

November 19, 2018

Chairman Joseph J. Simons
Commissioner Rohit Chopra
Commissioner Noah Phillips
Commissioner Rebecca Slaughter
Commissioner Christine S. Wilson
US Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairman Simons and Commissioners Chopra, Phillips, Slaughter, and Wilson:

The undersigned military and veterans service organizations, representing millions of current and former servicemembers, their families, and survivors, write to thank you for your decisive action to shut down the websites *Army.Com*, *Air-Force.com*, *ArmyEnlist.com*, *NavyEnlist.com*, *AirForceEnlist.com*, *MarinesEnlist.com*, *NationalGuardEnlist.com*, *AirGuardEnlist.com*, and *CoastGuardEnlist.com*. We urge you to disclose the names of the colleges that participated in this scheme.

These websites, as the Commission wrote in its complaint, “*targeted military recruits and induced them to submit their information by disguising their websites and advertisements as official [US military] recruiting channels and representing that the information would be used solely for [US military] recruiting purposes.*”¹

Because the US Armed Forces are all-volunteer, with no current conscription, and given recent news regarding inadequate numbers of new volunteer recruits for the US Army,² these websites acted perniciously in interfering with the military’s genuine recruitment and in denying potential enlistees with the opportunity to proudly wear their nation’s uniform.

Indeed, the Commission found that *Army.com* specifically told military recruits that the US Army did not need volunteers: “*Please be aware that our military is currently downsizing. Army.com wants you to know that there are more ways for you to serve your country than just military service. If you had a college education you could contribute through engineering, science, law, health care, and more.*” Because this is the exact opposite of the truth – given that the US Army is currently facing a critical shortage of volunteers – the websites’ actions are particularly pernicious and damaging to military readiness and national security.

As the Commission is aware, several colleges participated in this scheme to deny the Armed Forces of its volunteer enlistees. We urge you to disclose the names of the unscrupulous colleges that participated in this scheme, either by funding the websites, paying the websites for

¹ Complaint, *United States v. Sunkey Publishing*, available at https://www.ftc.gov/system/files/documents/cases/sunkey_filed_complaint.pdf at 6-7.

² Russel Read, “Why the US military is on the brink of a recruitment crisis,” (Feb. 16, 2018), <https://wjla.com/news/nation-world/why-the-us-military-is-on-the-brink-of-a-recruitment-crisis>.

potential military enlistees' contact information, or paying to be promoted by the websites, including deceiving students into believing that the military endorsed the schools and wished the recruits to attend the schools rather than join the military.

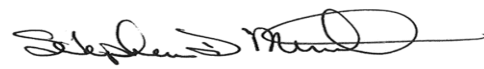
The attached screenshots of the websites support your findings. Patriotic citizens visited these websites, trying to enlist in the military to serve their country, but their contact information never was given to the Armed Forces. Instead, their attempts to volunteer with the Armed Forces were re-routed to bad actor colleges that bombarded them with sales pitches to attend the bad actor college rather than serve in the military. Moreover, potential military recruits were "*provided the false impression that the military endorsed those schools,*" as the Commission found.³

We thank you for your action shutting down these websites, and urge you to disclose the names of the unscrupulous colleges that participated in this scheme to deny the Armed Forces of its volunteer enlistees. We also urge you to share this information with the Department of Defense.

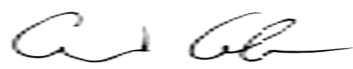
Sincerely,


Air Force Sergeants Association


AMVETS


Army Aviation Association of America


Association of the United States Army


Association of the United States Navy


Blue Star Families



Code of Support Foundation

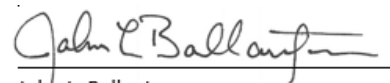

Fleet Reserve Association


High Ground Veterans Advocacy


Iraq & Afghanistan Veterans
of America


Ivy League Veterans Council


Jewish War Veterans of the USA


John L. Ballantyne
Senior Vice President and Chief Operating Officer
Military Child Education Coalition

³ *Id.* at 7.

Dana T. Atkins

Military Officers Association of America

Douglas J. Greenen

Military Order of the Purple Heart

Joyce Wesel Rogers
National Military Family Association

[Signature]
Non Commissioned Officers Assn.
of the United States of America

Carl Blake

Paralyzed Veterans of America

Lydia West
Service Women's Action Network

[Signature]

Student Veterans of America

[Signature]

Swords to Plowshares

Laura Esperance

The Mission Continues

Larry Madison

The Retired Enlisted Association

Bonnie Carroll

Tragedy Assistance Program for
Survivors

Randy Reid

U.S. Coast Guard Chief Petty Officers
Association & Enlisted Association

Amel Blaha

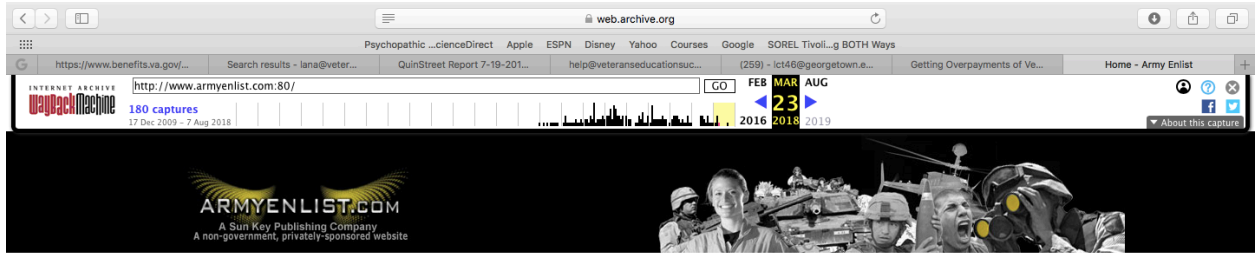
Veterans for Common Sense

c sword

Veterans Education Success

Richard F. Weidman

Vietnam Veterans of America



How To Join The U.S. Army

If you are interested in a career in the U.S. Army and becoming an important part of defending our Nations security and interests abroad the Army offers a series of benefits ranging from competitive pay and education assistance to insurance and retirement benefits. Learn the skills you need to succeed while making a difference. Follow the steps below to learn more about enlisting in the U.S. Army!

[> Contact a Recruiter <](#)



Active Duty

- Can I Join
- 7 Steps to Join
- Active Duty Requirements
- Active Duty vs. Reserve Duty



Reserves

- Army Reserves
- Benefits
- Requirements
- Basic Training



Prior Service

- Blue to Green
- Prior Service Enlistment Bonuses
- Prior Service FAQ



ROTC

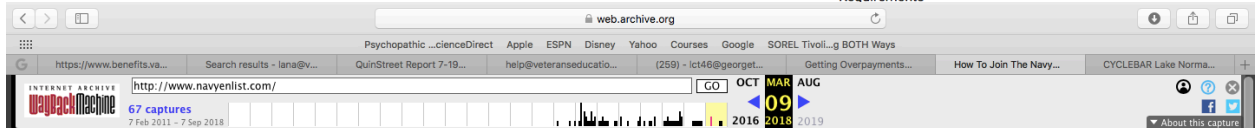
- Army JROTC
- Army ROTC
- Scholarships
- ASVAB

Active Duty

- ASVAB Basics
- Active Duty Requirements
- 7 Steps to Join the Army
- Basic Training
- Delayed Entry Program
- Military Occupation Specialties (MOS)

Reserve

- Army Reserves
- Benefits
- Requirements



How To Join The Navy

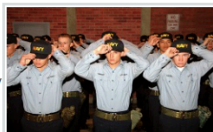
Joining the United States Navy is a great way to launch or advance your career. From the extensive job opportunities and unrivaled experience, to the exceptional benefits and generous educational assistance programs, America's Navy can help you establish your future as a professional. And it's one place where you can be assured that what you do makes a difference in the world. Every day.

[> Contact a Recruiter <](#)

Below are the **5 steps** to joining the Navy:

Speak to a Recruiter

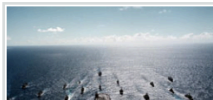
When you are interested in more information in regards to joining the Navy your local recruiter will be able to answer any questions you may have. Whether it is requirements to join, pay scale, benefits, or education your local recruiter will be able give you the answers.



[READ MORE >](#)

Talk With Family and Friends

With any big decision in life it is a good idea to lean on your loved ones for advice and direction. Make sure to talk with them about the Navy, its advantages, and why joining the Navy will be the best opportunity for you.



Home

- [Speak to a Recruiter](#)
- [Talk With Family and Friends](#)
- [Submit Your Application](#)
- [Get Processed](#)
- [Start Training](#)
- [Contact a Recruiter](#)
- [Get Information About Joining](#)
- [Careers In The Navy](#)
- [Navies of the World](#)

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Learn About Joining the Army and Educational Opportunities

Be More. join or reenlist today.

First Name:
 Last Name:
 Phone Number:

Next >

By entering my information and clicking "Next >" I consent to being contacted via phone or text at the phone number above about military and education information. I understand that these calls may be generated using an automated technology.

ASVAB Question of the Week: February 21, 2018
 ASVAB

Here is our ASVAB practice question for this week! Check the comments below for the answer!

ASVAB Question of the Week

The drive size of a socket is determined by the size of the opening that attaches to the

Find your REAL soulmate

I am at:
 Man
 Seeking at:
 Woman

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Can I join the US Air Force?

Stay Up with the US Air Force

First Name *
 Last Name *
 Email Address *
 Military Status *

What newsletters do you want?

Basic Eligibility Requirements:

Age and Parental Permission
 You must be at least 18 (17 with your parents permission) but have not reached your 28th birthday (with no prior service)

Citizenship
 You must be a born, naturalized, or otherwise legal citizen of the United States.

Education
 You must have either a high school diploma OR a GED plus 15 college credits.

Disqualifiers
 Drug use, alcohol abuse, other substance abuse, as well as law violations or convictions will prevent your enlistment.

Height and Weight Standards