

Exhibit C Markers of a Gülen Organization Charter Network

Marker	Concept (OH, IL, IN, MI, MO)	Magnolia (CA)	Harmony (TX)
A governing board of appointed, not elected, individuals, with those of Turkish descent and/or national origin operating in a supermajority or majority	Yes. This is true for both Concept's own governing board and Concept-managed schools' governing boards.	Yes. Unlike Concept, Magnolia charter schools have one governing board that oversees all Magnolia charter schools.	Yes. Unlike Concept, Harmony charter schools have one governing board that oversees all Harmony charter schools.
Use of closely affiliated vendors, also operated, governed, or staffed by Turkish individuals	Yes. New Plan Learning, Breeze, Inc., Advanced Solutions for Education, and Core Group, Inc., are all examples of vendors used by Concept and its schools that owned and operated by affiliated Turkish/Gülenist individuals and former Concept employees.	Yes. Magnolia contracts with Accord Education and Apex Educational Services, which are owned and operated by former Magnolia employees and affiliated Turkish individuals.	Yes. Harmony utilizes affiliated construction and technology vendors, TDM Construction, Solidarity Contracting, Charter School Solutions, and Brighten Technologies owned and operated by former Harmony employees and affiliated Turkish individuals.
Transition and overlap between Turkish employees of the charter network and the preferred Turkish vendors used by that charter network	Yes, see above. For example, Ozgur Balsoy, a former Concept employee owns both Advanced Solutions for Education and Euclid Properties, LLC, both vendors used by Concept and Concept-managed schools.	Yes. Accord Education was created and later run by Magnolia's former CEO.	Yes. Former Harmony employees (Turkish) run both Solidarity and Brighten Technologies.
Use of the H-1B visa process to sponsor high numbers of Turkish teachers and employees	Yes. Concept and its Illinois/Ohio schools filed approximately 784 H-1B applications from 2000-2015. Size of Network: approximately 30 schools (depending on year, some schools have since closed).	Yes. Magnolia filed 272 H-1B applications from 2008-2016. Size of Network: 11 schools	Yes. Harmony filed 3,280 H-1B applications from 2000-2015. Size of Network: 46 schools.
Turkish males operating nearly exclusively in positions of leadership within the charter network	Yes. A review of Concept school employment state data shows that Turkish males occupy the large majority of principal positions. Concept itself is also controlled by Turkish males.	Yes. Magnolia had a Turkish male CEO for almost its entire history until recent years when Magnolia came under fire for a series of forensic audits and investigations uncovering extensive financial misuse and impropriety related to favoritism for Turkish-owned businesses and employees.	Yes. Harmony's entire leadership team is comprised of Turkish males, the majority of its central office staff, and approximately 75% of its principals.
Shuffling of Turkish employees between charter schools within the network as well as with other Gülen Organization networks	Yes. Concept employees and principals are shuffled between schools and across state lines to other Concept-managed schools. One of Concept's founders works for Magnolia in California now.	Yes. Magnolia employees and principals are shuffled between Magnolia schools and into other Gülen Organization charter networks, particularly Arizona (Sonoran/Paragon).	Yes. Harmony employees and principals often begin in other Gülen Organization charter networks before arriving to Harmony, including Oklahoma (Dove Science), Louisiana (Abramson, Kenilworth), Arkansas (LISA Academy).
Extensive political donation requirements for Turkish employees	Yes.	Yes.	Yes.

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and board members			
Use of poor recordkeeping and ambiguous financial practices with the suspected motive of diverting public funds to the Gülen Organization for private purposes	Yes. Numerous Concept-managed schools have received negative findings for poor financial controls.	Yes. Magnolia was cited in forensic audits by both LAUSD and the California State Auditor's office for poor financial record-keeping practices and lack of controls.	Yes. Harmony was specifically audited and found to be out of compliance with federal Title I and IDEA funding programs, and their poor financial practices were noted.
STEM curriculum with Turkish language instruction	Yes.	Yes.	Yes.
Abusive property leasing arrangements with affiliated Turkish-controlled landlord entities	Yes. Concept works with New Plan Learning, an affiliated Turkish landlord entity operated by a former Concept employee to systematically overcharge on rents and sales of properties to Concept-managed schools.	Suspected. Magnolia works with an affiliated real estate company Kismet Properties for its property acquisition.	Yes. Harmony works with Charter Schools Solutions to systematically overcharge on rents of properties to Harmony charter schools.

For supporting documentation for Magnolia and Harmony, please review <http://guleninvestigation.com/documents/> for the complaints filed in Texas and California.