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June 24, 2020

Ohio Attorney General Dave Yost
Office of the Ohio Attorney General
30 E Broad St
Columbus, OH 43215

Dear Attorney General Yost,

I am reaching out to you to express my profound concerns regarding the ongoing conduct of Horizon Science Academies, a private charter operator linked to a controversial nationwide network.

As you are aware, in these difficult times the economic impact of the coronavirus pandemic has fallen hardest on communities that were already vulnerable, particularly the schoolchildren of those communities. Many students depend on their local public school for two of three daily meals – including 50,000 students in Columbus, OH – and with schools closed and only 15% of students nationwide receiving funds from a federal program intended to fill the gap, the risk of childhood hunger is higher than ever. Though Ohio is taking the critical step to make up the difference directly to families of students who qualify for free meals, the state is facing a \$2.4 billion budget shortfall in the wake of the pandemic.

Despite this dire predicament for the state of Ohio, it is outrageous to learn that the Horizon Science Academies have launched a lawsuit against the Ohio Department of Education, alleging that they were denied money through the grant program helping to feed vulnerable students due to a rule change after the application process – not to help address the urgent needs of students in crisis but to line their own pockets.

The grant was part of House Bill 166, under which qualified schools would be eligible to receive up to \$1,750 each fiscal year for each student identified as economically disadvantaged, compared to \$1,000 for all other students.

The twelve schools named the Ohio Department of Education, as well as Governor Mike DeWine and the state school superintendent as respondents in the filing. The dispute arose when the Ohio Office of Community Schools explained that as Horizon schools are run and operated by their charter management organization (CMO) “Concept Schools NFP”, and Concept is not registered as a foreign corporation with the Ohio Secretary of State’s office, they are not in “good standing” in Ohio.

In 2016, our firm was retained by the Republic of Turkey to investigate the conduct of this nationwide network of schools, including the Concept organization. This resulted in the filing of complaint identifying the school’s problematic relationship with Concept as well as their real estate arm “New Plan Learning” – the company from which Horizon leases their properties (please see copies in attached appendices). Our complaint provided evidence-based allegations about the various ways in which Horizon was able to misrepresent their numbers and use fraudulent practices to rip off the State of Ohio as well as its taxpayers. It is troubling to see that those running the school feel so entitled to the money

they have been able to bring in through these practices that they are now suing the State of Ohio to ensure they continue to pocket the same amount of funding. We have testimony from former teachers in Ohio that outlines how the funding that the school is suing over, dispensed to provide services for students of a lower socioeconomic class, is often misused or pocketed by the administration and not put towards supplementary lunches or other forms of support for low-income students.

Horizon is not new to controversy in the state of Ohio. In 2014, the Concept-run Horizon schools were subject to an FBI raid, an investigation that, according to authorities, is still ongoing. According to the complaint, while they claim to be two separate businesses, the board of Concept is made up of the same group of Turkish-American educators that launched Horizon. Concept's board is 84% Turkish, and members serve on multiple school boards at the same time. These Turkish American businessmen and educators not only control the administration, but often make up portions of the staff through the overuse and abuse of the H-1B visa program, in which the schools falsely claim that Americans are not qualified to teach math and science in the schools, and they are therefore forced to recruit teachers from overseas. Horizon has filed 760 H-1B applications between 2001 and 2015 to bring in teachers from Turkey. Concept's preferred vendors are also owned operated and controlled by Turkish individuals, several of whom are also under investigation for collusion and fraud.

The school's activities have mirrored those of other "Gülen Schools" around the country, and the heads of Concept have claimed to be "inspired" by the teachings of Fethullah Gülen, rather than affiliated with him directly, despite a vast network of financial ties. The "Gülen Schools" span 29 states and the District of Columbia, with over 250 campuses. While they strictly deny any affiliation with Gülen, their management companies often list Gülen as an honorary President. Moreover, all 250 schools are clearly operated in the same way by the same group of people, and together form one of the largest charter school chains in the country.

Our investigation has identified:

- Misuse of taxpayer funds totaling at least \$243 million.
- More than 6,504 H-1B visas to recruit unqualified Turkish teachers at a public cost of as much as \$26 million, as well as lost jobs for American teachers.
- Nearly 81,000 students enrolled at Gülen schools across 29 states and the District of Columbia.
- Per se human trafficking, as forced tithing threatens Turkish teachers with deportation.
- Widespread manipulation of state-mandated testing, grades, and attendance figures.
- Lobbying and publicly-funded trips to Turkey to influence politicians and local officials.

Over the course of the last two months, several American teachers from these schools have reached out to us, informing us that they have reason to believe that government funding is being used to keep the Turkish teachers on payroll while the American teachers are being fired en masse. We are hearing of abuse and misuse of the Paycheck Protection Program passed to help small businesses stay afloat in the wake of COVID-19, as well as rampant child safety abuses, fraudulent attendance records, and manipulated grading and test scores.

The idea that this bad actor would actively seek to further pillage the Ohio taxpayer, costing the state further funds right at the same moment lower revenues have officials requesting vendors to take 15% cuts

to payments, is an illustration of extraordinary disregard for the public good – they simply believe that they are entitled to continue their fleecing of the state treasury.

We urge you to critically analyze the findings of our investigation, detailed in our book *Empire of Deceit* that is available free of charge at www.empireofdeceit.com and to use the information to investigate the Gülen charter school network in order to protect the interests of American schoolchildren, parents, teachers, and taxpayers.

Please accept my assurances of the highest consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Amsterdam', with a large, sweeping flourish at the end.

Robert R. Amsterdam

Founding Partner, Amsterdam & Partners LLP

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