel services to Turkey. Bizwe, now known as Eco International Travel, is a travel agency based in Texas operated by Turkish businessman Veli Baysal.[50] Baysal also operates Abh Realty and Management,[51] an entity affiliated with Harmony (TX), and Baysal is a member of the Houston-Istanbul Sister City Association alongside notable Texas Gülenist, Kemal Oksuz.[52] Like most vendors shared amongst the Gülen Organization, it makes little sense for a Utah charter school to utilize a travel agency located in Texas.

Gülenist Cultural and Business Organizations Active in State

- Pacifica Institute-Utah (formerly known as Multicultural Arch Foundation): Global Cultural Connections is a non-profit Gülenist cultural association d.b.a. the Pacifica Institute with branches throughout the Western region, including California, Oregon, Washington, Nevada, Arizona, Hawaii, and Utah.[53] The Pacifica Institute sponsors talks and conferences on Fethullah Gülen and his teachings.[54] Pacifica is responsible for organizing and paying for trips for state lawmakers to

44 See Aurora board minutes from the May 22, 2007 meeting, available at: http://tinyurl.com/gmsjseo (last checked 2/15/2017).

45 Agent information available at: https://tinyurl.com/jupss5g and https://tinyurl.com/hm3l9ey (last checked 2/9/2017).

46 http://tinyurl.com/jszcdq3 (last checked 2/9/2017).

47 Checks to Promotion and Beyond are seen throughout Lotus's check registers, see e.g. December 2012, available at: http://tinyurl.com/hecpmbz (last checked 2/9/2017).

48 http://tinyurl.com/jtp85lc (last checked 2/9/2017).

49 http://tinyurl.com/zgjq5u5 (last checked 2/9/2017).

50 Texas business registry records, available at: http://tinyurl.com/leormle (last checked 3/23/2017).

51 Abh information, available at: http://tinyurl.com/mcxl2ly (last checked 3/23/2017).

52 Oksuz is best known for running TDM Construction, Harmony's preferred vendor exposed by the NY Times, and also orchestrating the 2013 trip to Azerbaijan for US members of Congress that resulted in a Congressional Ethics Commission investigation via the Turquoise Council for Americans and Eurasians. Oksuz is discussed extensively in the Texas narrative.

53 *See* information regarding Global Cultural Connections d.b.a. Pacifica Institute, also available at: http://pacificainstitute.org/mission-vision-statement/.

54 *See* Global Cultural Connections 990 form listing events, available at: http://tinyurl.com/j8ae3xp (last checked 3/14/17).

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Turkey.[55] Pacifica VP Attila Kahveci told USA Today that the trips were intended to serve as a bridge between Americans and Turks, and that they had no ulterior motive despite the fact that the Gülen Movement has sponsored thousands of trips costing millions of dollars across the U.S.[56] Suleyman Bahceci, Harmony founder (TX) and former Magnolia and Accord CEO, donated money to Beehive and also donated $164,644.00 to Pacifica, which comprised an outrageous 70% of his stated salary from Magnolia that year.[57] This organization is a member of TAA/WATC. The Multicultural Arch Foundation/Pacifica Institute Utah have specifically been named as Gülenist cultural associations by the Turkish media.[58]

- Turkish American Alliance/West American Turkic Council (TAA/WATC): This organization is a non-profit umbrella organization over several subsidiary Turkish organizations. TAA/WATC uses the same Gülenist vendors noted above as Beehive, and like Pacifica, has also organized and paid for congressional trips to Turkey. In fact, TAA/WATC sponsored the 2013 trip to Azerbaijan that resulted in a Congressional Ethics investigation alongside the Turquoise Council for Americans and Eurasians (TCAE) headed by Harmony (TX) vendor, Kemal Oksuz.[59]

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is quite common for the charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between education management vendors. This is just a small number of individuals with these overlapping ties throughout the Western region, which further demonstrates the region's interconnections.

- Murat Biyik: Math teacher at Sonoran Science Academy (AZ); Vice Principal at Beehive (UT)[60]; then Magnolia (CA); then Accord (CA), and now is back at Beehive (UT).[61] Biyak made a $61,000 donation to Beehive while Vice Principal,[62] comprising almost twice his salary, and appears to have forgiven that debt prior to being hired as principal in 2010.

- Mustafa Keskin: Board Member Dialog/ MERF Magnolia (CA); 2008 Pioneer Technology Charter School Petitioner

55 Richman, Josh. *Mike Honda took Trip to Turkey on Iffy Group's Dime,* San Jose Mercury News, 30 October 2015 (Discussing Honda's trips to Turkey funded by Pacifica). Available at: http://tinyurl.com/z94od74 (last checked 3/14/17).

56 Whyte, Liz E. Turkish Opposition Subsidizes Scores of State Lawmakers' Trips, USA Today, February 9, 2017, available at: http://tinyurl.com/ky5be2q (last checked 3/20/2017).

57 *See* 2012 990 for Magnolia showing Bahceci's salary at $120,000.00, also available at: http://tinyurl.com/z33bpsv and the 2012 990 for Global Cultural Connections showing Bahceci's donations in toto and for the year 2012 as $83,546.00, available at: http://tinyurl.com/j8ae3xp (last checked 3/14/17).

58 For article discussing Gülenist cultural associations, see http://tinyurl.com/gvrpglb (last checked 3/24/2017) (Translated with Google).

59 Singer, Paul. Group Linked to Ongoing Probe Paid for House Travel This Year, USA Today, June 24, 2015, available at: http://tinyurl.com/l24qrjc (last checked 3/20/2017).

60 See 2008 990 form for Beehive listing Biyak as the vice principal, available at: http://tinyurl.com/zjoq9nx (last checked 2/14/2017).

61 Tim Steller, *Foreigners Fill Ranks of Local Charter-School Chain*, Arizona Daily Star (Apr. 25, 2010) available at: http://tinyurl.com/jlpgo4a (last checked 2/2/2017).

62 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

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(OR)[63]; Board Secretary of Accord Education (CA); Board Member of Beehive, loaned Beehive (UT) $49,000.[64]

- Muhammet "Frank" Erdogan: Principal for BTSA (UT); Teacher and Principal for Magnolia (CA);[65] quoted as supporting Gülen during his tenure at BTSA.[66]

- Timur "Tim" Saka: Openly Gülenist,[67] founder and start-up coordinator for Lotus School for Excellence,[68] then left to found and teach at the Beehive charter network (UT),[69] became principal in the Magnolia (CA) network,[70] and now serves as the events coordinator for the Gülenist cultural association Peace Islands Institute and director of the Turkish Cultural Center in Syracuse, NY leading junkets to Turkey for local politicians.[71]

Notable Press Coverage and Research Regarding the Utah Gülenist Network

- McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* (Containing interview with Yunus Avcu, Accord whistle blower). LA Weekly. 1 December 2016.[72]

- Beauchamp, Scott. *120 American charter schools and one secretive Turkish cleric*. The Atlantic. 12 August 2014. Available at: http://tinyurl.com/z9vy9a9 (14 March 2017).

- Parker, Ray. *Charter schools have lowest, highest grad rates in Utah*. The Salt Lake Tribune. 10 January 2013. Available at: http://tinyurl.com/z5rg652 (14 March 2017).

- Winters, Rosemary. *State board pursues financial standards for charters*. (Reviewing BTSA's improved financial conditions). 15 December 2010. Available at: http://tinyurl.com/z8mllrq (14 March 2017).

- Winters, Rosemary. *Utah charter schools in need of greater oversight, audit says*. The Salt Lake Tribune. 21 October 2010. Available at: http://tinyurl.com/jr2hd3u (14 March 2017).

- Winters, Rosemary. *State board reverses decision to close charter school*. The Salt Lake Tribune. 10 June 2010. Available at: http://tinyurl.com/z2pxwnb (14 March 2017).

- Stuart, Elizabeth. *Islamic links to Utah's Beehive Academy probed*. Deseret News. 1 June 2010. Available at: http://tinyurl.com/2b7dmlc (14 March 2017).

63 Petition available at: http://tinyurl.com/lz9vn8y (last checked 3/20/2017).

64 http://tinyurl.com/zkkb8yy (last checked 3/20/2017).

65 Erdogan's teaching credentials in California are available at: http://tinyurl.com/kb3y5sb (last checked 3/24/2017).

66 http://tinyurl.com/hknxz36 (last checked 3/24/2017).

67 http://tinyurl.com/jhdrwhq (last checked 2/9/2017).

68 Aurora Public Schools board meeting minutes 2005, available at: http://tinyurl.com/zynyejb (last checked 2/9/2017).

69 Pictures from 2006 event with Tim Saka's class from Beehive, available at: http://tinyurl.com/kngjyhf (last checked 3/23/2017).

70 Saka was the principal at MSA-Santa Clara, see annual report submitted by Saka, available at: http://tinyurl.com/mruej3s (last checked 3/23/2017).

71 For discussion of Saka, see Ed Griffin-Nolan, Exerting Influence, The Syracuse New Times (June 25, 2014), available at: http://tinyurl.com/zp264kc (last checked 2/9/2017).

72 Available at: http://tinyurl.com/jxceqp7 (3 March 2017).

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- Stuart, Elizabeth. *Utah's Beehive Science & Technology charter school shut down because of financial problems; appeal is planned*. Deseret News. 2 May 2010. Available at: http://tinyurl.com/gwmu5kz (14 March 2017).

- Winters, Rosemary. *State charter board votes to close Beehive academy*. 29 April 2010. Available at: http://tinyurl.com/j8fmet4 (14 March 2017).

- Stewart, Kirsten. *Charter school controversy prompts audit of state board*. The Salt Lake Tribune. 30 November 2009. Available at: http://tinyurl.com/zln4vlp (14 March 2017).

- Stewart, Kirsten. *Probe finds no proof charter school has ties to Islam*. The Salt Lake Tribune. 12 November 2009. Available at: http://tinyurl.com/h6oxezx (14 March 2017).

- Stewart, Kristen. *Utah charter school's ties to Turkey draw scrutiny*. (Noting ties between Utah's Beehive network and Magnolia). The Salt Lake Tribune. 17 July 2009.[73]

- Schencker, Lisa. *Charter schools: Expansions, new facilities could bring 50 percent student boost*. (Discussing failure to approve satellite BTSA campus). The Salt Lake Tribune. 25 October 2008. Available at: http://tinyurl.com/h5tju92 (14 March 2017).

[73] Available at: https://tinyurl.com/hknxz36 (3 March 2017).

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Individual Designation	Role (Turkish school employee, school employee, affiliated Turkish individual, parent, student)	Region, State, Charter School	Core Subject of Testimony	Student Cheating, Testing Fraud, Grade Changing	Treatment of and by unqualified H-1B teachers from Turkey	Forced Tithing of H-1B teachers from Turkey, Tuzuk agreement	Use of Affiliated Turkish Vendors	Connections to Fethullah Gülen	
Parent 1	Parent	Western, California, Magnolia Science Academy - 2	Special Education	Yes	Yes		Yes	Yes	
Turkish Teacher 1	Turkish Teacher	Western, Colorado, Lotus School for Excellence	Tithing		Yes	Yes	Yes	Yes	
Turkish Individual 1	Affiliated Turkish Individual	Western, Arizona, Accord Education	Tithing		Yes	Yes	Yes	Yes	
Parent 2	Parent	Southern, Florida, Orlando Science Academy	Cheating	Yes	Yes				
Teacher 1	Teacher	Mid-West, Illinois, Science Academy of Chicago, Chicago Math and Science	Misuse of Public Funds		Yes		Yes		

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes		Yes	Yes	"Some of the Turkish teachers mentor this small group of students for the Congressional Award. The teachers hand pick certain students, and they always take the same group. The really only end up paying attention to this one group of students and its not open to everyone. This forms an "inner circle" and it makes it hard for the other students to get attention."	
	Yes	Yes	Yes		"The Turkish teachers at Lotus, all have a "scaled" salary based on whether they are married or have kids. They kick back a significant portion of their salaries to the movement every month. It is mandatory, but appears to be a donation or other fit. The pressure if significant."	"Hizmet would review emails and computers every other month, at the school and sometimes go into peoples homes. They were looking for suspicious activity from the movement members."
	Yes	Yes			"The organization was taking the money from the people. If you don't pay this money, they don't employ you. If you reject or refuse to pay this, you have to go back to Turkey."	"In this system, we have no paperwork or anything like that. The amounts are written on an excel file is kept on a flash drive in a secure program that only people with the password can open it. They are all told to swallow the flash drives if the police or FBI were ever to ask questions."
	Yes	Yes	Yes	Yes	"Specifically with CMP, which is the college mentorship program. What CMP is, is they will go on weekends and they'll go to different houses and things like that. They'll basically study for part of the day, but they mostly hang out with them, the teachers and everybody when they get together. CMP has pretty much had the same members since I was in the sixth grade."	
	Yes	Yes		Yes	"They are not excellent English speakers, yet they are put in positions that hold a high responsibility for our students, such as Principal, Assistant Principal, Collee Counselor, Math teacher, Science teacher, Computer or Engineering teacher.... unlicensed, foreign teachers are being employed at these schools."	"CMSA has been out of stat compliance the entire school year within its special education department due to not having enough special education teachers to meet the needs of the students.'

Individual Designation	Role (Turkish school employee, school employee, affiliated Turkish individual, parent, student)	Region, State, Charter School	Core Subject of Testimony	Student Cheating, Testing Fraud, Grade Changing	Treatment of and by unqualified H-1B teachers from Turkey	Forced Tithing of H-1B teachers from Turkey, Tuzuk agreement	Use of Affiliated Turkish Vendors	Connections to Fethullah Gülen	
Employee 1	School Employee	Mid-West, Illinois, Science Academy of Chicago, Chicago Math and Science	Recruiting		Yes		Yes		
Parent 3	Parent	Eastern, Maryland, Chesapeake Science Point Charter School	Recruiting		Yes		Yes		
Parent 4	Parent	Eastern, Maryland, Chesapeake Science Point Charter School	Special Education		Yes		Yes		
Parent 5	Parent	Western, Nevada, Coral Academy of Science	Misuse of Public Funds		Yes		Yes	Yes	

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	Yes	Yes	Yes	Yes	"They have a mentorship program called IMP. They had the teachers take the kids on different trips to all these places, take them out for meals, Turkish cultural centers and plan trips to Turkey every year."	"We all know it's a Turkish run company, so that's why they kept hiring Turkish people. Since its Turkish run, they will hire Turkish people and make sure they get priority. College counselors were all Turkish, we have had 5 different Turkish principals, computer teachers were always Turkish, Turkish substitute teachers would always come in and teach for the whole year."
	Yes	Yes	Yes	Yes	"The Turkish teachers would suggest that certain students should go back to their house for tutoring but this was after the teachers had developed a close relationship with these students. It was only the Turkish teachers that were doing this "out of hours tutoring" and would invite the students to spend weekends at the school with them."	"Once my child's grades dropped the staff would send thinly veiled threats encouraging me to pull my child and send him to a different school. They explained that if my son got expelled it would be on his permanent record and it may be easier to voluntarily withdraw him before that happens."
	Yes	Yes	Yes	Yes	"My child has an ISP note explaining that he is a special education student. The Turkish guidance counselor let me know that my child would have to attend after-school counselling and social skills groups that he was meant to receive during normal school hours. The administration informed me that this was not possible because they did not have a Special Education department. My child was suspended very year by the school, usually right before a field trip so he wouldn't be able to attend."	"The disruptive students were made to leave every year. By the end of the first semester about 10 students would be forced to leave because the parents were tired of the schools threats."
	Yes	Yes		Yes	"Coral had a Turkish majority on its board. At the last meeting of the year, the board would elect the next year's members by nominating each other again, and taking a vote. At one board meeting I overheard a board member suggest that Accord would not approve taking over a new charter school in Carson city. This was the first time I understood that Accord was controlling Coral."	"My child left the school because I thought it was falling apart. It was obvious that the school was using public funds to operate a religious organization, which I believe is contrary to state law. The teachers at Coral were more concerned with test results than teaching - there was an obvious interest in the appearance of good scores."

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Teacher 2	Teacher	Eastern, New York, Syracuse Academy of Science	Recruiting		Yes		Yes	Yes	
Teacher 3	Teacher	Eastern, New York, Syracuse Academy of Science	Vendors		Yes	Yes	Yes	Yes	
Teacher 4	Teacher	Eastern, New York, Syracuse Academy of Science	Vendors		Yes		Yes	Yes	
Parent 6	Parent	Eastern, New York, Syracuse Academy of Science	Recruiting	Yes	Yes			Yes	

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes	Yes	Yes	Yes	"Every year the Turkish teachers would offer trips to Turkey to the students and some parents, but it was mostly just offered to the same select group of students. Whoever would do the science Olympiad, whoever the Turkish teachers favorite students were the ones that were asked to go. The students were hand picked for these things. Speaking of hand picking students, supposedly the school either rents or owns a lake house. I have no idea where it is but there is a lake house that the Turkish teachers use and they would take a small group of kids there periodically for weekends."	"Female teachers were treated especially bad. We had very young female teachers that were just starting out that would constantly get bullied by the Superintendent and the administration. They really get treated horribly."
	Yes	Yes	Yes	Yes	"The Turkish teachers almost seemed like servants. They had to work off their extra payment and were very easily controlled by the administration. It was almost as if they had something on them, holding something against them. They would never speak up or argue with anything. As Americans we would occasionally ask questions or speak our mind but they seemed so under the thumb of the administrators."	
	Yes	Yes		Yes	"Every year I feel like the old group of Turkish teachers left, and a new group was brought in. The Turkish teachers never lasted more than 2-3 years at the school."	"The guidance counselor just showed up one day. They had come over from Turkey but had no previous experience at a school. They even told me that their previous experience was at a bank in Turkey."
	Yes	Yes	Yes	Yes	"When I went to this Little Caesars pizza shop here in town to pick up a pizza for the track team, I recognized a young woman in there who had graduated from SAS a few years before. I sked her what happened and she said that all of the staff there are former SAS graduates. The kids cant stay in college because they are never actually prepared for college. This cant be what our tax payer dollars are paying for."	"Board meetings are held, and parents are allowed to attend, but as parents we all understood that there was our meeting, and then a secret meeting was held before hand. A meeting before the meeting of just the Turkish staff. I also don't think its right that the President of the Board is the one who sends out the meeting minutes after every meeting."

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Employee 2	School Employee	Eastern, New York, Syracuse Academy of Science	Vendors	Yes	Yes	Yes	Yes	Yes	
Teacher 5	Teacher	Eastern, New York, Syracuse Academy of Science	Recruiting	Yes	Yes		Yes	Yes	
Parent 7	Parent	Eastern, New York, Syracuse Academy of Science	Special Education	Yes	Yes		Yes		
Employee 3	School Employee	Eastern, New York, Syracuse Academy of Science	Cheating	Yes	Yes	Yes	Yes		

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes	Yes	Yes	Yes	"When I was hired I had to go through this whole formal interview process. It took multiple interviews, I had my fingerprints taken and I had to provide a copy of my diploma. This isn't how it worked for all teachers. Turkish teachers would just show up at the school out of nowhere and start right away with no formal interview process. Most of the teachers weren't even certified to teach in New York state."	"Turkish teachers always got paid more than the American teachers, and the turnover for the Turkish teachers was always really high. Once this new Turkish teacher told a group of us that he didn't think his pay was unfair because he had to give some of it back to the Turkish Cultural Center. He said that is why he got the extra money and it is not like he got to keep it."
		Yes	Yes	Yes	"This is a form of terrorism that is right underneath our noses. People know about what's going on and don't do anything about it. I think they are in too deep and the school is putting money in the right peoples pockets."	"There was a prayer room in the school that the Americans were not told about. My friend got in there one time and got a video of it. It was in the most secluded room in the building up on the third floor. It was never talked about in the school but there were prayer rugs on the floor and there were Gülen books on the shelves."
	Yes	Yes	Yes	Yes	"SAS asked parents to sign this petition to New York state asking for an increase in their enrollment, which I gladly signed. It wasn't until later that I found out that petition was actually for the school to extend their school year, because the state was giving out grants to any school who agreed to start school two weeks earlier."	"It was common that students wouldn't have enough credits to graduate so the school would change their records so they could still graduate. They would teach these bogus classes that either nothing was taught, or sometimes no real teacher was even assigned. They would put the name down of an office assistant or administrator as the teacher but no one would show up for the class."
	Yes	Yes	Yes	Yes	"I was never warned of the arrival of these new Turkish teachers. I didn't receive any CV's or applications from the Turkish teachers for the jobs they were coming in for. They would just show up at the door and the principal would tell me what job they were here to do, and ask me to make them ID cards. Most of these teachers weren't even certified to teach in New York and they all lacked the educational experience to teach these classes. A lot of them would bring their partners over from Turkey, who get random job titles assigned to them so they could collect a pay check. They wouldn't actually do any work in the school."	"As a witness, I know that they used funds that were school funds for other things that were not school related. They used the school vehicle for non-school related use. They have a camp of some sort that they were leasing or renting, out in the Adirondacks that was supposed to be for the students but for some reason it has only been used for a small group of particular students. One group for the boys and one group for the girls. I thought it was odd that parents were not aware of this type of program, and only those students that were especially requested to attend."

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Teacher 6	Teacher	Mid-West, Ohio, Horizon Science Academy - Dayton	Cheating	Yes	Yes	Yes	Yes		
Teacher 7	Teacher	Mid-West, Ohio, Horizon Science Academy - Dayton	Cheating	Yes	Yes	Yes	Yes		
Teacher 8	Teacher	Mid-West, Ohio, Horizon Science Academy - Dayton	Cheating	Yes	Yes	Yes	Yes		
Teacher 9	Teacher	Mid-West, Ohio, Horizon Science Academy - Dayton	Tithing	Yes	Yes				

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes	Yes		Yes	"I don't think parents had any idea what was going on at the school. There was great emphasis on keeping parents happy, and there was a culture of intimidation intended to discourage teachers from doing anything that could adversely affect the schools relationship with parents. Any teacher who asked too many questions was at risk of getting fired."	"I know of one student who failed the seventh grade and then had to repeat the year with the agreement with an administrator that she would be promoted to the ninth grade if she passed seventh grade during the second attempt. She indeed completely skipped eighth grade and all associated curriculum."
	Yes	Yes		Yes	"The new school was built with a bond issue. The construction was accomplished by using Turkish laborers. The bookcases were made in Turkey, the bulletin boards were made in Turkey and they were shipped to the United States. During this construction, seven large screen televisions were purchased. Most of them were all stolen at once and the School Administrator refused to call the police."	"I was told to proctor the OGT test and given no training. In fact, I was just given the master test book the day of these while I was passing out the testing materials to the students. I had to learn the procedure while the students were taking their first test. After each test day, the test materials were delivered to ********* office and were left in the office until the net day. One day ******* reiterated that I should make sure students filled in every question, because some students were not finishing all of the questions."
	Yes	Yes		Yes	"Perhaps the biggest problem with the charter school was that it encouraged students to swap in and out of other schools. If a student had bad grades or difficult behavior, they were literally asked to transfer to another charter school. The parents were brought in and told that their child would be expelled unless they transferred to another school."	"The week after the OAT testing, I went to the school on a Saturday morning in order to keep ahead of my planning, and I saw a dozen Turkish men sitting in a classroom with stacks of OAT's on their desks. The current principal brought a cup of tea and a plate of cookies to me while I worked alone in my classroom. He said that the men were simply darkening in the answers for students who wrote too lightly."
		Yes			"I never had a full class and they'd say the school had a 97% attendance rate. I guess that was an easy one to fudge. There was no oversight at all."	"I asked how some of the Turkish teachers could make as much as $46,000 when the American teachers had such a higher workload. The American teachers had up to six classes and three preps. The Turkish teachers taught much les, either Turkish language class, science or math teachers, or served as guidance counselors. They would just get substitute teacher licenses to teach."

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Individual Designation	Role (Turkish school employee, school employee, affiliated Turkish individual, parent, student)	Region, State, Charter School	Core Subject of Testimony	Student Cheating, Testing Fraud, Grade Changing	Treatment of and by unqualified H-1B teachers from Turkey	Forced Tithing of H-1B teachers from Turkey, Tuzuk agreement	Use of Affiliated Turkish Vendors	Connections to Fethullah Gülen	
Teacher 10	Teacher	Southern, Texas, School of Science and Technology Discovery	Special Education	Yes	Yes		Yes		
Teacher 11	Teacher	Southern, Texas, School of Science and Technology Discovery	Cheating	Yes	Yes		Yes		
Turkish Teacher 2	Turkish Teacher	Southern, Texas, Harmony School of Innovation - El Paso	Recruiting	Yes	Yes	Yes	Yes	Yes	

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes	Yes		Yes	"Our school has been pushing 15-20% special education students because that's more money from the government. The government pays for the special education student populating. So they keep bringing in the special education students but they don't hire more teachers to work in the special education department."	"All of the maintenance companies that are hired for the school are Turkish. It is the same two Turkish men that come in to do the electricity, the painting and the repairs. They don't speak any English but they are usually just chatting with the Turkish administration."
	Yes	Yes		Yes	"The administration would encourage, almost force the teachers to round-up the students grades to make the school look better. They would send email reminders to the teachers telling them to change the grades for any borderline students. In the grade book, anything put in below a 50 would somehow just be marked down as a 50."	"The Turkish teachers don't have the qualifications they need to be teaching these students, and they all seem to know each other somehow. One of them hadn't even graduated from college but he was teaching algebra because he had a good relationship with the Vice Principal."
	Yes	Yes	Yes	Yes	"The Gülen movement wants to establish relationships with brilliant students because they will have a good future and they will keep in touch in their later life after they become judge, soldier or whatever. They were recruiting the students basically and ultimate goal was taking them to Turkey for 1 week or 10 days and making them a fan of Turkish teachers. There is the CLRP (College Learning and Readiness Program. This is just a name. It is actually a core group established by every Turkish teacher. They asked me to establish a core group or seed group. We were having special attention to them, taking them on trips, inviting them in our houses, tutoring them in our houses, playing games together spending time together, inviting them to Turkish cultural center. These activities were paid by the school with state funds."	"They came to the house to check our computers. All of the single male teachers are living together in a house so they stay in that house. All of the teachers are supposed to provide their emails and username and passwords. They are looking for if someone has downloaded anything. They search your emails, if you write emails to talking about this stuff or texted anyone. They delete your cell phone and emails. They do searches for certain key words to see if you are talking to anyone. They warn us not to take notes in meetings, we have to remember everything. They search your house, hard drives, they search everything and they tell you this before because they want you to be scared."

Individual Designation	Role (Turkish school employee, school employee, affiliated Turkish individual, parent, student)	Region, State, Charter School	Core Subject of Testimony	Student Cheating, Testing Fraud, Grade Changing	Treatment of and by unqualified H-1B teachers from Turkey	Forced Tithing of H-1B teachers from Turkey, Tuzuk agreement	Use of Affiliated Turkish Vendors	Connections to Fethullah Gülen	
Turkish Teacher 3	Turkish Teacher	Mid-West, Ohio, Horizon Science Academy Denison	Tithing	Yes	Yes	Yes	Yes	Yes	
Teacher 12	Teacher	Mid-West, Ohio, Horizon Science Academy Denison	Discrimination		Yes	Yes	Yes	Yes	
Teacher 13	Teacher	Western, Utah, Beehive Academy of Science	Anti-Semitism		Yes			Yes	
Teacher 14	Teacher	Mid-West, Ohio, Horizon Science Academy - Dayton	Cheating	Yes	Yes		Yes		
Parent 8	Parent	Western, Utah, Beehive Academy of Science	Recruiting	Yes	Yes		Yes		

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	Fraudulent and/or Illegal Activity, Misuse of Public Funds	Obstruction & Secrecy by Charter School	Recruitment of Select Students by Gülenists	Poor Treatment of Students	Anecdote	Anecdote
	Yes	Yes	Yes		"My salary was based on the contract which was sent to DOL and was supposed to be the prevailing wage of $44,000. However, when I met with Horizon Denison's Director, he told me that the Gülen Movement members had their own bylaws (Tuzuk) and according to the bylaws, in my region, a single person was supposed to get around $28,000 annually. ****** made another contract with me, stating that the school would pay a $28,000 instead of the $44,0000 amount stated on my H-1B visa application. To my knowledge, all the members of the Gülen Movement were getting their salary and benefits based on the Gülen Movement's bylaws instead of the Department of Labor prevailing wage listed on their H1-B visa application."	"According to the Tuzuk bylaws, I was giving 40% of my salary to the movement because I was single and did not have children. The other Turkish teachers (all part of the Gülen movement), also have give part of their salary according to the Tuzuk bylaws."
	Yes	Yes				
		Yes				
	Yes	Yes		Yes		
	Yes	Yes	Yes	Yes	"The teachers would just show up randomly. There was an apartment that the school rented out in the Fort Union area of town where they stayed. There was a bunch of single male Turks that were renting it all together. Sometimes they would be over at the school volunteering, and then all of the sudden they would be teaching. The teachers that were with the school would just leave in the middle of the year with no warning and one of these volunteers would take their place."	"I did see extra time being spent with certain students. They also wanted to stay in contact with the students after they left. This was just with a certain group of students from what I could gather. I attributed that to them trying to groom apologists for the movement as these kids grew up. They wanted people to be apologists for them and defend them."

Appendix I: Tuzuk

BY-LAWS 2005

1. These by-laws' provisions shall be applied from the salaries of October 2005 (to be paid at the end of October) forward.

2. All the cities with salaried employees shall be assigned by their districts to one fitting category among the 5 determined according to the items the criteria of which are displayed below. (The number of categories in the former by-laws which was 4 has been increased to 5.)

3. In determining the categories, the rent ranges shall be the main criteria to be considered. In addition to this, in case there are specific circumstances related with the city in question, those shall also be taken into consideration within the district itself and hence the final categories shall be assigned.

4. The rent ranges are determined by taking a normal apartment with two and three rooms as basis like in the following:

A	B	C	D	E
600 – 750	700 - 900	800 - 1000	950 - 1250	1200 - 1500
700 – 900	850 - 1000	950-1250	1200 – 1400	1400 and above

5. On the main salaries table, the base salary in each category of the cities are given according to the status of the employee as "single – married without children – married with one child– married with two children" together with the marginal payments to be added for each child as of the third child. For example, for a family with four children, the base rate of salary will be calculated by adding the marginal payments for the third and fourth child to the base salary of an employee that is "married with two children".

	A	B	C	D	E
Singles	1550	1650	1750	1850	1900
Married without children	1850	2050	2250	2550	2750
Married with one child	1950	2150	2400	2700	2900
Married with two children	2050	2250	2500	2800	3100
Marginal Payment for the:					
3rd Child	300	300	350	400	400
4th Child	300	300	300	300	300
5th Child	400	400	400	400	400
6th Child	300	300	300	300	300

6. **Executive compensation:** For deputy principals – small district heads $50, for principals, district deans of academy, project men, city(/county)-state heads, etc. $100, for general directors, district heads $150 shall be added as executive compensation.

7. **Travel allowance:** The travel expenses to be set by officers in each location for one travel to Turkey and back for each year shall be calculated (for a whole family) and added to the base salary after being divided into 12. In this addition, for children between ages of 0-2 10% of,

between ages of 2-11 80% of, and for and above 12 years old children the total of the adult fee shall be calculated.

8. The officers (District Heads) are authorized to add or subtract 5%.

9. **Seniority allowance:** To be counted as from the year the employee started to work for their corporate entity on salary basis, $10 for each year is going to be added as seniority allowance.

10. **Compensation:** When the employee gets relocated to a place outside of their district, he/she shall be paid by their former district so many salaries as the number of the years he/she had worked in their former district. As the basis for the salary, salary of an employee in a similar position in Istanbul, Turkey shall be taken.

11. **Retirement:** As for pension, an additional clause regarding the practice of the voluntary retirement system by Bağkur (Social Security Organization for Artisans and the Self-Employed) in Turkey is going to be brought in. As required by law in the United States, the money invested in the pension fund for an individual by the corporate entity shall be left entirely to the corporate entity at the time of the payment.

12. **Green Card:** The attorney fees of the colleagues that applied for a Green Card shall be covered by their county, the health and photography expenses by themselves.

13. For the ones who will come for the first time, the passport and visa expenses are going to be covered by the location they will arrive at.

14. For employees who work together with their spouses at one of our corporations, one spouse shall be paid the whole salary, the other the salary for single employees in their category. In families where one spouse works for us and the other is employed at a different corporate entity, our employee shall be paid the base salary of "married– without children".

15. **In the case of death:**

    a. In the case of death of a single employee, the family (mother–father); or in the case of death of a female employee, her spouse shall be aided in the amount of 3 months-seniority allowance. The funeral costs shall also be compensated.

    b. In the case of death of a male employee, his funeral costs shall be compensated and his spouse shall be aided in the amount of 3 months-seniority allowance. Furthermore, his spouse shall be paid half of his salary in Istanbul, Turkey throughout one year. In this last case, if the female spouse does not have a family or is unable to stay with them, the payment shall be made as the whole salary thereof.

    c. In the case of the death of a male employee's spouse, her funeral costs shall be compensated.

16. For the ones who will make a payment to be exempted from their military service, 30% of the exemption fee shall be compensated.

17. **PhD – Master's and further training courses**

    For the purpose of upgrading the teaching quality and the like, some colleagues may be allowed to attend a PhD or master's program under the circumstances listed below:

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a. Who is going to do a doctorate or master's shall be decided by the board.

b. It shall be done in subjects related with education and decided in communion.

c. The number of courses to be taken in one term shall be also determined by the board.

d. Teaching classes and counseling courses are not going to be skipped.

e. It shall not hinder any relocation.

f. The board shall decide whether courses can be taken during the summer term.

g. The expenses for the doctoral and master's studies shall be covered by the individual but the tuition ($ 1500) in tax repayments shall remain with them.

h. Besides the doctoral and master's studies, any compulsory further training courses shall be covered by the corporate entity.

18. **Tax refunds** belong totally to the corporate entity, including the repayments stemming from mortgage, etc.

19. There shall be no permission to do an extra job or give private lessons for a fee.

20. The health insurance shall not be covered by the corporate entity but a system that is designed to function as payment from a pool to be spent when needed shall be practiced. This system shall be explained in the attachment.

21. The payments of the ones to be relocated from overseas shall be paid by their former employers until they will receive their visa and arrive in the US.

22. These by-laws' provisions shall not apply retroactively.

Appendices II: Tuzuk (Turkish)

TUZUK 2005

1. Bu tuzuk hukumleri ekim 2005 maaslarindan (ekim sonunda verilen) itibaren uygulanacaktir.

2. Maasli eleman calisan butun sehirler her bolgenin kendisi tarafindan kriterleri asagida verilen noktalara gore belirlenmis olan 5 kategoriden hangisine uygunsa yerlestirilecektir. (eski tuzukteki 4 olan sayi 5 e cikarilmistir)

3. Kategorilerin belirlenmesinde ana esas olarak kira araliklari degerlendirilecektir. Buna ilave , o sehre has hususi durumlar varsa onlar da bolgenin kendi icinde dikkate alinacak ve nihai olarak kategorilendirme yapilacaktir.

4. Kira araliklari 2 odali ve 3 odali , normal bir apartman dairesi esas alarak asagidaki sekilde belirlenmistir.

A	B	C	D	E
600 – 750	700 - 900	800 - 1000	950 - 1250	1200 - 1500
700 – 900	850 - 1000	950-1250	1200 – 1400	1400 and above

5. Ana maas tablosunda bekar – evli cocuksuz – evli 1 cocuklu ve evli 2 cocukluya gore her katoride alinacak taban maaslarla birlikte 3. cocuktan itibaren her cocukta eklenecek farklar da yer almistir. Ornek olarak 4 cocuklu bir aile evli 2 ccuklunun uzerine 3. cocuk farki + 4. cocuk farki rakamlarini da ekleyerek taban maasini hesaplayacaktir.

	A	B	C	D	E
Bekarlar	1550	1650	1750	1850	1900
Evli cocuksuz	1850	2050	2250	2550	2750
Evli 1 cocuklu	1950	2150	2400	2700	2900
Evli 2 cocuklu	2050	2250	2500	2800	3100
3. Cocuk Farki	300	300	350	400	400
4. Cocuk Farki	300	300	300	300	300
5. Cocuk Farki	400	400	400	400	400
6. Cocuk Farki	300	300	300	300	300

6. **Makam:** Mudur yardimcilari – kucuk bolge h. icin $ 50 , mudurler , bolge dean of acad., project man, il-eyalet had. vb icin $ 100, genel md, bolge had icin $ 150 makam ucreti eklenecektir.

7. **ol Parasi:** Her yerdeki yetkili kisilerce tespit edilecek yilda bir kez TR ye gidis-donus yol paralari da toplam olarak (ailecek) hesap edilip 12 ye bolunerek taban maasa eklenecektir. Bu eklemede 0-2 yas icin % 10, 2-11 yas icin % 80, 12 ve ustu yas icin yetiskin ucretinin aynisi alinir.

8. Yetkililerin (BH) % 5 oraninda artirma veya azaltma yetkisi vardir.

9. **Kidem Farki:** Hzm muessesesinde maasli calismaya basladigi yildan itibaren sayilmak uzere kidem ucreti olarak yil basina $ 10 ekleme yapilir.

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10. **Tazminat:** Bolge disinda bir yere tayin edildiginde eski bolgesinde calistigi yil adedince maas kadar tazminat eski yeri tarafindan verilir. Maasa esas olarak da TR de , Istanbul da ayni statudeki birisinin aldigi maas alinir.

11. **Emeklilik:** Emeklilik olarak TR deki Bagkur un gonullu emeklilik sistemi uygulamasi hakkinda ek madde gelecektir. Amerikadaki kanunlar geregi emeklilik fonuna muessese tarafindan sahsin adina yatirilan paralar alinma zamaninda tamamen muesseseye birakilacaktir.

12. **Green Card:** Greencard icin basvuruda bulunan arkadaslarin avukatlik masraflari beldesi tarafindan, saglik ve fotograf masraflari sahis tarafindan karsilanacaktir.

13. Ilk defa gelecek olanlar icin pasaport ve vize masraflari gelecegi yer tarafindan karsilanacaktir. .

14. Esi ile birlikte muesseselerimizde calisanlardan birine tam ucret , esine ise ayni kategorideki bekar maasi verilir. Eslerden biri muessesemizde, digeri farkli yerde calisan ailelerde ise muessesede calisana evli – cocuksuz taban ucreti odenir.

15. **Vefat Durumunda:**

    a. Bekar bir calisanin vefati durumunda ailesine (anne – baba) veya bizde calisan bir bayanin vefatinda esine verilmek uzere 3 aylik kidem tazminati kadar yardim yapilir. Cenaze masraflari da karsilanir.

    b. Bizde calisan erkek arkadasin vefati durumunda cenaze masraflari bizim tarafimizdan karsilanir, esine 3 aylik kidem tazminati yardim yapilir, ayrica 1 yil sure ile TR deki Istanbul maaasinin yarisi kadar odeme yapilir. Son durumda bayanin ailesi yoksa veya onlarin yaninda kalamayacak durumda ise odeme tam maas olarak yapilir.

    c. Bizde calisan erkek arkadasin esinin vefati durumunda esinin cenaze masraflari karsilanir.

16. Bedelli askerlik yapacaklara odeyecegi ucretin % 30 u odenir.

17. **Doktora – master ve gelistirme dersleri**

    Ogretmenlik kalitesini artirmak vb maksatlarla asagidaki sartlar dahilinde bazi arkadaslarin doktora veya master yapmasina izin verilebilir.

    a. Kimin doktora – master yapacagi heyette kararlastirilacak.

    b. Egitim ile alakali ve istisare ile belirlenen konularda yapilacak.

    c. Bir donemde alacagi ders adedi de heyet tarafindan belirlenecek.

    d. Ders ve rehberlik aksatilmayacak.

    e. Tayin durumuna engel teskil etmeyecek.

    f. Yaz zamani ders alip almayacagi heyet tarafindan kararlastirilacak.

    g. Doktora-master masraflari sahis tarafindan karsilanacak, vergi iadesindeki egitim tution u ($ 1500) kendisine kalacaktir.

    h. Doktora-master disinda gelisim maksatli muessese tarafindan alinmasi istenen derslerin masrafi muessese tarafindan karsilanacaktir.

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18. **Vergi iadeleri** tamamen muesseye aittir. Buna mortgage vb den dolayi gelen iadeler de dahildir.

19. Baska bir iste calisilmasina, ucret karsiligi ozel ders verilmesine izin verilmez.

20. Saglik sigortasi muesseseden yapilmayacak, genel olusturulacak havuzdan ihtiyac durumunda verilmek uzere gelistirilen ve ekte izah edilecek sistem uygulanacaktir.

21. Amerika disindan tayin olanlarin vize alip da gelinceye kadar ucretleri eski yerleri tarafindan odenir.

22. Bu tuzuk hukumleri makabline samil degildir. (geriye islemez)

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Amsterdam & Partners LLP was recognized with the 2013 Global Pro Bono Litigation Award by The American Lawyer. More information can be found on robertamsterdam.com and amsterdamandpartners.com.

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