



# The State Bar *of California*

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**OPEN SESSION  
AGENDA ITEM  
FEBRUARY, 2019  
COMMITTEE OF BAR EXAMINERS ITEM O-400**

**DATE:** January 18, 2019

**TO:** Members, Committee of Bar Examiners

**FROM:** Natalie Leonard, Principal Program Analyst, Office of Admissions

**SUBJECT:** Lady Justice Law School Periodic Inspection Report

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## **EXECUTIVE SUMMARY**

Based on the results of its most recent inspection, staff recommends that Lady Justice Law School's registration as an unaccredited school be continued through Spring 2021 and that an inspection be scheduled for that time. (Attachment A) The school was found to be in substantial compliance with the Rules and Guidelines for Unaccredited Law Schools, and it has accepted the seven mandatory actions and three suggested actions enumerated in the Inspection Report. (Attachment B)

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## **BACKGROUND**

Lady Justice Law School (LJLS) is a for-profit law school located in Bakersfield, California. It was registered as an unaccredited law school in 2016.

When LJLS was registered, it agreed to submit to an interim inspection within two years of opening in order to confirm actual compliance once the school was in operation. Therefore, this interim inspection was scheduled in 2018, and it is the school's first inspection since LJLS began enrolling students.

## **DISCUSSION**

The school was inspected by educational standards consultant Sally Perring on May 30, 2018. Shortly thereafter, the school moved to a new location and Ms. Perring conducted several follow up conversations and a video call to confirm that the move had been completed smoothly.

Lady Justice Law School reviewed and accepted the Inspection Report via letter (Attachment B), and the school agreed to address all required and suggested actions identified in the report and enumerated below.

Recommended Mandatory Actions:

1. Pursuant to Guideline 2.3(D)(2) the school must ensure that the information required by Business and Professions Code section 6061.7(a) is complete, accurate, and not misleading.
2. Pursuant to Guideline 5.19 the school must review its academic deficiency policies to ensure that any decision to grant exceptions to the policies rests with a faculty committee and not left to the discretion of a single individual.
3. Pursuant to Guidelines 4.1 and 4.2 the school must ensure that the Administrator/Dean devotes adequate time to his duties to administer the program, including counseling and interchange with students and oversight and mentoring of faculty members.
4. Pursuant to Guidelines 4.8 and 4.9, the faculty members must be evaluated by the Dean or their peers, consistent with the school's own compliant policy of faculty evaluation.
5. Pursuant to California Rules of Court, Rule 9.30(b)(6) and Guideline 6.2, the school must update its hardcopy library holdings required by that Rule and Guideline.
6. Pursuant to Guidelines 8.1 and 8.2, the school must strive to bring its financial resources into balance.
7. Pursuant to Guidelines 5.32 and 9.1(B) and (D) the school must ensure that undergraduate transcripts are date-stamped or otherwise marked to verify receipt within 45 days after the term begins; ensure all required memoranda are in the student files; and record grades received on transcripts in a timely manner.

Recommended Suggested Actions:

1. Pursuant to Guidelines 2.9(B), 5.17-5.20 and 5.25, the school should review grading practices to ensure that the school, as soon as possible, identifies and disqualifies students who are not qualified to continue; LJS should also review academic disqualification policies, probation policies, and course repetition policies to ensure fairness and appropriateness.
2. Pursuant to Guidelines 4.6, 4.7, and 5.25 the Dean/Administrator should require faculty to have relevant practical experience and diverse educational experiences.
3. Pursuant to Guideline 5.2(K) and 5.25 the school should review required courses required during the first year, which currently do not include a required course on writing or legal methods.

## **RECOMMENDATION**

Staff recommends that the school's registration be continued through 2021, three years after this interim inspection and five years after the school's opening. The school should also be asked to provide an update with its 2019 Annual Report as to progress or completion in implementing the mandatory and suggested actions above.

The recommendation for the timing of the next inspection in three years is guided by a combination of the Rules, Committee action, and the findings contained in the school's two summary inspection reports, and the school is amenable to this recommendation.

When the school was first registered on June 25, 2016, the Committee moved "that, pursuant to Rule 4.223(C), the law school be registered for two years, subject to a visitation of the law school to be scheduled within six months prior to the expiration of that time to confirm its continued compliance with the Unaccredited Law School Rules and Guidelines for Unaccredited Law School Rules." The inspection was further identified as an interim inspection in the staff report, rather than a replacement for a five-year periodic inspection under Unaccredited Rule 4.244(A). Therefore, an inspection in Spring 2021 is recommended.

### **Should the Committee agree with this recommendation, the following motion is suggested:**

Move that the Interim Inspection Report of Lady Justice Law School conducted in May 2018 (Report) be received and filed; that the mandatory and suggested compliance recommendations made in the Report be adopted; that the response from the school accepting all mandatory and suggested actions be accepted and filed; that the school provide the Committee with a written progress report as to the status of the mandatory and suggested actions enumerated in the Report as part of the School's 2019 Annual Report; and that the school's registration as an unaccredited law school be continued through Spring 2021.

## **ATTACHMENT(S) LIST**

- A.** Periodic Inspection of Lady Justice Law School – May 30, 2018
- B.** Letter from Lady Justice Law School Accepting the Report and Recommendations

**LADY JUSTICE LAW SCHOOL**

**REPORT OF INTERIM INSPECTION FOLLOWING REGISTRATION  
AS A FIXED-FACILITY LAW SCHOOL**

Inspection conducted on May 30, 2018,  
Pursuant to *Rule 4.244(A)* of the  
*Unaccredited Law School Rules*

Sally Perring, Educational Standards Consultant,  
Office of Admissions, The State Bar of California

Report on the Interim Inspection of  
**Lady Justice Law School**  
7460 District Blvd., Suite C  
Bakersfield, California 93313

## INTRODUCTION

Lady Justice Law School (LJLS) was provisionally registered in 2016, upon the condition that a supplemental inspection should occur within two years in order for the school to be fully approved.

Lady Justice Law School originally applied in March 2016 to open and begin classes as a registered, unaccredited fixed-facility law school in Bakersfield, California. On March 18, 2016, The Committee of Bar Examiners (Committee) directed that the school undergo a pre-opening inspection to determine whether the law school would appear to be compliant with each of the registration standards required by Rule 4.240 of the Unaccredited Law School Rules (Rules) at the time of its opening. That inspection took place on April 4, 2016. After reviewing the Inspection Report produced as a result of that visit, the Committee confirmed the school's provisional registration as an unaccredited law school, and set forth that the school should be registered for two years, with an interim post-opening inspection occurring within six months before the end of that two-year period.

To comply with the Committee's directive, a one-day interim inspection was conducted by Sally Perring, Consultant for Educational Standards (Consultant), Office of Admissions, on May 30, 2018. Just prior to that inspection, LJLS submitted a self-study that provided the evidence the school wished to put forth to establish that it was in compliance with the Rules and the Guidelines for Unaccredited Law School Rules (Rules and Guidelines).

The inspection took place at the LJLS offices and classroom facility and included a discussion with founder/owners Registrar Molly Brown, Mr. Warren Record and Mr. John Porter, as well as the current Dean and Administrator, Dean Richard Fanning. The Consultant also spoke with current students and observed the teaching of a Wills and Succession Class. The Consultant also reviewed school and student records, class examinations, and student answers. Next, the Consultant also inspected the library holdings and both the current and future facilities for the school, as the school was tentatively scheduled to move locations on July 1, 2018. Finally, the consultant followed up via phone and video call after the inspection to confirm the successful completion of the school's move to downtown Bakersfield.

The school currently has seven students, four upper division students and three first year students. All courses are taught on a trimester system, with a single substantive course being taught each trimester in the first year. First year students take Criminal Law, Torts and Contracts during the first year of class, each for 7 units, meeting in total in excess of the minimum required class time of 270 hours per year for four years as required by Guideline 5.3(A). On one weekend per month, students may choose to take an elective Research and Writing class teaching basic briefing and test-taking skills; this optional course is graded on a

pass/fail basis. Upper division students take one or two substantive courses per trimester, with courses being offered on a revolving basis, once every three years. The first year students who have completed their first year are still in the process of taking the First Year Law Students' examination.

Based upon the inspection completed, supported by the written materials submitted both before and after the site visit, LJLS is found to be mostly compliant with the Rules and their associated Guidelines, and is progressing to full compliance.

**Recommendation:**

It is recommended that LJLS's registration be extended, that the school submit with its Annual Report an update on actions taken to come into full compliance with the Rules and Guidelines based on the recommended actions below, and that the school be scheduled for its first five-year periodic inspection during the Spring of 2021, unless an earlier inspection is deemed necessary by the Committee.

**Recommended Mandatory Actions:**

1. Pursuant to Guideline 2.3(D)(2) the school must ensure that the information required by Business and Professions Code section 6061.7(a) is complete, accurate, and not misleading.
2. Pursuant to Guideline 5.19 the school must review its academic deficiency policies to ensure that any decision to grant exceptions to the policies rests with a faculty committee and not left to the discretion of a single individual.
3. Pursuant to Guidelines 4.1 and 4.2 the school must ensure that the Administrator/Dean devotes adequate time to his duties to administer the program, including counseling and interchange with students and oversight and mentoring of faculty members.
4. Pursuant to Guidelines 4.8 and 4.9, the faculty members must be evaluated by the Dean or their peers, consistent with the school's own compliant policy of faculty evaluation.
5. Pursuant to California Rules of Court, Rule 9.30(b)(6) the school must update its hardcopy library holdings required by that Rule plus Guideline 6.2.
6. Pursuant to Guidelines 8.1 and 8.2, the school must strive to bring its financial resources into balance.
7. Pursuant to Guidelines 5.32 and 9.1(B) and (D) the school must ensure that undergraduate transcripts are date-stamped or otherwise marked to verify receipt

within 45 days after the term begins; ensure all required memoranda are in the student files; and record grades received on transcripts in a timely manner.

**Recommended Suggested Actions:**

1. Pursuant to Guidelines 2.9(B), 5.17-5.20 and 5.25, the school should review grading practices to ensure that the school, as soon as possible, identifies and disqualifies students who are not qualified to continue; LJS should also review academic disqualification policies, probation policies, and course repetition policies to ensure fairness and appropriateness.
2. Pursuant to Guidelines 4.6, 4.7, and 5.25 the Dean/Administrator should require faculty to have relevant practical experience and diverse educational experiences.
3. Pursuant to Guideline 5.2(K) and 5.25 the school should review required courses required during the first year, which currently do not include a required course on writing or legal methods.

**INTERIM INSPECTION REPORT**

**(A) Lawful Operation. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guidelines 1.9)**

LJSL is fully compliant with all state, federal and local laws, having an appropriate privacy policy, accommodation policy and substance abuse policy. It has a current business license and duly filed articles of incorporation.

**(B) Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1, 2.2, 2.3, 2.8 - 2.12)**

LJSL is in substantial compliance with all required policies relating to student discipline, academic standards, grading system, grade review process and examination policies. The school's refund policy complies with the Guidelines. Syllabi all include a clear statement for the basis of the final grade in the course. Authenticity of student work is guaranteed by an agreement signed by each student.

The school complies with the disclosure statements required by Rule 4.241 and Guidelines 2.3(D)(1), 2.3(D)(3) and 2.3(D)(4), with required language appearing in all advertisements, correspondence, applications, and enrollment agreements. The report required by 2.3(D)(2), Business and Professions Code section 6061.7(a), however, contained some inaccuracies.

Subsequent to the visit the school amended the form to reflect properly the total cost of a J.D. degree and the number of part-time administrators. (Recommended Mandatory Action 1.)

Additionally, while most of the policies relating to good standing, academic deficiency, probation, and repeating a class, are facially compliant with Guidelines 2.9 (A) and (B), as applied, they could result in a substantial delay in graduation. The school evaluates students for good standing at the end of each trimester. The school's policies related to Advancement on Probation, Academic Disqualification, and Basis for Readmitting Student Previously Disqualified for Academic Reasons all incorporate in one way or another the notion that a student may or must repeat a class or entire trimester in which they received a grade below good standing or failing grades. A first-year student could readily repeat a class the following academic year because first year courses are offered every year. Upper division students, however, would be unable to repeat a course without a substantial postponement of graduation because only one section of each upper division course is offered each trimester on a three-year rotating basis. An upper division student would have to wait three years to repeat a class.

The school should review its policies to balance the need to promptly disqualify students when appropriate with fairness to students who are otherwise qualified but performed poorly in one or two courses. (Recommended Suggested Action 1.)

In addition, the Readmission policy should be adjusted to require participation of a faculty committee as required by Guideline 5.19, not just one individual, when considering exceptions to good standing policies. (Recommended Mandatory Action 2.). Currently, the Dean alone may "readmit" a student previously disqualified if the student repeats his or her final trimester which resulted in disqualification and earns grades at or above good standing. If successful, the student is fully reinstated receives credit for all prior classes.

**(C) Governance. The law school must be governed, organized, and administered so as to provide a sound educational program.** (Guidelines 3.1)

Dean Richard Fanning currently serves as both Dean and Administrator of the Juris Doctorate program at LJSL. Dean Fanning graduated in 2005 from Ridgecrest School of Law, a registered unaccredited school of law. He became a licensee of the California State Bar in 2009. After graduation he taught as an adjunct professor at Ridgecrest School of Law, University of San Luis Obispo School of Law and at the San Luis Obispo College of Law, a Branch Campus of Monterey College of Law, until coming to LJSL.

Dean Fanning resides in San Luis Obispo and practices law there, devoting part of his time to his duties at LJSL. He commutes periodically from San Luis Obispo to Bakersfield to discharge his obligations to the school. These two cities are approximately 140 miles and three hours' drive apart. While he appears qualified by experience to serve as both Dean and Administrator, the school requires a greater presence and engagement by Dean Fanning. Faculty evaluations, other than student feedback, have not been done. The school would benefit from strategic

faculty hiring and training of faculty. Review of the curriculum and policies at the school is in order. Finally, it is not clear how he discharges his obligation for student counselling. (Guidelines 4.1 and 4.2; Recommended Mandatory Action 3.)

Alternatively, the school might consider hiring someone from the local legal community to serve as Administrator.

Ms. Molly Brown, one of the three corporate owners, serves as Registrar. All records, reports and correspondence with the State Bar are timely and accurate.

**(D) Dean and Faculty. The law school must have a competent dean or other administrative head and a competent faculty that devotes adequate time to administration, instruction, and student counseling.** (Guidelines 4.1- 4.10)

The school is substantially compliant with the requirements involving the Dean and faculty. The school has a compliant Academic Freedom Policy protecting both teacher and student rights of expression.

As noted above, a more substantial and involved presence of the Dean/Administrator is required. While the school has a Faculty Evaluation policy which complies with the Guidelines, providing a comprehensive evaluation by students, peers, and themselves, no complete faculty evaluations have been undertaken. The school must do so soon. (Recommended Mandatory Action 4.)

The organizational chart provided in the self-study listed the two current substantive law faculty members as Assistant Dean and Assistant Administrator. Neither is a licensee of the State Bar of California, though both graduated from law schools accredited by the American Bar Association, one in Florida and one in California. It is not clear what, if any, duties they have in these positions as Assistant Dean and Assistant Administrator above and beyond those of a regular adjunct faculty member, or that their performance in these roles has been evaluated. The school does not have minutes of any faculty meetings.

The Consultant observed a portion of the Wills and Succession course offered to upper division students. The instruction was adequate, though there was little discussed beyond the material offered in the cases to be briefed. It did not appear that the professor had practical experience in the area or any specialized knowledge of the area. The students were generally prepared and seemed well-oriented on the material being presented. The classroom atmosphere was conducive to learning. The same professor taught the upper division classes in Fall and Winter, Civil Procedure and Remedies, as well as this class. Similarly, first year classes have all been taught by a single professor this year.

The students might benefit from having a faculty with more diverse practice experience. First year students might be helped by having an instructor, either for the substantive classes or the writing classes, who has successfully passed the First Year Law Students' Examination or the

California Bar Examination, or who has experience helping students succeed on these examinations. Upper division courses could be taught by local attorneys, who practice in the area being taught, giving students not only practical insight into the subject matter, but also developing connections with the local legal community. (Recommended Suggested Action 2.)

**(E) Educational Program. The law school must maintain a sound program of legal Education.** (Guidelines 5.1-5.16)

Quantitatively, the school is in compliance with the Guidelines. Students are required to take courses covering all topics tested on the General Bar Examination (GBX) including Torts, Contracts, Criminal Law and Procedure, Civil Procedure, Property, Constitutional Law, Remedies, Evidence, Professional Responsibility, Business Associations, Trusts, Wills and Succession, and Community Property. Students regularly attend classes for almost 9 hours per week for each 12-week trimester, for a total of 315 hours annually, exceeding the minimally required 270 hours per year of instruction. The school requires 84 units for graduation.

Currently the school has no courses allowing credit for clinical experience.

Other than a required upper division course in Legal Research, all classes other than bar-tested subjects are offered only as electives and would be for units in excess of the 84 units required for graduation. Based upon the current curriculum, a student finishing the first year of study should satisfy the legal education requirements to sit for the First Year Law Students' Examination and a student graduating should satisfy the legal education requirements to sit for the California Bar Examination.

The school's attendance policy requires that students attend at least 80% of their classes or they will be dropped from a course. Professors use attendance sheets at their courses to adhere to the policy.

Qualitatively, the school could improve its curriculum and unit allocation. Because the school must take steps to comply with the new Competency Training requirements (see below), the school should also take this opportunity to review its entire curriculum.

The school should review its students' performance on the First Year Law Students' Examination to analyze whether more emphasis should be placed on writing (essay scores) or substantive law, or both. Most law schools, whether ABA, state- accredited, or registered, unaccredited law schools, require extensive writing and legal methods courses during the first year. Mastery of these skills is necessary for success in law school as well as in the practice of the law. At LJSL the first-year writing course is an optional elective, it meets only once a month on a Saturday with varying professors, and it is only offered pass/fail. (Recommended Suggested Action 3.) Moreover, many registered unaccredited law schools offer first year students an intensive review experience, either required or elective, to help them prepare for the June First Year Law Students' Examination. (See Guideline 1.11.) LJSL should consider offering this type of opportunity.

**(F) Competency Training. The law school must require that each student enrolled in its Juris Doctor Degree program satisfactorily complete a minimum of six semester units of course work designed to teach practice-based skills and competency training. (Guideline 5.12)**

In an addendum to its self-study the school proposed to meet this requirement by converting the first-year curriculum's optional legal research and writing course to mandatory status and adding two required courses for upper division students whose subject matter was yet to be determined, but was proposed to comport with competency training required under this new Rule and Guideline 5.12. A list of potential courses enumerated options that would satisfy the practice-based skills and competency training requirements. Any additional required courses, including first year Research and Writing, will increase the number of units students are required to take to graduate above the current 84. The school can choose to increase the number of units to graduate, reduce the number of units of some first year and upper division courses, or use a combination of both methods to achieve a proper balance.

**(G) Scholastic Standards. The law school must maintain sound scholastic standards and must as soon as possible identify and exclude those students who have demonstrated they are not qualified to continue. (Guidelines 5.17-5.25)**

LISL is in substantial compliance with the requirement that it maintain sound scholastic standards.

The school evaluates students for good standing at the end of each trimester. The grading scale ranges from A+ (100%; 4.0) to F (0-59%; .0). Students must achieve and maintain a cumulative grade point average (GPA) of a C, 2.0 on their grading scale. If a student fails to achieve or maintain a 2.0 average that student will be automatically placed on probation for one trimester. First year students have an additional trimester to bring their grades to a 2.0 average, before being subject to disqualification. Advanced students are also placed on probation for one trimester if their GPA falls below 2.0. If they fail to raise their GPA at the end of the next trimester, they may be required to repeat a course or courses to raise their GPA to a 2.0. If, upon course repetition, they fail to raise their GPA to a 2.0, they will be academically disqualified. As noted above in (A), it is impractical for an upper division student to repeat a course under current academic scheduling.

Grading practices at the school need to be reviewed and instructors must become oriented to the expectations the students will be under in taking the First Year Law Students' Examination and The California Bar Examination. Current transcripts report no grades below a C, with students posting a range of GPAs from a 2.9 GPA to an extraordinary 4.3 GPA. These grades are not yet correlating with the performance of students on the First Year Law Students' Examination so far. Since the date of the inspection, two more sets of first year results have been release and the results require improvement. Therefore, the grades received potentially mislead the students about their mastery of the law or their readiness to take and pass

required examinations. Similarly, as students progress, inflated grades could cause a student to decide to remain enrolled in law school when the student has not made sufficient progress to be successful on the California Bar Examination. The Dean/Administrator should establish and implement a program to familiarize faculty with appropriate and effective examination practices and appropriately rigorous grading practices. (Recommended Suggested Action 1.)

The Consultant reviewed examinations given over the last two years, read student answers, and reviewed the grading. Grades were appropriate in the sense that better answers received higher scores, poorer answers received lower scores. All grades however were too high, even for the best answers. First year exams given this year had extensive comments and helpful feedback for the students on the exams. The school should ensure that all professors know that they cannot use prior First Year Law Student Examination questions or commercially available material as examinations. (See Guideline 15.15.)

Though the school is relatively new, the June 2018 FYLSX represents the third administration of the FYLSX for some law students, and the school has been required to take action based on the results, and a number of students were not qualified to continue their studies. Specific pass/fail results for the FYLSX are not provided here due to the small sample size. The school has made no exemptions or exceptions to any academic policy in place so far, and has not been asked to do so.

**(H) Admissions. The law school must maintain a sound admissions policy. The law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program. (Guidelines 5.26-5.35)**

Student admission policies and practices are substantially compliant with the requirements of the Guidelines. Signed applications and enrollment agreements all contained the required disclosures. The application form inquired about prior law study as required by Guidelines 5.31 and 9.1(B)(3). The application does not contain free form essays or other narrative descriptions about why the student wishes to attend law school; such additions could increase the school's ability to assess a student's readiness to undertake law study. Transcripts of undergraduate studies appeared in all student files. However, the school needs to date stamp all undergraduate transcripts as received so that timeliness of receipt may be verified for purposes of demonstrating satisfaction of the requirement to have transcripts on file within 45 days of enrollment. The school has not yet admitted special students or students previously disqualified from other law schools.

The school has admitted one transfer student. That student's file lacked the required copy of a transcript from his first year of law study. While it is understood that the school attended by the student shut down after the student's first year, LJSL should request from the State Bar the name of the custodian of records for that school so that it may obtain a copy. The student successfully passed the FYLSX. Also, while the student's LJSL transcript contains transfer credit for subsequent legal studies after the first year, it does not reflect any credit for first year classes. This is appropriate, absent supporting transcripts.

**(I) Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 6.1, 6.2, 6.3, 6.5, 6.6)**

LJSL will be in substantial compliance with the Committee's Guideline requirements for minimum library requirements but must take steps to comply with California Rules of Court, Rule 9.30. (Recommended Mandatory Action 5.)

When opening the school in 2016, LJSL acquired all the hardcopy volumes required by Guideline 6.2 for fixed-facility law schools. However, the school recently cancelled its subscription and the volumes were not updated this year, as the school was expecting to move its location in July and the new location is very close to the Kern County Law Library. The school believed it remained in compliance under Guideline 6.4 as it was moving close to the Kern County Law Library. Guideline 6.4 provides in part: "A fixed-facility law school must ensure that each law student, throughout the student's law study, has access to the library material it is required to maintain at a physical location within a reasonable distance of the law school's classroom facilities. . . ." The school also provides all students with a Lexis Nexis Advance subscription and onsite access through a computer in the library area.

California Rules of Court Rule 9.30 (adopted in 1975, amended in 1984 and 2007) further requires that an unaccredited law school in the state must "own and maintain" (emphasis added) a hardcopy library consistent with the requirements of Guideline 6.2.

Therefore, the school is in the process of updating its hardcopy volumes and has completed more than fifty percent of those purchases as of January 2019.

**(J) Physical Resources. The law school must have physical resources and an infrastructure adequate for its programs and operations. The law school must, at a minimum, maintain its primary administrative office in the State of California. (Guidelines 7.1, 7.2)**

The facility rented by the law school at the time of the inspection complied with the requirements of an adequate physical location for the delivery of classes and administrative offices of the school. It was comprised of a small lobby and adjacent office and two very large rooms which housed the library and classroom space.

After the Committee of Bar Examiners approved a Major Change Request to move its facilities to other premises in the downtown area, the school moved to new facilities on July 1, 2018. The new facilities are better suited to the needs of the students and school. A large lobby in the front has a couch and two arm chairs. The registrar's office is just inside the door, with a large desk, computer, filing cabinets and bookshelves. A classroom is across the hall and can accommodate between 10 and 12 students. Beyond that is a kitchenette for the use of students and staff. Next to the kitchenette are men's and women's restrooms which are ADA accessible. At the end of the hall is a larger classroom/library. Bookshelves holding the required library volumes line two walls of the room. The room can readily accommodate a

class of 15 to 20 students. Currently the school utilizes only one classroom during each evening, either the first-year class or upper division class. The classroom/library can be used as a study room for students not in class that evening. Adjacent to the large classroom is an even larger room, currently being used as a sanctuary for a church which subleases the space. Church services are held on Wednesdays and Sundays, and the room is otherwise available for use by the law school. As noted above, the new building is close to both the Kern County Law Library and to the county courthouse.

**(K) Financial Resources. The law school must have adequate present and anticipated financial resources to support its programs and operations. (Guidelines 8.1, 8.2, 8.3)**

Adequate.

While not currently compliant, the school has a financial plan to bring the school's finances into balance. (Recommended Mandatory Action 6.) The Consultant discussed budgetary concerns with the principals of the corporation and they are committed to supporting the school and its students.

Financially the school has operated at a loss for the last two years. Capital infusions to cover start-up costs and overhead costs have kept the school debt-free. The school is optimistic that, as a consequence of the move, the reduced rent and utilities plus the income from the rental to the church, will save the school a significant sum without compromising educational quality. The school projects that with slightly greater success in recruiting students it will achieve a balanced budget in the next couple of years.

**(L) Records and Reports. The law school must maintain adequate records of its programs and operations. (Guidelines 9.1)**

The school is substantially compliant with all recordkeeping requirements. In general student files were complete and contained all required materials. As noted above, the school must institute a practice to date-stamp all undergraduate transcripts as received so timely receipt can be verified readily. One file lacked the required memorandum detailing units accepted for a transfer student, as discussed earlier.

All class records, including attendance records, past examinations, student answers, and grades were readily produced by the Registrar. Current transcripts could not be produced while the Consultant was onsite, as some grades from the prior trimester had not yet been entered. Subsequent to the visit transcripts were provided to the Consultant, containing all information required under the Guidelines. The Registrar should record grades immediately once they become final for each course. (Recommended Mandatory Action 7.)

**(M) Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, the law school should demonstrate a commitment to providing equal**

**opportunity to study law and in the hiring, retention and promotion of faculty without regard to sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation, or veteran status. (Guidelines 10.1)**

The school serves a diverse group of historically underserved students. There was no evidence that the school discriminates against or denies equal opportunity to any group of individuals for any reason.

**(N) Compliance with Committee Requirements. The law school must demonstrate its compliance with these rules by submitting the required annual reports and otherwise complying the rules. Guidelines 9.1 (M) through (Q).**

The school is in compliance with all reporting requirements of the State Bar of California and has preserved all materials and correspondence associated with its registration either physically or electronically.

**LADY JUSTICE LAW SCHOOL**

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January 10, 2019

RE: Response to Interim Inspection Report

Dear Committee of Bar Examiners:

Dean Richard Fanning, owners John Porter, Warren Record, and I, Molly Brown, along with the faculty and administration of Lady Justice Law School, would like to personally thank Inspector Sally Perring for her time with us. We valued her knowledgeable advice, keen insight, and practical approach to running a law school.

We are pleased with Ms. Perring's findings as recorded in her Report on our Interim Inspection, and we are satisfied that LJLS was found to be mostly compliant with the Rules and Guidelines for Unaccredited Law Schools.

Ms. Perring recommends seven (7) mandatory actions and three (3) suggested actions in her report.

**Lady Justice Law Schools accepts all seven (7) mandatory actions and three (3) suggested actions.**

Thank you for your time on our behalf.

Sincerely,  
Molly Brown  
Owner & Registrar