



Army.com List of Partner Schools Revealed

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The US Federal Trade Commission (Commission) took legal action in 2018 to shut down several fraudulent websites that promised visitors they could enlist in the Armed Forces by submitting their personal information, but instead their personal information was never given to the US military and was instead sold to predatory colleges that purchased the personal information as potential student “leads.” Veterans and military organizations requested the Commission release the name of colleges that participated in this pernicious scheme, but the Commission deemed that information protected as part of its law enforcement activities. Through independent website historical research, Veterans Education Success discovered that at least one of the websites, *Army.com*, listed “Partner Schools,” presented here.

I. Federal Trade Commission Shuts Down Fraudulent Military Websites

Following several years of alerts by Veterans Education Success to fraudulent military recruiting websites,¹ the Commission took legal action against the publishers of several fraudulent military websites, *Army.Com*, *Air-Force.com*, *ArmyEnlist.com*, *NavyEnlist.com*, *AirForceEnlist.com*, *MarinesEnlist.com*, *NationalGuardEnlist.com*, *AirGuardEnlist.com*, and *CoastGuardEnlist.com*.² FTC found that Sunkey Publishing, Inc., Sun Key Publishing LLC, and Fanmail.com LLC operated a series of websites that were disguised as official recruiting channels for the United States Armed Forces since at least 2010.³ These companies induced potential military recruits to submit their personal information on these websites while representing that the information would be used for military recruiting purposes.⁴ Instead, Sunkey Entities and Fanmail actually sold this information as marketing leads to unscrupulous colleges, making millions of dollars.⁵ Sunkey operated *ArmyEnlist.com*, *NavyEnlist.com*, *MarinesEnlist.com*, *CoastGuardEnlist.com*,

¹ See, e.g., Veterans Education Success, “Understanding Misleading Websites and ‘Lead Generators’” (2016), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/58bec03020099e2d8e76aaab/1488896051219/Victory+Media+Report.FINAL.2.pdf>.

² *U.S. v. Sunkey Publishing, et. al*, Complaint, September 6, 2018, available at https://www.ftc.gov/system/files/documents/cases/sunkey_filed_complaint.pdf, 6-7.

³ *Id.*

⁴ *Id.* at 6.

⁵ *Id.*

NationalGuardEnlist.com, *AirForceEnlist.com*, and *ArmyReserves.com*,⁶ while Fanmail operated *Army.com* and *Air-Force.com*, among other websites.⁷

The September 2018 settlement agreement with the Commission required Sunkey and Fanmail to shut down the websites, relinquish the domain names, and stop any deceptive practices. 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.”⁸ Because the US Armed Forces are all-volunteer, with no current conscription, and inadequate numbers of new volunteer recruits for the US Army,⁹ these websites interfered with the military’s genuine recruitment and denied potential enlistees with the opportunity to proudly serve their nation. 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.*”¹⁰ Given that the US Army is currently facing a critical shortage of volunteers¹¹ – the websites’ actions damaged military readiness and national security.

Along with 27 other veterans and military organizations, Veterans Education Success requested Commission release the names of the schools that participated in this fraudulent scheme by partnering with these sites and paying for the “leads.”¹² The Commission denied a FOIA request asking for the school names to be released, stating “the disclosure of that material could reasonably be expected to interfere with the conduct of the Commission’s law enforcement activities.”¹³

Through independent website historical research, Veterans Education Success discovered that at least one of the websites, *Army.com*, listed “Partner Schools,” presented here.¹⁴ Most of the “Partner Schools” were for-profit colleges.

⁶ *Id.* at 8.

⁷ *Id.* at 26.

⁸ *Supra* note 2 at 6-7.

⁹ Russel Read, “Why the US military is on the brink of a recruitment crisis,” ABC 7 WJLA, (Feb. 16, 2018), available at <https://wjla.com/news/nation-world/why-the-us-military-is-on-the-brink-of-a-recruitment-crisis>.

¹⁰ *Supra* note 2 at 29.

¹¹ Russel Read, “Why the US military is on the brink of a recruitment crisis,” ABC 7 WJLA, (Feb. 16, 2018), available at <https://wjla.com/news/nation-world/why-the-us-military-is-on-the-brink-of-a-recruitment-crisis>.

¹² See November 19, 2018 Letter to FTC, available at <https://vetsedsuccess.org/what-we-do/policy-advocacy-what-we-do/policy-issues/school-accountability-student-protections-letters/28-veterans-and-military-leaders-ask-us-federal-trade-commission-to-release-the-names-of-the-schools-that-participated-in-fake-military-recruiting-websites/>.

¹³ Letter from Dione J. Stearns, Assistant General Counsel, US Federal Trade Commission to James Haynes, Legal Advisor, Veterans Education Success (April 5, 2019) (on file with recipient).

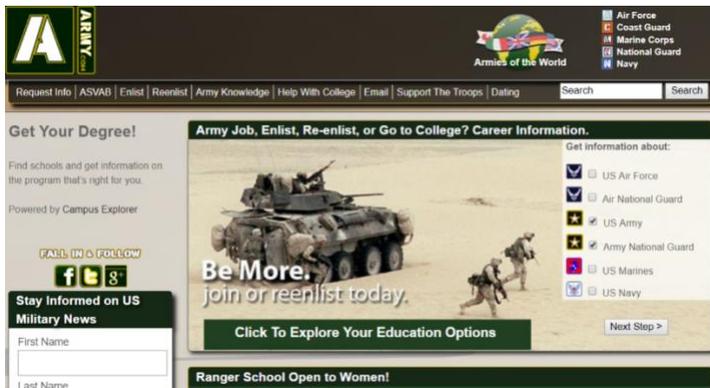
¹⁴The “Wayback Machine” was used at <https://archive.org/web/> to access this information.

II. Army.com

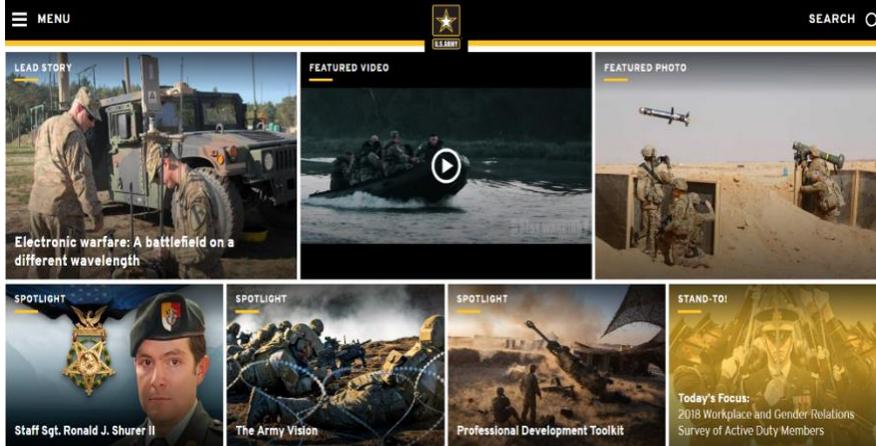
Army.com was a website that Fanmail presented as a resource for people interested in joining the U.S. Army. While it did not claim to be an official website of the Army, the website's design resembled that of the official *army.mil* website.¹⁵ For example, *Army.com*'s logo was clearly based off the Army's official logo. Considering the website's domain name, its design, and military-oriented content, it would have been easy for an unsuspecting visitor to assume that *Army.com* was an official U.S. Army website.



[Image above: Comparison of *Army.com* logo and official U.S. Army logo, downloaded October 17, 2017]



[Image above: a screenshot taken of *Army.com* on September 4, 2015, downloaded October 19, 2018]



[Image above: official *Army.mil* website (compare with *Army.com*), downloaded October 19, 2018]

¹⁵ A disclaimer is included at the bottom of *Army.com*, which states “[t]his web site is provided by FanMail.com, L.L.C. and is not affiliated, owned, or managed by the United States Coast Guard, the United States Army or the military and/or government of any country,” available at <https://web.archive.org/web/20150315012525/http://army.com/school/list>.

In 2018, the Commission took legal action against the operator of the fraudulent website *Army.com*, Fanmail.¹⁶ The Commission complaint alleged that *Army.com* promised to use the information consumers submitted to the site for military recruitment only and not to share it with anyone else.¹⁷ However, the Commission charged that the defendant, Fanmail, sold the information as marketing leads to post-secondary schools for \$15 to \$40 per lead.¹⁸ As a result of Commission's lawsuit, the operators of *Army.com* agreed to settle the Commission's charges that they targeted people seeking to join the Armed Forces and misled them by falsely claiming to be affiliated with the military, with the purpose of generating sales leads for post-secondary schools.¹⁹ The settlement terms required the operators of *Army.com* to relinquish the website to the Commission, to cease misrepresenting a military affiliation, to disclose that their sites are not official recruiting websites of the U.S. military, to solicit consumers' acknowledgement of that fact, and to obtain permission to disclose consumer information collected in connection for lead generator purposes.²⁰ In addition, the owners of *Army.com* were required to notify the companies (i.e., colleges) that purchased the consumer data (student "leads") about the Commission's allegations and instruct the companies to stop using the information.²¹

III. Partner Schools

Army.com listed "Partner Schools," which were almost exclusively for-profit colleges. On March 15, 2015, *Army.com*'s website was configured such that a visitor who hovered over a tab labeled "Help With College" would receive a drop-down menu with "Partner Schools" listed at the bottom.²² Clicking on "Partner Schools" opened a page that listed 60 schools, including Ashford University, Colorado Technical University, and the University of Phoenix.²³

The Commission found that visitors to the website were "*provided the false impression that the military endorsed those schools.*"²⁴

This is the full list of "Partner Schools": Advanced Technology Institute, All-State Career (Baltimore, Essington), American Career College, American Intercontinental University, American Sentinel University, Ameritech College, Ashford University, Berkeley College, Blue Cliff College, Brandman University, Branford Hall Career Institute, Capella University, Carrington College, Carrington College California, Colorado Technical University, Concorde Career College, Concordia University, DeVry Online, Dover Business College, ECPI College of Technology, ECPI University Online, First Institute, Fortis, Full Sail University, Georgetown (an

¹⁶ *Supra* note 2.

¹⁷ *Id.* at 6-7.

¹⁸ *Id.*

¹⁹ US Federal Trade Commission, "FTC Takes Action Against Operators of Copycat Military Websites," (Sept. 6, 2018), available at <https://www.ftc.gov/news-events/press-releases/2018/09/ftc-takes-action-against-operators-copycat-military-websites>.

²⁰ *Id.*

²¹ *Id.*

²² <https://web.archive.org/web/20150315011437/http://army.com/school/intro>.

²³ <https://web.archive.org/web/20150315012525/http://army.com/school/list>; <https://web.archive.org/web/20160505175706/http://army.com/school/list>.

²⁴ *See Supra* note 2 at 7.

online nursing program), Grand Canyon University, Harris School of Business, Heald College, Indiana State, International Academy of Design & Technology, Kaplan College, Kaplan University, Keiser University Online, Keller Graduate School of Management, Le Cordon Bleu, Medical Careers Institute, Medix School, MedVance Institute, National American University, New England Institute of Technology, Northcentral University, Northwestern College, Post University, Rasmussen College Campus, Rasmussen Online, Ross Medical Education Center, Salem International University, San Joaquin Valley College, Sanford Brown College, St. Louis College of Health Careers, Strayer University, Texas A&M University – Commerce, Texas School of Business, University of Mary, University of Phoenix, Virginia College, Walden University, Western International University, and Westwood College.

Many of these schools were identified as bad actor colleges in a 2016 Veterans Education Success report on misleading websites.²⁵ The “Partner Schools” listing was available until May 5, 2016, although “Partner Schools” was no longer available in the “Help With College” drop-down menu at that point in time.

²⁵Veterans Education Success, “Understanding Misleading Websites and ‘Lead Generators’” (2016), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/58bec03020099e2d8e76aaab/1488896051219/Victory+Media+Report.FINAL.2.pdf>.



[Image above: Army.com "Partner Schools" page from May 5, 2016, downloaded September 10, 2018]

IV. Conclusion

While it is not dispositive that these schools paid *Army.com* for student leads, their listing as “Partner Schools” on *Army.com* suggests these schools had some relationship with the *Army.com* fake military website, which the Commission determined was designed to defraud patriotic Americans out of their ability to join the Army and subject them to unwanted recruiting by colleges willing to participate in what federal law enforcement deemed a predatory scheme.