



VETERANS EDUCATION SUCCESS

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Re: House of Prayer Christian Church

Dear Mr. Kett and Ms. Snyder,

As you may be aware, Veterans Education Success is a non-profit organization providing free legal assistance to veterans and military-connected students in higher education. We recently received complaints by former students of House of Prayer Christian Church (HOPCC). A Veterans Education Success staff lawyer interviewed several former students, a current student, and former employees. The contact information for each student and employee is provided at the end of this letter. The information presented here is compiled from those interviews as well as publicly available information. Based on the below, Veterans Education Success respectfully requests that a targeted risk-based review be conducted of HOPCC.

HOPCC is a 501(c)(3) corporation that operates bible seminaries throughout the United States.¹ According to the Department of Veterans Affairs' GI Bill Comparison tool, HOPCC has bible seminaries in Tacoma, Washington; Fayetteville, North Carolina; Killeen, Texas; Hephzibah, Georgia; and Hinesville, Georgia.² According to the former church members interviewed by Veterans Education Success, it also has 12 churches, 11 of which are near military bases. Veterans Education Success spoke with 14 former members of the Church and one current member. Almost all were veterans, and they allege that HOPCC deceives VA during inspections and targets veterans in order to access GI Bill funding, VA disability compensation, and VA home loans.

¹ Interview with . All interview notes or recordings are available from Veterans Education Success if needed.

² <https://www.va.gov/gi-bill-comparison-tool/search?category=school&name=HOUSE+OF+PRAYER+BIBLE+SEMINARY>

For the reasons set forth below, the Department of Veterans Affairs (VA) should undertake a targeted risk based review of HOPCC, including interviewing the students and church members whose contact information is provided at the end of this letter, and, if the allegations are substantiated, disapprove HOPCC for GI Bill funding for violations of 38 CFR § 21.4210, 38 USC § 3690, 38 USC § 3696, and 38 CFR § 21.4201, as well as any other applicable law or VA regulation.

I. HOPCC is allegedly deceiving VA and defrauding veterans of their education benefits

Multiple student veterans approached Veterans Education Success with allegations that HOPCC defrauded them. Generally, they allege that HOPCC is lying to VA during inspections, defrauding veterans by keeping students enrolled perpetually without providing them with marketable training, and providing them with no actual education. They also claim HOPCC is coaching veterans applying for VA disability so they will receive 100% ratings and pressuring them into paying their disability compensation to HOPCC through tithes. They also allege that HOPCC is engaged in other criminal activity, such as mortgage fraud, and that it is essentially an illegitimate religious organization.

Veterans Education Success was first made aware of HOPCC by former member [redacted], who contacted us through our help line email. [redacted] claimed that HOPCC was defrauding veterans. She stated that HOPCC has 12 churches she is aware of, with 11 out of those 12 located near military bases. [redacted] a former minister at the church, claims that this is by design. HOPCC recruits heavily on and around military bases. [redacted] provided the contact information of 13 former HOPCC members and 1 current member to Veterans Education Success.

a. HOPCC officials allegedly lie to VA inspectors

Former students and employees allege that HOPCC deceived VA inspectors. For example, they allege HOPCC misled VA about how much time students spend in class. Students say they often left class early to recruit new church members or to do chores (such as washing cars and doing construction) for church leaders. The students allege HOPCC listed this work as “church study” on paperwork that it sent to VA. When HOPCC got word of an upcoming VA inspection, students tell us that HOPCC officials told students to say they were in class even if they were recruiting or doing other work for the church.

[redacted], a former student veteran at HOPCC, told us that he went to class 3 times a week, but HOPCC told VA that he was going 4 times a week so he could be classified as a full-time student. HOPCC officials also told [redacted] that his time spent in church was documented as “class time” and that he did not have to attend class during weeks he spent more time in church.

HOPCC also allegedly lied to VA inspectors about where classes were taught. According to the former minister [redacted], classes at the Fayetteville, NC, campus were taught in a “run down house” on church grounds. Rony Denis, the church’s leader, did not want to repair existing

buildings or lease a new one to teach class. Denis got around this by claiming that classes were taught in a building known as HOPCC's "fellowship hall." When HOPCC got word of an upcoming VA inspection, they would hold classes in the fellowship hall, according to . When VA inspectors left, explained that the classes would resume at the "run down house." also stated that church officials would tell VA inspectors that the bible seminary classes were held at their day school where parishioners' children were taught. According to former HOPCC student , the Hinesville, Georgia, seminary also would tell VA inspectors that classes were being taught in buildings other than where they were actually being taught in order to mislead VA.³

Students and the former minister allege HOPCC misrepresented to VA the ratio of student veterans to civilian students and that student veterans were charged a significantly higher tuition than civilian students. According to the former minister , 90% of bible seminary students are veterans and he alleged that HOPCC does not report these percentages accurately to VA. According to ,⁴ a current HOPCC member, HOPCC lists 17 and 18-year-old students from its day schools as being enrolled in the bible seminaries to make it seem like more civilians are attending than there really are.⁵

Some student veterans similarly allege that HOPCC lied about the number of students it had enrolled when it only had one bible seminary that was approved for GI Bill funding. allege that when the Hinesville, GA, seminary was the only school approved for GI Bill funding, lectures would be taught via teleconference to other HOPCC bible seminaries throughout the United States. HOPCC would then count students who listened in on the lecture as being enrolled at the Hinesville, GA, bible seminary, even if they attended class at seminaries in other states.

b. HOPCC allegedly charges VA students a significantly higher tuition

Students and the former minister also allege a disparity in the cost of tuition for veterans versus the cost of tuition for civilians. According to former minister , HOPCC would make it seem like tuition was the same for civilians and veterans. In reality, he explained, civilians were given "in house grants" to reduce the price or later reimbursed if they paid the full price. By contrast, student veterans were billed the full price of tuition. According to , veterans using the Montgomery GI Bill had to pay \$500 to \$600 per month, while their spouses only had to pay \$100 per month. When he started using the Post 9/11 GI Bill, HOPCC increased his tuition rates so that he was paying between \$800 and \$900 monthly.

c. HOPCC allegedly misled VA about teacher qualifications

³ Interview with .

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⁵ Interview with .

According to former member [redacted], HOPCC lied to VA about whether teachers were licensed to teach and does not pay teachers.⁶ He explained that HOPCC officials would tell VA that its teachers had college degrees and were certified to teach. In reality, many teachers at HOPCC had only received training at the bible seminary. One of these teachers did not even have a high school diploma. According to [redacted], a former seminary teacher, HOPCC teachers are not paid.⁷

d. HOPCC students say they were required to recruit new students during class time

According to former students, HOPCC seminary students are required to engage in a form of recruiting called “soul-winning.” Soul-winning is an organized event coordinated by HOPCC’s clergy. Five days a week, individuals are paired up and sent out to recruit new members on or around military bases. Students explained they were often let out of class early in order to “soul-win.”

Servicemembers are HOPCC’s primary targets, especially young soldiers, according to students and the former minister. The former HOPCC member Veterans Education Success interviewed stated there are multiple reasons for this. Young servicemembers are used to taking orders and often lack support structures when assigned to a new duty station.⁸ Additionally, most servicemembers will eventually be eligible for veterans’ education benefits, disability compensation, and VA home loans. HOPCC recruiters also targeted military spouses and looked for mothers who were alone with their children on or around military bases.⁹

According to multiple former HOPCC students, HOPCC sends students on base to recruit new members. Students would recruit at Post Exchanges, barracks, and on-base housing. However, base authorities reportedly caught on and cracked down on HOPCC recruiters. To get around this, HOPCC dispatched students who were still active duty to go on base in uniform to recruit. Higher ranking HOPCC members would often coerce lower ranking individuals to attend church. According to [redacted], students would recruit at different units than their own in order to avoid raising suspicion.¹⁰

[redacted] is a disabled Army veteran and was a student at the bible seminary in Fayetteville, North Carolina. In 2008, [redacted] was recruited by an Army sergeant (E5) named [redacted] at the reception barracks at Fort Stewart. The reception barracks is where newly joined soldiers were temporarily housed until being assigned to their units. [redacted], a Marine veteran and former student, says he was recruited this way in Okinawa, Japan. [redacted], an Army veteran, says he was recruited when he was on duty at his base’s welcome center.

⁶ Interview with [redacted].

⁷ Interview with [redacted].

⁸ Interview with [redacted].

⁹ Interview with [redacted].

¹⁰ Interview with [redacted].

, another Army veteran and former HOPCC student, stated that he recruited soldiers at Fort Stewart, Georgia; Hunter Army Airfield, Georgia; and Ft. Gordon, Georgia. When he was active duty, he recruited on base in uniform. , an Army veteran and former HOPCC student, also went on military installations to “soul-win.”

, both Army veterans, were told to continue recruiting on base despite being ordered by military officials to desist. was confronted by a non-commissioned officer and told not to recruit on base. According to students, Military police officers also told HOPCC students to not recruit on base. When told HOPCC about this, they were told to “be wise” and that this was “the devil trying to interfere with God’s work” which they interpreted as being told to disregard the military’s orders.¹¹

Not only are students forced to do work for the school when they should be studying in class, but they are forced to engage in activity that is illegal.¹²

e. HOPCC allegedly changes its curriculum to keep students enrolled longer

HOPCC also allegedly changed its curriculum in order to keep students enrolled longer. According to former members, classes were renamed or separated into multiple classes to reteach material already taught to students. For example, HOPCC had a class called “The Books of Moses.” HOPCC broke up the course into five separate classes, each covering one of the five books of Moses. According to , students who took the original “Books of Moses” course were required to take the five separate classes, even though they covered the same material.¹³ This allowed HOPCC to continue to collect tuition money.

f. HOPCC student veterans deplete their veterans education benefits and never receive a completion certificate

All the HOPCC student veterans interviewed used or exhausted their GI Bill without ever receiving a certificate. The former minister did not see a single graduation at HOPCC between 2004 and 2018. used 12 months of the Montgomery GI Bill and four months of the Post 9/11 GI Bill. used one year of the Post 9/11 GI Bill, and used two years of the Post 9/11 GI Bill. attended bible seminaries in San Diego, California; Savannah, Georgia; and Hinesville, Georgia for approximately 10 years. He exhausted his GI Bill. attended the bible seminary in Hinesville, Georgia, for approximately 12 years. also exhausted his GI Bill. None of these student veterans ever received a certificate due to HOPCC’s changing program requirements.

¹¹ Interview with .

¹² It is a violation of the Uniform Code of Military Justice for a servicemember to disobey a direct order, such as to stop recruiting for a church on base. 10 USC § 892, available at <https://www.law.cornell.edu/uscode/text/10/892>.

¹³ Interview with .

It is highly unlikely that receiving a certificate from HOPCC's bible seminaries would benefit students in any way, even if they did receive one. A HOPCC certificate would only allow graduates to preach or teach at HOPCC churches and bible seminaries, and HOPCC prohibits women from preaching or teaching even though women are allowed to be students. tried transferring his credits from HOPCC to other schools but was told that he would have to start over. currently works as . His supervisors will not consider his time spent at HOPCC towards promotion.

In words, "I don't see how VA approved them to be a school.... That is not a real school."¹⁴

II. HOPCC provides students with a very low-quality education

Former HOPCC students identified multiple issues with HOPCC bible seminaries' quality of education. One chief complaint was that there was not much actual teaching. While HOPCC has curriculum on paper, students alleged that it is not actually taught. Students explained that class usually consisted of a few hours of lectures in the morning, but the schedule was never consistent. Students were told by teachers that the schedule depended "on how the spirit moved."¹⁵ According to former students, this really meant the schedule depended on the church leader's whims. said there was no actual curriculum and students were not even provided with bibles. He also said students did not have to turn in assignments, and nothing was graded. He was told that HOPCC operates on an "honor system."

Students and the former minister allege that classes were frequently interrupted by Rony Denis, the church's leader. Polycom conference phones are in each class. According to students, Mr. Denis listened in on classes through the conference phones and if he did not like what was being taught, he interrupted class through the conference phone. When Mr. Denis called a class on the conference phone, teaching stopped. According to and , students were often made to get on their knees and pray when Mr. Denis called and were sometimes publicly humiliated by Mr. Denis through the conference phone.¹⁶

III. HOPCC does not provide students with financial or academic records

Students allege they were not even provided with student records or billing information. paid for his tuition with the Montgomery GI Bill and the Post 9/11 GI Bill. started asking for receipts after he switched to the Post 9/11 GI Bill. alleges that HOPCC refused to provide them. When asked for a transcript and other records, he said that HOPCC officials told him they "don't do records."

IV. HOPCC is allegedly engaged in other criminal activity and operates like a cult

¹⁴ Interview with .

¹⁵ Interview with .

¹⁶ Interview with .

a. HOPCC allegedly manipulates veterans into donating their VA disability compensation to the church

Former members alleged that HOPCC encourages veterans to apply for VA disability compensation and then collects it from them through “tithes.” According to [redacted], church officials would coach people when applying for VA disability and instruct them how to get 100% ratings. Students and the former minister allege that many veterans who applied for disability had nothing wrong with them and were told to falsely state whatever was necessary to get 100% for a specific disability. According to [redacted], a former pastor at the HOPCC church in Greensboro, North Carolina, and [redacted], an Army veteran and former HOPCC student, Rony Denis asked if anyone in the room lied about having a service-connected disability to get disability compensation during a sermon. Many veterans in the room raised their hands, and Mr. Denis stated that he forgave them. [redacted] believes that Mr. Denis was taking advantage of his parishioners’ religious beliefs in order to encourage them to lie to VA.

HOPCC even allegedly encouraged active duty military members to get on medical boards so that they could be discharged early and access VA benefits. For example, [redacted] states that he was told to act as if he was contemplating suicide in order to get discharged. [redacted] refused to do this, but HOPCC still helped him get out of a 2009 deployment to Iraq by instructing him how to get on an Army medical board. According to [redacted], HOPCC would convince people to get out of the military by telling them that “God was calling them to do something greater.”¹⁷ Former members explained that HOPCC would rationalize lying to VA by telling parishioners that other people are “sinners” but their lies to VA were “right with God.”¹⁸

While helping veterans apply for VA disability compensation for legitimate conditions is harmless on its own, HOPCC has an ulterior motive. The church seeks access to veterans’ disability compensation, some gained through lying, to finance the church. [redacted] explained that veterans are often required to make a variety of payments, such as “weekly offerings,” “monthly offerings,” “electric bill offerings,” and “soul-winning offerings.”¹⁹ Many veterans were even allegedly told that “God blessed you [with disability compensation] so you could give your time to him and not worry about working a regular job” and that their disability compensation and other veteran’s benefits were “for the church.”²⁰ HOPCC officials even allegedly went as far as to convince VA employees to access information about its parishioners’ VA disability ratings. One former HOPCC member claims that he worked for VA when he was a parishioner.²¹ The VA employee stated that an HOPCC minister called him at work and asked if another church member was receiving disability compensation from the VA in order to harass that parishioner into giving more money to the church.

¹⁷ Interview with [redacted].

¹⁸ Interview with [redacted].

¹⁹ Interview with [redacted].

²⁰ Interview with [redacted].

²¹ [redacted].

Former HOPCC members also allege they were encouraged to abuse VA's Caregiver Support programs.²² claim that HOPCC encouraged veterans to lie to VA so that their spouses could get into caregiver programs. According to , 20-30 HOPCC members in Charleston, South Carolina were kicked out of the Caregiver program because VA discovered the fraud.²³ claimed that he witnessed this deception firsthand.²⁴

b. HOPCC is allegedly engaged in mortgage fraud

Former HOPCC members also allege that the church takes out mortgages in parishioners' names and forges signatures. , a Marine veteran and former teacher at the HOPCC bible seminary, had multiple properties purchased in his name without his knowledge or consent. , a veteran and former HOPCC member, claims that he discovered five homes were purchased under his name after he returned from his deployment to Iraq. According to , a male minister once pretended to be a woman over the phone to get a loan in a female church member's name. HOPCC is allegedly able to engage in mortgage fraud because it has access to its students' social security numbers and personal information. In addition, a current member of the church claims that HOPCC has multiple in-house notaries that it uses to assist in mortgage fraud.²⁵

c. HOPCC may be under FBI investigation

According to multiple former HOPCC members, the Federal Bureau of Investigation (FBI) started an investigation into HOPCC's alleged mortgage fraud, but they are unaware of the status of the investigation or any investigations into HOPCC's other activities. A Veterans Education Success attorney contacted the FBI and spoke with , who stated that he was unable to confirm or deny the existence of an FBI investigation into HOPCC. consented to having his contact information shared with VA. He can be reached at .

d. HOPCC allegedly operates like a cult

Former HOPCC members describe the church as being cult-like, instead of religious. According to former members, there appears to be a cult of personality around the church's leader, Rony Denis.²⁶ He claims to be one of the "last prophets" and to communicate directly with God. As mentioned previously, Mr. Denis interrupts classes regularly and forces students

²² <https://www.caregiver.va.gov/>

²³ Interview with .

²⁴ Interview with .

²⁵ Statement of , p. 16. Available from Veterans Education Success upon request.

²⁶ sent documents to Veterans Education Success that indicate HOPCC is trying to make it appear as though Rony Denis never had a leadership position at the church. One letter states that Mr. Denis "is not the leader of the Bible seminary" and is back-dated (according to) to January 1, 2004. It is signed by "Gerard Robertson" as HOPCC's CEO. However, HOPCC's certificate of authority from Georgia, dated May 28, 2004, clearly lists Rony Denis as CEO. See Rony_Denis_leadership_documents.pdf (attached).

to pray as a means of exerting control over their free will. Church members and students who question Mr. Denis are said to be publicly humiliated.

Church members who attempt to leave are allegedly stalked and harassed. For example, [redacted], the current member of the church, stated that a HOPCC member went to his home and [redacted] when he announced that he would be leaving the church. [redacted], a former member and Army veteran, was confronted by church members at her barracks room when she was on active duty after she left the church. She also explained that she received multiple calls from church members saying the church knew that she wanted “to be right with God” and demanding she return to the church.

HOPCC also seems to go to great lengths to exert control over its students and members. Again, HOPCC allegedly targets young servicemembers because they lack a support structure and are easy to indoctrinate.²⁷ [redacted] said that she was told to live in a “woman’s home” for female church members when she was on active duty. She explains she was told that the barracks was not safe for women. [redacted] believes that this was a means for the church to exert control over female members.

Multiple former HOPCC members believe that Mr. Denis is using the church and the seminary merely to enrich himself. They claim that Mr. Denis used church funds (which consist mostly of GI Bill funding and VA disability compensation) to finance luxury homes in Florida and to go on lavish vacations. [redacted] claimed that Mr. Denis disappeared for two weeks with church money. He said that Mr. Denis brought none of the money back when he returned. To make up for the lost funding, HOPCC raised rent on their properties and raised tithes.

V. Legal Analysis

a. HOPCC is likely violating multiple VA regulations

HOPCC is likely violating multiple VA regulations by sending false information to VA. For example, 38 CFR § 21.4210 lists examples of violations that would be grounds for disapproving enrollments at an educational institution. This includes violating record keeping requirements and “willful and knowing submission of false reports or certifications concerning students or courses of education.”²⁸ As mentioned above, former HOPCC members have alleged that HOPCC has lied to VA about student attendance, classroom locations, the ratio between student veterans and civilian students (discussed below), teacher qualifications, and the total number of students enrolled at its bible seminaries. It has lied to VA in order to satisfy eligibility requirements to receive veterans’ education benefits and to enroll student veterans. Further, when [redacted] asked for student records, HOPCC told him they did not “do records.” Considering that student veterans have also complained about spending years at HOPCC, exhausting their veterans education benefits, and leaving with no credential, it is likely that HOPCC is also sending false reports to VA about whether students are actually receiving credentials.

²⁷ Interview with [redacted].
²⁸ 38 CFR § 21.4210

HOPCC also allegedly lied to VA when it reported that students were attending the Hinesville, Georgia, campus when they were actually in other locations and merely listening to the lectures by conference call. Section 21.4252(d) prohibits enrollment in courses conducted “by radio.”

Further, HOPCC is allegedly charging VA a different tuition rate for GI Bill students than it charges non-veterans. Section 3690 of Title 38 of the U.S. Code prohibits an educational institution from charging veterans more than nonveterans who are enrolled in the same course. HOPCC allegedly charges veterans the full tuition price while reimbursing tuition for nonveteran students or providing “in house grants” to reduce their tuition amount. Such behavior violates 38 USC 3690 and is grounds for VA to discontinue paying GI Bill benefits for veterans at HOPCC.

b. VA should disapprove GI Bill enrollment at HOPCC under 38 USC § 3696

Section 3696(a) of Title 38 United States Code prohibits VA from approving a school “which utilizes advertising, sales, or enrollment practices of any type which are erroneous, deceptive, or misleading either by actual statement, omission, or intimation.” Further, 38 CFR § 21.4252, the VA regulation implementing § 3696, states that “VA will not approve...an enrollment in any course such an educational institution offers.” If the allegations listed above are true, then HOPCC has utilized enrollment practices that are deceptive. It leads students to believe they will receive a seminary certification, when they allegedly constantly change program requirements to prolong attendance, often perpetually, and no one ever actually graduates. HOPCC has also misled student veterans by telling them their veterans education benefits are a gift from God meant for the church in order to financially profit from these benefits.²⁹

c. HOPCC is likely violating the 85-15 rule

If the allegations listed above are true, then HOPCC’s enrollment practices violate the 85-15 rule contained in 38 CFR § 21.4209. The 85-15 rule prohibits schools from having more than 85% of students receiving “all or part of their tuition, fees or other charges paid for them by the educational institution or by VA.”³⁰ According to the former minister , 90% of bible seminary students are veterans, and civilian students are given “in-house grants.”³¹ Further, non-students are made to appear as if they are seminary students in order for HOPCC to manipulate their enrollment ratios. HOPCC is likely violating the 85-15 rule.

VI. Conclusion

²⁹ Interview with .

³⁰ 38 CFR § 21.4201; <https://vetsedsuccess.org/the-85-15-rule-and-related-gi-bill-safeguards/>.

³¹ Interview with .

VA and the Georgia State Approving Agency should conduct a targeted risk-based review of HOPCC. According to the allegations listed above, HOPCC is lying to VA inspectors, defrauding veterans of their hard-earned benefits, and leaving them with an unmarketable education. Beyond defrauding veterans, HOPCC is also impeding troop readiness by recruiting servicemembers and encouraging them to leave the military early. Again, HOPCC might have prevented at least one veteran from deploying to Iraq.³² HOPCC also faces multiple allegations of other types of criminal activity, including mortgage fraud. According to the GI Bill Comparison Tool, HOPCC has 164 GI Bill students enrolled in all its bible seminaries.³³ In FY 2018, HOPCC received at least \$708,145.53 in Post 9/11 GI Bill funding.³⁴ If these allegations are founded, VA and the Georgia State Approving Agency should immediately disapprove HOPCC for GI Bill funding.

Should you have any questions, please contact Alex Kish at or alex@vetsedsuccess.org.

Very Respectfully,



Alex Kish
Attorney



Aniela K. Szymanski
Senior Director of Legal Affairs and Military Policy

³² Interview with .

³³ <https://www.va.gov/gi-bill-comparison-tool/search?category=school&name=house+of+prayer>

³⁴ <https://www.va.gov/gi-bill-comparison-tool/profile/35014233>; <https://www.va.gov/gi-bill-comparison-tool/profile/35469147>; <https://www.va.gov/gi-bill-comparison-tool/profile/35135543>; <https://www.va.gov/gi-bill-comparison-tool/profile/35015411>; <https://www.va.gov/gi-bill-comparison-tool/profile/35015111>.