

Texas



QUICK FACTS ON GÜLEN CHARTER SCHOOLS TEXAS



NUMBER OF SCHOOLS

54

KNOWN AS

Harmony, Science and Technology

TOTAL ENROLLMENT

32,493

CHARTER VENDOR

Harmony Public Schools

TOTAL REVENUES

\$317,437,421

RELATED INSTITUTIONS

Dove Public Charter School Foundation	Little Scholars of Arkansas Foundation	Harmony D.C.
Frontier Schools	Read Foundation	Pelican Educational Foundation
Riverwalk Education Foundation	School of Excellence	

KEY PEOPLE

Ali Yavuz Zeybek	Yetkin Yildirim	Vahap Uysal	Suleyman Bahceci	Coskun Cetinkaya	Soner Tarim	Maria Frances Curtis-Richardson	Murat Torlak	Turgay Korkmaz	Mehmet Sabri Agachan	Bulent Gumus

FINANCIAL ISSUES

In 2012, the TEA published an audit of Harmony's federal program spending. Findings included:



Harmony misspent
\$186,000
in federal funds



Inappropriate use of federal funds for payroll



Non-compliant financial accounting records

33.7%
of the Title I expenditures are questionable



Over Half
of the IDEA special education expenditures are questionable



According to the TEA, the questionable costs constituted a "material amount and effectively illustrate the degree to which [Harmony] failed to comply with law, rules and grant requirements and to maintain internal control over federal programs."

BOND FINANCING

Harmony currently owes a principal and interest debt of

\$645,405,203.53

On public bond issuances

Harmony created CSS in 2015 to serve as a third-party real estate arm for financing and developing charter schools in Texas and nine other states in the Greater Texas Gülen region.



CSS



Under its arrangement with Harmony, CSS will own these properties and lease the facilities back to the schools, **charging schools inflated rents** that are significantly higher than the bond service payments and more than the bond reserve fund requirements.

HIRING PRACTICES

Harmony also favors Turkish nationals for leadership positions and, in most cases, Turkish men.



100% of Harmony's ten senior leadership & six cluster superintendents positions including the CEO are Turkish men.

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

Quick Facts

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| <ul style="list-style-type: none"> ▶ Region: Greater Texas ▶ School Names (known as): <ul style="list-style-type: none"> ▷ Harmony Public Schools ▷ Schools of Science and Technology (SST) ▶ Total number of schools in state: Total - 54¹ (7 new schools to open in 2017-18) <ul style="list-style-type: none"> ▷ Harmony - 48 (6 new schools to open in 2017-18) ▷ Science and Technology – 6 (1 new school to open in 2017-18) ▶ Total student enrollment 2015-16: 32,493² <ul style="list-style-type: none"> ▷ Harmony Public Schools: 30,450 ▷ Schools of Science and Technology: 2,043 ▶ Charter Holder/Governing Board(s): <ul style="list-style-type: none"> ▷ Harmony Public Schools <ul style="list-style-type: none"> ▪ Organized as a non-profit 501(c)(3) organization (originally incorporated as the Cosmos Foundation) ▪ Oversees the Harmony schools (48 schools, with 6 new schools opening 2017-18) ▷ Riverwalk Education Foundation <ul style="list-style-type: none"> ▪ Organized as a non-profit 501(c)(3) organization ▪ Oversees the Schools of Science and Technology (6 schools with 1 new school opening 2017-18) ▶ Charter Management Services Vendor: | <p style="text-align: center;">Harmony Public Schools³</p> <ul style="list-style-type: none"> ▶ Regional Gülen Organization Oversight Entity: Harmony Public Schools ▶ Regional Sister Networks: <ul style="list-style-type: none"> ▷ Little Scholars of Arkansas Foundation (AR) (LISA Academies) ▷ Harmony DC Public Charter Schools (D.C.) (Harmony School of Excellence) ▷ Dove Public Charter School Foundation (OK) (Dove Science) (formerly Sky Foundation) ▷ Read Foundation (TN) (School of Excellence) ▷ Frontier schools (MO) (formerly Millenium [sic]) ▷ School of Excellence (NM) (formerly Focus Foundation) ▷ Pelican Educational Foundation (LA) (Kenilworth/Abrahamson schools) ▷ Riverwalk Education Foundation (TX) (Schools of Science and Technology) ▶ Total Revenues for FY 2016: \$317,437,421⁴ <ul style="list-style-type: none"> ▷ Harmony Public Schools: \$298,731,072 ▷ Riverwalk Education Foundation (SST Schools): \$18,706,349 ▶ Network Founders: <ul style="list-style-type: none"> ▷ Harmony Public Schools (formerly the Cosmos Foundation): <ul style="list-style-type: none"> ▪ Ali Yavuz Zeybek: Founder, Harmony |
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¹ The total number of schools includes 4 schools that opened in the 2016-17 school year (2 Harmony and 2 Science and Technology).

² All school information from the Texas Education Agency School and District file (data current as of Dec. 2015), <http://tinyurl.com/y8266jbb> (last checked 6/6/2017). Total enrollment does not include enrollment for 4 schools that opened in 2016-17 (1,776 students).

³ Until 2012, the Cosmos Foundation was also known as Harmony Public Schools. In 2012, the Board changed the name to Harmony. See Harmony Board of Directors Minutes (Feb. 21, 2012), received from Harmony via 2016 open records request; Certificate of Amendment (June 13, 2012), Texas Secretary of State, available at <http://tinyurl.com/r7iw> (last checked 2016).

⁴ Harmony Financial Statement (June 30, 2016), available at: <http://tinyurl.com/tjyfuw2> (last checked 6/16/2017). Riverwalk Education Foundation Financial Statement (June 30, 2016), available <http://tinyurl.com/yd4b6zvc> (last checked 7/19/2017).

Public Schools (formerly Cosmos Foundation); CEO, Harmony Science Academy (Houston and Austin) (2000); Founder, Sky Foundation (OK).⁵

- Yetkin Yildirim: Founder, Harmony Public Schools (formerly the Cosmos Foundation); Co-founder, Terra Pave (commercial highway coating producer); former Board Member, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); Board Member, Alliance for Shared Values (national organization openly aligned with Gülen).⁶
- Vahap Uysal: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former Oklahoma Area Representative, Turquoise Council of Americans and Eurasians; current faculty advisor for Turquoise University Club, part of the Turkish American Society (Chicago); Board

Member, Concept Schools; Presenter, "Gülen Movement and School Financing," Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.⁷

- Suleyman Bahceci: Founder, Harmony Public Schools (formerly the Cosmos Foundation); President, Willow Education (CA); CEO and Founder, Accord (Western region oversight entity); CEO, Magnolia (CA); Creditor for \$30,000, Beehive (UT); now VP of Student Affairs at Virginia International University, a Gülen-inspired university.⁸
- Coskun Cetinkaya: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former President, Cosmos Foundation; Executive Director, Texas Gulf Foundation (d/b/a North American University); former President, Frontier Public Schools (MO); former Provost, North American College.⁹

⁵ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); see Harmony Science Academy Austin and Houston Charter Applications (Jan. 21, 2000), at p. 1, available at: <http://tinyurl.com/r9gvm2l> and <http://tinyurl.com/mhkeovf> (last checked 6/14/2017); Sky Foundation Articles of Incorporation (Nov. 22, 1999), Oklahoma Secretary of State, available at: <http://tinyurl.com/toc3evf> (last checked 7/3/2017).

⁶ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Zaragoza, Sandra. *Ready for greener roads?* Austin Business Journal (27 July 2012), available at: <http://tinyurl.com/y8yzk4mm> (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017). Alliance for Shared Values, available at <http://tinyurl.com/yclsm642> (last checked 7.21.2017).

⁷ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); *Raindrop Turkish House Oklahoma City Chapter Host Azerbaijan Ambassador Elin Suleymanov*, Raindrop Turkish House (2012), available at: <http://tinyurl.com/yb2qxojd> (last checked 6/15/2017); Turquoise University Club, available at <http://tinyurl.com/y7oolwkv> (last checked 6/15/2017); Concept Schools IRS Form 990 (2014), available at: <http://tinyurl.com/z9y36lh> (last checked 7/3/2017); *Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice*, Agenda (Nov. 3, 2007), available at: <http://tinyurl.com/gt2vujs> (last checked 10/31/2016).

⁸ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Willow 2004 990 form, available at: <http://tinyurl.com/zvl5372> (last checked 2/14/2017); 2015 California State Audit, at p. 40, available at: <http://tinyurl.com/zen2cb7> (last checked 2/14/2017); Kirsten Stewart, *Utah Charter School's Ties to Turkey Draw Scrutiny*, The Salt Lake Tribune (July 17, 2009), available at: <http://tinyurl.com/zkbb8yy> (last checked 3/20/2017); McGahan, Jason. *Did a California Charter School Group Fund an Effort to Overthrow the Turkish Government?* LA Weekly (1 December 2016), available at: <http://tinyurl.com/jxceqp7> (last checked 7/5/2017).

⁹ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Harmony Public Schools and Cosmos Foundation IRS 990 Form (2001-2002), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017); Final Technical Report: Sustainable Energy Solutions (Mar. 1, 2010), Wichita State University, available at <http://tinyurl.com/yatravwk> (last checked 6/15/2017); Student Handbook (2011), Frontier Public Schools, available at: <http://tinyurl.com/y95lqmpj> (last checked 7/5/2017); Hays County Commissioners' Court Consent to Agenda Item (June 21, 2011), Solidarity Contracting, available at <http://tinyurl.com>.

- Maria Frances Curtis-Richardson: Founder, Harmony Public Schools (formerly the Cosmos Foundation); former Director, Intercontinental Education Consulting; former Board Director, Texas Gulf Foundation (d/b/a North American University); former Director, Amity Foundation, Inc.; former Board Member Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).¹⁰
- Soner Tarim: Founder, Harmony Public Schools (formerly the Cosmos Foundation); CEO, Harmony Public Schools; Presenter at charter presentation, Albuquerque School of Excellence (NM, 2009); Applicant, Abramson and Kenilworth Science and Technology schools (LA); former Vice President, Intercontinental Education Consulting; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹¹
- Murat Torlak: Founder, Harmony Public Schools (formerly the Cosmost Foundation); former Board Director, Texas Gulf Foundation (d/b/a North American College); Director, Institute of Academic Studies.¹²
- Riverwalk Education Foundation:
 - Turgay Korkmaz: Founder and former President, Riverwalk Education Foundation/Schools of Science and Technology.¹³
 - Mehmet Sabri Agachan: Founder, Riverwalk Education Foundation/Schools of Science and Technology.¹⁴
 - Bulent Gumus: Founder and former Board Member, Riverwalk Education Foundation/Schools of Science and Technology.¹⁵

com/yckdkkzo (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017).

¹⁰ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Intercontinental Education Consulting, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹¹ Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Transcript of Proceedings, Charter School Public Input Hearing (Aug. 26, 2009), New Mexico Public Education Commission, available at: <http://tinyurl.com/y8yy7vd2> (last checked 6/6/17); LinkedIn Profile, available at: <https://tinyurl.com/lfadqqg> (last checked 5/24/2017); Abramson and Kenilworth Charter Applications, Cowan Institute for Public Education Initiatives at Tulane University, available at: <http://tinyurl.com/24t7emn> (last checked 7/5/2017); Intercontinental Education Consulting, available at: <http://tinyurl.com/ycs3ej7c> (last checked 7/5/2017); Intercontinental Education Consulting, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), The Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹² Harmony Science Academy Charter Application (Jan. 1, 2000), Texas Education Agency, available at <http://tinyurl.com/r9gvm2l> (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017); Murat Torlak, Corporation Wiki, available at: <http://tinyurl.com/yae7tohq> (last checked 6/15/2017).

¹³ School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at <http://tinyurl.com/y7koz4bb> (last checked 6/15/2017); Riverwalk Education Foundation IRS 990 Form (2010-2012), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

¹⁴ School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at <http://tinyurl.com/y7koz4bb> (last checked 6/15/2017).

¹⁵ School of Science and Technology Charter Application (Mar. 20, 2004), Texas Education Agency, available at <http://tinyurl.com/y7koz4bb> (last checked 6/15/2017); Riverwalk Education Foundation IRS 990 Form (2010-2012), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

Overview

Harmony Public Schools ("Harmony") is the largest Gülenist charter network in the United States and the largest charter school network in Texas. It currently operates 48 schools, with an additional six schools opening in 2017-2018. Harmony also serves as the charter management services vendor and regional oversight entity for the Greater Texas region of the Gülen Organization. In 2014, Harmony opened a charter school in Washington, D.C.¹⁶

Harmony's governing board incorporated as the Cosmos Foundation, Inc. ("Cosmos") in 1999,¹⁷ doing business as Harmony Public Schools. Cosmos changed its name to Harmony in 2012.¹⁸ Cosmos opened its first Harmony school in 2001 and has rapidly expanded to 48 schools in 19 cities across Texas.¹⁹ Harmony has been able to quickly expand its network because of Texas charter school law that favors easy replication. To open new school sites, Harmony only needs to file an amendment to its original charter contract with the Texas Education Agency (TEA) to open a new school anywhere in the state, subject to certain requirements. This amendment application is only subject to approval by the TEA Education Commissioner; the State Board of Education does not have any oversight or veto authority over the site amendment process. Since there is no required advance announcement of the amendments to the general public, local communities are often unaware that Harmony is seeking to open a new school in their area. Harmony's strategic plan projected expansion to 50 schools by 2020,²⁰ but the addition of six new schools in the 2017-2018

school year will push Harmony's total number of schools to 54, thereby putting them ahead of their own aggressive expansion schedule.

Riverwalk Educational Foundation ("Riverwalk"), a second Gülenist charter school network in Texas, operates six Science and Technology (SST) schools with a seventh scheduled to open in 2017. Riverwalk has close ties to Harmony and entered into a "Shared Services Agreement" with its sister network. Under the agreement, Harmony serves as Riverwalk's fiscal agent and provides management and administrative services. In return, Harmony receives five percent of all state funds from Riverwalk schools. Although Riverwalk SST schools are not well-known in Texas given the large number and prominence of Harmony schools, they are aggressively expanding. Riverwalk submitted applications to open ten new schools to the TEA 2017 through the charter amendment process (five were approved, two were denied, and three are under consideration as of March 2017). This charter school network should be closely monitored because it is positioned to grow rapidly with little public notice.

A third organization called New Dimension Educational Foundation, Inc. was formed in 2002²¹ by individuals associated with various Gülen entities and with academic/STEM backgrounds similar to other Gülen school founders. There is evidence that New Dimension applied to open three charter schools in 2007 and 2010, but the schools were not approved.²² New Dimension became inactive after 2010.²³ Key founders and leaders of New Dimensions were:

¹⁶ See Harmony School of Excellence DC Charter Application (Sep. 9, 2013), available at: <http://tinyurl.com/yab5l5nk> (last checked 6/10/17).

¹⁷ Articles of Incorporation (July 5, 1999), Texas Secretary of State, available at: <http://tinyurl.com/7oy8w>.

¹⁸ Certificate of Amendment (June 13, 2012), Texas Secretary of State, available at: <http://tinyurl.com/7oy8w>.

¹⁹ Cities with Harmony schools include: El Paso, Odessa, Lubbock, San Antonio, Laredo, Waco, Garland, Dallas, Carrollton, Fort Worth, Grand Prairie, Euless, Houston, Austin, Pflugerville, Bryan, Sugar Land, Katy, and Beaumont.

²⁰ Harmony 2020, Harmony Public Schools, available at: <http://tinyurl.com/ya45gqv3> (last checked 6/18/17).

²¹ New Dimension Articles of Incorporation; Texas Secretary of State, available at <http://tinyurl.com/mfxbyjr> (last checked 7.20.2017).

²² Minutes from Texas State Board of Education meetings in 2007 and 2010 (requested via FOIA 7.21.2017 – still pending).

²³ Corporate documents available from Texas Secretary of State at <http://tinyurl.com/mfxbyjr> (last checked 7.19.2017).

Kamil Sarac, currently an associate professor in computer science at the University of Texas Dallas;²⁴ Osman Kazan, also a founding trustee of the Pelican Educational Foundation in 2005 (the Gülen charter organization in Louisiana)²⁵ and currently an assistant professor at the Energy Institute, Tulane University; and Osman Kanlioglu who later served as the Dean of Students Affairs at North American University.²⁶

On average, the Harmony charter schools serve 56.1% free and reduced lunch population vs. 59% state average; 8.7% students with disabilities vs. 8.6% state average; 19.2% English language learners vs. 18.5% state average; 85.5% minority students vs. 71.5% state average; and 14.5% Caucasian students vs. 28.5% state average.²⁷ However, when student demographics at Harmony

schools are compared to student demographics at traditional public school districts where they are located, the comparison often looks very different. In a report issued in 2014, the Office of Civil Rights (OCR) of the U.S. Department of Education found that Harmony enrolls a disproportionately low number of English Language Learners (“ELL”) and students with disabilities compared to the public school districts hosting Harmony’s schools.²⁸ The OCR specifically examined enrollment rates of ELL students at eighteen Harmony charter schools. These schools enrolled approximately half the percentage of ELL students as the local school districts: 11.5% at Harmony schools compared to 22.5% for the school districts. The enrollment rate of the students with disabilities was even lower: 2.7% at the Harmony schools compared to 7.3% for the school districts.²⁹

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony Science Academy - El Paso 9405 Betel Dr. El Paso, TX 79907	K-12 2006-present	Enrollment: 1000 75.5% FRL 20.1% ELL 5.6% SWD 92% Hispanic 3% White 1.1% Asian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Selcuk Bakir

²⁴ Faculty profile at University of Texas Dallas, available at <http://tinyurl.com/y6vkm6ll> (last checked 7.20.2017).

²⁵ Founding Board of Pelican Education Foundation; Louisiana Secretary of State, available at <http://tinyurl.com/y7n7qblw> (last checked 5.21.17); See faculty profile at Tulane University, available at <http://tinyurl.com/y83pswzd> (last checked 7.20.2017).

²⁶ Job profile on ZoomInfo, available at <http://tinyurl.com/yb9otbml> (last checked 7.20.2017).

²⁷ These numbers are approximate since the Texas Education Agency does not make full demographic available in certain instances due to FERPA privacy concerns. These percentages are based on the 2015-16 school year statistics. This information comes from Texas Education Agency for the 2015-2016 school year, comparing statewide totals to district totals (using district numbers 101846, 227816, 161807, 015828, 071806, 101862, 101858, 015827, 015831). The reports are available at: <http://tinyurl.com/ybxu5mm5> (FRL data), <http://tinyurl.com/y9xmxljo> (SWD data), <http://tinyurl.com/yczvwmvd> (ELL data), and <http://tinyurl.com/y93vb5r9> (enrollment and ethnicity data).

²⁸ Settlement and resolution letters from OCR (2014), available at <http://tinyurl.com/yaw7aeyl> (last checked 7.20.2017).

²⁹ *Id.*

³⁰ Texas Education Agency Enrollment (Dec. 2016), available at: <http://tinyurl.com/tuub6h5> (enrollment and grades in operation) (last checked 6/6/2017); Economically Disadvantaged Reports, Enrollment Reports, and Special Education Reports, Texas Education Agency, available at: <http://tinyurl.com/swwwjb6> (FRL, SWD, and ELL statistics) (last checked 7/3/2017); see also Education Facility Lease Revenue Bonds Official Statement, Charter School Solutions to Harmony Public Schools (Apr. 27, 2016), available at <http://tinyurl.com/k676dhq> (dates in operation and FRL statistics) (last checked 6/16/2017).

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Innovation El Paso 5210 Fairbanks Dr. El Paso, TX 79924	K-12 2009-present	Enrollment: 933 63% FRL 13.4% ELL 8.3% SWD 82.8% Hispanic 8.7% White 5.5% Af. Amer. 2.2% Two or More Races	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Riza Gurlek
Harmony Science Academy – Odessa 2755 N. Grandview Ave. Odessa, TX 79762	K-8 2010-present	Enrollment: 454 56.6% FRL 10.8% ELL 9.5% SWD 71.3% Hispanic 15.5% White 8.8% Af. Amer. 3.1% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Cetin Demir
Harmony Science Academy – Lubbock 1516 53 rd St. Lubbock, TX 79412	K – 12 2007-present	Enrollment: 304 72% FRL 4.6% ELL 7.9% SWD 60.4% Hispanic 19.1% White 18.6% Af. Amer. 1.4% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Hakan Simsek
**Harmony School of Excellence El Paso 9435 Betel Dr. El Paso, TX 79907	K-5 2016-present	Enrollment: 686 FRL/ ELL/ SWD Not Available 92% Hispanic 6.3% White 0.7% Af. Amer.	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Not Listed
Harmony Science Academy 8505 Lakeside Pkwy San Antonio, TX 78245	6-12 2006-present	Enrollment: 651 68% FRL 9% ELL 6.2% SWD 76.4% Hispanic 11.5% White 7.5% Af. Amer. 4% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Yasar Cakir

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Innovation - San Antonio 8125 Glen Mont Dr. San Antonio, TX 78239	K-5 2010-present	Enrollment: 610 75.2% FRL 9.5% ELL 5.6% SWD 56.6% Hispanic 13.6% White 25.4% Af. Amer. 4.5% Asian/Two or More Races/Native Hawaiian/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mert Aykanat
Harmony Science Academy - Laredo 4401 San Francisco Ave. Laredo, TX 78041	6-12 2008-present	Enrollment: 680 70% FRL 16.9% ELL 4.6% SWD 95.7% Hispanic 2.4% White 1.5% Af. Amer./Asian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mustaf Ayik
Harmony School of Innovation- Laredo 4608 Daugherty Ave. Laredo, TX 78041	K-5 2014-present	Enrollment: 541 76% FRL 41.1% ELL 3.7% SWD 97.8% Hispanic 1.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Geraldine Salas
Harmony Science Academy - Brownsville 1124 Central Blvd. Brownsville, TX 78520	K-12 2008-present	Enrollment: 475 84.6% FRL 28.2% ELL 5.3% SWD 97.3% Hispanic 1.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mustafa Altindag
Harmony School of Excellence 2015 SW Loop 410 San Antonio, TX 78227	K-5 2015-present	Enrollment: 554 62.5% FRL 14.3% ELL 4.9% SWD 73.6% Hispanic 11% White 10.2% Af. Amer. 4.5% Asian/ Two or More Races Native Hawaiian/ American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bambi Teaff
Harmony Science Academy - Waco 1900 N. Valley Mills Dr. Waco, TX 76710	K-12 2007-present	Enrollment:775 79% FRL 18.7% ELL 5.9% SWD 7% Af. Amer. 1% Asian 75.3% Hispanic 16% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serkan Beyhan

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony Science Academy – Garland 2303 Firewheel Pkwy. Garland, TX 75040	K-5 2010-present	Enrollment: 688 56% FRL 23.5% ELL 5.1% SWD 36.6% Af. Amer. 13.6% Asian 24.9% Hispanic 1.5% Two or More Races 23% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Christy Dreka
Harmony Science Academy – Dallas 11995 Forestgate Dr. Dallas, TX 75243	K-12 2007-present	Enrollment: 1180 81% FRL 36.8% ELL 6.9% SWD 13.6% Af. Amer. 2.8% Asian 75.4% Hispanic 2.5% Two or More Races/Native Hawaiian 5.6% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serif Mercan
Harmony School of Innovation – Carrollton 1024 W. Rosemeade Pkwy. Carrollton, TX 75007	K-12 2009-present	Enrollment: 510 38% FRL 19.4% ELL 4.1% SWD 15% Af. Amer. 35.5% Asian 30% Hispanic 2.4% Two or More Races 16.5% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Clinton Barnes
Harmony School of Business – Dallas 8080 W. President George Bush Hwy. Dallas, TX 75252	K-11 2012-present	Enrollment: 894 49% FRL 24.5% ELL 5.4% SWD 36% Hispanic 21% White 23% Af. Amer. 18% Asian 2% Two or More Races/American Indian	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Muhammed Gecit
Harmony School of Innovation- Garland 2303 Firewheel Pkwy. Garland, TX 75040	6-12 2014-present	Enrollment: 563 50% FRL 11.2% ELL 7.5% SWD 26% Af. Amer. 13.3% Asian 35.3% Hispanic 2.3% American Indian/Two or More Races 23.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Murat Tunca

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony Science Academy - Fort Worth 5651 Westcreek Dr. Fort Worth, TX 76133	K-3 2006-present	Enrollment: 714 51% FRL 18.6% ELL 4.3% SWD 28% Af. Amer. 9.8% Asian 25% Hispanic 2.5% Two or More Races 34.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serena Jackson
Harmony Science Academy - Grand Prairie 1102 NW 7 th St. Grand Prairie, TX 75050	K-8 2008-present	Enrollment: 573 69% FRL 25.3% ELL 7% SWD 36.3% Af. Amer. 2.3% Asian 48% Hispanic 2% Two or More Races 10.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Angela Knapp
Harmony Science Academy - Euless 701 S. Industrial Blvd Suite 115 Euless, TX 76040	5-12 2009-present	Enrollment: 625 54% FRL 11% ELL 5.3% SWD 24.2% Af. Amer. 15% Asian 18.2% Hispanic 2.4% Two or More Races 40.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Maksat Altiyev
Harmony School of Nature & Athletics 8210 W. Camp Wisdom Rd. Dallas, TX 75249	K-12 2010-present	Enrollment: 1000 60% FRL 17.7% ELL 5% SWD 28% Af. Amer. 6.7% Asian 50.4% Hispanic 2.6% American Indian/ Two or More Races 12.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bilal Ozen
Harmony School of Innovation - Fort Worth 8100 S. Hulen St. Fort Worth, TX 76123	4-12 2012-present	Enrollment: 887 46% FRL 5.5% ELL 6% SWD 21.4% Af. Amer. 1% American Indian 12.8% Asian 35.2% Hispanic 3% Two or More Races 26.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Basoglu

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Innovation – Euless 701 S. Industrial Blvd Ste. 105 Euless, TX 76949	K-5 2013-present	Enrollment: 646 54% FRL 27.4% ELL 6.2% SWD 30.6% Af. Amer. 28.6% Asian 14% Hispanic 3.8% Two or More Races 22.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Crystal McAnalley
Harmony Science Academy Carrollton 1024 W. Rosemeade Pkwy. Carrollton, TX 75007	K-5 2015-present	Enrollment: 423 50% FRL 10.2% ELL 7.6% SWD 17.5% Af. Amer. 18.2% Asian 44.8% Hispanic 2.5% Two or More Races 16.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Huseyin Sari
Harmony School of Exploration – Houston 9305 W. Sam Houston Pkwy. S. Houston, TX 77099	K-5 2013-present	Enrollment: 671 76% FRL 42.2% ELL 5.8% SWD 37% Af. Amer. 15% Asian 44.2% Hispanic 12% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Nora Morales
Harmony School of Fine Arts and Technology 9115 Kirby Dr. Houston, TX 77054	K-8 2010-present	Enrollment: 734 61.2% FRL 19.2% ELL 5.7% SWD 58.5% Af. Amer. 5.7% Asian 64.3% Hispanic 2% Two or More Races 4.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Alain Frankiewicz
Harmony School of Ingenuity 10555 Stella Link Rd. Houston, TX 77025	6-12 2009-present	Enrollment: 587 65.6% FRL 13.8% ELL 4.8% SWD 28.7% Af. Amer. 2% Asian 66.3% Hispanic 2.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Recep Yilmaz

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Innovation – Houston 9421 W. Sam Houston Pkwy. S. Houston, TX 77099	6-8 2005-present	Enrollment: 581 73% FRL 16.9% ELL 3.6% SWD 21% Af. Amer. 16% Asian 39% Hispanic 5.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Ali Yilmaz
Harmony Science Academy – High School 9431 W. Sam Houston Pkwy S. Houston, TX 77099	9-12 2001-present	Enrollment: 578 77% FRL 10% ELL 4.7% SWD 18% Af. Amer. 13.5% Asian 42% Hispanic 1% Two or More Races 9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Subas
Harmony Science Academy – Houston 5435 Braeswood Houston, TX 77096	K-8 2010-present	Enrollment: 367 84.2% FRL 34.9% ELL 4.9% SWD 40.2% Af. Amer. 2.8% Asian 52.4% Hispanic 2.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Oguzkaan Torun
Harmony Science Academy – Austin 930 E. Rundberg Ln. Austin, TX 78753	K-8 2001-present	Enrollment: 562 86.3% FRL 57.7% ELL 7.8% SWD	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Kyle Borel
Harmony Science Academy – North Austin 1421 Wells Branch Parkway W. Ste. 200 Pflugerville, TX 78660	6-12 2008-present	Enrollment: 808 49% FRL 15.7% ELL 5.2% SWD 9.8% Af. Amer. 16.7% Asian 54% Hispanic 4% Two or More Races 15.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Bunyamin Bozdogen
Harmony School of Science – Austin 11800 Stonehollow Dr. Austin, TX 78758	K-7 2006-present	Enrollment: 532 42% FRL 31% ELL 5.3% SWD 9.2% Af. Amer. 4.3% Asian 91.5% Hispanic 2% Two or More Races 4.5% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Allanur Agaberdiev

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Political Science and Communication 13415 FM 620 N Austin, TX 78717	K-12 2011-present	Enrollment: 906 28% FRL 13.8% ELL 4.6% SWD 15.7% Af. Amer. 1% Am. Indian/ Alaskan 37.5% Asian 14.4% Hispanic 2.6% Two or More Races 28.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Ilker Yilmaz
Harmony School of Innovation- Austin 2124 E. St. Elmo Rd. Austin, TX 78744	K-5 2014-present	Enrollment: 468 74.4% FRL 46.8% ELL 5.1% SWD 7% Af. Amer. 1% Asian 82% Hispanic 1.6% Two or More Races 8.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Talitha Alexander
Harmony School of Excellence – Austin 2100 E. St. Elmo Rd. Austin, TX 78744	6-12 2009-present	Enrollment: 565 69.7% FRL 26.7% ELL 9.6% SWD 4.8% Af. Amer. 1.2% Asian 86.5% Hispanic 1% Two or More Races 6.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Engin Dogan
Harmony School of Excellence – Houston 7340 N. Gessner Dr. Houston, TX 77040	K-8 2006-present	Enrollment: 901 29.6% FRL 13.4% ELL 3.8% SWD 12.6% Af. Amer. 28% Asian 38% Hispanic 3.4% Two or More Races 17.8% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Hasan Sazci
Harmony School of Excellence – Endeavor 5668 W. Little York Rd. Houston, TX 77091	K-12 2009-present	Enrollment: 549 81% FRL 34.4% ELL 6.2% SWD 27.6% Af. Amer. 2.5%Asian 65.6% Hispanic 2.9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Kamil Yilmaz

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony Science Academy - Bryan/College Station 2031 S. Texas Ave. Bryan, TX 77082	K-12 2007-present	Enrollment: 397 75% FRL 27% ELL 8.6% SWD 19.7% Af. Amer. 55.9% Hispanic 2.2% Two or More Races 21.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Mehmet Uguz
Harmony School of Advancement – High School 3171 N. Sam Houston Pkwy. W. Houston, TX 77038	9-12 2010-present	Enrollment: 611 47% FRL 4.7% ELL 4.9% SWD 16.7 Af. Amer. 19.3% Asian 49.8% Hispanic 1.7% Two or More Races 11.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Fatih Oner
Harmony School of Discovery – Houston 6270 Barker Cypress Rd. Houston, TX 77084	6-12 2010-present	Enrollment: 625 53% FRL 8.8% ELL 4.6% SWD 22.6% Af. Amer. 15.4% Asian 45.7% Hispanic 1.9% Two or More Races 14.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Adnan Karanci
Harmony Science Academy - Houston NW 16200 Tomball Pkwy. Houston, TX 77086 <i>Listed as School of Technology Houston in TEA Database³¹</i>	K-12 2006-present	Enrollment: 678 47.5% FRL 18.6% ELL 7.7% SWD 24.1% Af. Amer. 19.2% Asian 47.1% Hispanic 3.9% Two or More Races 5.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Sezgin Aydin
Harmony School of Achievement 16209 Keith Harrow Blvd. Houston, TX 77084	K-5 2015-present	Enrollment: 626 53% FRL 29% ELL 4.8% SWD 29.1% Af. Amer. 18.2% Asian 35.4% Hispanic 1.6% Two or More Races 15.1% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Melissa Knight

³¹ Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: <http://tinyurl.com/y93vb5r9> (last checked 6/13/2017).

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Harmony School of Science –Houston 13415 W. Belfort Sugar Land, TX 77478 <i>Listed as Science Academy Sugarland in TEA Database³²</i>	K-5 2008-present	Enrollment: 722 53% FRL 28.9% ELL 3.6% SWD 25.2% Af. Amer. 41% Asian 14.8% Hispanic 1.3% Two or More Races 17.4% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Afreem Mercahnt
Harmony School of Science - Houston High 13522 W. Airport Blvd. Sugar Land, TX 77478 <i>Listed as School of Innovation Sugarland in TEA Database³³</i>	7-12 2011-present	Enrollment: 854 47.7% FRL 4.3% ELL 3.5% SWD 20.2% Af. Amer. 43.4% Asian 20.2% Hispanic 15.2% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Alpaslan Uzgoren
Harmony Science Academy- West Houston 22400 Grand Corner Dr. Katy, TX 77494 <i>Listed as Science Academy Katy in TEA Database³⁴</i>	K-12 2011-present	Enrollment: 915 43% FRL 15.2% ELL 5% SWD 42.8% Af. Amer. 1.1% Am. Indian/ Alaskan 24.4% Asian 14.3% Hispanic 2.9% Two or More Races 14.3% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Jasmeen Kohli
Harmony Science Academy Beaumont 4055 Calder Ave. Beaumont, TX 77706	K-12 2007-present	Enrollment: 533 49.2% FRL 9.6% ELL 11.4% SWD 28.1% Af. Amer. 8.2% Asian 29.2% Hispanic 4.5% Two or More Races 29.9% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Klediol Murati
**Harmony School of Innovation Katy 22400 Grand Corner Dr. Bldg B Katy, TX 77494	K-12 2016-present	Enrollment: 502 FRL not available 32.1% Af. Amer. 19.5% Asian 24.1% Hispanic 2.4% Two or More Races 21.7% White	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Jasmeen Kohli

³² Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: <http://tinyurl.com/y93vb5r9> (last checked 6/13/2017).

³³ Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: <http://tinyurl.com/y93vb5r9> (last checked 6/13/2017).

³⁴ Student Enrollment Reports (2016-2017), PEIMS Standard Reports Overview, Texas Education Agency, available at: <http://tinyurl.com/y93vb5r9> (last checked 6/13/2017).

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
Riverwalk Education Foundation Science and Technology Schools				
School of Science and Technology San Antonio 1450 NE Loop 410 San Antonio, TX 78209	6-12 2005 - present	Enrollment: 450 56% FRL 2.7% ELL 6.7% SWD 8.1% Af. Amer. 5.7% Asian 58.7% Hispanic 4.4% Two or More Races 23.2% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Atila Akyurek
School of Science and Technology Alamo 12200 Crownpoint Dr. Ste. 100 San Antonio, TX 78233	K-12 2009 - present	Enrollment: 413 60.8% FRL 9.9% ELL 8% SWD 12.3% Af. Amer. 4.2% Asian 52.5% Hispanic 6.8% Two or More Races 24.5% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Mehmet Nalcaci
**School of Science and Technology Houston 16200 TX 249 Houston, TX 77086	K-8 2016-present	Enrollment: 350 38.6% Af. Amer. 9.7% Asian 38% Hispanic 2.3% Two or More Races 11% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Cecil Kucukbasol
School of Science and Technology Discovery 5707 Bandera Rd. San Antonio, TX 78238	K-12 2008 - present	Enrollment: 446 61.6% FRL 3.7% ELL 5.4% SWD 8.3% Af. Amer. 11.6% Asian 63% Hispanic 2.7% Two or More Races 14.3% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Mustafa Kililioglu
School of Science and Technology Corpus Christi 4737 Saratoga Blvd. Corpus Christi, TX 78423	K-12 2009 - present	Enrollment: 734 61.6% FRL 3.7% ELL 9% SWD 4.6% Af. Amer. 2.5% Asian 63.5% Hispanic 28% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Ekrem Demirci
**School of Science and Discovery Advancement 10550 Westoffice Dr. Houston, TX 77042	K-8 2016-present	Enrollment: 238 49.6% Af. Amer. 11.3% Asian 23.5% Hispanic 2% Two or More Races 13% White	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation Principal: Haci Mert Dilli

School	Operation	Student Demographic Information ^{30*}	Authorizer	Governing Board
New Schools 2017 - 2018				
Harmony Science Academy Cedar Park 12200 Anderson Mill Rd. Austin, TX 78726	PK-4 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Yilker Yilmaz
Harmony School of Innovation Brownsville 3451 Dana Ave. Brownsville, TX 78526	6-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Leyla Trevino
Harmony School of Innovation Waco 1900 N. Valley Mills Dr. Waco, TX 76710	7-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Serkan Beyhan
Harmony Science Academy Plano 550 Talbert Dr. Plano, TX 75075	K-5 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Scott Coleman
Harmony School of Excellence Laredo 4401 San Francisco Ave. Laredo, TX 78041	9-12 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Maribel Lopez
Harmony School of Enrichment Houston 3207 N Sam Houston Pkwy W Houston, TX 77038	K-5 2017-2018 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Brent Bardo
(Riverwalk) Science and Technology – NW Houston	K – 6 2017 – 18 First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Riverwalk Education Foundation
New School 2018				
Harmony School of Excellence Sugar Land 1424 Eldridge Rd. Sugarland, TX 77478 (not included in new schools for 2017 because it may be delayed until 2018 and is not on Harmony's school list)	6-8 2017 or 18- (may be delayed to 2018) First year of operation	Enrollment: 0	Texas Education Agency/ State Board of Education	Harmony Public Schools Principal: Not Listed

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

**The four schools that opened in the 2016 - 2017 school year are included in the total number of schools reported, but their enrollment (1,776) is not included in the total enrollment for Harmony/Riverwalk schools which is reported for the 2015-16 school year.

A History of Strategic Ambiguity and Conflicting Interests

Harmony Public Schools (“Harmony”) receives an annual fee from Gülenist charter networks in six states plus the Schools of Science and Technology in Texas and the District of Columbia³⁵ to provide a range of management and administrative services through support services agreements.³⁶ Harmony’s alleged services include: consulting services; educational technology solutions; data network solutions; efficiency analysis; strategic planning; and coaching key leadership and teacher training.³⁷ Additional services are provided to at least some charter networks including: human resources support (including hiring/firing employees/international teachers); facility management; student recruitment; marketing and PR (including web site design); curriculum development (including testing); accreditation; grant writing; and purchasing services.³⁸

Beginning in 2010, Harmony received a percentage of each Gülenist charter network’s education funding in exchange for its services.³⁹ Harmony subsequently changed its billing structure and currently bills \$80 - \$120 per hour for its services. In addition, Harmony now charges a licensing fee for its intellectual property,

charging schools \$15,000 - \$147,000 per year.⁴⁰

In our view, the fees paid to Harmony through these agreements yield significant benefits to the Harmony organization. Our investigation shows that Harmony has created a steady revenue stream from public funds that can be expended without fiscal restrictions, providing funds to expand its model within a state or in other states, which in turn increases overall student enrollment as well as its annual fees. It is difficult to identify the actual payments made individually by these charter schools and networks to Harmony through public documents because Harmony’s transactions are not transparently reported. As a result, there is little accountability regarding how funds are used, whether they fulfill the stated purposes in the support services agreement, and how well the services are delivered. Between 2010 and 2016, Harmony received at least \$7,345,705 from other charter networks.⁴¹ Revenues for 2012 and 2013 are not available, however. If Harmony received \$1.4 million for each year, it received over \$10 million in revenue from other Gülenist charter school networks in this timeframe.

³⁵ See Official Statements, Appendix B (pg. B5-6), Harmony Public Schools Bond Issues for 2017, available at: <http://tinyurl.com/y8gduwl7> (last checked 5/19/17).

³⁶ See the support services agreement for Kenilworth Middle School in the Charter Application, Pelican Educational Foundation, at pg. 209, available at: <http://tinyurl.com/y8syenun> (last checked 6/18/17).

³⁷ See Official Statements, Appendix B (pg. B5-6), Harmony Public Schools Bond Issues for 2017, available at: <http://tinyurl.com/y8gduwl7> (last checked 5/19/17).

³⁸ See the support services agreement for Kenilworth Middle School in the Charter Application, Pelican Educational Foundation, at pg. 209, available at: <http://tinyurl.com/y8syenun> (last checked 6/18/17).

³⁹ See Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: <http://tinyurl.com/yavbe95f> (2012), <http://tinyurl.com/ya9wo9ya> (2011), and <http://tinyurl.com/ydcvya5n> (2011); Official Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: <http://tinyurl.com/ybboyse6> (2014), <http://tinyurl.com/y7on943p> (2014), <http://tinyurl.com/yddvl2lq> (2014), <http://tinyurl.com/y96ht3fg> (2015), <http://tinyurl.com/y8ajh2v8> (2016), <http://tinyurl.com/y9xs5rdd> (2016), <http://tinyurl.com/ybjw932j> (2016), <http://tinyurl.com/y8gduwl7> (2017) (last checked 5/19/17).

⁴⁰ See Official Statements, Appendix B, Harmony Public Schools Bond Issues (July 2, 2014), available at: <http://tinyurl.com/ybboyse6> (2014) (last checked 5/19/17).

⁴¹ See Official Statements, Appendix B, Cosmos Foundation Bond Issues for 2011 and 2012, available at: <http://tinyurl.com/yavbe95f> (2012), <http://tinyurl.com/ya9wo9ya> (2011), and <http://tinyurl.com/ydcvya5n> (2011); Official Statements, Appendix B, Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: <http://tinyurl.com/ybboyse6> (2014), <http://tinyurl.com/y7on943p> (2014), <http://tinyurl.com/yddvl2lq> (2014), <http://tinyurl.com/y96ht3fg> (2015), <http://tinyurl.com/y8ajh2v8> (2016), <http://tinyurl.com/y9xs5rdd> (2016), <http://tinyurl.com/ybjw932j> (2016), <http://tinyurl.com/y8gduwl7> (2017) (last checked 5/19/17).

In addition to the support services agreement which ties the charter networks to Harmony, teachers and administrative staff also move frequently among the Gülen-affiliated schools in the region. Some of the individuals that have

worked with multiple Gülenist schools are listed in this report. This frequent shift of employees among schools creates a ready pool of trusted Turkish employees who will faithfully execute Gülen programs and directives.

Financial Issues

In 2012, the TEA published an audit of Harmony's federal program spending, finding that Harmony misspent \$186,000 in federal funds.⁴² The audit findings included:

- ▶ Inadequate documentation to support Harmony's spending;
- ▶ Non-compliant financial accounting records;
- ▶ Use of Title I funds at non-Title I campuses;
- ▶ Inappropriate use of federal funds for payroll;
- ▶ Lack of documentation supporting the required qualifications of Title I staff; and
- ▶ Questionable expenditures, including 33.7% of the Title I expenditures and over half of the IDEA special education expenditures examined by the auditors. According to the TEA, the questionable costs constituted a "material amount and effectively illustrate the degree to which [Harmony] failed to comply with law, rules and grant requirements and to maintain internal control over federal programs."

Notably, Harmony's regular annual audits during this period did not catch any of these issues. Only the TEA's audit of Harmony's financials uncovered this misuse of federal funds, and no follow-up audit has been done recently to ensure that Harmony has rectified these issues.

TEA also conducted a grant audit of the use Title I and IDEA B funds at SST schools during the 2010 fiscal year that was released in August 2012, one month after the Harmony audit was released. Like the Harmony audit, the SST audit questioned costs of \$80,661 and requested repayment of funds from Riverwalk.⁴³ It is important to note that Riverwalk/SST schools pay Harmony 5% of state revenues through a support services agreement to provide a range of management and administrative services that supposedly ensure the SST schools are following state and federal financial requirements.⁴⁴

In addition, Riverwalk borrowed over \$2 million between 2009 – 2012 from at least seven "individual companies" that are not identified by name in the Riverwalk's annual audit.⁴⁵ The loans are secured by "the academy" or by equipment. Two of the companies are identified in a Riverwalk 2014 bond document, including one loan made in October 2011 from Rasanet Construction for \$361,400 that matures in 2021, and one from Winport Export made in

⁴² See Harmony Audit (July 17, 2012), Texas Education Agency. See Lindsey Kastner, *Auditors Say Funds Misspent for Harmony Campuses*, mySA.com (July 31, 2012), available at: <http://tinyurl.com/y74zu23v> (last checked 7/8/2017).

⁴³ Riverwalk Education Foundation Financial Statement (June 30, 2013), available in Riverwalk bond issue at <http://tinyurl.com/y7yxldc9> (last checked 7.20.2017).

⁴⁴ See Harmony bond issue; July 2, 2014; Official Statement P. B-3; available at <http://tinyurl.com/k3mnqv2> (last checked 5.19.17).

⁴⁵ Loans to "individual companies" are included in Riverwalk Financial Statements for 2009 – 2012, available at <http://tinyurl.com/yaonrm5g>; <http://tinyurl.com/y6urgxsk>; <http://tinyurl.com/y9ajws6n>; <http://tinyurl.com/y7fvsbnc> (last checked 7.20.2017). Note: 2 companies identified by name in 2015 Financial Statement, available from <http://tinyurl.com/yd5z5epf> (last checked 7.20.2017).

2011 for \$38,592 that matures in 2014.⁴⁶ Rasanet Construction (doing business as Sam&m Trade and Construction or Sam&m Group LLC) was created in 2008 in Texas and is owned by Muhsin Davud Ozcan from Missouri City in the Houston area.⁴⁷ Ozcan was at a Turkish university from 1983 – 2015 and is involved in businesses such as Esra Trade, Cars & Credit, Serra Dis Tiscaret, and Serra Mobilya Sanayii.⁴⁸ Winport Export is not listed as a company with the Texas Secretary of State, but a company called the Winport Group LLC, formerly known as Aurora Handyman or

Aurora International, does business under similar assumed names, including: Winport, Winport Rug, Winport Playgrounds, Winport Investment, and Winport Furniture. The Winport companies are currently owned by Ahmet Duran who is affiliated with the American Turkish Business Council and the Raindrop Foundation.⁴⁹ A former owner of Winport/Aurora also includes Ibrahim Sumer who is the owner of Crystal Facility Solutions, a company that has \$9.5 million in contracts with Harmony.⁵⁰

Bond Financing

Harmony (also doing business as the Cosmos Foundation) has borrowed a total of \$559,540,000 between 2007 – 2017 through fifteen different public bond issuances for the purchase, renovation, and construction of school properties, as well as refinancing prior bond debt.⁵¹ Most recently, Harmony borrowed \$40,540,000 through the Arlington Higher Education Finance Corporation in 2017.⁵² Harmony currently owes a principal of \$354,605,000 on these bonds with a combined principal and interest debt of \$645,405,203.⁵³

will also repay \$43 million in bonds acquired by Charter School Solutions (“CSS”) in 2016 through rental payments made to CSS.⁵⁴ Harmony created CSS in 2015 to serve as a third-party real estate arm for financing and developing charter schools in Texas and nine other states in the Greater Texas Gülen region.⁵⁵ Under its arrangement with Harmony, CSS will own these properties and lease the facilities back to the schools, charging schools inflated rents that are significantly higher than the bond service payments and more than the bond reserve fund requirements. Our research suggests that CSS will use the excess rental

In addition to the these bonds, Harmony

⁴⁶ Riverwalk 2014 bond document (Official Statement pg. B-4), available from <http://tinyurl.com/y7hjs3e7> (last checked 7.20.2017).

⁴⁷ Corporate documents for Rasanet Construction from Texas Secretary of State, available at <http://tinyurl.com/mfxbyjr> (last checked 7.20.2017).

⁴⁸ Linked in, available at <http://tinyurl.com/y9u24zfh> (last checked 7.20.2017).

⁴⁹ Corporate documents for American Turkic Business Council (2015) and Rain Drop Foundation (2.17.16) available from Texas Secretary of State, available at <http://tinyurl.com/mfxbyjr> (last checked 2016).

⁵⁰ Harmony IRS Forms 990 include contracts, available at <http://tinyurl.com/hu9wqcl> (last checked 7.20.2017).

⁵¹ See Cosmos Foundation Bond Issues for 2007, 2010, 2011 and 2012, available at: <http://tinyurl.com/yavbe95f> (2012), <http://tinyurl.com/ya9wo9ya> (2011), <http://tinyurl.com/ydcvya5n> (2011), <http://tinyurl.com/yalrsm5e> (2010), <http://tinyurl.com/y8peyfhf> (2010), <http://tinyurl.com/y7mqh2vm> (2007), and <http://tinyurl.com/yac877sn> (2007); Harmony Public Schools Bond Issues for 2014, 2015, 2016 and 2017, available at: <http://tinyurl.com/ybboyse6> (2014), <http://tinyurl.com/y7on943p> (2014), <http://tinyurl.com/yddvl2lq> (2014), <http://tinyurl.com/y96ht3fg> (2015), <http://tinyurl.com/y8ajh2v8> (2016), <http://tinyurl.com/ybjw932j> (2016), <http://tinyurl.com/y8gduwl7> (2017) (last checked 5/19/17); see also *Prior and Future Financings*, Official Statement, Cosmos Foundation Bond Issue (2012), at p. B-6, available at: <http://tinyurl.com/yavbe95f> (last checked 6/18/17).

⁵² Harmony Bond Issue Official Statement (May 9, 2017), available at: <http://tinyurl.com/y8gduwl7> (last checked 6/27/2017).

⁵³ Texas State Comptroller records for Harmony debt (2016), available <http://tinyurl.com/y7t9xo4m> (last checked 7.18.2017).

⁵⁴ Charter School Solutions bond documents for Harmony - Official Statement (Apr. 27, 2016), available at: <http://tinyurl.com/y9xs5rdd>, <http://tinyurl.com/ybjw932j> (last checked 6/27/2017).

⁵⁵ See Charter School Solutions corporate documents, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/5/17).

payments to fund its own operations and programs and expand the Harmony model to other states. The three-member governing Board of Directors for CSS includes individuals that are affiliated with Harmony and other Gülenist organizations: Bilal Erturk, the former President of the Sky Foundation (the Gülenist charter organization in Oklahoma that is now inactive as a result of a critical audit conducted by the OK State Auditor);⁵⁶ Harmony's current legal counsel; and Gokturk Tunc, a former Harmony board member also affiliated with the Raindrop Foundation.⁵⁷ Hakan Yagci, formerly the budget director for Harmony, left that position to serve as the founding CEO of CSS in 2015.⁵⁸

In 2016, CSS borrowed \$43,285,000 through its first bond issue for construction projects at five Harmony schools in Euless, Grand Prairie, Sugar Land, Plano, and El Paso.⁵⁹ Under the terms of the bond, CSS, acting as Harmony's landlord, will receive \$600,000 annually in rental payments from the Harmony schools that is in excess of the total owed for the bond. Over the life of the bonds, Harmony will pay CSS a total of \$18.1 million more than the amount of the bond debt repayment—paying CSS 115%

of the bond debt. The excess payments are not shared equally by the five schools, however. For example, the Harmony school in Euless will pay CSS between 134% - 151% of the bond debt for its property. Despite making excess rental payments to CSS, Harmony, and not CSS, will be responsible for all maintenance and repairs to the school facilities.

CSS also borrowed \$8.21 million through a bond for the Albuquerque School of Excellence in 2016.⁶⁰ Like the Harmony Texas schools, the Albuquerque school will pay \$150,000 per year more than the debt on the bond and \$4.4 million more over the life of the bond. Importantly, between these two bond issuances, CSS will receive over \$750,000 per year in revenue from taxpayer dollars for its own operations. Once the bonds are paid in full using taxpayer dollars, CSS will own the school properties, even though charter schools' public funds provided the resources to acquire, construct, and renovate CSS's property.

In addition, Riverwalk has borrowed a total of \$14,075,000 in three bond issues in 2007 and 2014 for construction and refinancing facilities.⁶¹

Real Estate

One of the most significant profit centers for the Gülen Organization is real estate. This property financing scheme has been replicated throughout the country. In fact, Vahap

Uysal, a Harmony Founder and board member of Concept Schools,⁶² wrote and presented an article entitled "Gülen Movement and School Financing" at the Third Annual Conference on

⁵⁶ Sky Foundation IRS Form 990, available at <http://tinyurl.com/y96wnshc> (last checked 7/18/17). See Dove Science Academy Investigative Report; the Oklahoma State Auditor and Inspector; March 2016; available at <https://tinyurl.com/kv3ade4> (last checked 5/20/2017). Harmony Public Schools IRS Form 990 (2006 and 2007), available at <https://tinyurl.com/hu9wqcl>

⁵⁷ Harmony Public Schools IRS Form 990 (2006 and 2007), available at <https://tinyurl.com/hu9wqcl> (last checked 7/19/2017). Rain Drop Foundation IRS 990 Form (2002), available at: <http://tinyurl.com/zcvgskm> (last checked 6/15/2017).

⁵⁸ See Charter School Solutions bond documents for Harmony - Official Statement pg. A-1 (Apr. 27, 2016), available at: <http://tinyurl.com/y9xs5rdd>, <http://tinyurl.com/ybjw932j> (last checked 6/27/2017).

⁵⁹ Charter School Solutions bond documents for Harmony - Official Statement (Apr. 27, 2016), available at: <http://tinyurl.com/y9xs5rdd>, <http://tinyurl.com/ybjw932j> (last checked 6/27/2017).

⁶⁰ Charter School Solutions bond documents for Albuquerque - Official Statement (June 8, 2016), available at: <http://tinyurl.com/yary29pl> (last checked 6/5/2017).

⁶¹ Riverwalk bond issues: 2014 for \$7,430,000, available at <http://tinyurl.com/y7hjs3e7> and 2007 for \$6,345,000, available at <http://tinyurl.com/y7jalmmq> (both last checked 7/20/2017)

⁶² See Uysal's biography, *supra*.

Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice.⁶³ Gülenists throughout the country attended and presented, including Yuksel Alp Aslandogan, former Harmony landlord, President of one Harmony's largest vendors, and Gülen's official spokesperson in his role as President/Executive Director of the Alliance for Shared Values.⁶⁴

In Texas, Gülenist individuals have made millions of dollars in profit from real estate arrangements with Harmony schools. Several of the individuals worked with other Harmony vendors before, during, or after the time of the real estate transactions, and many of the individuals regularly move in and out of businesses that transact with Harmony. This complex network of long-standing business connections raises questions about apparent conflicts of interest and whether Harmony's real estate transactions are conducted at arm's length.

Harmony Science Academy - Austin (930 E. Rundberg Lane): Harmony (also known as the Cosmos Foundation) rented this property from Yuksel Alp Aslandogan between 2002 and 2010, after which is purchased the property from

Aslandogan.⁶⁵ Aslandogan bought the property for \$1.375 million in 2002.⁶⁶ Harmony paid \$2 million in rent over the eight years and purchased the property for \$1.7 million in 2010.⁶⁷ Even after deducting property taxes paid during this time period⁶⁸ as well as all known property improvements,⁶⁹ our research indicates that Aslandogan cleared an estimated profit of up to \$2 million from the sale.

Harmony Science Academy - Houston (5435 Braeswood Blvd): Harmony rented this property from Fercan Kalkan and Dr. Cahit Gezgin from 2001 to 2010. The property first served as Harmony's central office and later became the Harmony Science Academy. The property flipped ownership between Kalkan and Gezgin several times for unknown reasons, but Kalkan borrowed \$910,000 in 2006 to re-purchase the property from Gezgin.⁷⁰ Harmony paid an estimated \$240,000 annually in rent and purchased the property in 2010 from Kalkan for \$2.3 million.⁷¹ Our research indicates that Kalkan made an estimated profit of up to \$3.3 million on the sale even after deducting the property taxes paid on this property from 2001 - 2010.⁷²

⁶³ *Third Annual Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice*, Agenda (Nov. 3, 2007), available at: <http://tinyurl.com/gt2vujs> (last checked 10/31/2016).

⁶⁴ See Aslandogan's biography, *infra*.

⁶⁵ See property purchase history available from Travis County Tax Assessor at <http://tinyurl.com/ybhltbas> (last checked 7/19/2017).

⁶⁶ See Aslandogan purchase price he quoted to New York Times (6 June 2011), available from <http://tinyurl.com/3ua255n> (last checked 7/19/2017).

⁶⁷ See Q & A from Harmony related to Cosmos/Harmony purchase price and monthly rent paid to Aslandogan, available from <http://tinyurl.com/yb7g629c> (last checked 7/19/2017).

⁶⁸ Aslandogan paid \$217,057 in property taxes between 2002 - 2010 (through May); tax totals are archived but were received from Travis County Tax Assessor office in phone conversation on 8/03/2016: Property records available from <http://tinyurl.com/y8l5hmmw>; Travis County Tax Assessor available at <http://tinyurl.com/ybld4ymn> (both last checked 7/20/2017).

⁶⁹ Search of all city permits for construction from 2002 - 2010, City of Austin Permitting, available at <http://tinyurl.com/ybunndfc> (last checked 8/3/2016).

⁷⁰ See first general warranty deed to Kalkan in 2002, available from Harris County Clerk (Record No. V807839) at <http://tinyurl.com/y9lqud7l> (last checked 7/19/2017); see warranty deed with vendor lien 2006 (loan amount for property) from Harris County Clerk (Record No. Z371895) available at <http://tinyurl.com/y9lqud7l> (last checked 7/19/2017).

⁷¹ See Q & A from Harmony related to Cosmos/Harmony purchase price and monthly rent paid to Kalkan, available from <http://tinyurl.com/yb7g629c> (last checked 7/19/2017). Note that Harmony states it paid \$28,000 monthly rent in one section of this document (which would be \$336,000 in annual rent) and \$240,000 annually in another section. The more conservative annual payment has been used in this calculation.

⁷² Tax payments from 2001 - 2010 totaled \$170,983; received annual tax payments via telephone conversation from Harris County Tax Assessor office because records are archived for this time period, contact information for Tax Assessor available at <http://tinyurl.com/y9bnf6yu> (last checked 08/2016). Calculation involving this transaction are made using available public information.

Considering these questionable transactions, Harmony's other real estate transactions should be thoroughly investigated. In particular, Fercan Kalkan sold Harmony property used for the Harmony School of Fine Arts and played a role in complicated land transactions involving the Texas Gulf Foundation/North American University, the Harmony School of Advancement, and the Harmony Science Academy NW.

Each of the individuals involved in the real estate transactions described above have been actively involved in Gülenist organizations and schools. Aslandogan, who has been a leader of

many Gülen-affiliated organizations since 1999, currently serves as a spokesman for Fethullah Gülen and is the paid President/Executive Director of the Alliance for Shared Values, an openly Gülenist national organization.⁷³ Among his many businesses and affiliations with Gülen organizations, Kalkan became the manager of Target Design and Management in 2014,⁷⁴ a company that received a total of \$52 million in contracts from Harmony and Riverwalk between 2009 - 2014.⁷⁵ Dr. Cahit Gezgin was the former Board Chairman of Texas Gulf Foundation/North American University, a Gülenist organization.⁷⁶

Excessive Use of the H-1B Visa Program

Like other Gülen organization charter networks, the Harmony and Riverwalk schools utilize the H-1B visa program to immigrate large numbers of Turkish Gülenists into the United States for employment in the schools. Since its inception, Harmony has filed a staggering number of 2,559 H-1B visa applications;⁷⁷ Riverwalk filed an additional 258 H-1B Visa applications;⁷⁸ the total applications filed in Texas are 2,816. The cost of these applications is estimated to be between \$2,000 - \$4,000 per application, making the total amount expended in public funds for immigration by Harmony/Cosmos and Riverwalk an estimated \$5,632,000 - \$11,264,000. While the

Gülen Organization typically states that the visas are only to fill shortages for math and science teachers, these applications were filed for such positions as: legal counsel, law clerks, construction engineers, art teachers, educational diagnostician, budget analysts and accountants, director of special programs, publication coordinator, assistant principals, principal, finance manager, physical education teacher, Turkish teachers, social studies and social science teachers, English as a second language teachers, account managers, economics teachers, assistant superintendents, English and English grammar teachers, elementary school teachers,

⁷³ Alliance for Shared Values IRS 990 Form 2014, available at: <https://tinyurl.com/ybvmo96o> (last checked 5/26/2017)

⁷⁴ See TDM Texas Franchise Tax Public Information Report 2014, available from Texas Secretary of State at <http://tinyurl.com/7oy8w> (last checked 7/19/2017).

⁷⁵ See contracts with TDM on Harmony IRS Form 990 for 2009 - 2014, available from <https://tinyurl.com/hu9wqcl> (last checked 7/19/2017) and Riverwalk IRS 990 Form (2014), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

⁷⁶ Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017).

⁷⁷ Harmony filed 2,558 H-1B applications from 2001-2016, available at: <http://tinyurl.com/ybjttopm> (Harmony Science Academy-West Houston Cluster Office) (1), <http://tinyurl.com/y7f6b42z> (Harmony Science Academy-Carrollton) (4), <http://tinyurl.com/yb6p6s9a> (Cosmos Foundation dba Harmony Elementary Austin) (3), <http://tinyurl.com/ydexzwd5> (Cosmos Foundation Inc, Dba Harmony School of Excel) (1), <http://tinyurl.com/ycoyr9g6> (Cosmos Foundation Inc, Dba Harmony School of Innov) (7), <http://tinyurl.com/ycqh5mdw> (Harmony Science Academy-Dallas) (2,006), <http://tinyurl.com/y7gwj2xj> (Cosmos Foundation, Inc.) (493), <http://tinyurl.com/y9n8x9sz> (Harmony School of Innovation-Garland) (13), <http://tinyurl.com/ycgpwnc7> (Harmony School of Excellence-Houston) (7), <http://tinyurl.com/yaz4epl3> (Harmony School of Political Science and Communicat) (21), <http://tinyurl.com/ybepbrjk> (Harmony School of Excellence-Dallas) (2) (last checked 7/6/2017)

⁷⁸ Riverwalk filed 258 H-1B applications from 2001-2016, available at: <http://tinyurl.com/yctpchjd> (Riverwalk Education Foundation, Inc.) (183), <http://tinyurl.com/y7hlxks2> (School of Science and Technology-Houston) (5), and <http://tinyurl.com/y9cdoayq> (School of Science and Technology-Corpus Christi) (70) (last checked 7/6/2017).

cluster superintendents, instructional coordinators, education administrators, human resources advisor, purchasing agents and managers, director of communication, Spanish language teacher, public relations manager, curriculum developer for the gifted and talented program, operations research analyst, director of high school programs, small projects director, academic advisors, and internal auditor.⁷⁹

Harmony uses the same limited number of attorneys to file and process its H-1B visa applications as other known Gülen Organizations charter networks, vendors, and cultural associations, indicating once again the existence of an overall network.

- ▶ Leonard D'Arrigo: the Texas network used D'Arrigo, an Albany, New York-based attorney, to file numerous H-1B applications. D'Arrigo also filed applications for:
 - ▷ Albuquerque School of Excellence (formerly Focus Foundation) (NM)
 - ▷ Little Scholars of Arkansas (AR)
 - ▷ Raindrop Foundation
 - ▷ Central Jersey College Prep Charter School (NJ)
 - ▷ Syracuse Academy of Science Charter School (NY)
 - ▷ Millenium Education Foundation (MO)
 - ▷ Rochester Academy Charter School (NY)
 - ▷ Sky Foundation (OK)
 - ▷ Bergen Arts and Science Charter School (NY)
 - ▷ Read Foundation (TN)
 - ▷ Truebright Science Academy Charter School⁸⁰
- ▶ Tina Nguyen: Harmony used Nguyen, a Houston-based attorney to file

applications. Nguyen also filed applications for:

- ▷ Pelican Educational Foundation
- ▷ Dove Science Academy
- ▷ Little Scholars of Arkansas
- ▷ Millenium Education Foundation
- ▷ Sky Foundation, Inc.⁸¹

- ▶ Garrett White: the Texas network used White, a Houston-based attorney, to file numerous H-1B applications. White also filed applications for:

- ▷ Memphis School of Excellence/ Read Foundation (TN)
- ▷ Dove Science Academy
- ▷ Riverwalk Education Foundation (TX)
- ▷ Pelican Educational Foundation (LA)
- ▷ Little Scholars of Arkansas (AR)
- ▷ Raindrop Foundation
- ▷ Sky Foundation (OK)
- ▷ Millennium Foundation (MO)
- ▷ Texas Gulf Foundation (TX)
- ▷ Helix Design and Production
- ▷ Solidarity Contracting
- ▷ Brighten Technologies
- ▷ Target Design and Management
- ▷ Institute of Interfaith Dialog for World Peace
- ▷ Nur International⁸²

- ▶ Yalcin Karadag: The Texas network used Karadag, a Houston-based attorney to file applications. Karadag also filed applications for:

- ▷ Cosmos Foundation, Inc.
- ▷ Dove Science Academy
- ▷ LISA Academy
- ▷ Riverwalk Foundation
- ▷ Sky Foundation
- ▷ Millenium Education Foundation⁸³

⁷⁹ Jobs in Tech, available at: <https://tinyurl.com/y8muahbt>, <https://tinyurl.com/yb2foulo>, and <https://tinyurl.com/ycwlm2x6> (last checked 6/11/17).

⁸⁰ Leonard D'Arrigo, Jobs in Tech, available at: <https://tinyurl.com/kcb3kjq> (last checked 5/24/2017).

⁸¹ Tina Nguyen, Jobs in Tech, available at: <http://tinyurl.com/mh29kbe> (last checked 5/20/17)

⁸² Garrett White, Jobs in Tech; available at: <https://tinyurl.com/lg5f2aq> (last checked 5/24/2017).

⁸³ Yalcin Karadag, Jobs in Tech, available at: <http://tinyurl.com/yckgzf2c> (last checked 5/20/17).

Notable Turkish Vendors

According to its tax returns, Harmony has spent an estimated \$161,861,038 on contracts with Turkish-owned or affiliated companies since 2004. In addition, Riverwalk schools paid approximately \$5,267,054 to Turkish-owned or affiliated companies since 2005. Each company listed below is owned or operated by individuals of Turkish national origin, and they represent 72 percent of the total contracting dollars disclosed between 2004 and 2015 on Harmony's tax returns:

- ▶ Apple Catering, Inc: Harmony paid Apple Catering \$2,025,095 for catering services in 2012.⁸⁴
- ▶ Atlas Texas Construction ("Atlas Construction"): Harmony paid Atlas Construction \$1,344,671 in 2006, \$6,709,375 in 2007, and \$3,898,941 in 2009 for a total of \$11,952,987.⁸⁵ Riverwalk Education Foundation similarly paid Atlas Construction for leasehold improvements in 2005 totaling \$60,000.⁸⁶ Atlas Construction received a total of \$12,012,987 from Riverwalk and Harmony.
- ▶ Atlas Texas Food and Beverage, LLC ("Atlas Food"): Harmony paid Atlas Food \$427,195 in 2008 and \$1,948,978 in 2010 for a total of \$2,376,173.⁸⁷
- ▶ Crystal Facility Solutions, Inc.: Harmony paid Crystal Facility Solutions for maintenance and janitorial services \$2,150,092 in 2010, \$2,955,841 in 2011, \$1,922,027 in 2012, and \$2,465,502 in 2015 for a total of \$9,493,462.⁸⁸
- ▶ DNR Catering, Inc. ("DNR") (d/b/a Turquoise Grill and Alamo City Foods): Harmony paid DNR \$358,061 for catering services in 2008.⁸⁹ Riverwalk had contracts with DNR Catering, Alamo City Foods, and Turquoise Grill from 2009 to 2014 totaling \$2,597,279.⁹⁰ In total, DNR has received \$2,955,340 since 2008 from Harmony and Riverwalk.
- ▶ Ege Construction, LLC.: Harmony paid Ege for constructing and contracting services \$1,154,005 in 2006, \$790,364 in 2007, and \$8,301,709 in 2009 for a total of \$10,246,078. Ege is also the contractor for a new school built by Charter School Solutions in Grand Prairie for an unknown amount.⁹¹
- ▶ Helix Design and Production, LLC ("Helix"): Harmony paid Helix \$694,995 for publication and design in 2008.⁹² Riverwalk also paid Helix \$148,681 for advertising in 2009.⁹³ In total, Helix received \$843,676 over two years.
- ▶ Karadag Law Firm: Harmony paid Karadag \$178,520 in 2006 and \$307,450 in 2008 for a total of \$485,970 for legal fees.⁹⁴

⁸⁴ Harmony IRS 990 Form (2012), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁸⁵ Harmony IRS 990 Form (2006-2009), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁸⁶ Riverwalk IRS 990 Form (2005), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

⁸⁷ Harmony IRS 990 Form (2008-2010), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁸⁸ Harmony IRS 990 Form (2010-2014), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017); Harmony IRS 990 Form (2015), available at: <http://tinyurl.com/tjyfuw2> (last checked 6/15/2017).

⁸⁹ Harmony IRS 990 Form (2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹⁰ Riverwalk IRS 990 Form (2009-2014), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

⁹¹ Harmony IRS 990 Form (2006-2009), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹² Harmony IRS 990 Form (2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹³ Riverwalk IRS 990 Form (2009-2014), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

⁹⁴ Harmony IRS 990 Form (2006-2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

- ▶ **Macrocosm Service and Solutions:** Harmony paid Macrocosm \$3,085,214 for construction services in 2009.⁹⁵
- ▶ **North American Construction:** Harmony paid \$1,225,115 to North American Construction for building contractor services in 2007.⁹⁶
- ▶ **Northwest Catering Services, Inc.:** Harmony paid Northwest Catering Services \$2,420,613 in 2011, \$3,186,087 in 2012, \$3,610,734 in 2013, and \$2,969,815 in 2015 for a total of \$12,187,249.⁹⁷
- ▶ **Rainbow Construction, LLC:** Harmony paid Rainbow Construction \$2,343,777 in 2006 for construction.⁹⁸
- ▶ **Solidarity Contracting, LLC:** Harmony paid Solidarity \$5,127,139 in 2008, \$18,129,632 in 2009, \$14,043,279 in 2010, and \$8,661,241 in 2011 for a total of \$45,961,291.⁹⁹
- ▶ **Target Design and Management, LLC (a/k/a TDM Construction):** Harmony paid TDM Construction \$15,073,902 in 2009, \$22,658,487 in 2010, \$5,103,932 in 2011, \$2,445,561 in 2012, \$2,972,084 in 2013, \$2,966,066 in 2014, and \$3,654,849 in 2015. Riverwalk also paid TDM Construction \$692,393 in 2014.¹⁰⁰ In total, TDM Construction has received \$55,567,274.

- ▶ **Winport Equipment:** In 2010, Harmony paid Winport \$4,550,690 for furniture and equipment.¹⁰¹

Harmony is required to disclose only its five largest independent contracts of \$100,000 or more on its IRS Form 990 each year. The contracts listed above are compiled from those IRS documents, but they only represent a small percentage of Harmony contracts that are \$100,000 or more. For example, Harmony disclosed there were 129 contracts totaling \$100,000 or more on its 2014 IRS Form 990.¹⁰² Harmony has refused to comply with numerous FOIA requests we have made to provide complete records for all its contracts of \$100,000 or more so that there can be a public review of its entire contracting history.

In addition to these vendors, Harmony has used Turkish-operated businesses for E-Rate services. Brighten Technologies LLC ("Brighten") is a Turkish-owned/operated business founded and staffed by former Harmony employees that has received significant E-Rate funds from Harmony.¹⁰³ Yusuf Duzgun, also known as Joseph Duggan, taught at Harmony and later founded Brighten. Brighten now regularly wins millions in contracts from Harmony, Duzgun's former employer.

Using federal Race to the Top grant funds, Harmony awarded Brighten a sub-grant valued at \$904,719 to provide wireless networks infrastructure upgrades.¹⁰⁴ Brighten also received \$625,971 in E-Rate funds for telecommunication services

⁹⁵ Harmony IRS 990 Form (2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹⁶ Harmony IRS 990 Form (2007), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹⁷ Harmony IRS 990 Form (2010-2014), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017); Harmony IRS 990 Form (2015), available at: <http://tinyurl.com/tjyfuw2> (last checked 6/15/2017).

⁹⁸ Harmony IRS 990 Form (2006), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

⁹⁹ Harmony IRS 990 Form (2008-2011), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

¹⁰⁰ Riverwalk IRS 990 Form (2014), available at: <http://tinyurl.com/ydg4yv8m> (last checked 6/15/2017).

¹⁰¹ Harmony IRS 990 Form (2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

¹⁰² Harmony IRS 990 Form (2008), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017).

¹⁰³ Taxable Entity Search, Texas Comptroller of Public Accounts (listing Yusuf Z. Duzgun, a/k/a Joseph Duggan, as president of Brighten Technologies), available at: <http://tinyurl.com/ybt4nu2s> (accessed by searching for Brighten Technologies using its Texas ID (32038619923), then clicking "Officers and Directors Information") (last checked 7/7/2017); George Joseph, *Education, Inc.*, Jacobin (Nov. 4, 2014) (reporting that former Harmony employees founded and staff Brighten Technologies), available at: <http://tinyurl.com/kfl5oar> (last checked 7/7/2017).

¹⁰⁴ *Brighten Technologies, LLC*, USA Spending, available at: <http://tinyurl.com/ybr628gp> (last checked 3/29/2016) (award details accessed by clicking on link to Award ID 017595341-1).

provided to Harmony.¹⁰⁵ Although Harmony is required to follow fair and open competitive bidding processes when awarding contracts funded by Race to the Top funds and ERate,¹⁰⁶ there is a clear pattern of awarding contracts to companies staffed with former Harmony employees. These contractual awards should be investigated. Concept Schools, the Gülenist regional oversight entity for the Midwest region, is currently under investigation for questionable E-Rate subcontracts awarded to affiliated Turkish individuals and vendors.¹⁰⁷ Presumably as a result of the revenues generated by these awards, Duzgun has been able to make substantial political donations from his private funds. In fact, he has donated \$83,950 to federal election campaigns since 2010, including nearly \$80,000 in the 2012 election cycle alone.¹⁰⁸

Harmony also contracts with the Texas Gulf

Foundation ("TGF"), which does business as North American College and North American University ("NAU").¹⁰⁹ The owners and operators of TGF worked for Harmony before founding TGF in 2007.¹¹⁰ The TEA recognized the close relationship between Harmony and TGF in 2010, stating, "[t]hese organizations work cohesively together to create an interlocking educational system, serving grades K-20, for the Houston area."¹¹¹ Between 2007 and 2011, Harmony paid TGF \$525,000 for various services.¹¹² In 2013, Harmony awarded TGF \$805,000 in contracts for consulting services using federal funds.¹¹³ Harmony potentially violated rules governing use of federal funds by awarding substantial contracts to TGF despite prohibitions against "[o]rganizational conflicts of interest."¹¹⁴ Harmony also potentially failed to use sealed bids or competitive procurement processes for these services, as required by federal law.¹¹⁵

Scandals, Investigations, & Notable Activities

In December 2014, the U.S. Department of Education's Office of Civil Rights ("OCR") found

that Harmony enrolls a disproportionately low number of English language learners ("ELL") and

¹⁰⁵ *Brighten Technologies, LLC*, USA Spending, available at: <http://tinyurl.com/ybr628gp> (last checked 3/29/2016) (award details accessed by clicking on link to Award ID 017595341-1).

¹⁰⁶ 34 C.F.R. Part 80 (outlining federal procurement regulations applicable to Department of Education awards prior to December 2014); 2 C.F.R. Part 200 (outlining uniform procurement rules applicable to awards from all federal agencies after December 2014); 47 C.F.R. § 54.503 (requiring all entities participating in the E-Rate program to "conduct a fair and open competitive bidding process").

¹⁰⁷ See, e.g., the Illinois and Ohio state profiles.

¹⁰⁸ Yusuf Duzgun Contributions, Federal Election Commission, available at: <http://tinyurl.com/ydemfy4q> (last checked 7/8/2017); Yusuf Duzgun, CampaignMoney.com, available at: <http://tinyurl.com/y7cj6g3w> (last checked 7/8/2017).

¹⁰⁹ See Letter from Cristian Rosas-Grillet, Assistant Attorney General, Office of Attorney General of Texas to W. Montgomery Meitler, Senior Counsel, Texas Education Agency (July 28, 2015), available at: <http://tinyurl.com/ybkjwdb> (last checked 7/11/2017) (noting that Texas Gulf Foundation did business as North American College).

¹¹⁰ Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011) (reporting TGF owners and operators originally worked for Harmony), available at: <http://tinyurl.com/ya6cku5c> (last checked 7/8/2017); NAU History, North American University (last visited Mar. 29, 2016) (noting that the Texas Gulf Foundation was founded in April 2007), available at: <http://tinyurl.com/y8sdn74c> (last checked 7/8/2017).

¹¹¹ *One-year Compliance Report for Texas Gulf Educator Certification Program*, Texas Education Agency (Apr. 7, 2010) (emphasis added), available at: <http://tinyurl.com/y7uztg7k> (automatically downloads as PDF) (last checked 7/8/2017).

¹¹² Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011), available at: <http://tinyurl.com/ya6cku5c> (last checked 7/8/2017).

¹¹³ *Texas Gulf Foundation*, USA Spending, available at: <http://tinyurl.com/y9y9tfjd> (last checked 7/8/2017).

¹¹⁴ 34 C.F.R. Part 80 (outlining federal procurement regulations applicable to Department of Education awards prior to December 2014); 34 C.F.R. § 80.36(c)(1)(v); see 2 C.F.R. Part 200 (outlining uniform procurement rules applicable to awards from all federal agencies after December 2014).

¹¹⁵ 34 C.F.R. § 80.36(d).

students with disabilities compared to the public school districts hosting Harmony's schools.¹¹⁶ The OCR specifically examined enrollment rates of ELL students at eighteen Harmony charter schools. These schools enrolled approximately half the percentage of ELL students as the local school districts: 11.5% at Harmony schools compared to 22.5% for the school districts. The enrollment rate of the students with disabilities was even lower: 2.7% at the Harmony schools compared to 7.3% for the school districts.

The OCR also found that Harmony's enrollment policies could have a chilling effect that excludes students based on their or their parents' citizenship or immigration status. The investigation revealed that Harmony policies and procedures do not ensure that students will receive adequate educational services, including language development for ELL students and special education and related services for students with disabilities. In the settlement with OCR, Harmony agreed to correct its policies, including reviewing its admissions policies, procedures, and practices to identify potential barriers to increased participation by ELL students and students with disabilities. However, as recently as 2016, Harmony settled another case with OCR regarding its apparent failure to provide required services to a student with

special needs.¹¹⁷

Harmony also favors Turkish nationals for leadership positions and, in most cases, Turkish men. Harmony's favoritism for individuals with the same national origin is displayed in its recruiting, hiring, and promotion of Turkish individuals. Four of six members of the Harmony board leadership are Turkish men.¹¹⁸ Other Turkish men in leadership positions in 2015-2016 include: 100% of Harmony's ten senior leadership positions including the CEO; 100% of Harmony's six cluster superintendents; 67% of campus principals; and 78% of Harmony's counselors.¹¹⁹

Atlas Texas Construction, one of Harmony's construction vendors, has been accused of attempting to bribe public officials in Louisiana. While one of the Louisiana Gülen charter schools was under investigation, an employee of the state education department conducting the investigation informed law enforcement authorities that Inci Akpinar, Vice President of the Atlas Construction, offered him a \$25,000 bribe to "help fix the problem" at the school.¹²⁰ When he responded that it would be a conflict of interest for a state official to accept money from the school, Akpinar told him that he would "only need to advise them."¹²¹ Akpinar participated in a meeting with the state official and

¹¹⁶ Settlement and resolution letters from OCR (2014), available from <http://tinyurl.com/yaw7aeyl> (last checked 7.20.2017).

¹¹⁷ Settlement letter (2016) from OCR to Harmony, available from <http://tinyurl.com/ydalessd> (last checked 7.20.2017).

¹¹⁸ See *Board of Directors*, Harmony Public Schools, available at: <http://tinyurl.com/y98wyz2p> (last visited 5/18/2016) (listing Soner Tarim, Oner Ulvi Celepcikay, Cengizhan Keskin, and Hakduran Koc as four of six directors); Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, N.Y. Times (June 6, 2011) (reporting that Soner Tarim is from Turkey), available at: <http://tinyurl.com/ya6cku5c> (last checked 7/8/2017); *Biography of Oner Celepcikay*, University of Houston-Downtown (listing bachelor's degree obtained from Istanbul University in Istanbul, Turkey), available at: <http://tinyurl.com/y96r5o8g> (last visited 7/8/2017); *Profile of Cengizhan Keskin*, LinkedIn (listing bachelor's and master's degrees from Middle East Technical University in Ankara, Turkey), available at: <http://tinyurl.com/y99lbcna> (last visited 7/8/2017); *Biography of Hakduran Koc*, University of Houston Clear Lake (listing bachelor's degree from Ankara University in Ankara, Turkey), available at: <http://tinyurl.com/ydxezvd6> (last visited 7/8/2017).

¹¹⁹ Harmony employee data for 2015-16 received from the Texas Education Agency via FOIA request; other positions identified through LinkedIn profiles, Harmony purchasing bids, Harmony Finance Committee minutes, and IRS Form 990 for 2014. See position for Soner Tarim, Yalcin Akyildiz, Zekeriya Yuksel, Ozgur Ozer, and Erdal Caglar on IRS Form 990 for 2014 available at <https://projects.propublica.org/nonprofits/organizations/760615245> (last checked 8.12.17); See Kemal (Mark) Namver available at LinkedIn <https://www.linkedin.com/in/mark-namver-63141aa2/> (last checked 8.12.17); see Darren Polat at LinkedIn available at <https://www.linkedin.com/in/polatdarren/> (last checked 8.12.17); See Zekeriya Yaman LinkedIn available at <https://www.linkedin.com/in/zekeriya-yaman-822a5b137/> (last checked 8.12.17); See Kaan Camuz LinkedIn available at <https://www.linkedin.com/in/kaan-camuz-b782b92b/>; See Nihat Bayhan LinkedIn available at <https://www.linkedin.com/in/nihat-bayhan-50981b43/> (last checked 8.12.17).

¹²⁰ Vanacore, Andrew. *Abramson charter group's ties to Gülen movement come to surface*. New Orleans Time-Picayune (22 July 2017), available at: <http://tinyurl.com/3l2cnxs> (last checked 5/25/17).

¹²¹ *Id.*

representatives of Harmony at Abramson just before she made the bribery offer.

Gülenist Cultural and Business Organizations Active in State

- ▶ The Dialogue Institute of the Southwest: The Houston-based Dialogue Institute of the Southwest hosts forums, conferences, dinners and cultural exchange “dialogue” trips to Turkey.¹²² The Dialogue Institute has branches in Little Rock and Fayetteville, as well as in Texas, Kansas, Mississippi, Oklahoma and New Mexico.¹²³ The Dialogue Institute is a member organization of the Alliance for Shared Values, an umbrella organization for Gülenist cultural organizations around the United States that are openly aligned with the Gülen Movement.¹²⁴
- ▶ Raindrop Foundation: The Raindrop Foundation is a Houston-based organization that sponsors Raindrop Turkish Houses in Texas, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, Tennessee, and New Mexico.¹²⁵ There are eleven Raindrop Turkish houses in Texas: Arlington, Austin, College Station, Dallas, El Paso, Houston, NW Houston, San Antonio, Lubbock, Corpus Christi, and Waco.¹²⁶ Like Turkish cultural centers in other states across the country, the Raindrop Foundation promotes Turkish culture through language and cooking classes, festivals and local events with special guests. It also sponsors annual “dialogue” trips to Turkey for community members and leaders.¹²⁷ The Raindrop Foundation also operates under assumed names that include: Raindrop Turkevi, Raindrop Helping Hands, Raindrop Turkish House, Bluebonnet Learning Center, Merit Learning, RD Events and Sales, Bluebonnet Child Care, Zenith Learning (inactive), Turkish-American Community Center, Institute of Turkish Studies, and Raindrop Youth Development Center – RYDC.¹²⁸
- ▶ Turquoise Council for Americans and Eurasians (“TCAE”): TCAE is one of six Gülenist member organizations affiliated with the Turkic American Alliance.¹²⁹ TCAE is active in Texas, Arkansas and neighboring states. It hosts awards dinners, forums on various topics, and other community and cultural events, and sponsors trips to Turkey and other countries and for local elected officials and leaders.¹³⁰ TCAE helped organize a trip for ten-members of Congress in 2013 to Baku, Azerbaijan. The Office of Congressional Ethics later investigated the trip when it learned that SOCAR, the state-owned oil company of Azerbaijan,

¹²² Dialogue Institute of the Southwest on the Alliance for Shared Values website, available at: <https://tinyurl.com/ybg3psok> (last checked 6/6/2017).

¹²³ Dialogue Institute of the Southwest Branches, available at: <http://tinyurl.com/ycldgejx> (last checked 6/13/2017).

¹²⁴ Alliance for Shared Values, available at: <https://tinyurl.com/ybg3psok> (last checked 6/6/2017).

¹²⁵ About Raindrop Turkish House, available at: <http://tinyurl.com/mbf9jd6> (last checked 6/6/2017).

¹²⁶ Raindrop Turkish House, available at: <http://tinyurl.com/yaqn2g7b> (last checked 6/13/2017).

¹²⁷ About Raindrop Turkish House, available at: <http://tinyurl.com/mbf9jd6> (last checked 6/6/2017).

¹²⁸ Raindrop Foundation corporate documents, available from Texas Secretary of State at <http://tinyurl.com/mfxbyjr> (last checked 7.20.2017).

¹²⁹ Turkic American Alliance Members, available at: <http://tinyurl.com/ycy89wv2> (last checked 6/18/17).

¹³⁰ TCAE About Us, available at: <http://tinyurl.com/yannxyqc> (last checked 6/18/17).

secretly paid for the trip.¹³¹ At the time of the trip, Kemal Aksuz, a founder of Target Design and Management (“TDM

Construction”), served as TCAE’s director.¹³² TDM Construction has received over \$55 million in contracts from Harmony.¹³³

Friends of Gülen Spotlight:

Four members of Congress from Texas participated in a ten-member Congressional trip in 2013 to Azerbaijan organized by TCAE. The Office of Congressional Ethics later investigated the trip when it learned that SOCAR, the state-owned oil company of Azerbaijan, secretly paid for the trip.¹³⁴ The trip included U.S. Representative Sheila Jackson Lee, U.S. Rep. Ted Poe, then-U.S. Rep. Ruben Hinojosa, and then-U.S. Rep. Steve Stockman. The members of Congress were not aware that SOCAR funded the trip and sought pre-trip approval from the House Ethics Committee. The Washington Post reported that during the previous year “SOCAR and several large energy companies sought exemptions for a \$28 billion natural gas pipeline project in the Caspian Sea from U.S. economic sanctions being imposed on Iran.”¹³⁵

Other examples of state elected officials who

participated in subsidized trips to Turkey include (not an exhaustive list)¹³⁶:

- ▶ Representative Alma Allen
- ▶ Representative Valinda Bolton (former)
- ▶ Senator Troy Fraser (former)
- ▶ Representative Pete Gallego (former)
- ▶ Senator Joan Hoffman
- ▶ Senator Eddie Lucio
- ▶ Representative Elliot Naishtat (former)
- ▶ Representative Mark Strama (former)
- ▶ Senator Leticia Van de Putte (former)

Gülen Connections: Individuals Caught in the Gülen Organization Web

It is common for the Gülen Organization charter networks within a region to shuffle their Turkish H-1B visa teachers from school to school, as well as between regions. This is just a small number of individuals with these overlapping ties throughout the region, which further demonstrates the region’s interconnections. Notably, this shuffling only occurs with Turkish

employees.

- ▶ Yuksel Alp Aslandogan: Current President/Executive Director, Alliance for Shared Values; former Secretary, Gülen institute; former President, Dialogue Institute of the Southwest; Founder, Wisconsin Career Academy (WI);

¹³¹ Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: <http://tinyurl.com/y7pegxo9> (last checked 5/29/17).

¹³² TDM Construction, Texas Secretary of State; available at: <http://tinyurl.com/r7iw> (last checked 2016).

¹³³ Harmony IRS Form 990s; available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/17); see also Notable Turkish Vendors, *supra*.

¹³⁴ Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: <http://tinyurl.com/y7pegxo9> (last checked 5/29/17). See Will Tucker and Lise Olsen, *Lawmakers’ trips to Baku raises ethics questions*, Houston Chronicle (24 July 2014) available at <http://tinyurl.com/ycuq75ey> (last checked 7.20.2017).

¹³⁵ *Id.*

¹³⁶ *Scores of state lawmakers took trips subsidized by controversial Turkish opposition movement*, Center for Public Integrity (Feb. 9, 2017), available at: <https://tinyurl.com/lzd8zsl> (last checked 5/20/2017).

former President, Texas Gulf Foundation (d/b/a North American College); former Director, Amity Foundation, Inc.; landlord for Harmony Science Academy (Austin).¹³⁷

- Nihat Guvercin: CEO, iLearn Schools (NJ); Founder/School Leader, four Arts and Sciences/iLearn charter schools (NJ); former Principal/Science Teacher, Harmony; School Director/Teacher/Researcher, Gulistan Education Institutions (Turgot Ozal HS) (Albania); B.S. Middle Eastern Technical University (Turkey).¹³⁸
- Mithat Karabulut: Principal, Triangle (NC); Science Dept. Head/Assistant Principal, Dove Science (OK); Assistant Principal, LISA Academy (AR); Superintendent/Principal, School of Science and Technology (TX); Assistant Superintendent/College Readiness, Harmony.¹³⁹
- Atila Akyurek: Former Principal, Queen City STEM School (NC); current Principal, Harmony; former Principal, School of Science and Technology (TX); former Testing Coordinator/Physics Teacher,

Dove Science (OK); former Teacher, MEF International School (Turkey); former Teacher, Yahya Kemal College (Macedonia); former Teacher, Tarsus American College (Turkey); former Teacher, Ferikoy Armenian Elementary School (Turkey).¹⁴⁰

- Ahmet Cetinkaya: Principal, Albuquerque School of Excellence (NM); former Principal, Harmony; current Director of Accountability, Harmony.¹⁴¹
- Salih Aykac: Current Principal, Albuquerque School of Excellence (NM); former Principal, Harmony School of Innovation Fort Worth; former Principal, Harmony Science Academy San Antonio; former Assistant Principal, Harmony School of Science Austin.¹⁴²
- Nihat Bayhan: Former Director/CEO, Abramson Science and Technology (LA); Teacher/Principal/Guidance Coordinator, Harmony; later Area Superintendent, Harmony; currently Chief Internal Auditor, Harmony; Teacher, Sisli Ufuk Middle School (Turkey); Teacher, FEM Education Center (Turkey); B.S., Bogazici University

¹³⁷ Alliance for Shared Values IRS 990 Form 2014, available at: <https://tinyurl.com/ybvm096o> (last checked 5/26/2017); Alliance for Shared Values, available at: <http://tinyurl.com/ycovvhby> (last checked 7/9/2017); Gülen Institute IRS 990 Forms, available at: <https://tinyurl.com/yc5zdr4> (last checked 5/26/2017); Yuksel Alp Aslandogan, Huffington Post, available at: <https://tinyurl.com/l4laf4k> (last checked 5/26/2017); Wisconsin Career Academy Charter School Contract, at p. 13, available at: <http://tinyurl.com/n77x7g3> (last checked 4/23/2017); Texas Gulf Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹³⁸ Information available from annual reports for New Jersey Arts and Sciences schools; Nihat Guvercin, LinkedIn, available at: <http://tinyurl.com/y7tk8zyc> (last checked 7/9/2017).

¹³⁹ Maturity Schedule for Triad Math and Science Academy Education Revenue Bonds (2015), at p. 74, available at: <https://tinyurl.com/yadjz4n8> (last checked 5/31/2017); Bond issue - Public Finance Authority Wisconsin (Mar. 11, 2015), at p. A-9, available at: <http://tinyurl.com/y88m6hek> (last checked 6/4/2017).

¹⁴⁰ Atila Akyurek, LinkedIn, available at: <https://tinyurl.com/ya4tfqoj> (last checked 5/31/2017); Harmony Fine Arts and Technology Letter from Principal (June 2016), available at: <https://tinyurl.com/y7zlwmp2> (last checked 5/31/2017); Texas School Directory (2012-2013), Texas Education Agency, available at: <https://tinyurl.com/y9gos7lm> (last checked 5/31/2017).

¹⁴¹ Heinz, Hailey, *Texas Charter School Chain's Resources Used at Local, but Unrelated, Campus*, Albuquerque Journal (Oct. 11, 2010), available at: <https://tinyurl.com/l4ujvqs> (last checked 5/25/2017); Ahmet Cetinkaya, LinkedIn, available at: <https://tinyurl.com/ktzknwh> (last checked 5/25/2017).

¹⁴² New Mexico Public Education Dept. Directory, State Supported Charter School Directors, available at: <https://tinyurl.com/yapw3o3u> (last checked 5/26/2017); Harmony Public Schools Request for Sealed Proposals, 2013-2014 Furniture Procurement, available at: <https://tinyurl.com/y9evm3lr> (last checked 5/26/17); Texas Education Agency Alternative Appraisal Report for 2010, available at: <https://tinyurl.com/y98pl85j> (last checked 5/26/2017); Harmony School of Science Austin, HSANA Brochure, available at: <http://tinyurl.com/yay4gmbv> (last checked 6/6/2017).

(Turkey).¹⁴³

- ▶ Ebubekir Orsun: Assistant Principal, Albuquerque School of Excellence (NM); former Assistant Principal/Guidance Counselor/Math Teacher, Harmony.¹⁴⁴
- ▶ Tefvik Eski: CEO, Pelican Educational Foundation (LA); former Principal, Harmony.¹⁴⁵
- ▶ Cuneýt Dokman: Principal, Abramson Science and Technology (LA) when it closed after scandal in 2011; Director of Housing, Texas Gulf Institute; currently College Transition Counselor, Harmony.¹⁴⁶
- ▶ Mustafa Guvercin: Superintendent, Abramson Science and Technology (LA); Principal/COO/Assistant Principal/Teacher, Dove Science (OK); Math Teacher/Assistant Superintendent, Harmony; Teacher, UFUK Educational Foundation and UB International School (Mongolia).¹⁴⁷
- ▶ Azamat Kolbaev: former Budget Accountant/Operations Manager, Read Foundation (TN); currently Budget

Accountant, North American University; B.B.A., International Ataturk Alatoo University (Turkey).¹⁴⁸

- ▶ Kemal Namver (a/k/a Mark Namver): current Director of Development, Harmony; former Board Member, Cosmos Foundation; former Director, Intercontinental Education Consulting, Inc.; former President, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); proposed Superintendent, Riverwalk Education Foundation School of Science and Technology Discovery; former Superintendent, School of Science and Technology; former Principal, Harmony Science Academy Austin; former Director of Community Outreach, Harmony; former Principal, Harmony Science Academy Houston; B.S., Dokuz Eylul University (Turkey).¹⁴⁹
- ▶ Cahit Gezgin: former Board Chairman, Texas Gulf Foundation; former Director, Amity Foundation, Inc.¹⁵⁰
- ▶ John Can Topuz: Current Provost/Vice

¹⁴³ Charter applications for Abramson and Kenilworth, Cowan Institute for Public Education Initiatives at Tulane University, available at: <http://tinyurl.com/24t7emn> (last checked 7/8/2017); Nihat Bayhan LinkedIn, available at: <http://tinyurl.com/yd3nuk6w> (last checked 7/8/2017).

¹⁴⁴ Ebubekir Orsun, LinkedIn, available at: <https://tinyurl.com/ycwykdnq> (last checked 6/6/2017).

¹⁴⁵ Pelican Educational Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/y8rdjix9> (last checked 7/8/2017); Texas Public Schools and Charters Directory (Oct. 2011), available at: <http://tinyurl.com/ycdsyols> (last checked 5/25/17).

¹⁴⁶ Pelican IRS 990 Form (2010), available at: <http://tinyurl.com/y8rdjix9> (last checked 7/8/2017); Cuneýt Dokman, LinkedIn, available at: <http://tinyurl.com/y6usueyz> (last checked 7/8/2017); TEA Non-Teacher Master File (2014-2015), available from Texas Education Agency through 2016 open records request.

¹⁴⁷ Pelican IRS Form 990 (2007), available at: <http://tinyurl.com/y8rdjix9> (last checked 7/8/2017); Donna Garner, *FBI Raids Turkish Gülen Charter School in LA*, Voices Empower (Dec. 12, 2013), available at: <http://tinyurl.com/yc4gkj4k> (last checked 7/8/2017); Harmony IRS 990 Form (2005), available at: <http://tinyurl.com/hu9wqcl> (last checked 7/8/2017); Abramson Charter Application, available at: <http://tinyurl.com/ycybxeeb> (last checked 7/8/2017).

¹⁴⁸ Azamat Kolbaev, LinkedIn, available at: <http://tinyurl.com/y8k2oe7k> (last checked 6/6/2017).

¹⁴⁹ Mark Namver, LinkedIn, available at: <http://tinyurl.com/y76925cm> (last checked 6/15/2017); Harmony IRS 990 Form (2001), available at: <http://tinyurl.com/hu9wqcl> (last checked 7/8/2017); Intercontinental Education Consulting, Inc., Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Charter School Application (Oct. 27, 2006), School of Science and Technology Discovery, Texas Education Agency, <http://tinyurl.com/yazpgfud> (last checked 6/15/2017).

¹⁵⁰ Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017); Articles of Incorporation (Apr. 22, 2002), Amity Foundation, Inc., Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

- President for Academic Affairs, North American College; former CFO, Texas Gulf Foundation (d/b/a North American College); former Director, Institute of Academic Studies; Curriculum Consultant, Sky Foundation (OK).¹⁵¹
- ▶ Gokturk Tunc: Current Director, Charter School Solutions; former Vice President, Harmony; former President, Raindrop Foundation; former Board Secretary, Institute of Interfaith Dialog for the World Peace.¹⁵²
 - ▶ Orhan Cavdar: Former Board Member, Institute of Interfaith Dialog for the World Peace (d/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue); former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁵³
 - ▶ Gulsah Yildirim: Former District Instructional Program Director, Harmony; former Board Member, Institute of Interfaith Dialog for the World Peace (/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).¹⁵⁴
 - ▶ Guner Arslan: Former Board Member, Institute of Interfaith Dialog for the World Peace; Managing Member, Apex Investors, LLC.¹⁵⁵
 - ▶ Mustafa Yavuz: Former Director/President, Gülen Institute; former Board Member, Institute of Interfaith Dialog for the World Peace (/b/a Dialogue Institute of the Southwest and Institute of Interfaith Dialogue).¹⁵⁶
 - ▶ Bilal Erturk: President, Sky Foundation (OK); Officer/Founder, Charter School Solutions.¹⁵⁷
 - ▶ Fatih Yigit: Former Board Member, Harmony Public Schools; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁵⁸

¹⁵¹ John C. Topuz, LinkedIn, available at: <http://tinyurl.com/y7opyfxn> (last checked 6/15/2017); Texas Gulf Foundation IRS 990 Form (2011) (filed under North American University), available at: <http://tinyurl.com/yap2gg6k> (last checked 6/15/2017); Institute of Academic Studies, Corporation Wiki, available at: <http://tinyurl.com/y86vjphl> (last checked 6/15/2017); Sky Foundation IRS Form 990 (2006), available at: <http://tinyurl.com/z7xxxk6> (last checked 6/13/2017).

¹⁵² Charter School Solutions, Corporation Wiki, available at <http://tinyurl.com/yd4uctep> (last checked 7/9/2017); Official Statement (May 10, 2007), Texas Public Finance Authority, Cosmos Foundation, available at: <http://tinyurl.com/y9luxja6> (last checked 6/15/2017) Rain Drop Foundation IRS 990 Form (2002), available at: <http://tinyurl.com/zcvgskm> (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁵³ Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁵⁴ Texas Education Agency, Non-Teacher Master File 2014-2015, available from Texas Education Agency through 2016 open records request; Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁵⁵ Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Apex Investors, Corporation Wiki, available at: <http://tinyurl.com/nyn8pvg> (last checked 6/15/2017).

¹⁵⁶ Gülen Institute IRS 990 Form (2013), available at: <http://tinyurl.com/yc5zdrq4> (last checked 6/15/2017); Articles of Incorporation (Aug. 13, 2002), Institute of Interfaith Dialog for the World Peace, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁵⁷ Sky Foundation IRS 990 Form (2013), available at: <http://tinyurl.com/z7xxxk6> (last checked 6/14/2017); Bilal Erturk, Corporation Wiki, available at: <http://tinyurl.com/y7vy3kdk> (last checked 6/15/2017).

¹⁵⁸ Harmony IRS 990 Form (2006), available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

- ▶ Levent Ulusal: Former President, Solidarity Contracting; former Business Manager, Harmony; Vice President, ATL Development Corporation; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁵⁹
- ▶ Yunus Dogan: President, Apple Catering; Director, Atlas Texas Construction and Trading; Director, Atlas Texas Food and Beverages; Director, Center for Turkish Studies; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁶⁰
- ▶ Vedat Alpkiray: Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council); former Board Member, Rain Drop Foundation; Agent, ALP Trading, LLC.¹⁶¹
- ▶ Ali Ciftci: Treasurer, Rain Drop Foundation; Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁶²
- ▶ Yusuf Duzgun: President, Brighten Technologies; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council).¹⁶³
- ▶ Ferkan Engin Kalkan: Owner, Riverwalk Investments; former Director, Turquoise Council of Americans and Eurasians; former Manager, Target Design and Management; former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council); Founder, Southern Lighthouse Foundation; landlord for Harmony Public Schools Harmony Science Academy (Houston).¹⁶⁴
- ▶ Unal Cevak: Former Director, Institute of International Commerce and Partnership (d/b/a American Turkic Business Council);

¹⁵⁹ Levent Ulusal, LinkedIn, available at: <http://tinyurl.com/yc6zzg3m> (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁶⁰ Apple Catering Texas Franchise Tax Public Information Report (2014), Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Aug. 12, 2014), Atlas Texas Construction and Trading, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Organization (May 11, 2005), Atlas Texas Food and Beverages, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Center for Turkish Students, Corporation Wiki, available at: <http://tinyurl.com/y9f3amgk> (last checked 6/15/2017); Articles of Incorporation (Sep. 30, 2005), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁶¹ Statement of Change of Registered Agent (Nov. 12, 2010), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Rain Drop Foundation IRS 990 Form (2011), available at: <http://tinyurl.com/zcvgskm> (last checked 6/15/2017); ALP Trading, Corporation Wiki, available at: <http://tinyurl.com/yc94lt9b> (last checked 6/15/2017).

¹⁶² Rain Drop Foundation, Corporation Wiki, available at <http://tinyurl.com/ycneryyh> (last checked 6/15/2017); Statement of Change of Registered Agent (Nov. 12, 2010), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Apex Education Foundation, Corporation Wiki, available at: <http://tinyurl.com/yaauthj8> (last checked 6/15/2017).

¹⁶³ Certificate of Formation (Jan. 5, 2009), Brighten Technologies, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Texas Franchise Tax Public Information Report (2012), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

¹⁶⁴ Certificate of Formation (June 5, 2012), Riverwalk Investments, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Turquoise Council of Americans and Eurasians IRS 990 Form (2011), available at: <http://tinyurl.com/y9v782u8> (last checked 6.15.2017); Change of Registered Agent (June 6, 2014), Target Design and Management, available at: Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Texas Franchise Tax Public Information Report (2012), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (Mar. 19, 2004), Southern Lighthouse Foundation, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017).

Director, Apple Catering; Director, Atlas Texas Food and Beverages; Director, DNR Catering (d/b/a Alamo City Foods); Director, Northwest Catering Services, Inc.¹⁶⁵

- ▶ Ramazan Ozgen: Founder/Board Member, LISA (AR); President/CEO, Westlake Trading; Managing Member, Apex Investors, LLC.¹⁶⁶
- ▶ Kemal Oksuz: Director of the Turquoise

Council of Americans and Eurasians who arranged the trip to Azerbaijan for U.S. Representatives that was financed illegally using funds from SOCAR, the Azerbaijan state oil company; Founder of Target Design and Management Construction that has received over \$55 million in contracts from Harmony; most current reference is as Instructional Coordinator at the Institute for Interfaith Dialogue (IID) in Houston.¹⁶⁷

Notable Press Coverage and Research Regarding the Texas Gülenist Network

- ▶ Stephanie Saul, *Charter Schools Tied to Turkey Grow in Texas*, New York Times (June 6, 2011).¹⁶⁸
- ▶ Will Tucker and Lise Olsen, *Lawmakers' trips to Baku raises ethics questions*, Houston Chronicle (24 July 2014).¹⁷¹
- ▶ Lindsay Kastner, *Auditors Say Funds Misspent for Harmony Campuses*, mySA.com (July 31, 2012).¹⁶⁹
- ▶ Will Tucker, Lise Olsen, Kevin Diaz, *House opens ethics probe into foreign travel by lawmakers paid for by nonprofits*, San Antonio Express News (13 May 2015).¹⁷²
- ▶ Alia Malik, *Inquiry Finds Problems at Harmony Charters*, San Antonio Express News (Nov. 26, 2014).¹⁷⁰
- ▶ Lindsay Kastner, *Harmony schools causing discord*, San Antonio Express News (4 January 2012).¹⁷³

¹⁶⁵ Texas Franchise Tax Public Information Report (2011), Institute of International Commerce and Partnership, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Apple Catering Texas Franchise Tax Public Information Report (2014), Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Organization (May 11, 2005), Atlas Texas Food and Beverages, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Articles of Incorporation (July 13, 2007), DNR Catering, Texas Secretary of State, available at: <http://tinyurl.com/7oy8w> (last checked 6/15/2017); Northwest Catering Services, Corporation Wiki, available at: <http://tinyurl.com/y7lh6fxt> (last checked 6/15/2017).

¹⁶⁶ LISA IRS 990 Forms; available at: <https://tinyurl.com/kcy94qn> (last checked 5/22/2017); Apex Investors LLC, Corporation Wiki, available at: <https://tinyurl.com/nyn8pvg> (last checked 5/22/2017); Ramazan Ozgen, LinkedIn, available at: <https://tinyurl.com/lca6u5b> (last checked 5/20/2017).

¹⁶⁷ Will Tucker and Lise Olsen, *Lawmakers' trips to Baku raises ethics questions*, Houston Chronicle (24 July 2014) available at <http://tinyurl.com/ycuq75ey> (last checked 7.20.2017). See Scott Higham, Steven Rich & Alice Crites, *10 members of Congress took trip secretly funded by foreign government*, Washington Post (May 13, 2015), available at: <http://tinyurl.com/y7pegxo9> (last checked 5/29/17). TDM Construction, Texas Secretary of State; available at: <http://tinyurl.com/r7iw> (last checked 2016). See Harmony IRS Form 990s; available at: <http://tinyurl.com/hu9wqcl> (last checked 6/15/17); see also Notable Turkish Vendors, *supra*. LinkedIn, available at <http://tinyurl.com/y7v8l9sn> (last checked 7.21.2017).

¹⁶⁸ Available at: <http://tinyurl.com/ya6cku5c> (last checked 7/8/2017).

¹⁶⁹ Available at: <http://tinyurl.com/y74zu23v> (last checked 7/8/2017).

¹⁷⁰ Available at: <http://tinyurl.com/y78poy7n> (last checked 6/18/17).

¹⁷¹ Available at <http://tinyurl.com/ycuq75ey> (last checked 7.20.2017).

¹⁷² Available at: <http://tinyurl.com/ybodxe9o> (last checked 7/20/17).

¹⁷³ Available at: <http://tinyurl.com/y7empc87> (last checked 7/20/17).