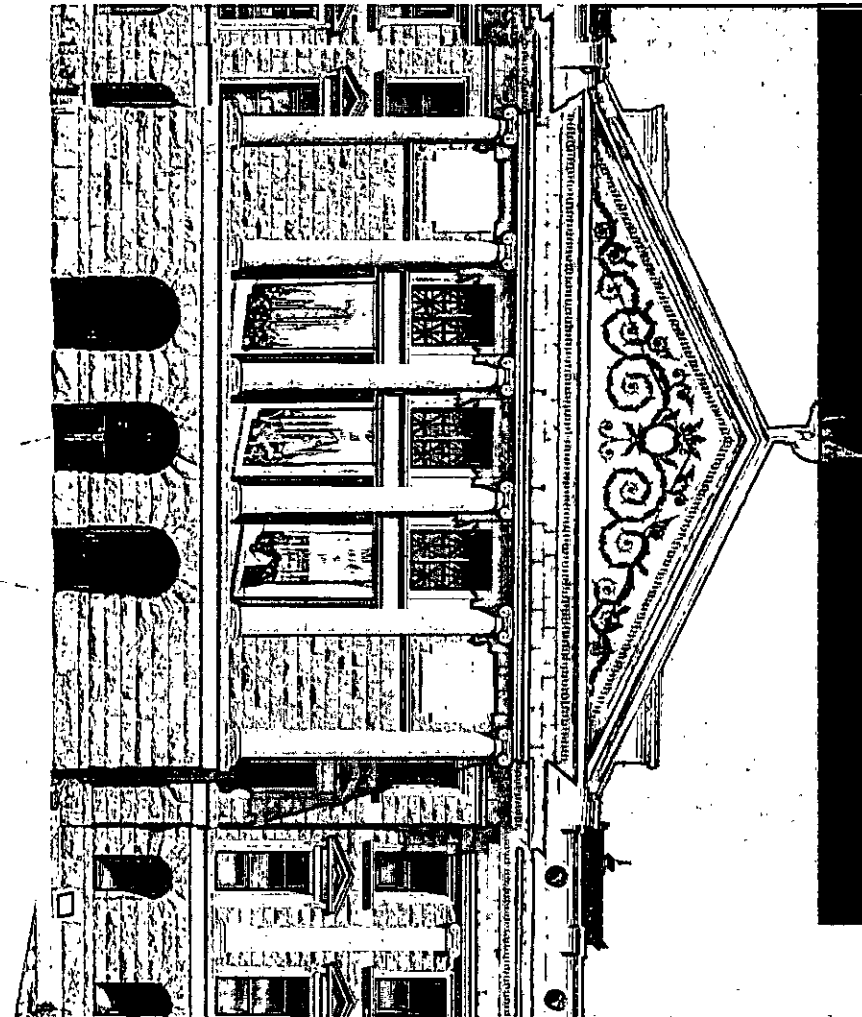


Arizona



Quick Facts

- ▶ Region: Western
- ▶ Total Revenues for the 2015-16 school year: \$18,983,866³
- ▶ School Names (known as):
 - ▶ Sonoran Science Academy
 - ▶ Paragon Science Academy
- ▶ Network Founders:
 - ▶ Nasuhi Yurt: now works at Ebru TV, a Gülenist television station in NJ
 - ▶ Abdullah Yilmaz: still runs Daisy & Sonoran Schools.
 - ▶ Turay 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.
- ▶ Total Student Enrollment 2015-16: 2,292
- ▶ 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
 - ▶ Metin Yildirim: later served as board member for Mokapu Stem School, a failed Gülenist charter school in Hawaii also partnering with Accord and Daisy.
 - ▶ Ozgur 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.
- ▶ Regional Sister Networks: Magnolia (CA), Coral (NV), Lotus (CO), Beehive (UT), Attempted Networks: Pioneer (OR), Sonoran (HI), Coral (WA).

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/gwa7ac6> (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/hvny9se> (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/kpoumzd> (last checked 3/24/2017).

- ▷ **Ramzi Shaytanudinov:** 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.¹
- ▷ **Ahli Aydın:** 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).²
- ▷ **Selcuk Buyukasaarac:** 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).³
- ▷ **Dogan Tozoglu:** Board President, Stars Education Services (FL); Board member, Consultant, Sweetwater Education, Inc. (FL); Founding Academy member, Palm Beach Science Academy (FL) (attempt); Petitioner, Capital City Charter Science Academy (FL) (attempt); Executive Director, River City Science Academies (FL).⁴
- ▷ **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.⁵

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

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; and 40.5% Caucasian students vs. 60.5% 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	Student Demographic Information	Authorizer	Governing Board
Orlando Science Middle High Charter (0089)	Grades 6-12 2008-Present	19% ELL 36% FRL 2.7% SWD 72.8% Minority 27.2% Caucasian	Orange County School Board	Discovery Education Services, Inc.
2427 Lynx Lane Orlando, FL 32804				
Orlando Science Elementary Charter (0200) 2611 Technology Drive Orlando, FL 32804	Grades K-5 2012-Present	8.9% 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 8.6% 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 6.3% 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 (5901) 10911 Old St. Augustine Rd Jacksonville, FL	Grades K-8 2016-Present	8.5% ELL 37.8% FRL 9.6% SWD 47.6% Minority 52.4% Caucasian	Duval County School Board	River City Education Services, Inc.

- Information gathered from the Florida Secretary of State, available at: <http://tinyurl.com/mn12th> (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/gf2wus> (last checked 6/15/2017); Conference speaker list is available at: <http://tinyurl.com/kjv482> (last checked 6/15/2017); Conference presentation is available at: <http://tinyurl.com/kw29d> (last checked 6/15/2017); Article listing (search name), available at: <http://tinyurl.com/m5cdp3> (last checked 6/15/2017).
- Information taken from Green Charter board minutes, available at: <http://tinyurl.com/m5jinz> (last checked 6/15/2017); Green charter petition pg. 18, available at: <http://tinyurl.com/m5jinz> (last checked 6/15/2017); Article discussing Aydın and Amity, available at: <http://tinyurl.com/y7pzd78> (last checked 6/15/2017); Article discussing Aydın and the Atlantic Institute, available at: <http://tinyurl.com/men1smk> (last checked 6/15/2017).
- Information taken from LinkedIn profile, available at: <http://tinyurl.com/kyezhu> (last checked 6/15/2017).
- Information taken from LinkedIn profile, available at: <http://tinyurl.com/knykai> (last checked 6/15/2017); Stars Academy corporate filings, available at: <http://tinyurl.com/lbw3iv> (last checked 6/15/2017); Palm Beach Science Academy Petition, pg. 5 <http://tinyurl.com/m5693g> (last checked 6/15/2017); 2013-14 Charter school report, available at: <http://tinyurl.com/m5c5cb3> (last checked 6/15/2017); Sweetwater 2010 990 form, available at: <http://tinyurl.com/g9j3w43> (last checked 6/15/2017).
- Information taken from: Discovery Education Services, Articles of Incorporation available at: <http://tinyurl.com/milqgh> (last checked 6/15/2017); Universal Education Services, corporate information available at: <http://tinyurl.com/kwvz7p> (last checked 6/15/2017); River City Plaza LLC corporate information available at: <http://tinyurl.com/mc32gm> (last checked 6/15/2017); Khatib Development corporate information available at: <http://tinyurl.com/kc2z95u> (last checked 6/15/2017); Blue Ocean Corporate filings, available at: <http://tinyurl.com/lb5e505> (last checked 6/15/2017).

School	Operation	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	73% 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 Mergate, FL 33063	Grades K-12 2014-Present	18.7% ELL 67.7% FRL 6.6% SWD 81.3% Minority 15.7% 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 (8697) 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 9200 South Palm Dr, Deerfield Beach, FL 33035	Denied 2009		Broward County School Board	Riverside Science, Inc.
Sweetwater Branch Academy (Elementary and Middle) Palm Beach Science School	2010-2013 Closed Approved 2011; Delayed 2013; Never Opened	Elementary closed due to failing grades; middle due to financial insolvency	Alachua County School Board	Neosprings, Inc.
Atlantic Science Academy	Authorized 2005; never opened		Palm Beach County School Board	Palm Beach Science, 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	Sweetwater Education, 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/mrtdmww> (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 2008 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.

⁹ Sweetwater corporate filings, available at: <http://tinyurl.com/kq9tshd> (last checked 6/15/2017).

¹⁰ Discovery Education Services, Articles of Incorporation available at: <http://tinyurl.com/mrtdmww> (last checked 6/15/2017).

¹¹ Universal Education Services, corporate information available at: <http://tinyurl.com/kwmoz7p> (last checked 6/15/2017).

¹² For more information, see the Georgia profile.

After the Fulton Science (GA) schools were of the H-B teachers and employees utilized by non-renewed due to numerous issues, the Fulton Science (GA) schools were ultimately Grace Institute changed its name to CESR and dispersed throughout the Florida Gulen charter continued to provide "services" to its Florida ter schools, though the two networks shared customers from its Atlanta and Jacksonville offices.¹⁴ CESR was incorporated in Florida by Avni Murat Cetin, Principal of the Fulton Science Cokerci, the former principal of Fulton Science elementary school, is currently Principal of the Academy High School (formerly TEACH).¹⁵ Many Osceola Science Charter School.¹⁶

A Sample of Board Member/Employee Overlap Across the Florida Network¹⁷

Elyan Aktas	Sweetwater Education 2005-07	River City Education Services 2013-Present	
Mehmet Tasken	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
Dogan Tozoglu	Stars Education Services, Inc. 2006-Present	Sweetwater Education Inc. (non-voting advisor) 2009-10	Palm Beach Science Inc. (only in petition 2010)
Renat Shaykhutdinov	Riverdale Science, Inc. 2008-Present	Palm Beach Science Inc. 2010-13	Employed by River City Education Services Inc. 2010-Present

¹⁴ For an archived version of the Grace Schools website as of February 2010, listing member schools, see: <http://tinyurl.com/n2apcs> (last checked 6/15/2017).
¹⁵ GA Department of Education report, listing TEACH information, available at: <http://tinyurl.com/AgpV2v> (last checked 6/15/2017).
¹⁶ Information taken from: Orlando Science listing, available at: <http://tinyurl.com/k3p8rbg> (last checked 6/15/2017), and LinkedIn profile, available at: <http://tinyurl.com/jp6m7dy> (last checked 6/15/2017).
¹⁷ Information gathered from corporate filings for each of the Florida Gulen charter foundation boards.

Inter-Entity Lending Practices

Our investigation would suggest that charter schools within the Gulen 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 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 Gulen 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

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/7b58nel> (last checked 6/15/2017).
¹⁹ See 2016 audits for each school.
²⁰ Information taken from the 2014-15 audit, available at: <http://tinyurl.com/jyfbu> (last checked 6/15/2017), and 990 tax documentation.
²¹ See the 2014 990 form for Stars Education, Inc.

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 Fetullah Gülen Movement in Thought and Practice.²³ Gülenists throughout the country attended and presented, including the Greater Texas region’s founder Alp Aslanoğlu,²⁴ as well as Florida’s own Renat Shaykhudinov, 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 schools’ 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 \$100,000 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 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.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 - \$910,000 for “improvements” for 7555	+\$910,000 “improvements” paid by Khatib in cash for 7555	-\$2,000 for 7555 tree removal
2011	-\$73,500 plumbing for 7555 -\$15,000 wiring for 7555 -\$25,000 electrical for 7555 -\$35,000 sprinkler system for 7555 -\$50,000 sprinkler system for 7555 -\$165,000 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		
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 in cash +\$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 -\$12,509,500 purchase 7555 and 7605 -\$50 LED sign bulbs -\$30,949 LED sign for 7555 -\$1000 lighting for 7605 =\$1168,044 spent before owning either building =\$13,678,594 spent total =\$29,326,656 ultimate cost due to bond financing
2015	-\$2,858 sign for 7605 +\$12,509,500 for sale of 7555 and 7605 to River City Science Academy	+\$7655 gym canopy for 7605	
Total	= \$12,509,500 gained = \$10,510,804 net profit	= \$1916,130 profit	

²² See Concept Schools 990 tax form, available at: <http://tinyurl.com/h5yrit> (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/gr2ujs> (last checked 6/15/2017).
²⁴ See Texas profile for more information about Alp Aslanoğlu.
²⁵ Foreclosure information available at: <http://tinyurl.com/mxzg2U7> (last checked 6/15/2017). Property history available at: <http://tinyurl.com/leqct3a> (last checked 6/15/2017). and River City Plaza LLC corporate information available at: <http://tinyurl.com/mc32nqh> (last checked 6/15/2017). Khatib Development corporate information available at: <http://tinyurl.com/kczg35u> (last checked 6/15/2017).
²⁶ This figure is the \$100 sale price plus the aggregate total of fees listed in the permits, available at: <http://tinyurl.com/m7z2au> (last checked 6/15/2017).
²⁷ Property history, available at: <http://tinyurl.com/kuslfta> (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/mv7k2au> (last checked 6/15/2017).

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.²⁷ 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.²⁸

of the same individuals from Discovery, which submitted an application for a Gülenist charter school in Osceola that was not approved.²⁹ 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.³⁰ 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-\$240,235.³¹ 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.³²

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.³³ Executive Director Yalcin Aklin is listed as the owner of this related for-profit entity, More Science, and Seminole Science.³⁴ He also incorporated Universal Education Services with many

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.³³ Executive Director Yalcin Aklin is listed as the owner of this related for-profit entity, More Science, and Seminole Science.³⁴ He also incorporated Universal Education Services with many

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.³⁵ 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,

2014,³⁶ 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.³⁷

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 2016.³⁸

- **Cherle Cookonins:** the Florida network (including: Discovery, River City, New Springs, Neosprings, Stars Education, Galaxy) used Cookonins, a Georgia-based attorney to file numerous H-1B applications.³⁹ Cookonins 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)

²⁷ GREEN Charter school minutes, available at: <http://tinyurl.com/kwudat> (last checked 6/15/2017).
²⁸ Blue Ocean uses Attorney Renzi Kulen, see Abuse of the H-1B Program section.
²⁹ Discovery Education Services Articles of Incorporation, available at: <http://tinyurl.com/mnlgqth> (last checked 6/15/2017).
³⁰ Universal Education Services, corporate information available at: <http://tinyurl.com/kmwz7p> (last checked 6/15/2017).
³¹ Corporate information for 5M Associates, available at: <http://tinyurl.com/k3agp2> (last checked 6/15/2017). 3434 Monroe Holdings, available at: <http://tinyurl.com/kd3agp> (last checked 6/15/2017).
³² Figures taken from the 2015 audits and 2016 accountability reports for each school, which for some reason, list different amounts for leases paid, available at: <http://tinyurl.com/mnlgqth> (last checked 6/15/2017).
³³ See Ohio profile for more detail.
³⁴ See Ohio profile for more detail.
³⁵ See 2016 audit, available at: <http://tinyurl.com/mnlgqth> (last checked 6/15/2017).

³⁶ Bond statements available at: <http://tinyurl.com/meh9auv> (last checked 6/15/2017).
³⁷ Bond official statement, pg 10, available at: <http://tinyurl.com/k5pbc6> (last checked 6/15/2017).
³⁸ See MyVslsJobs.com for each governing board's information. 1) Discovery Education Services 80 H-1Bs, available at: <http://tinyurl.com/kct2af> (last checked 6/15/2017). 2) River City Education Services 80 H-1Bs, available at: <http://tinyurl.com/kct2af> (last checked 6/15/2017). 3) Stars Education Services 18 H-1Bs, available at: <http://tinyurl.com/mcwmsm> (last checked 6/15/2017). 4) Riverside Science 3 H-1Bs, available at: <http://tinyurl.com/mc3af> (last checked 6/15/2017). 5) Galaxy Education, 5 H-1Bs, available at: <http://tinyurl.com/k5g5v44> (last checked 6/15/2017). 6) New Springs Inc. 19 H-1Bs, available at: <http://tinyurl.com/kax429n> (last checked 6/15/2017). 7) Sweetwater Education 2 H-1Bs, available at: <http://tinyurl.com/m5d20n> (last checked 6/15/2017). 8) Neosprings, Inc. 12 H-1Bs, available at: <http://tinyurl.com/kvrs52> (last checked 6/15/2017) and <http://tinyurl.com/kd6w2w> (last checked 6/15/2017).
³⁹ Court docket, available at: <http://tinyurl.com/m24kxw> (last checked 6/15/2017).
⁴⁰ List of entities represented by Cherle Cookonins, available at: <http://tinyurl.com/m4efcg> (last checked 6/15/2017).

- **Remzi Kulen:** the Florida network used Kulen, a New York-based attorney, to file numerous H-1B applications.⁴¹ 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 Döğün Tozlu wrote a letter to Jacksonville's mayor stating that the schools had no direct affiliation with Gülen or involvement with the coup.⁴² Also, Akif Aydın, 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.⁴³ Though Aydın 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:

► Aydın 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, Aydın was defending Gülen charter schools nationally, rather than discussing his own school River City Science Academy.

► Aydın 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.

► Aydın 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.

► 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 Aydın was that the interviewer had not

⁴¹ List of entities represented by Remzi Kulen, available at <http://tinyurl.com/gprw5xk> (last checked 6/15/2017).

⁴² Tozlu letter, available at: <http://tinyurl.com/mrm6sg> (last checked 6/15/2017).

⁴³ Aydın interview, available at: <http://tinyurl.com/j2a7b9d> (last checked 6/15/2017).

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 Cokayci, 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 Academy, 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).⁴⁴

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 teachings⁴⁵ and inter-faith dialogue, and two of the Florida Network's landlords are currently listed on its governing board, Naem Halder and Yezan Khatib.⁴⁶ Additionally, it hosts dialogue dinners and trips to Turkey for local politicians.

Istanbul Cultural Center: The Istanbul Cultural Center has branches throughout Florida, to Turkey.⁴⁷

⁴⁴ All of the following school websites contain the language "Powered by Charter Educational Services & Resources," endorsing the tie between CESR's Gülenist charter school customers, available at: <http://tinyurl.com/6k5am0> (last checked 6/15/2017), <http://tinyurl.com/mrm6sg> (last checked 6/15/2017), <http://tinyurl.com/rdh4k> (last checked 6/15/2017), <http://tinyurl.com/kp7fas> (last checked 6/15/2017), <http://tinyurl.com/43gqdy> (last checked 6/15/2017), <http://tinyurl.com/4k2m4c> (last checked 6/15/2017), <http://tinyurl.com/m2xvab> (last checked 6/15/2017), <http://tinyurl.com/m23kcd> (last checked 6/15/2017), <http://tinyurl.com/kxw73> (last checked 6/15/2017), <http://tinyurl.com/7bc0d3> (last checked 6/15/2017).

⁴⁵ Discovery Education Services Articles of Incorporation, available at: <http://tinyurl.com/m8q4gh> (last checked 6/15/2017); Universal Education Services, corporate information available at: <http://tinyurl.com/kwmpz7p> (last checked 6/15/2017).

⁴⁶ Fethullah Gülen bio on Atlantic Institute's website, available at: <http://tinyurl.com/mvjgm09> (last checked 6/15/2017).

⁴⁷ Board of directors, available at: <http://tinyurl.com/4k2m4c> (last checked 6/15/2017).

⁴⁸ Istanbul Cultural Center website, available at: <http://tinyurl.com/yxwvsn> (last checked 6/15/2017).

⁴⁹ Corporate information, available at: <http://tinyurl.com/6d9gum> (last checked 6/15/2017).

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.

- **Murat Cettin:** Principal, Fulton Sunshine Academy (GA); Principal, Osceola Science Charter School (FL).⁵⁴
- **Alseddin Atay:** 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
- **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).⁵⁶
- **Sertkan 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).⁵⁷
- **Yunus Akse:** Substitute teacher, Noble Academy Cleveland (OH); Principal, Seminole Science Charter School (FL); Principal, New Springs Schools (FL).⁵⁸
- **All Gülenus:** Founder and Superintendent, LISA Academy (AR); Principal, Memphis School of Excellence (TN); Presenter, Harmony Public Schools Conference (TX); Principal, Broward Math and Science (FL).⁵⁹
- **Ozan Sipahoglu:** Principal, River City Science Academy (FL); Pacific Technology School Orangeville (Magnolia CA).⁶⁰

- ⁵⁴ Information taken from: Pinebluffs charter schools, available at: <http://tinyurl.com/m2q4z2l> (last checked 6/15/2017); Bio, available at: <http://tinyurl.com/m47324> (last checked 6/15/2017); Newsetter, available at: <http://tinyurl.com/mn20ys> (last checked 6/15/2017).
- ⁵⁵ Information taken from: MMSA 990 forms, available at: <http://tinyurl.com/z4nhqg> (last checked 6/15/2017); Florida Corporate Documents available at: <http://tinyurl.com/mn6b7c7> (last checked 6/15/2017); Florida Corporate Documents available at: <http://tinyurl.com/mn6b7c7> (last checked 6/15/2017).
- ⁵⁶ Information taken from: Principal newsetter, available at: <http://tinyurl.com/nquqlra> (last checked 6/15/2017); School listing, available at: <http://tinyurl.com/k3pibng> (last checked 6/15/2017); Employee credential search OH, available at: <http://tinyurl.com/10aykh> (last checked 6/15/2017).
- ⁵⁷ Information taken from: Orlando Science listing, available at: <http://tinyurl.com/k3pibng> (last checked 6/15/2017); and LinkedIn profile, available at: <http://tinyurl.com/jp6m7dy> (last checked 6/15/2017).
- ⁵⁸ Information taken from: LinkedIn Profile, available at: <http://tinyurl.com/153zqzd> (last checked 6/15/2017); LinkedIn profile, available at: <http://tinyurl.com/jw3zpod> (last checked 6/15/2017); Harmony schedule, available at: <http://tinyurl.com/jwg9uqs> (last checked 6/15/2017); LISA Academy information, available at: <http://tinyurl.com/jwg9uqs> (last checked 6/15/2017); Article re: Gülenus, Harmony, and Gülen, available at: <http://tinyurl.com/k617y44> (last checked 6/15/2017).
- ⁵⁹ Information taken from: Charter newsetter, available at: <http://tinyurl.com/k500c1> (last checked 6/15/2017); Bond statement at A-8, available at: <http://tinyurl.com/k500c1> (last checked 6/15/2017).

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/k70d4p2> (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/kmj143q> (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).

Bank, 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/me1ddqa> (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/lky9we> (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/vb744k> (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/mqtrw16> (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/mk58jd> (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/mmp587> (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/zdv44y> (last checked 6/15/2017).

Illinois

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: 2196¹
 - ▶ 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/ Gulen Organization Oversight Entity: Concept Schools, Inc.
 - ▶ Regional Sister Networks: Horizon (OH); Noble (OH); Math and Science (IN); Math and Science (MN); Math and Science
- ▶ Network Founders:
 - ▶ Taner Ertekin: Established Gulenist 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 Gulenist 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 Selim Ucan: Founding Principal Chicago Math and Science;¹² Co-Founder of Concept Schools, Inc.;¹³ Founding board member for Breeze Inc., for-profit Gulenists

¹ Student enrollment and demographic information available at: <http://tinyurl.com/lrvyobd> (last checked 4/19/2017)

² Figure includes revenues from 2015-16 revenues for CMSA, available at: <http://tinyurl.com/kx7zjng> (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/foisudt> (last checked 4/23/2017)

³ Bond statement at A-23 describing Ertekin's involvement, available at: <http://tinyurl.com/keaa5fs> (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/4pug45> (last checked 9/6/2016).

⁶ 2007 Breeze Inc. 990 form, available at: <http://tinyurl.com/z9pkdxz> (last checked 9/8/2016).

⁷ CMSA 990 tax documents listing Ertekin, available at: <http://tinyurl.com/hou4goe> (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/k2pbgm> (last checked 4/20/2017).

¹¹ Search warrant, pg 22, available at: <http://tinyurl.com/j5p4ed> (last checked 4/20/2017).

¹² LinkedIn profile, available at: <http://tinyurl.com/m5eeen> (last checked 4/19/2017).

¹³ See Concept Schools, Our Story narrative, available at: <http://tinyurl.com/z6s23yh> (last checked 9/6/2016).

landlord for Concept Schools," Vice President of Concept Schools, Inc.,¹⁸ currently Professional Development coach for Concept.¹⁹

► 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;²⁰ visited Fethullah Gülen at the Golden Generation Retreat Center with Concept whistleblower Mustafa Emenet;²¹ Superintendent Gateway Science Academy (MO).²²

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 ²³	Authorizer	Governing Board
Chicago Math and Science Academy 7212 N. Clark St. Chicago, IL 60625	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

¹⁸ Breeze Articles of Incorporation, available at: <http://tinyurl.com/mic5ca> (last checked 4/20/2017).

¹⁹ LinkedIn profile, available at: <http://tinyurl.com/l6se6n> (last checked 4/19/2017).

²⁰ LinkedIn profile, available at: <http://tinyurl.com/l6se6n> (last checked 4/19/2017).

²¹ Interview with Engin Blackstone, available at: <http://tinyurl.com/mw9ey6> (last checked 4/23/2017)

²² 2015 Letter from Mary Addi and Mustafa Emenet to OH legislature, available at: <http://tinyurl.com/mw9ey6> (last checked 4/20/2017)

²³ LinkedIn profile, available at: <http://tinyurl.com/mj33o> (last checked 4/25/2017).

²⁴ 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.²⁵

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 Tamer 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 in throughout the Midwestern region.²⁶ Then, in 2003, Ertekin and Akgun followed up by forming Breeze Inc., a for-profit corporation to serve as the Concept Schools' landlord.²⁷ 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.²⁸ An application was submitted for approval and granted in January of 2010. The governing board opened 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 administration. In 2015, the Quest governing board and Concept "mutually agreed to end their contract."²⁹ The authorizer then renewed Quest's charter has been operating independently since.³⁰

²⁵ Student enrollment and demographic information available at: <http://tinyurl.com/k52oae> (last checked 4/19/2017).

²⁶ Concept Schools NFP corporate information, available at: <http://tinyurl.com/zaiy47> (last checked 4/20/2017).

²⁷ Corporate information available at: <http://tinyurl.com/kn9xuz> (last checked 4/20/2017).

²⁸ Quest history, available at: <http://tinyurl.com/m4ewdx> (last checked 4/23/2017).

²⁹ Id.

³⁰ Adams, Pam, Quest Charter Academy Approves Five-Year Plan, Peoria Journal Star, February 27, 2015. Available at: <http://tinyurl.com/qd2xc7> (last checked 4/23/2017).

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 CMSAs 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.²⁰ 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.²¹ 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 Özgür Batsay was one of the fraudulently enriched Turkish vendors who was raided.²² While Batsay 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.²³ 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.²⁴ Since his cooperation with the FBI, Emanet and his wife who was also employed with Concept, Mary Addi, have come forward and provided information regarding the forced fuzuk payments and tithing to the Gülen Organization required of Turkish H-1B employees.²⁵ Emanet also produced a copy of the tuzuk agreement itself, which is attached to this report as Appendix ____.

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.

- ²⁰ Minapopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Aug. 9, 2016), available at: <http://tinyurl.com/j5nubd> (last checked 9/8/2016).
- ²¹ Search Warrant application available at: <http://tinyurl.com/jf94ed> (last checked 9/8/2016).
- ²² See *id.*, see also Minapopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (Aug. 9, 2016), available at: <http://tinyurl.com/j5nubd> (last checked 9/8/2016).
- ²³ See Minapopoulos, Dan, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jmzueh> (last checked 9/8/2016).
- ²⁴ Search Warrant application, pg 44, available at: <http://tinyurl.com/jf94ed> (last checked 9/8/2016).
- ²⁵ 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: <http://tinyurl.com/mezzupk> (last checked 4/20/2017).

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,²⁶ 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.²⁷ Gülenists throughout the country attended and presented, including Alp Aslanoğlu, 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.²⁸

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.²⁹ New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.³⁰ Murat Arabacı, a former Concept employee,³¹ has managed New Plan Learning and each of its subsidiaries since 2005.³² 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.³³ 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

- ²⁶ See Concept Schools 990 tax form, available at: <http://tinyurl.com/h5yji7>.
- ²⁷ Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: <http://tinyurl.com/g2xvjs> (last checked October 31, 2016).
- ²⁸ See Texas profile for more information about Alp Aslanoğlu.
- ²⁹ New Plan Learning, Inc. 2011A Bond Official Statement, pg A-4, available at: <http://tinyurl.com/zxoauy> (last checked 9/6/2016).
- ³⁰ New Plan Learning, Inc. 2011A Bond Official Statement, pg A-4, available at: <http://tinyurl.com/zxoauy> (last checked 9/6/2016); see also Exhibit A for Property Information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools.
- ³¹ See 2007 Concept 990 with Arabic listed as employee, available at: <http://tinyurl.com/29j36n> (last checked 9/8/2016).
- ³² See Business profile for New Plan Learning, Inc. showing its incorporation in 2005 and listing A. Arabacı as agent, available at: <http://tinyurl.com/hu2o6x7> (last checked 9/8/2016).
- ³³ See CMSA 2012 audit, available at <http://tinyurl.com/h5xco2> (last checked 11/23/2016).

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 schools' 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 repairs' 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 payer's 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 now subject to extremely high annual rents in

non-cancelable leases set to expire in 2041.⁴⁶ 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.⁴⁷

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.⁴⁸ 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)⁴⁹
- David Nachman: Concept IL used Nachman, a New Jersey-based attorney, to file H-1B applications.⁵⁰ Nachman also filed H-1B applications for:
 - Milly/Mey Education Center (NJ)
 - Paterson Charter School for Science and Technology (NJ)

► Nuzhat Hafiez: Concept IL schools used Hafiez, an Illinois-based attorney, to file numerous H-1B applications.⁵¹ Hafiez also filed H-1B applications for:

- Concept Schools, Inc.
- Niagara Educational Services, Inc. (IL)
- Niagara Foundation (IL)
- The Core Group (IL)

⁴⁰ New Plan Learning, Inc. 2011A Bond Official Statement, pg 9, available at: <http://tinyurl.com/zxoauup> (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/zwbxby2> (last checked 11/11/2016).

⁴² New Plan Learning, Inc. 2011A Bond Official Statement, pg A-5, available at: <http://tinyurl.com/zxoauup> (last checked 9/6/2016); *Mihalopoulos, Dan, Lawyers Call for Probe of Chicago Charter School*, Chicago Sun-Times (Jan. 25, 2017), available at: <http://tinyurl.com/jemzesh> (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/zaiyy7> (last checked 4/28/2017).

⁴⁵ See Exhibit — 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/hjqd4jk> (last checked 11/11/2016).

⁴⁶ New Plan Learning, Inc. 2011A Bond Official Statement, available at: <http://tinyurl.com/zxoauup> (last checked 9/6/2016).

⁴⁷ Pima County Bond issuances, available at: <http://tinyurl.com/karids94> (last checked 3/30/2017).

⁴⁸ 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-80 H-1Bs, due to multiple names used, <http://tinyurl.com/9pouuy>; <http://tinyurl.com/994qd>; <http://tinyurl.com/n3ywb2>; <http://tinyurl.com/Abmz2aa>; <http://tinyurl.com/lr5v78> Concept filed between 176-197 H-1B applications 2001-2016. See <http://tinyurl.com/3whstet> for Concept Schools, Inc.; <http://tinyurl.com/zbg3xdl> for Concept Schools NIP.

⁴⁹ List of entities represented by Remzi Kulen, available at <http://tinyurl.com/gpww5x> (last checked 3/21/2017).

⁵⁰ Nachman profile listing entities represented for H-1B visa work, available at <http://tinyurl.com/ny5l3ty> (last checked 4/13/2017).

⁵¹ Hafiez profile listing entities represented for H-1B visa work, available at: <http://tinyurl.com/mvmtvay> (last checked 4/13/2017).

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.³¹ 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 titling payments to Concept.³⁴

In 2010, CMSA principal Ali Yilmaz fired a teacher who was eight months pregnant at the time.³⁵ 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.³⁶

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.³⁷ 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.³⁸ 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.³⁹

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.⁴⁰ The founders of the first OH charter schools in the Gülen Organization formed Concept shortly thereafter.
- The Core Group: The Core Group, owned by Ertugrul Guzbuz, is currently under federal investigation as one of the vendors Concept used purportedly to defraud the E-Rate program.⁴¹ The company and its subsidiaries have received over \$3.2 million dollars from Concept schools.⁴² 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.⁴³
- Quality Builders of Midwest: Quality Builders is a Gülen-affiliated construction company that does the majority of Concept and NPL's construction work.⁴⁴ Several of Quality Builders' Gülenist employees have worked at Concept and its schools, as well as at other charter networks throughout the Gülen Organization.

- 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.⁴⁵ 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).⁴⁶ 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 Baisoy, is also implicated in the ongoing FBI investigation regarding the purported defrauding of the E-Rate program.⁴⁷ The company served as an E-Rate funding consultant to the schools.

³⁰ See Concept Schools network, available at: <http://tinyurl.com/23d8qsb> (last checked 8/26/2016).

³¹ New Plan Learning, Inc. 2011A Bond Official Statement, pg A-4, available at: <http://tinyurl.com/zxeauwp> (last checked 9/6/2016).

³² New Plan Learning, Inc. 2011A Bond Official Statement, pg A-4, A-5, available at: <http://tinyurl.com/zxeauwp> (last checked 9/6/2016). See also Exhibit A to Property Information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools.

³³ See perfect information, available at <http://tinyurl.com/zwkyg2> (last checked 11/11/2016).

³⁴ See Mahlopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jznzwhv> (last checked 9/8/2016).

³⁵ *Id.*

³⁶ See George's profile, see also Georgia Forensic Audit of Gülen-affiliated Charter Schools (June 1, 2012), at 17-25, available at <http://bit.ly/1TATHy>.

³⁷ See Mahlopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jznzwhv> (last checked 9/8/2016).

³⁸ Saul, Stephanie. *Charter Schools Tied to Turkey Grow in Texas*, The New York Times (June 6, 2011), available at: <http://tinyurl.com/2ka25on> (last checked 4/23/2017).

³⁹ *Feds Question Schools' Visa Use*, The Columbus Dispatch (May 20, 2011), available at: <http://tinyurl.com/mzss9h> (last checked 4/23/2017).

⁴⁰ Lydersen, Kai. *Firing of pregnant Chicago teacher becomes battle over charter school unionization*, In These Times (August 9, 2010) Available at: <http://tinyurl.com/jqyrtct>.

⁴¹ Representative Grijalva's letter is available at: <http://tinyurl.com/rnchqqs> (last checked 3/14/2017). Representative Gallego's letter is available at: <http://tinyurl.com/zyrth3u> (last checked 3/14/2017).

⁴² Article discussing Madigan's involvement with Concept, available at pg 107-08: <http://tinyurl.com/rndmrv4> (last checked 4/22/2017).

⁴³ *Id.*

⁴⁴ *Id.*

Gülenist Cultural Foundations

- **Niagara Foundation:** The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.⁶⁴ 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.⁶⁵ 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.⁶⁶

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.
- **Ali Kurani:** Teacher, Dean HSA Columbus (OH).⁶⁷ Principal HSA Dayton Elementary (OH).⁶⁸ Proposed Principal for Indiana Math and Science Academy South (IN).⁶⁹ Principal Quest Charter Academy (IL).⁷⁰ Principal, CMSA (IL).⁷⁰
- **Ahmet Ozarslan:** Board member Fulton Science (GA).⁷¹ Quality Builders of Midwest - Gülen-affiliated construction vendor (Midwestern region).⁷²

- **Aydin Kara:** Teacher, Director at HSA Columbus.⁷³ Director for HSA Cleveland MS.⁷⁴ Principal for Chicago Math and Science Academy (IL).⁷⁵ Director for HSA Toledo.⁷⁶ Author for The Fountain, a known Gülenist magazine.⁷⁷
- **Levent Elitai:** Employed at Ramson Contractors - Gülenist construction vendor (Western region).⁷⁸ Quality Builders of Midwest - Gülen-affiliated

- construction vendor (Midwestern region).⁷⁹ Director of Purchasing Concept
- (Midwestern region).⁸⁰ Indiana Math and Science Academy (IN).⁸⁰

Notable Articles regarding the Illinois Network

- **Mihalopoulos, Dan.** *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jamzwh>.
- **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/oeskz2>.
- **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 charter 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/kqzxc6r> (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/3snbad>.
- **Lydersen, Kari.** *Firing of pregnant Chicago teacher becomes battle over charter school unionization*. In These Times. (August 9, 2010) Available at: <http://tinyurl.com/jqyftct>.
- **Strauss, Valerie.** *Charter school ruled private entity for labor relations*. The Washington Post. (January 4, 2013). Available at: <http://tinyurl.com/hnrm5jv>.
- **Karp, Sarah.** *Concept Charter Schools get a green light*. Catalyst Chicago. (April 22, 2013) Available at: <http://tinyurl.com/jag8699>.
- **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/zsdlk35>.
- **Livingston, Doug.** *Auditor Joins Investigation of 19 Charter Schools*, Akron Beacon Journal (July 17, 2014). Available at: <http://tinyurl.com/hevz2h8>.
- **Ravitch, Diane.** *Concept Schools in Ohio Import Large Numbers of Turkish Teachers for Gülen Schools*. (October 14, 2014) Available at: <http://tinyurl.com/hcy34f8>.

⁶⁴ See <http://www.niagarafoundation.org/> for information about the Niagara Foundation and <http://tinyurl.com/8dlwv5c> for information about Gülen as Honorary President (last checked 9/6/2016).

⁶⁵ Audit available at: <http://tinyurl.com/hsas4qu> (last checked 9/6/2016).

⁶⁶ For a description of a legislator's trip to Turkey with the Niagara Foundation, see: <http://tinyurl.com/mkando> (last checked 4/20/2017).

⁶⁷ <http://tinyurl.com/mkwmgs> (last checked 4/20/2017).

⁶⁸ <http://tinyurl.com/m6bkc3h> (last checked 4/20/2017).

⁶⁹ CMSA 990 tax forms 2012-2015, available at: <http://tinyurl.com/hduagpe> (last checked 4/20/2017).

⁷⁰ Director's message, available at: <http://tinyurl.com/kccbw48> (last checked 4/20/2017).

⁷¹ <http://tinyurl.com/lz3bwoz> (last checked 4/20/2017).

⁷² Bio available at: <http://tinyurl.com/5h356w> (last checked 4/23/2017).

⁷³ Press release listing Kuran as Principal, available at: <http://tinyurl.com/jhgban> (last checked 4/23/2017).

⁷⁴ Petition available at: <http://tinyurl.com/rmej568> (last checked 4/23/2017).

⁷⁵ Article quoting Kuran as principal, available at: <http://tinyurl.com/nee6whv> (last checked 4/23/2017).

⁷⁶ School information, available at: <http://tinyurl.com/rmwkpu9> (last checked 4/23/2017).

⁷⁷ See Fulton Educational Services 990 tax forms, available at <http://tinyurl.com/zxjtkm> (last checked 11/23/2016).

⁷⁸ Ozarslan was on the board from 2007-2010.

⁷⁹ See LinkedIn profile for Ahmet Ozarslan, available at: <http://tinyurl.com/jdnh34> (last checked 11/23/2016).

⁸⁰ See LinkedIn profile for Levent Elitai, available at <http://tinyurl.com/zu33nv> (last checked 11/23/2016).

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Empire of Deceit: An investigation of the Gülen Charter School Network

Indiana

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
- ▶ Total Student Enrollment 2015-16: 1,478
- ▶ 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
- ▶ Network Founders:
 - ▶ Gültekin "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.
 - ▶ Numan Koca: Founder, IMSA; Incorporator, The Holy Dove Foundation (now known as Turkish American Society of Indiana, Inc.); manager of Güven Transportation (Turkey); manager of Polen Securities (Turkey); CEO of Ebran LLC (TX and IN); purchasing manager at Bio-Botanical Labs (Canada); real estate salesperson for Century 21 (Canada).

- Vic Puckert, Low Enrollment leads to Indianapolis Charter Schools Closure, USA Today (Feb. 7, 2017), available at: <http://tinyurl.com/kdbs6f2> (last checked 4/17/2017).
- Student enrollment and demographic information available at: <http://tinyurl.com/nbosen5> (IMSA - West); <http://tinyurl.com/l6yrt0> (IMSA North); <http://tinyurl.com/yhlg6> (IMSA - South) (last checked 4/17/2017).
- Figure includes revenues of IMSA North, IMSA South, and IMSA West, audits available at: <http://tinyurl.com/kamimupk> (last checked 4/19/2017).
- Information taken from: Resume available pg 99 at: <http://tinyurl.com/mykclaj> (last checked 4/19/2017); LinkedIn Profile available at: <http://tinyurl.com/mj93y2> (last checked 4/19/2017); Search Wexian application pg 40, available at: <http://tinyurl.com/j94ed6> (last checked 9/8/2016).
- Corporate documents in Indiana are available at: <http://tinyurl.com/lmmy5t79> (last checked 4/19/2017).
- Numan Koca, LinkedIn, available at: <http://tinyurl.com/kygqnhw> (last checked 4/19/2017).

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- **Kazim Eldes:** Immigration fees paid by Horizon (OH) to Concept;¹⁷ Founder, IMSA (IN); Incorporator, Wisdom Educational Services, Inc.;¹⁸ Incorporator, The Holy Dove Foundation (now known as Turkish American Society of Indiana, Inc.);¹⁹ Vice President, Turkish American Society, Inc.;²⁰ 2007 Registered Agent, IMSA West (IN);²¹ Math Consultant, Concept.²²
- **Cemil Selcuk:** Treasurer, Atlantis
- **Foundation Inc.:** Incorporator, Indiana Math and Science Academy Indianapolis Inc. and Indiana Math and Science Academy Gary Inc (IN).²³
- **Tim Nation:** Founding Board member, IMSA West (IN);²⁴ currently Executive Director at Peace Learning Center,²⁵ which includes Fethullah Gülen in its peacemaker curriculum taught to young students after a trip to Turkey with the Turkish Friendship Center in Indianapolis.²⁶

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;²⁷ 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

- ¹⁷ Horizon Science Academy Dayton Initial Audit, at 27 (July 27, 2007), available at: <http://tinyurl.com/4dc3as> (last checked 4/19/2017).
- ¹⁸ Corporate documents in Indiana are available at: <http://tinyurl.com/kxnh79> (last checked 4/19/2017).
- ¹⁹ Corporate documents in Indiana are available at: <http://tinyurl.com/mym5f9> (last checked 4/19/2017).
- ²⁰ Id.
- ²¹ Corporate documents in Indiana Math and Science Academy - Indianapolis Inc. are available at: <http://tinyurl.com/hnd571> (last checked 4/19/2017).
- ²² IMSA - West Replication Application, at 242 (Sep. 20, 2013), available at: <http://tinyurl.com/mhbxwy> (last checked 4/19/2017).
- ²³ Corporate documents in Indiana for these entities are searchable at: <http://tinyurl.com/lyai18> (last checked 4/19/2017).
- ²⁴ IMSA - West, 990s, available at: <http://tinyurl.com/lrzk7> (last checked 4/19/2017).
- ²⁵ Tim Nation, Peace Learning Center, available at: <http://tinyurl.com/Amhe2w> (last checked 4/19/2017).
- ²⁶ LinkedIn, available at: <http://tinyurl.com/kohj8w7> (last checked 4/19/2017).
- ²⁷ Peace Curriculum includes Fethullah Gülen, YouTube (Feb. 17, 2012), available at: <http://tinyurl.com/lm9xhuh> (last checked 4/19/2017); Peace Curriculum includes Fethullah Gülen, Hizmet Movement News Portal (Dec. 12, 2010), available at: <http://tinyurl.com/l4k7uz> (last checked 4/19/2017).
- ²⁸ Staff Report, 21 Applications Were Reviewed, The Indianapolis Recorder (Dec. 14, 2001), available at: <http://tinyurl.com/m1se9s> (last checked 4/17/2017).

School	Operation	Student Demographic Information ^a	Authorizer	Governing Board
Indiana Math and Science Academy - West (IMSA - West) 4575 W. 38 th 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	Bail 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 2000 due to lack of facilities, students, and teachers		Bail 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.

^a 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.^a

^a Student enrollment and demographic information available at: <http://tinyurl.com/mh05ens> (IMSA - West); <http://tinyurl.com/6gywto> (IMSA - North); <http://tinyurl.com/yn9j6> (IMSA - South) (last checked 4/17/2017).

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 Indianapolis [sic] Charter School Inc. Just a year later, articles of amendment changed the entity's name to Indiana Math and 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 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

¹⁹ IMSA West, 990s, available at: <http://tinyurl.com/lrzj47> (last checked 4/19/2017); IMSA North, 990s, available at: <http://tinyurl.com/mzxwu3m> (last checked 4/19/2017); IMSA South, 990s, available at: <http://tinyurl.com/mzxwu3m> (last checked 4/19/2017).

²⁰ School audits from the years 2007-2016 are searchable at: <http://tinyurl.com/imq55gw> (last checked 4/19/2017).

²¹ 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).

²² Search Warrant application available at: <http://tinyurl.com/jr94ed> (last checked 9/8/2016).

²³ 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).

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 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).

students throughout the Gulien 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 Gulien 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 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 recordation and classification of disbursements and receipts;
 - ▶ Excess cash carried further between years;
 - ▶ Understating cash on hand³⁰; 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 Gulien 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/Imq5gw> (last checked 4/19/2017).

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:

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, the 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, impeding its financial stability.

³³ These reports are available at: <http://tinyurl.com/kqczm> (IMSA - West); <http://tinyurl.com/mpb6tr> (IMSA - North); <http://tinyurl.com/xoia3k> (IMSA - South)

³⁴ Indiana corporate records available at: <http://tinyurl.com/y4ait8> (last checked 4/21/2017). Property records are available at: <http://tinyurl.com/k8gjuw> (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/k8gjuw> (last checked 4/17/2017).

³⁶ Indiana corporate records available at: <http://tinyurl.com/y4ait8> (last checked 4/21/2017).

³⁷ IMSA - South lease information taken from audits available at: <http://tinyurl.com/k4mmupk> (last checked 4/21/2017).

Learning apparently overcharges its Concept- tenet of Gülen Organization's suspicious real controlled schools in other states and is a prime 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)
- 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)⁴⁰

- 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 Hafiez: IMSA schools used Hafiez, an Illinois-based attorney, to file numerous H-1B applications. Hafiez also filed H-1B applications for:
 - Concept Schools, Inc.
 - Niagara Educational Services, Inc. (IL)
 - Niagara Foundation (IL)
 - The Core Group (IL)⁴⁰

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/mhfh8> (53); <http://tinyurl.com/kuz2ssg> (4); <http://tinyurl.com/67e4da> (18); <http://tinyurl.com/k4hdadd> (1); <http://tinyurl.com/jw7m2a3> (1). For 2016, refer to the 2016 data on the US DOL website, available at: <http://tinyurl.com/zms5dwc> (6) (last checked 1/30/2017).

⁴⁰ List of entities represented by Remzi Kulen, available at <http://tinyurl.com/gpwnvsk> (last checked 4/21/2017).

⁴¹ Hafiez profile listing entities represented for H-1B visa work, available at: <http://tinyurl.com/mvmtt1av> (last checked 4/23/2017).

⁴² List of entities represented by Mustafa Genc, available at <http://tinyurl.com/ko7Thqg> (last checked 4/20/2017).

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

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.

- 2710 Bethel LLC: 2710 Bethel LLC was created in 2002 by Mural 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/ky6g9hj> (last checked 4/20/2017).

⁴⁴ Representative Grijalva's letter is available at: <http://tinyurl.com/hnxbqbs> (last checked 3/14/2017). Representative Gallego's letter is available at: <http://tinyurl.com/zyrft3u> (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/myp3y2> (last checked 4/19/2017).

⁴⁷ Figure includes payments by IMSA North, IMSA South, and IMSA West, audits available at: <http://tinyurl.com/44mmuqk> (last checked 4/19/2017), and IMSA - West 990s available at: <http://tinyurl.com/lizq47> (last checked 4/19/2017).

⁴⁸ IMSA - South lease information found in audits available at: <http://tinyurl.com/44mmuqk> (last checked 4/21/2017). Property records are available at: <http://tinyurl.com/r8j4uov> (last checked 4/17/2017).

⁴⁹ New Plan Learning, Inc. 2014 Bond Official Statement pg A-4, A-5, available at: <http://tinyurl.com/z3oauwp> (last checked 9/6/2016); see also the Ohio State Narrative.

⁵⁰ See Dan Mahopoulos, *Targeted Firms Still Get Tax Money After Charter Raids*, *Chicago Sun-Times* <http://tinyurl.com/jzmevth> (last checked 9/8/2016).

E-Rate funding consultant to the schools. In 2014, Gültekin Aytekin filed an FCC Form 471 on behalf of IMSA. The form names Özgür 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

Gülenist Cultural Foundations

► Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.⁵² 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.⁵³ 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.⁵⁴

► Turkish American Federation of Midwest (TAFM): TAFM is a member of the Turkic

by Ertugrul Gurbuz, is currently under federal investigation as one of the vendors Concept allegedly used to defraud the E-Rate program.⁵⁵ The company and its subsidiaries have received over \$3.2 million dollars from Concept schools.⁵⁶ In 2014, Gültekin Aytekin filed an FCC Form 471 on behalf of IMSA. The form names Core Group, Inc. as the service provider.⁵⁷

American Alliance (TAA).⁵⁸ The TAA posts articles and op-eds written by Fetullah 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,

Kazim Eldes and Numan Koca, incorporated TASI as The Holy Dove Foundation in 2004. The third incorporator, Turay 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

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.⁶⁴ 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.⁶⁵ Eksili has also worked with Ant Travel & Tours and Arjun Travel in Chicago, outfits that arrange the Gülenist junkets to Turkey.⁶⁶

► Trips: Eksili has hosted and coordinated multiple trips to Turkey across his different roles to build political support for the Gülenist agenda.⁶⁷

► Donations: In 2013, Eksili donated \$5,000 to federal campaigns. At the time, he worked as the vice president of the Turkish American Federation of Midwest but only earned a salary of only \$31,592.⁶⁸ This led one news report to question the legitimacy of the donations.⁶⁹ Since 2010, he has given over \$33,000 to political campaigns, including: \$5,000 to

⁵¹ USAC Form 471 available at: <http://tinyurl.com/mw4ew8> (last checked 4/21/2017).
⁵² See Mihalopoulos, Dan, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jmzxevn> (last checked 9/8/2016).
⁵³ Id.
⁵⁴ USAC Form 471 available at: <http://tinyurl.com/mw4ew8> (last checked 4/21/2017).
⁵⁵ See <http://www.niagarafoundation.org/> for information about the Niagara Foundation and <http://tinyurl.com/d8t5sc> for information about Gülen as Honorary President (last checked 9/8/2016).
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/mkxkxnd> (last checked 4/20/2017).
⁵⁸ BilalEksili.com, available at: <http://tinyurl.com/m47jnd> (last checked 4/21/2017).
⁵⁹ Turkish American Alliance, available at: <http://tinyurl.com/lls5td> (last checked 4/21/2017).
⁶⁰ Turkish American Federation of Midwest, available at: <http://tinyurl.com/lqzbtot> (last checked 4/21/2017).
⁶¹ Turkish American Federation of Midwest, available at: <http://tinyurl.com/kroc65> (last checked 4/21/2017).
⁶² IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶³ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁴ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁵ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁶ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁷ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁸ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).
⁶⁹ IMSA - West, 990s, available at: <http://tinyurl.com/rzkt7> (last checked 4/19/2017). IMSA - North, 990s, available at: <http://tinyurl.com/kgopb5> (last checked 4/19/2017). TAFM, 990s, available at: <http://tinyurl.com/luznwm> (last checked 4/19/2017).

- 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).⁷⁶ 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,⁷⁸ Bill Clinton,⁷⁷ Jeb Bush,⁷⁹ 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 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

American Society of Chicago (IL).⁹¹

- Levent Elbail: 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 Dunder: 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

- Turgey 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

⁷⁶ Campaign contributions are searchable at <http://tinyurl.com/lypdc> (last checked 4/21/2017).

⁷⁷ IMSA - South Testimonials available at: <http://tinyurl.com/m4h7wg> (last checked 4/21/2017).

⁷⁸ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁷⁹ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁰ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸¹ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸² Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸³ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁴ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁵ TAA Staff Congressional Ramadan Dinner at the U.S. House of Representatives, Turkish American Alliance (July 16, 2014), available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁶ Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁷ IMSA - South Application available at: <http://tinyurl.com/kxkags> (last checked 4/21/2017); Bilal Eksili on Flickr, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁸ Bilal Eksili on YouTube, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁸⁹ IMSA South Application at 81, available at: <http://tinyurl.com/kxkags> (last checked 4/21/2017).

⁹⁰ Pam Adams, Quest Academy Cuts Ties with Management Company, Extends Deal with District 150, Journal Star (Jan. 22, 2015), available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁹¹ CMSA Press Release available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017); Illinois High School Association Contact Information, CMSA, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

⁹² IMSA West Replication Application, at 94 (Sep. 20, 2013), available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

⁹³ LinkedIn Profile available at: <http://tinyurl.com/lypdc> (last checked 4/19/2017).

⁹⁴ See LinkedIn profile for Levent Elbail, available at <http://tinyurl.com/z3j3nv> (last checked 11/23/2016).

⁹⁵ Id.

⁹⁶ Id.

⁹⁷ LinkedIn Profile available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

⁹⁸ IMSA West, 990s, available at: <http://tinyurl.com/lypdc> (last checked 4/19/2017); IMSA South, 990s, available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

⁹⁹ Corporate documents in Indiana are available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁰ Corporate documents in Indiana are available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰¹ Mural Dunder, Curriculum Vitae, available at: <http://tinyurl.com/m4d5dl> (last checked 4/21/2017).

¹⁰² Corporation registration information available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017); Indiana Science Academy Charter School Proposal at 1, available at: <http://tinyurl.com/m4d5dl> (last checked 4/17/2017); Indiana Life Sciences Academy, Charter School Prospectus, available at: <http://tinyurl.com/m4d5dl> (last checked 4/26/2017).

¹⁰³ Magnolia Public Schools Board available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁴ LinkedIn Profile available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁵ Indiana Science Academy Charter School Proposal at 1, available at: <http://tinyurl.com/m4d5dl> (last checked 4/17/2017).

¹⁰⁶ Corporate documents in Indiana are available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁷ Corporate documents in Indiana are available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁸ Corporate documents in Indiana are available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017).

¹⁰⁹ New Plan Learning, Inc. 2014 Bond Official Statement pg. A-32, available at: <http://tinyurl.com/m4d5dl> (last checked 9/6/2016).

¹¹⁰ Corporation registration information available at: <http://tinyurl.com/m4d5dl> (last checked 4/19/2017); Indiana Science Academy Charter School Proposal at 1, available at: <http://tinyurl.com/m4d5dl> (last checked 4/17/2017); Indiana Life Sciences Academy, Charter School Prospectus, available at: <http://tinyurl.com/m4d5dl> (last checked 4/26/2017).

¹¹¹ New Plan Learning, Inc. 2014 Bond Official Statement pg. A-32, available at: <http://tinyurl.com/m4d5dl> (last checked 9/6/2016).

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 Turkish 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

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).¹¹⁸

► *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).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

► *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,

► *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/z9kbox> (last checked 9/8/2016).

¹¹² 2012 990 tax return, showing Argun as a board member, available at: <http://tinyurl.com/w8ssnk> (last checked 4/19/2017); Georgia Secretary of State business search for Officer Vedat Argun, available at: <http://tinyurl.com/pa73hw> (last checked 4/19/2017).

¹¹³ Id.

¹¹⁴ LinkedIn profile, available at: <http://tinyurl.com/kamsck> (last checked 4/19/2017).

¹¹⁵ LinkedIn profile, available at: <http://tinyurl.com/kamsck> (last checked 4/19/2017).

¹¹⁶ <http://tinyurl.com/nh3iz> (last checked 4/21/2017).

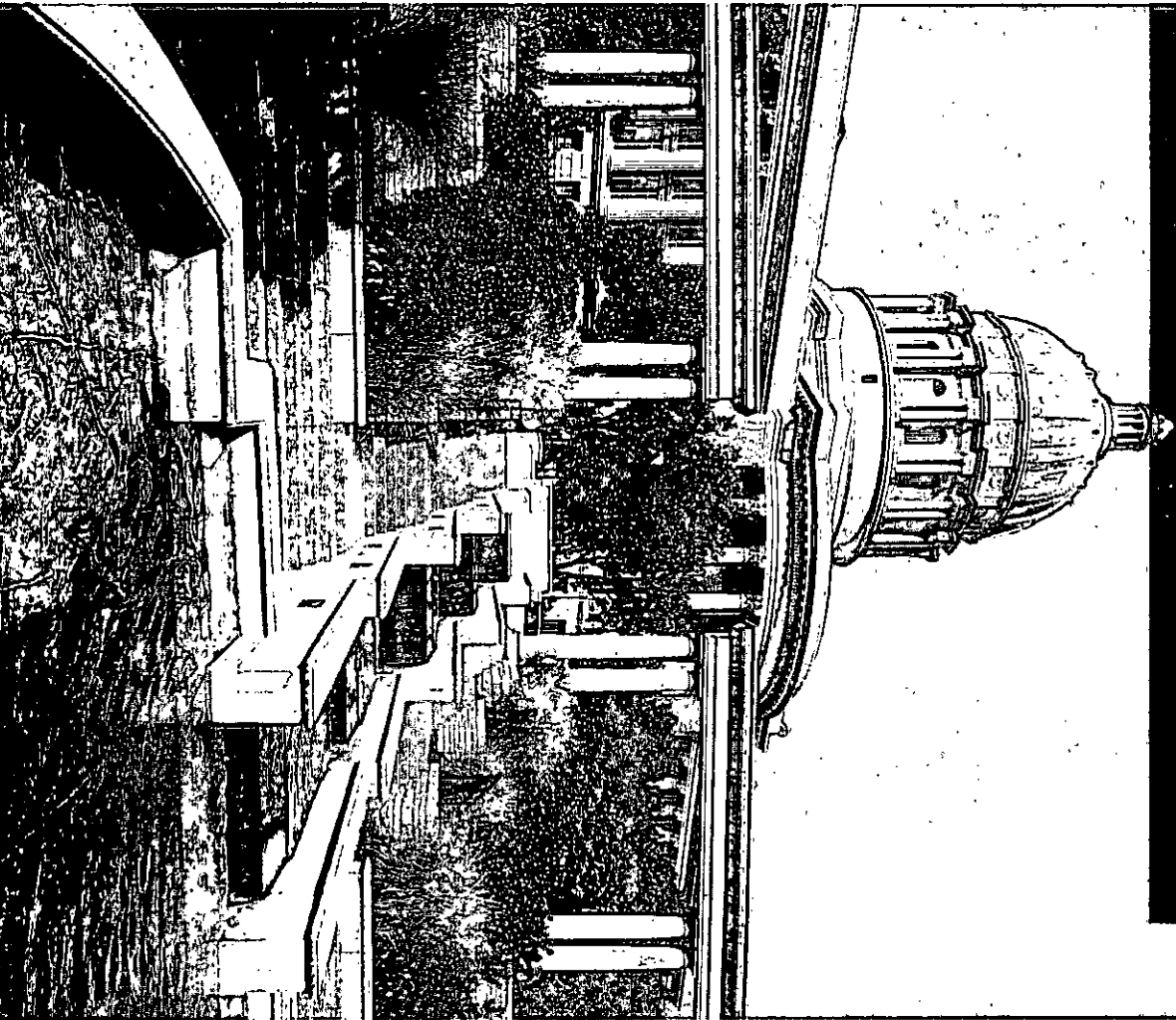
¹¹⁷ <http://tinyurl.com/jp6d3z3> (last checked 4/21/2017).

¹¹⁸ <http://tinyurl.com/j7uxcm> (last checked 4/21/2017).

¹¹⁹ <http://tinyurl.com/gragble> (last checked 4/21/2017).

¹²⁰ <http://tinyurl.com/h3vs8g> (last checked 4/21/2017).

Missouri



Empire of Deceit: An Investigation of the Gulen Charter School Network

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
 - ▶ 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 Millennium 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 Gulen 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: \$12,538,911²
 - ▶ 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 Gulenist cultural association in Maryland; led trip to Turkey for fellow professors sponsored by the Niagara Foundation and disclosed that it was openly Gulenist; 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/6nubwxy> (last checked 4/19/2017)
- ² Figure represents only the Gateway MO schools, taken from the Gateway Science Academy 2016 audit information gathered from Articles of Incorporation, pg 82, available at: <http://tinyurl.com/12sbkxy> (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/fjlyc6s> (last checked 4/25/2017).
- ³ <http://tinyurl.com/kchbxyw> (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/kdambba> (last checked 4/25/2017).
- ⁵ Information gathered from Gateway charter petition, pg 7, E-rate form, available at: <http://tinyurl.com/jlnz0ds> (last

- Emre Celebi: Incorporator of Gateway Science Academy of St. Louis; Published several academic papers with Y. Alp Aslanooglu, Gulen's official spokesperson and Executive Director of Alliance for Shared Values, Harmony (TX) landlord, and major Harmony (TX) vendor; Professor at LSU Shreveport;⁸
- Taner Ertekin: Established Gulenist 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 Gulenist landlord; entity; founder of Chicago Math and Science Academy.⁹

Overview

As of the 2016-2017 school year, Missouri has nine charter schools within the Gulen Organization. Unlike other states, Missouri is split across two regions of the Gulen 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 Gulen Organization.⁸ The information in this profile is limited to the Gateway (MO) network.

School	Operation	Student Demographic Information ^a	Authorizer	Governing Board
Gateway Science Academy of St. Louis-Elementary School Smiley Campus	Grades K-5 2010-present	11% ELL 31.5% FRL 5.7% SWD	Lindenwood University	Gateway Science Academy of St. Louis
6576 Smiley Avenue, Saint Louis, MO 63139		17.8% Minority 82.2% Caucasian		

- checked 4/25/2017); LinkedIn profile, available at: <http://tinyurl.com/kjce23> (last checked 4/25/2017).
- * Information taken from Articles of Incorporation, pg. 67, available at: <http://tinyurl.com/2exky> (last checked 4/25/2017). List of three articles by Celebi and Aslanooglu, available at: <http://tinyurl.com/yssb06> (last checked 4/25/2017); see Greater Texas region for more information about Alp Aslanooglu; Celebi resume, available at: <http://tinyurl.com/mnshlna> (last checked 4/25/2017).
- * Information taken from Bond statement at A-23 describing Ertekin's involvement, available at: <http://tinyurl.com/leas6fs> (last checked 4/19/2017). See, e.g., HSA Cleveland 2007 audit, pg. 24, where a finding was made against the school for paying the immigration expenses of the spouses of Sedar Duran and Taner Ertekin, Concept's founders, available at: <http://tinyurl.com/4p9q45> (last checked 9/8/2016); 2007 Breeze Inc. 990 form, available at: <http://tinyurl.com/j9stux> (last checked 9/8/2016); CMSA 990 tax documents listing Ertekin, available at: <http://tinyurl.com/hdujgbe> (last checked 4/20/2017).

For more information about the Frontier (MO) network, please see the Missouri profile in the Greater Texas region.

School	Operation	Student Demographic Information ^a	Authorizer	Governing Board
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Gateway Science Academy of St. Louis-Elementary School South
6651 Garvis 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 Gulen relocated to the United States in 1999, his followers promptly formed non-profit educational foundations and filed applications for the first of the Gulen Organization's charter schools throughout the country. Some of the earliest charter school efforts by the Gulen 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 Gulenists 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

^a Student enrollment and demographic information available at: <http://tinyurl.com/konbwty> (last checked 4/19/2017).

⁹ Concept Schools NFP corporate information, available at: <http://tinyurl.com/zalry7> (last checked 4/20/2017).

school year." 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 Gulen 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 Gulenist vendors. Former Concept executive Ozgur Balsey was one of the purportedly fraudulently enriched Turkish vendors who was raided.¹⁶ According to the same media reports, while Balsey 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 Balsey's business to provide services, as well.¹⁸ The investigation is ongoing.

¹² Mustafa Emanet, a former H-1B employee and Gulenist, 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 Gulen Organization.¹⁹ Since his cooperation with the FBI, Emanet and his wife, who was also employed with Concept, Mary Addi, have come forward and provided information regarding the forced tuzuk payments and titling to the Gulen 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 C.

¹³ Information available at Lindenwood University's charter website, available at: <http://tinyurl.com/ymkxkx> (last checked 4/25/2017) as well as from Gateway's initial charter petition.

¹⁴ See Akkaya's resume, available at: <http://tinyurl.com/kxbvbw> (last checked 4/25/2017).

¹⁵ Trip summary featuring Akkaya and write-up regarding sponsorship of trip, available at: <http://tinyurl.com/hfjy6s> (last checked 4/25/2017).

¹⁶ Maniopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: <http://tinyurl.com/3snbnd> (last checked 9/8/2016).

¹⁷ Search Warrant application available at: <http://tinyurl.com/j9j4ed> (last checked 9/8/2016).

¹⁸ See *id.*, see also Maniopoulos, Dan and Seidel, Jon, *Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: <http://tinyurl.com/3snbnd> (last checked 9/8/2016).

¹⁹ See Maniopoulos, Dan, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times (<http://tinyurl.com/mzzenh>) (last checked 9/8/2016).

²⁰ AEE provides day-camp services at Gateway, available at: <http://tinyurl.com/hnbdpc5> (last checked 4/25/2017).

²¹ Search Warrant application, pg 44, available at: <http://tinyurl.com/j9j4ed> (last checked 9/8/2016).

²² 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: <http://tinyurl.com/mezzuxp> (last checked 4/20/2017).

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 Gulenist-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.²³

While the Gateway MO audits are overall

Real Estate

One of the most significant profit centers for the Gulen Organization, and in particular the Midwestern region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Yahap Uysal, a board member of Concept Schools,²⁴ wrote and presented an article entitled "Gulen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Feithullah Gulen Movement in Thought and Practice.²⁵ Gulenists throughout the country attended and presented, including Alp Aslanooglu, former Harmony Public Schools landlord/CEO of one Harmony's largest vendors, property buyer from Dove Science Academy, and Gulen's official spokesperson in his role as President of the Alliance for Shared Values, a Gulenist cultural organization.²⁶

²³ Gateway Science Academy 2012 audit.

²⁴ See Concept Schools 990 tax form, available at: <http://tinyurl.com/f5yult>.

²⁵ Conference was held Nov. 3, 2007 in San Antonio, Texas, and the conference agenda is available at: <http://tinyurl.com/g2xvuj5> (last checked October 31, 2016).

²⁶ See Texas profile for more information about Alp Aslanooglu.

²⁷ New Plan Learning, Inc. 2011A Bond Official Statement pg A-4, available at: <http://tinyurl.com/zxoauyp> (last checked 9/6/2016).

²⁸ New Plan Learning, Inc. 2011A Bond Official Statement, pg A-4, A-5, available at: <http://tinyurl.com/zxoauyp> (last checked 9/6/2016); see also Exhibit A for Property information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools.

²⁹ See 2007 Concept 990 with Arabic listed as employee, available at: <http://tinyurl.com/z9y36h> (last checked 9/8/2016).

³⁰ See Business profile for New Plan Learning, Inc., showing its incorporation in 2005 and listing Arabic as agent, available at: <http://tinyurl.com/tu2dbx7> (last checked 9/8/2016).

much cleaner than its sister networks within the Gulen Organization, Gateway utilizes the same Gulenist 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 Gulen Organization.

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 Gulen Organization.

Currently, New Plan Learning owns the Gateway South building under its subsidiary 6651 Gravels 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.²² \$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.²³

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.²⁴ While Gateway will pay \$6.7 million in rent

to New Plan Learning from 2015-28, Gateway will pay only \$1.6 million for the Gateway Smiley campus over the same period, nearly four times' less.²⁵ 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 unfiliated with the Gulen Organization and is not seeking to exploit its public resources.²⁶

Gateway owns the Gateway Middle/High campus in its own name, having purchased it in 2013 from an unaffiliated third party for \$795,000.²⁷ 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.²⁸

Egregious rents far above the purchase price are not the only means that New Plan Learning, Concept, and the Gulen Organization extract public funds in real estate. Hiring Gulenist affiliated contractors who routinely overcharge and underperform is another critical money-maker for the Gulen Organization. Just as it had throughout Ohio and Illinois, New Plan Learning hired Quality Builders of Midwest, the preferred Gulenist contractor for the Midwestern region, for a million dollar renovation of the Gateway South building at the school's additional expense.²⁹

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.³⁰ 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 2041.³¹ 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) Gulen Organization charter networks.³² 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 Gulen Organization charter networks, Concept and their MO schools utilize the H-1B visa program to immigrate large numbers of Turkish Gulenists 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.³³ While the Gulen 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 Gulen Organization charter networks, vendors, and cultural associations, indicating once again the existence of an overall network. For example:

► **Renzli Kulen, Concept and Gateway MO used Kulen, a New York-based attorney,**

²² New Plan Learning, Inc. 2011A Bond Official Statement, available at: <http://tinyurl.com/xzcaupk> (last checked 9/6/2016).

²³ *Id.*

²⁴ Pima County bond issuances, available at: <http://tinyurl.com/kard94> (last checked 3/30/2017).

²⁵ Gateway MO schools filed 30 H-1B applications from 2001-2016, available at: <http://tinyurl.com/nhm6sf9> (last checked 4/24/2017). Concept filed 176 H-1B applications 2001-2016. See <http://tinyurl.com/3what> for Concept Schools, Inc.; <http://tinyurl.com/zhg3xk> for Concept Schools Nfp.

²⁶ List of entities represented by Renzli Kulen, available at <http://tinyurl.com/gpww5x> (last checked 3/21/2017).

²⁷ List of entities represented by Mustafa Genc, available at <http://tinyurl.com/k0z7hqd> (last checked 4/24/2017).

► **Mustafa Genc: Gateway MO used Genc, an Illinois-based attorney, to file numerous H-1B applications.³⁴ Genc also filed applications for:**

- Concept Schools
- Horizon (OH)
- Noble (OH)
- Math and Science (IL)
- Math and Science (IN)

³⁴ See sale price, available at: <http://tinyurl.com/mrnbdc>, purchase details at: <http://tinyurl.com/pe9u6> (last checked 4/25/2017).

³⁵ Budget, pg 12, available at: <http://tinyurl.com/2ek4y> (last checked 4/25/2017).

³⁶ Project details, available at: <http://tinyurl.com/mrnbdc> (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).

³⁷ 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/mrnbdc>, <http://tinyurl.com/kard94>, <http://tinyurl.com/2ek4y>, and <http://tinyurl.com/28qce> (last checked 4/25/2017).

³⁸ Gateway Science Academy 2016 audit projections, pg 14.

³⁹ Gateway Science Academy 2012 Audit, pg 11.

⁴⁰ The Gateway Smiley rent projections are based off of those contained in the Gateway Science Academy 2016 audit projections, pg 14.

⁴¹ Gateway Science Academy 2012 Audit, pg 11.

⁴² See sale price, available at: <http://tinyurl.com/mrnbdc>, purchase details at: <http://tinyurl.com/pe9u6> (last checked 4/25/2017).

⁴³ Budget, pg 12, available at: <http://tinyurl.com/2ek4y> (last checked 4/25/2017).

⁴⁴ Project details, available at: <http://tinyurl.com/mrnbdc> (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).

- ▶ David Nachman: Concept used Nachman, a New Jersey-based attorney, to file H-1B applications.³² Nachman also filed H-1B applications for:
 - ▶ MilkyWay Education Center (NJ)
 - ▶ Paterson Charter School for Science and Technology (NJ)
- ▶ Nuzhat Hafeez: Concept MO schools

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.³³ 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.³⁴ 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.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, including 6651 Gravois LLC, the owner of the Gateway South property.³⁶ 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.³⁷ 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

³² Nachman profile listing entities represented for H-1B visa work, available at: <http://tinyurl.com/nysh-3y> (last checked 4/13/2017).

³³ Hafeez profile listing entities represented for H-1B visa work, available at: <http://tinyurl.com/mvmtay> (last checked 4/13/2017).

³⁴ Gateway Science Academy 2012 audit, pg. 12.

³⁵ See Concept Schools network, available at: <http://tinyurl.com/33d8sb> (last checked 8/26/2016).

³⁶ New Plan Learning, Inc. 2011 Bond Official Statement, pg. A-4, available at: <http://tinyurl.com/zxcuap> (last checked 9/6/2016).

³⁷ New Plan Learning, Inc. 2011 Bond Official Statement, pg. A-4, A-5, available at: <http://tinyurl.com/zxcuap> (last checked 9/6/2016). See also Exhibit A for Property Information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools.

³⁸ See project information, available at: <http://tinyurl.com/zw2dy2> (last checked 11/11/2016).

Gülenist Cultural Foundations

- ▶ of the E-Rate program.³⁹ The company served as an E-Rate funding consultant to the schools and also provides services to the Gateway MO network.⁴¹
- ▶ 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.⁴²
- ▶ Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.⁴³ 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.⁴⁴ 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.⁴⁵ In Missouri, Niagara assisted the Turkish American Society of Missouri in hosting a dialog dinner for the state legislature.⁴⁶

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, aka. Engin Blackstone:

³⁹ See Mhalopoulos, Dan, *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jznzwh> (last checked 9/8/2016).

⁴⁰ ASE provides day-camp services at Gateway, available at: <http://tinyurl.com/h4bpc5> (last checked 4/25/2017).

⁴¹ See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: <http://tinyurl.com/28269f> (last checked 4/25/2017).

⁴² See <http://www.niagarafoundation.org/> for information about the Niagara Foundation and <http://tinyurl.com/08hvc4> for information about Gülen as Honorary President (last checked 9/6/2016).

⁴³ Audit available at: <http://tinyurl.com/hac54q> (last checked 9/6/2016).

⁴⁴ For a description of a legislator's trip to Turkey with the Niagara Foundation, see: <http://tinyurl.com/mk4ndo> (last checked 4/20/2017).

⁴⁵ See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: <http://tinyurl.com/28269f> (last checked 4/25/2017).

⁴⁶ 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 Emenet to OH legislature, available at: <http://tinyurl.com/yln330> (last checked 4/25/2017); and state employee salary search, available at: <http://tinyurl.com/kzp3al> (last checked 4/21/2017) (searching both "Engin Karatas" and "Engin Blackstone").

- ▶ 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
- ▶ 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.⁶⁰
- ▶ Cenk Kademir: Substitute teacher, HSA

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).
- ▶ SLPS sells Gardenville School to Concept Schools for \$12M. 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/j4czb14> (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).
- ▶ Mihalopoulos, Dan and Seidel, Jon. *Charter Firm Suspected of Cheating Federal Grant Program*. Chicago Sun-Times (December 16, 2016). Available at: <http://tinyurl.com/j3snbad>.
- ▶ Clubb, Shawn. *Parishioners say goodbye to St. Pius V school*. St. Louis Post-Dispatch. 5 December 2008. Available at: <http://tinyurl.com/zobowfw> (1 March 2017).

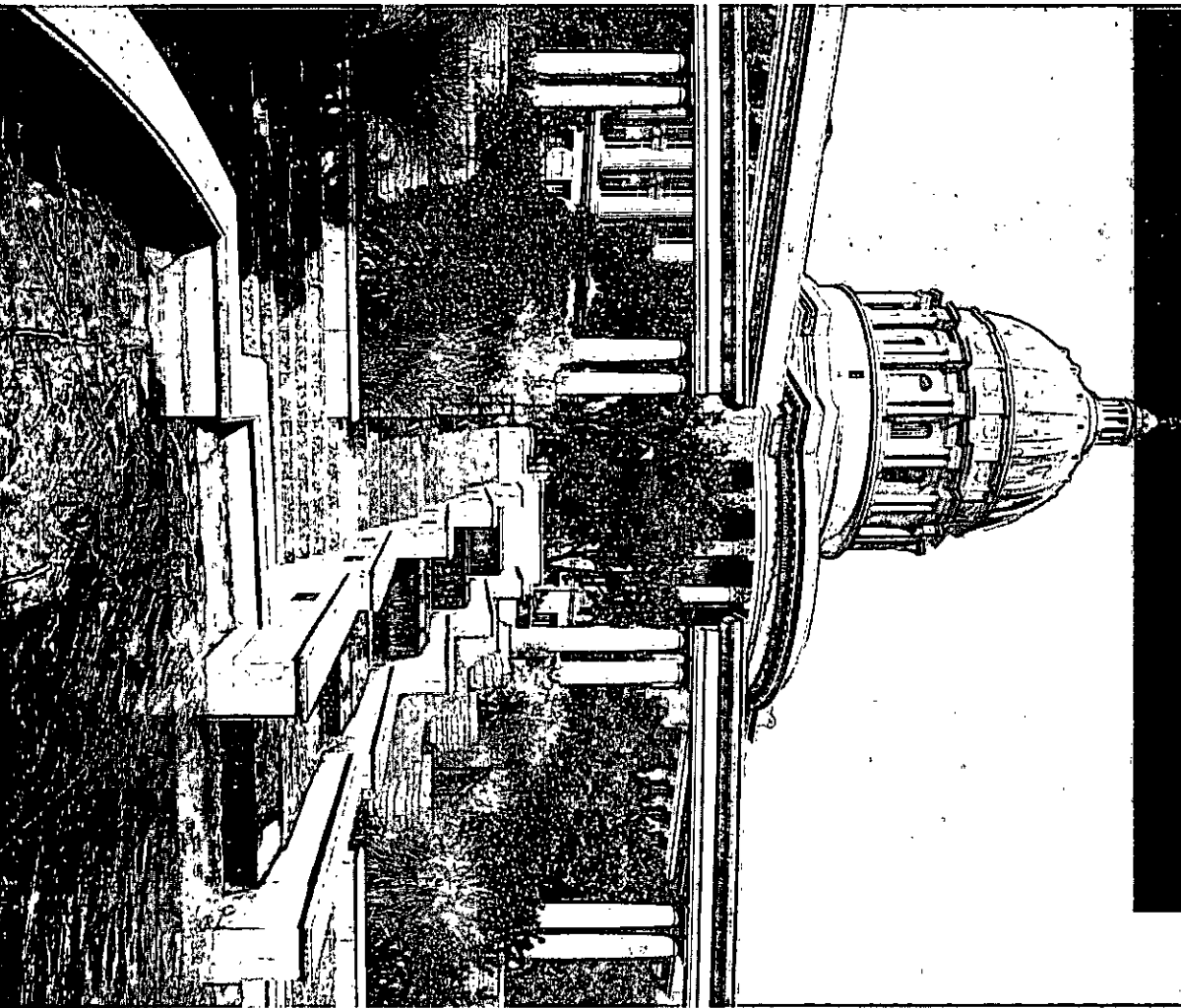
⁵⁸ Information taken from educator credentials search OH, available at: <http://tinyurl.com/7bnytk> (last checked 4/27/2017); Concept newsletter 2011, available at: <http://tinyurl.com/jwbsnzt> (last checked 4/27/2017); Missouri Department of Education School Directory, available at: <http://tinyurl.com/r7st5tg>.

⁵⁹ Information taken from educator credentials search OH, available at: <http://tinyurl.com/7bnytk> (last checked 4/27/2017); Missouri Department of Education School Directory, available at: <http://tinyurl.com/r7st5tg>.

⁶⁰ Information taken from educator credentials search OH, available at: <http://tinyurl.com/7bnytk> (last checked 4/27/2017); state employee search, available at: <http://tinyurl.com/kzpa3at> (last checked 4/27/2017); 2013 Missouri department of education directory, available at: <http://tinyurl.com/kw937ds> (last checked 4/27/2017); LinkedIn profile, available at: <http://tinyurl.com/m2z8xc> (last checked 4/27/2017).

⁶¹ Information taken from Educator credentials search OH, available at: <http://tinyurl.com/7bnytk> (last checked 4/27/2017); and LinkedIn profile, available at: <http://tinyurl.com/mzmpcs> (last checked 4/27/2017).

Missouri



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: 2789¹
 - ▶ 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 Millennium Education Foundation s/c)
 - Organized as a non-profit 501(c)(3) organization
 - Oversees the 5 Frontier campuses
 - ▶ Charter Management Services Vendor: Concept Schools, Inc.
- ▶ Regional Gulen Organization Oversight Entity: Concept Schools, Inc.
- ▶ Student enrollment and demographic information available at: <http://tinyurl.com/4n6mwy> (last checked 4/19/2017)
- ▶ Figure represents only the Gateway MO schools, taken from the Gateway Science Academy 2016 audit.
- ▶ Information gathered from Articles of Incorporation, pg 6; available at: <http://tinyurl.com/12ekly> (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/jfjy06> (last checked 4/25/2017). Bio available at: <http://tinyurl.com/kx0r6w> (last checked 4/25/2017).
- ▶ "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/kdambba> (last checked 4/25/2017).
- ▶ Information gathered from Gateway charter petition, pg 7, E-rate form, available at: <http://tinyurl.com/jln208s> (last checked 4/19/2017)
- ▶ 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: \$12,538,911²
- ▶ 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 Gulenist cultural association in Maryland; led trip to Turkey for fellow professors sponsored by the Niagara Foundation and disclosed that it was openly Gulenist; 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 Trad Math and Science Academy (NC).⁵

- Emre Celebi: Incorporator of Gateway Science Academy of St. Louis; Published several academic papers with Y. Alp Aslandogan, Gulen'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 Gulenist

Overview

As of the 2016-2017 school year, Missouri has nine charter schools within the Gulen Organization. Unlike other states, Missouri's split across two regions of the Gulen 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 (TX), which classifies them within the Greater Texas region of the Gulen Organization.⁷ 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 Gulen 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 ⁸	Authorizer	Governing Board
Gateway Science Academy of St. Louis-Elementary School Smiley Campus 6978 Smiley Avenue, Saint Louis, MO 63139	Grades K-5 2010-present	11% ELL 31.5% FRL 5.7% SWD 178% Minority 82.2% Caucasian	Lindenwood University Academy of St. Louis	Gateway Science Academy of St. Louis

⁶ checked 4/25/2017; LinkedIn profile, available at: <http://tinyurl.com/kce293> (last checked 4/25/2017).

⁷ Information taken from Articles of Incorporation, pg. 67, available at: <http://tinyurl.com/2eikxy> (last checked 4/25/2017); List of three articles by Celebi and Aslandogan, available at: <http://tinyurl.com/lvsx86> (last checked 4/25/2017); see Greater Texas region for more information about Alp Aslandogan; Celebi resume, available at: <http://tinyurl.com/minishna> (last checked 4/25/2017).

⁸ Information taken from Bond statement at A-23 describing Ertekin's involvement, available at: <http://tinyurl.com/keas8f5> (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/2p9q45> (last checked 9/8/2016), 2007 Breeze Inc. 990 form, available at: <http://tinyurl.com/2j9u0xx> (last checked 9/8/2016), CMSA 990 tax documents listing Ertekin, available at: <http://tinyurl.com/hdu0gbe> (last checked 4/20/2017).

⁹ For more information about the Frontier (MO) network, please see the Missouri profile in the Greater Texas region.

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 Gulenist landlord entity; founder of Chicago Math and Science Academy.⁷

School	Operation	Student Demographic Information ⁸	Authorizer	Governing Board
Gateway Science Academy of St. Louis-Elementary School South 6651 Gravois Avenue, Saint Louis, MO 63318	Grades K-5 2013-present	9.9% ELL 69% FRL 9.6% SWD 36.7% 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 4.5% 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		

⁸ 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 Gulen relocated to the United States in 1989, his followers promptly formed non-profit educational foundations and filed applications for the first of the Gulen Organization's charter schools throughout the country. Some of the earliest charter school efforts by the Gulen 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 Gulenists 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

⁹ Student enrollment and demographic information available at: <http://tinyurl.com/k6mwbwy> (last checked 4/19/2017).

¹⁰ Concept Schools NFP corporate information, available at: <http://tinyurl.com/zaijy7> (last checked 4/20/2017).

Empire of Decadence: An investigation of the Gulen Charter School Network

school year." 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 Gulen 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" 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 Gulenist vendors. Former Concept executive Oguz Baisoy was one of the purportedly fraudulently enriched Turkish vendors who was raided.¹⁶ According to the same media reports, while Baisoy 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 Baisoy's business to provide services, as well.¹⁸ The investigation is ongoing.

Mustafa Emanet, a former H-1B employee and Gulenist, 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 Gulen Organization.¹⁹ Since his cooperation with the FBI, Emanet and his wife, who was also employed with Concept, informed Addi, have come forward and provided information regarding the forced tuzak payments and tithing to the Gulen Organization required of Turkish H-1B employees.²⁰ Emanet also produced a copy of the tuzak agreement itself, which is attached to this report as Appendix

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 Gulenist-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

Real Estate

One of the most significant profit centers for the Gulen Organization, and in particular the Midwest region, is through real estate. This property financing scheme has been replicated throughout the country—in fact, Vehap Uysal, a board member of Concept Schools,²² wrote and presented an article entitled "Gulen Movement and School Financing" at the Third Annual Conference on Islam in the Contemporary World: The Fethullah Gulen Movement throughout Thought and Practice.²³ Gulenists throughout the country attended and presented, including Alp Aslanoğlu, former Harmony Public Schools landlord, CEO of one Harmony's largest vendors, property buyer from Dove Science Academy, and Gulen's official spokesperson in his role as President of the Alliance for Shared Values,²⁴ Gulenist cultural organization.²⁵

much cleaner than its sister networks within the Gulen Organization, Gateway utilizes the same Gulenist 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 Midwest region and the Gulen Organization.

Early on, the founders of the Midwest region established Breeze Inc. to acquire properties for Concept Schools throughout the Concept network.²⁶ New Plan Learning was created shortly thereafter, and now acts as the non-profit umbrella organization for Breeze and several other wholly owned subsidiaries.²⁷ Murat Arabaci, a former Concept employee, 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 schools at egregiously high lease rates. This model allows the Gulen Organization to acquire

¹¹ Information available at Lindenwood University's charter website, available at: <http://tinyurl.com/nykshk> (last checked 4/25/2017) as well as from Gateway's initial charter petition, available at: <http://tinyurl.com/kxbtbow> (last checked 4/25/2017).
¹² See Akkaya's resume, available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹³ Trip summary featuring Akkaya and write-up regarding sponsorship of trip, available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁴ *Whistleblower*, Dan and Seidel, *Ion, Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁵ Search Warrant application available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁶ See *id.*; see also *Whistleblower*, Dan and Seidel, *Ion, Charter Firm Suspected of Cheating Federal Grant Program*, Chicago Sun-Times (December 16, 2015). Available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁷ See *Whistleblower*, Dan, *Targeted Firms Still Get Tax Money After Charter Ruled*, Chicago Sun-Times (December 16, 2015). Available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁸ ASE provides day-camp services at Gateway, available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
¹⁹ Search Warrant application, pg. 44, available at: <http://tinyurl.com/3snbad> (last checked 9/8/2016).
²⁰ 2015 Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: <http://tinyurl.com/3snbad> (last checked 4/20/2017).

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 Gulen Organization.

Currently, New Plan Learning owns the Gateway South building under its subsidiary 6651 Grayco 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.²² \$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.²³

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.²⁴ 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.²⁵ 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 affiliated with the Gulen Organization and is not seeking to exploit its public resources.²⁶

Gateway owns the Gateway Middle/High campus in its own name, having purchased it in 2013 from an unaffiliated third party for \$735,000.²⁷ 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.²⁸

Egregious rents far above the purchase price are not the only means that New Plan Learning, Concept, and the Gulen Organization extract public funds in real estate. Hiring Gulenist affiliated contractors who routinely overcharge and underperform is another critical money-maker for the Gulen Organization. Just as it had throughout Ohio and Illinois, New Plan Learning hired Quality Builders of Midwest, the preferred Gulenist contractor for the Midwestern region, for a million dollar renovation of the Gateway South building at the school's additional expense.²⁹

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.³⁰ 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 2041.³¹ 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) Gulen Organization charter networks.³² 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 Gulen Organization charter networks, Concept and their MO schools utilize the H-1B visa program to immigrate large numbers of Turkish Gulenists 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.³³ While the Gulen 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 Gulen 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,**

► **Mustafa Genc: Gateway MO used Genc, an Illinois-based attorney, to file numerous H-1B applications.**³⁴ Genc also filed applications for:

- Concept Schools
- Horizon (OH)
- Noble (OH)
- Math and Science (IL)
- Math and Science (IN)

²² New Plan Learning, Inc. 2011A Bond Official Statement, available at: <http://tinyurl.com/znoauuo> (last checked 9/6/2016).

²³ *Id.*

²⁴ Pima County bond issuances, available at: <http://tinyurl.com/karids4> (last checked 3/30/2017).

²⁵ Gateway MO schools filed 30 H-1B applications from 2001-2016, available at: <http://tinyurl.com/nhm6t9g> (last checked 4/24/2017). Concept filed 176 H-1B applications 2001-2016. See <http://tinyurl.com/3whatn> for Concept Schools, Inc.

²⁶ <http://tinyurl.com/hzg3d1> for Concept Schools NLP.

²⁷ List of entities represented by Remzi Kulen, available at <http://tinyurl.com/gptwv5x> (last checked 3/21/2017).

²⁸ List of entities represented by Mustafa Genc, available at <http://tinyurl.com/k077h9q> (last checked 4/24/2017).

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/nhm6t9g>, <http://tinyurl.com/karids4>, <http://tinyurl.com/23z3p7v>, and <http://tinyurl.com/129tqce> (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/nhm6t9g> (last checked 4/25/2017).

³⁵ Budget, pg. 12, available at: <http://tinyurl.com/2enky4> (last checked 4/25/2017).

³⁶ Project details, available at: <http://tinyurl.com/nhm6t9g> (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).

- ▶ David Nachman: Concept used Nachman, a New Jersey-based attorney, to file H-1B applications.³³ Nachman also filed H-1B applications for:
 - ▶ MilkyWay Education Center (NJ)
 - ▶ Paterson Charter School for Science and Technology (NJ)
- ▶ Nuzhat Hafeez: Concept MO schools

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.³⁴ 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.³⁵ 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.³⁶ 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 8851 Gravois

³³ Nachman profile listing entities represented for H-1B visa work, available at <http://tinyurl.com/nyshdy> (last checked 4/13/2017).

³⁴ Hafeez profile listing entities represented for H-1B visa work, available at: <http://tinyurl.com/mvmtav> (last checked 4/13/2017).

³⁵ Gateway Science Academy 2012 audit, pg. 12.

³⁶ See Concept Schools network, available at: <http://tinyurl.com/z3d8qsb> (last checked 8/26/2016).

³⁷ New Plan Learning, Inc. 2014 Bond Official Statement Pg A-4, available at: <http://tinyurl.com/zxoaupx> (last checked 9/6/2016).

³⁸ New Plan Learning, Inc. 2014 Bond Official Statement Pg A-4, A-5, available at: <http://tinyurl.com/zxoaupx> (last checked 9/6/2016); see also Exhibit A for Property information, including landlords, rent, and transfer history for the facilities of the Ohio Concept Schools.

³⁹ See project information, available at <http://tinyurl.com/zxwky2> (last checked 11/11/2016).

- used Hafeez, an Illinois-based attorney, to file numerous H-1B applications.⁴⁰ Hafeez also filed H-1B applications for:
 - ▶ Concept Schools, Inc.
 - ▶ Niagara Educational Services, Inc. (IL)
 - ▶ Niagara Foundation (IL)
 - ▶ The Core Group (IL)

LLC, the owner of the Gateway South property.⁴¹ 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.⁴² 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

of the E-Rate program.⁴³ The company served as an E-Rate funding consultant to

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.⁴⁴
- ▶ Niagara Foundation: The Niagara Foundation is a major Turkish Gülenist cultural association based in Chicago. Gülen is its honorary president.⁴⁵ Niagara Educational Services, Inc., oversees the Niagara Foundation, the Science Academy of Chicago, a private Gülenist school, and is very active throughout

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 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:

⁴⁰ See Mihalopoulos, Don. *Targeted Firms Still Get Tax Money After Charter Raids*, Chicago Sun-Times <http://tinyurl.com/jmzevth> (last checked 9/9/2016).

⁴¹ ASE provides day-camp services at Gateway, available at: <http://tinyurl.com/h4bpc5> (last checked 4/25/2017).

⁴² See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: <http://tinyurl.com/z8269f> (last checked 4/25/2017).

⁴³ See <http://www.niagarafoundation.org/> for information about the Niagara Foundation and <http://tinyurl.com/d8hvcv> for information about Gülen as Honorary President (last checked 9/6/2016).

⁴⁴ Audit available at: <http://tinyurl.com/h4b44qu> (last checked 9/9/2016).

⁴⁵ For a description of a legislator's trip to Turkey (last checked 4/25/2017).

⁴⁶ See, e.g., Event details with Missouri lawmakers, Niagara, and TASOM, available at: <http://tinyurl.com/z8269f> (last checked 4/25/2017).

⁴⁷ Information taken from an interview with Engin Blackstone, available at: <http://tinyurl.com/mwdb6y6> (last checked 4/20/2017); Letter from Mary Addi and Mustafa Emanet to OH legislature, available at: <http://tinyurl.com/mz3u3p> (last checked 4/20/2017); LinkedIn profile, available at: <http://tinyurl.com/kz4k3al> (last checked 4/27/2017) (searching both "Engin Karatas" and "Engin Blackstone").

the schools and also provides services to the Gateway MO network.⁴¹

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.⁴² 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.⁴³ In Missouri, Niagara assisted the Turkish American Society of Missouri in hosting a dialog dinner for the state legislature.⁴⁴

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).⁴⁵

- ▶ Nuh Celik: Substitute teacher, HSA schools (OH); Teacher, HSA Springfield (OH); Director HSA Denison (OH); Principal Gateway Smiley campus (MO).⁵⁴
- ▶ Murat Sagnak: Substitute teacher, HSA Cleveland (OH); Principal, HSA Denison Middle (OH); Principal, HSA Dayton Downtown (OH); Principal, Gateway Middle/High (MO).⁵⁵
- ▶ 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.⁵⁶
- ▶ Cenk Kandenir: Substitute teacher, HSA

Notable Articles regarding the Missouri Network

- ▶ Mihailopoulos, Dan. *Targeted Firms Still Get Tax Money After Charter Raids*. Chicago Sun-Times <http://tinyurl.com/jzmzevh>.
- ▶ Mihailopoulos, Dan. *Federal funds for charter 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 2016. Available at: <http://tinyurl.com/zk83ux8> (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).
- ▶ Cambria, Nancy. *Charter school finalizes purchase of vacant St. Louis school*. St. Louis Post-Dispatch. 24 July 2012. Available at: <http://tinyurl.com/j4czb14> (1 March 2017).
- ▶ SLPs sells Gardenville School to Concept Schools for \$12M. The St. Louis American. 16 August 2012. Available at: <http://tinyurl.com/j988995> (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/zobowfw> (1 March 2017).

⁵⁴ Information taken from educator credentials search OH, available at: <http://tinyurl.com/j7bnytk> (last checked 4/27/2017); Concept newsletter 2011, available at: <http://tinyurl.com/jybsnzt> (last checked 4/27/2017); Missouri Department of Education School Directory, available at: <http://tinyurl.com/n7st5tg>.

⁵⁵ Information taken from educator credentials search OH, available at: <http://tinyurl.com/j7bnytk> (last checked 4/27/2017); Missouri Department of Education School Directory, available at: <http://tinyurl.com/n7st5tg>.

⁵⁶ Information taken from Educator credentials search OH, available at: <http://tinyurl.com/j7bnytk> (last checked 4/27/2017); state employee search, available at: <http://tinyurl.com/kzpa3dt> (last checked 4/27/2017); 2013 Missouri department of education directory, available at: <http://tinyurl.com/kw997ds> (last checked 4/27/2017); LinkedIn profile, available at: <http://tinyurl.com/m2y28tc> (last checked 4/27/2017).

⁵⁷ Information taken from Educator credentials search OH, available at: <http://tinyurl.com/j7bnytk> (last checked 4/27/2017); and LinkedIn profile, available at: <http://tinyurl.com/mzncpys> (last checked 4/27/2017).

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.

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

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

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

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. 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;
- ▶ 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;
 - ▶ inter-school lending and borrowing.¹¹

⁷ The overlap between the board members of the three primary entities, Daisy, Paragon, and Sonoran Schools, is available as Figure ____.

⁸ Sonoran Schools, Inc. About US History Section, available at: <http://tinyurl.com/gyskaf> (last checked 1/26/2017).

⁹ Daisy's 2016 financial statements, available at: <http://tinyurl.com/pjwswt1> (last checked 2/12/2017).

¹⁰ Daisy's 2016 financial statements, available at: <http://tinyurl.com/h5opum> (last checked 2/12/2017).

¹¹ Tim Sailer, *St. Reporter: What does \$364k in Tax Money Buy These Charter Schools*, Arizona Daily Star (Oct. 22, 2010), available at: <http://tinyurl.com/h39a56> (last checked 2/11/2017).

¹² See, e.g., the Georgia chapter.

¹³ The Anti-Money Laundering and Countering Terrorist Financing Guidance to accompany the federal and international legislation is numerous unusual transactions made with little to no justification between affiliated entities as warning signs. See Guidance at <http://tinyurl.com/zd55kel> (last checked 9/7/2016).

¹⁴ These findings were taken from a review of school and Daisy audits from the years 2009-2015, searchable at: <http://tinyurl.com/gyskaf> (last checked 1/26/2017). Instructions for searching for annual audits can be found at <http://tinyurl.com/zd7obg>.

Bond Financing

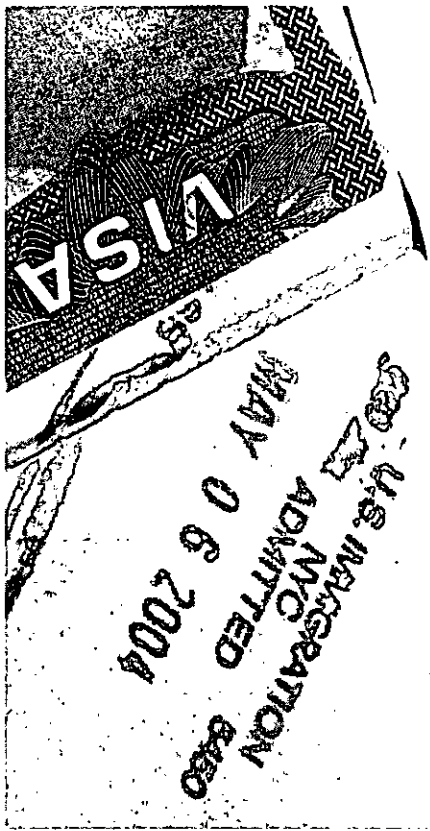
Daisy/Sonoran has taken out at least two bonds: 1) in 2006, for the SSA-Phoenix campus in the amount of 2,085,000¹⁴; and 2) in 2006, for the construction of SSA-Tucson's school campus in the amount of \$10,605,000.¹⁵ Notably, these bonds were issued by the Industrial

Development Authority of the County of Pima,

Arizona, the same bond authorizer utilized by two other Gulen 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 Gulen Organization charter networks, Daisy/Sonoran and their schools utilize the H-1B visa program to immigrate large numbers of Turkish Gulenists into the United States for employment in the schools and Daisy/Sonoran. From 2001-2016, Daisy, Sonoran, Paragon, and their six schools have filed 358 H-1B visa applications for foreign workers.¹⁶ While former

¹⁴ SSA-Tucson Bond Official statement, pg3 available at: <http://tinyurl.com/zbnvqcs> (last checked 1/30/2017).

¹⁵ SSA-Tucson Bond Official statement available at: <http://tinyurl.com/zbnvqcs> (last checked 1/27/2017).

¹⁶ 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/zwe6kic> (113); <http://tinyurl.com/h5z4g92> (18); <http://tinyurl.com/h4i4a6> (5); <http://tinyurl.com/tb3a28> (4); <http://tinyurl.com/jp6k4k> (42); <http://tinyurl.com/z2x9xci> (82); <http://tinyurl.com/h2x7j9a> (14); <http://tinyurl.com/h34anu> (13); <http://tinyurl.com/pqwyiz> (44). For 2016, refer to the 2016 data on the US DOL website, available at: <http://tinyurl.com/zm5ovc> (last checked 1/30/2017).

Daisy/Sonoran CEO Ozgur Yildiz has stated that these H-1Bs are only to fill shortage areas for math and science teachers.¹⁷ 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 Gulen 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)¹⁸

- ▶ Catherine Garcia: Daisy/Sonoran used Garcia, a California-based attorney, to file numerous H-1B applications. Garcia also filed applications for:
 - ▶ Magnolia (CA)
 - ▶ Paragon (AZ)
 - ▶ Lotus (CO)¹⁹

- ▶ 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)²⁰

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 Gulen. 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.²¹

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 Gulenist charter schools maintained Turkish leadership at the school level, and regulating that Turkish leadership regularly hire H-1B Turkish teachers in order

¹⁷ Steller, Tim, *Foreigners fill ranks of local charter-school chain*, Arizona Daily Star, (25 April 2010) <http://tinyurl.com/h5cmwxa> (last checked 1/30/2017).

¹⁸ Surowitz profile (listing entities represented for H-1B visa work available at: <http://tinyurl.com/qvash7n> (last checked 1/31/2017).

¹⁹ Garcia profile (listing entities represented for H-1B visa work available at: <http://tinyurl.com/t4wtkx> (last checked 1/31/2017).

²⁰ List of entities represented by Nancy Robinett, available at: <http://tinyurl.com/jc-6ruu> (last checked 1/31/2017).

²¹ Representative Grijalva's letter is available at: <http://tinyurl.com/hnbcqg> (last checked 3/14/2017). Representative Gallego's letter is available at: <http://tinyurl.com/zyrftdu> (last checked 3/14/2017).

to keep the cash flow from these teachers' forced titling through *tuzak* 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.²²

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 \$20,619 in federal funds by using the money for unallowable expenses.²³ 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.²⁴

Notable Turkish Vendors

operating the Gülen Organization.

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)²⁵, 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

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.²⁶

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.

- Pacific 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.²⁷ 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.²⁸

- Sema Foundation (AZ)
 - ▷ Arizona Founder Mevlan 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.²⁹
- 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.³⁰

- Mehmet Argin: Principal, Daisy/Sonoran (AZ)³¹; Daisy board member (AZ)³²; CEO at Magnolia (CA)³³; currently Lecturer at California Polytechnic, Pomona campus.³⁴
- Ozkur Yildiz: Principal, Daisy/Sonoran (AZ)³⁵; Superintendent, Daisy/Sonoran

²² 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/jpceq7> (last checked 2/9/2017).

²³ Audit report available at: <http://tinyurl.com/jboyn3c> (last checked 1/25/2017).

²⁴ <http://tinyurl.com/z2z0z02> (last checked 1/31/2017).

²⁵ SSA-B Club Catalog 2016/2017 Fall Semester, Sonoran Schools, available at <http://tinyurl.com/34uhb3> (last checked 2/12/2017); Minutes of Meeting of Governing Board of Daisy Education Corporation d/b/a Sonoran Science Academy - Phoenix, Sonoran Schools (Mar. 3, 2016), available at: <http://tinyurl.com/np0i0g> (last checked 2/12/2017); 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/j3b8av6> (last checked 2/11/2017) (discussing payments of over \$350,000 to Accord from Daisy schools); Academic Competitions, Sonoran Schools, available at: <http://tinyurl.com/z8fk448> (last checked 2/11/2017) (the Sonoran Schools' website shows use of Accord products); Tim Vanderpool, Hidden Agenda?, Tucson Weekly (Dec. 31, 2009), available at: <http://tinyurl.com/zgwnak>; 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/hw9j8jg> (last checked 2/11/2017). The Accord Education website even includes a promotional blurb from the CEO of "Sonoran Schools" with other Gülen schools. Accord Education, available at <http://tinyurl.com/igpweio> (last checked 2/11/2017).

²⁶ <http://tinyurl.com/Alf0oar> (last checked 1/25/2017).

²⁷ <http://tinyurl.com/hkgw49u> (last checked 1/30/2017).

²⁸ <http://tinyurl.com/hkgw49u> (last checked 1/30/2017).

²⁹ <http://tinyurl.com/z8fk448> (last checked 1/30/2017).

³⁰ Tim Steller, Foreigners Fill Ranks of Local Charter-School Chain, Arizona Daily Star (Apr. 25, 2010), available at: <http://tinyurl.com/jp0q04e> (last checked 2/2/2017).

³¹ Article quoting Argin during his tenure as SSA principal, available at: <http://tinyurl.com/jcrtv9s> (last checked 2/15/2017).

³² See 2012 Daisy Education 990 tax form, available at: <http://tinyurl.com/jcrtv9s> (last checked 2/15/2017).

³³ Article quoting Argin during his tenure as Magnolia CEO, available at: <http://tinyurl.com/mby72a3> (last checked 2/15/2017).

³⁴ According to Argin's LinkedIn profile, available at: <http://tinyurl.com/sdqqtz> (last checked 2/15/2017).

³⁵ Article quoting Yildiz during his tenure as Vice Principal at SSA-Tucson, available at: <http://tinyurl.com/jm5ncq> (last checked 2/15/2017).

(AZ)³⁵; Principal Bay Area Technology (CA)³⁶; President of the West American Turkish Council.³⁸

- ▶ Adem Oksuz: Daisy/Sonoran CEO (AZ)³⁹; CEO at Accord (Western Region)⁴⁰; tied to failed Mokapu-STEM charter school (HI); Lancaster Science Academy proposal (PA)⁴¹; Regional Director of Apple Education Services (Northeast Region)⁴²; CEO of Vision Academy Charter School (PA).⁴³

- ▶ Ibrahim Bayraktar: SSA-Tucson teacher (AZ)⁴⁴, now works at Accord (Western Region).⁴⁵

- ▶ Omer Guvener: Board member of Paragon Education Corporation (AZ), also board

member of Foundation for Inter-cultural Dialogue (AZ).⁴⁶

- ▶ 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)⁴⁷; Lotus Academy of Excellence Principal (CO); SSA-Tucson Principal (AZ); Sonoran Associate Superintendent (AZ).

- ▶ Mural Biyik: Math teacher at SSA; Vice Principal at Beehive (UT)⁴⁸, then Magnolia (CA); then Accord (CA), and now is back at Beehive (UT).⁴⁹

Notable Articles regarding the Arizona Network

- ▶ David Saffier, *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).⁵⁰

- ▶ 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

investigation for E-Rate fraud).⁵¹

- ▶ 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).⁵²

- ▶ 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).⁵³

- ▶ Tim Steller, *Sr. Reporter: More on Sonoran Science, on Gülen*, Arizona Daily Star, (Apr. 26, 2010) (publishing a letter from Mr. Faith 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).⁵⁴

- ▶ 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).⁵⁵

- ▶ Faith Karatas, *Letter*, Tucson Weekly (Jan. 28, 2010) (Faith Karatas denies allegations that Sonoran Science Academy schools have any links to any religious or nationalist movements).⁵⁶

- ▶ 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 Faith Karatas as denying a link between Accord and Gülen).⁵⁷

- ▶ Saxon Burns, *Police Dispatch*, Tucson Weekly, (July 24, 2003) (students at Sonoran Science Academy complained a teacher repeatedly shut them in the closet).⁵⁸

³⁵ Article quoting Yildiz during his tenure as Sonoran Superintendent, available at: <http://tinyurl.com/n8anp9q> (last checked 2/15/2017).

³⁶ Oakland Unified directory listing Yildiz as Principal of Bay Area Technology, available at: <http://tinyurl.com/zipsu34> (last checked 2/15/2017).

³⁷ According to Yildiz's LinkedIn profile, available at: <http://tinyurl.com/n87JueM> (last checked 2/15/2017).

³⁸ See 2003 Daisy Education 990 tax form, available at: <http://tinyurl.com/lcrxh9> (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/hsmnfw> (last checked 2/15/2017).

⁴¹ Oksuz resume available at page 196, <http://tinyurl.com/n7zqv5r> (last checked 1/30/2017).

⁴² Oksuz resume available at page 196, <http://tinyurl.com/n7zqv5r> (last checked 1/30/2017).

⁴³ <http://tinyurl.com/2er7zwn> (last checked 1/30/2017).

⁴⁴ <http://tinyurl.com/2emusu> (last checked 1/30/2017).

⁴⁵ Check the 2007 990 form for Foundation for Inter-cultural Dialogue, available at: <http://tinyurl.com/jurwnh3> (last checked 1/30/2017).

⁴⁶ Pg 15 of Magnolia application, available at: <http://tinyurl.com/hc7fhep> (last checked 1/31/2017).

⁴⁷ See 2008 990 form for Beehive listing Biyik as the vice principal, available at: <http://tinyurl.com/zqogfpx> (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/lqopda> (last checked 2/17/2017).

⁴⁹ <http://tinyurl.com/zykgf98> (last checked 2/17/2017).

⁵⁰ <http://tinyurl.com/jqqlkes> (last checked 3/14/2017).

⁵¹ <http://tinyurl.com/n136a6e> (last checked 2/17/2017).

⁵² <http://tinyurl.com/2b7dmlc> (last checked 2/17/2017).

⁵³ <http://tinyurl.com/z5hynep> (last checked 2/17/2017).

⁵⁴ <http://tinyurl.com/n8cnwva> (last checked 2/17/2017).

⁵⁵ <http://tinyurl.com/zaz3fde> (last checked 2/17/2017).

⁵⁶ <http://tinyurl.com/zgwyfak> (last checked 2/17/2017).

⁵⁷ <http://tinyurl.com/g2nu8u> (last checked 2/17/2017).

Florida

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: 4,525¹
- ▶ 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 Gulen 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: \$29,603,000²
- ▶ Florida Network Founders:
 - ▶ **Valcin Aktin:** 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, 2011 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/mtdznmw> (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/m9ldgh> (last checked 6/15/2017).

³ Information taken from: Discovery Education Solutions Articles of Incorporation, available at <http://tinyurl.com/k44d5wz> (last checked 6/15/2017); 2011 Technology corporate filing, available at: <http://tinyurl.com/lb3krmn> (last checked 6/15/2017); Discovery Education Properties filing, available at: <http://tinyurl.com/5b9pvy> (last checked 46/15/2017); 949 John Young LLC filing, available at: <http://tinyurl.com/kd5onmx> (last checked 6/15/2017); Article by Valcin Aktin, available at: <http://tinyurl.com/hb3cd22> (last checked 6/15/2017); New Springs corporate filings, available at: <http://tinyurl.com/knhhm> (last checked 6/15/2017).

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 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 08% African American 48% Caucasian 30% Hispanic	Arizona State Board for Charter Schools	Daisy

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.

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* (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 Ünver, 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).

* Demographic information available at: <http://tinyurl.com/gwa7aoc> (last checked 3/24/2017).
Paragon Science Academy-Elementary changed its name in 2009 to SSA-Ahwatukee. Transfer application available at: <http://tinyurl.com/z33vva> (last checked 3/13/2017).