



October 8, 2026

Via email

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Re: Ben Gamla Jewish Charter School application

Dear counsel for the Oklahoma Statewide Charter School Board:

We have learned that Ben Gamla Jewish Charter School founder Peter Deutsch last week sent emails to Jewish leaders in Oklahoma asking for assistance in recruiting students to attend Ben Gamla and finding a principal for the school. In the emails, Mr. Deutsch states, “Our aspirational enrollment goal for the first year [of the school’s operation] is intentionally modest: 10 students.” The emails also state that Ben Gamla will be “an online high school.” Attached is a copy of one such email, which Mr. Deutsch sent to one of our clients, a defendant-intervenor in the federal-court lawsuit filed by Ben Gamla.

The information in the email is diametrically different from the representations set forth in Ben Gamla’s application for charter-school sponsorship. In the application, Ben Gamla projected an enrollment of 335 to

495 students.¹ And the application represented that Ben Gamla would be a K–12 school.²

The miniscule “aspirational enrollment” set forth in Mr. Deutsch’s emails and the severe contradictions with the application demonstrate that Ben Gamla lacks community support, that the school cannot be financially or operationally viable, that its application is fatally deficient, and that the school lacks credibility. We therefore urge the Statewide Charter School Board to reaffirm on these grounds its past denials of Ben Gamla’s application.

Ben Gamla lacks community support. A charter-school application must include “[i]nformation related to the proposed school’s community, including the importance of the educational model to the community and its support.”³ To be approved, charter applications must “meet identified educational needs.”⁴ Ben Gamla’s admission that it will struggle to enroll as few as ten students shows that the proposed school lacks community support and will not fulfill an unmet educational need.

Ben Gamla is not financially or operationally viable. A charter high school that admits that it will struggle to enroll as few as ten students cannot possibly be financially or operationally viable. The school will need to hire, for each grade level, teachers who are qualified to teach the numerous classes across many subject areas that Oklahoma high-school students must pass to satisfy graduation requirements.⁵ The school must also be prepared and able to serve students with disabilities, English-language learners, and students who are academically behind.⁶ The costs of hiring sufficient administrators, teachers, and staff to satisfy all these requirements will far exceed the

¹ Ben Gamla Jewish Charter School, *2025 Oklahoma Statewide Charter School Board Initial Authorization Application*, at 121, 141, 142. A version of Ben Gamla’s application with page numbers, added by us and used for the page citations here, is at <http://bit.ly/4qNAfmF>.

² *Id.* at 141–42.

³ OAC § 777:10-3-3(b)(4)(F).

⁴ 70 O.S. § 3-134(I)(3).

⁵ *See id.* §§ 3-134(B)(12), 11-103.6; OAC § 777:10-3-3(c)(1)(E).

⁶ *See* 70 O.S. §§ 3-134(B)(15), 3-136(A)(6); OAC § 777:10-3-3(c)(1)(C).

revenue that the school will receive from the state, which will be very low under the state’s funding formula due to the miniscule enrollment.⁷

Ben Gamla’s application is fatally deficient. A charter-school application must include detailed financial plans, including budgets and cash-flow projections for its start-up phase and first five years.⁸ Ben Gamla’s application contained such information, but it was based on a projected enrollment of 425 students in the school’s first year, and on the assumption that the school would serve students in grades K–12.⁹ Now that Ben Gamla has an “aspirational enrollment” of ten students and plans to only be a high school, the financial and budget projections in the application are utterly meaningless.

Ben Gamla lacks any credibility. In the November 3, 2025 letter of intent that Ben Gamla sent the Board, Ben Gamla stated that it would be a high school and projected “an initial enrollment of approximately 40 students across grades 9–12.”¹⁰ In its application, Ben Gamla represented that it would be a K–12 school with enrollment of 335 to 495 students in its first year.¹¹ Now, Ben Gamla says that it will be a high school and is seeking help to meet an “aspirational enrollment goal” of ten students in its first year. These wild swings in how many students and what grades the school hopes to serve demonstrate that the Board should not give credence to any representations made by Ben Gamla about its planned operations.

The Board has a duty to deny Ben Gamla’s application. The Board has authority to approve only “quality charter applications” and is obligated to “[d]ecline to approve weak or inadequate charter applications.”¹² The preliminary ruling in the litigation filed by Ben Gamla prohibits the Board only (and temporarily) from continuing to deny Ben Gamla’s application based on its religious character; the Board’s authority to deny the application

⁷ See 70 O.S. §§ 3-142(A), 3-142(C), 18-200.1, 18-201.1.

⁸ See *id.* §§ 3-134(B)(3), (27), (29), (30); OAC § 777:10-3-3(b)(4)(H).

⁹ Application at 141–42.

¹⁰ Letter from Peter Deutsch to Oklahoma Statewide Charter School Board, at 1 (Nov. 3, 2025), <https://bit.ly/4i9zly3>.

¹¹ Application at 121, 141–42.

¹² 70 O.S. § 3-134(I)(3)–(4); *accord* OAC § 777:10-3-3(b).

on other grounds is unaffected.¹³ As the disclosure of Ben Gamla’s miniscule “aspirational enrollment” demonstrates that the school lacks community support, that the school is not financially or operationally viable, that its application materials are woefully deficient, and that the school lacks credibility, the Board is statutorily obligated to deny Ben Gamla’s application.

We request that the Board’s counsel share this correspondence with the Board’s members and staff. Thank you for your attention and consideration.

¹³ *Nat’l Ben Gamla Jewish Charter Sch. Found., Inc. v. Shellem*, No. CIV-26-582-R, 2026 WL 2882202, at *14 (W.D. Okla. Sept. 24, 2026) (“Accordingly, Plaintiffs are entitled to a preliminary injunction precluding the Oklahoma Statewide Charter School Board from enforcing the nonsectarian requirement or otherwise excluding Plaintiffs from participating in the charter school program *on account of their religious character*.” (emphasis added)).

Very truly yours,



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Enclosure: September 30, 2026, 4:51 a.m. email from Peter Deutsch to Rabbi Daniel Kaiman

From: peter deutsch <p[REDACTED]@gmail.com>

Sent: Wednesday, September 30, 2026 4:51 AM

To: Dan Kaiman <[REDACTED]>

Subject: Founding Leadership Opportunity - First Religious Charter School in the United States

Dear Rabbi Kaiman,

I am reaching out because you know the Tulsa Jewish community and its joint high-school Jewish-education program. I am looking for an exceptional person to help launch and lead a new Jewish high school, and I thought you might either be interested yourself or know someone outstanding whom I should speak with.

We are preparing to open the Ben Gamla Jewish Charter School of Oklahoma in September 2027. As a result of the recent preliminary injunction decision, Ben Gamla Jewish Charter School is entitled to open and will be the first religious charter school in the United States.

The school will initially be an online Jewish high school serving students in Oklahoma. Our aspirational enrollment goal for the first year is intentionally modest: 10 students. The purpose of the first year is to establish an excellent school, demonstrate that the model works, and create the foundation for substantial future growth.

Our goal, however, is much larger than opening a single school in Oklahoma.

We believe Ben Gamla Jewish Charter School can become a national model and potentially create a paradigm shift in Jewish education in the United States. Although our initial school in Oklahoma will be an online high school, our long-term vision is much broader: to establish Jewish religious charter schools serving students from kindergarten through 12th grade in communities throughout the country. We envision that the vast majority of these future schools will be traditional brick-and-mortar schools, providing both an outstanding secular education and a serious Jewish education, without charging tuition. If successful, this model could ultimately increase Jewish-school enrollment in the United States by hundreds of thousands of students.

There are several major reasons why so many Jewish parents today do not send their children to Jewish schools. Cost is obviously one. Geographic availability is another. But an equally important concern for many parents is the perception—or reality in some communities—that the available Jewish-school option does not provide the level of academic excellence they want for their children.

Our objective is therefore not simply to create a tuition-free Jewish

educational option. We want to demonstrate that a religious charter school can provide both serious Jewish education and outstanding secular academics. The long-term vision is to create a model compelling enough that Jewish-school participation in the United States could ultimately increase by hundreds of thousands of students.

We are looking for an exceptional founding principal and educational leader. During the school's initial stage, one of the principal's most important responsibilities will be recruiting high-school-aged students in Oklahoma and convincing their parents that Ben Gamla Jewish Charter School offers an outstanding educational opportunity.

Would you personally have any interest in discussing the position?

If the position is not something you would consider, I would be extremely grateful for your advice. Who are the best people you know who have been exceptionally successful recruiting Jewish high-school-aged students and who might be excited by the opportunity to build something from its very beginning that could ultimately have a major impact on Jewish education throughout the United States?

I would particularly value an introduction to anyone you believe I should speak with.

I would also very much appreciate the opportunity to speak with you briefly by telephone about what we are building, the position, and the people you think I should be talking to.

Please feel free to call or text me directly at 954-232-██████, or let me know a convenient time for me to call you.

Thank you very much.

Peter Deutsch
954-232-██████