



The State Bar *of California*

**OPEN SESSION
AGENDA ITEM O-401
MARCH 2019
COMMITTEE OF BAR EXAMINERS ITEM O-401**

DATE: March 22, 2019

TO: Members, Committee of Bar Examiners

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

SUBJECT: Request for Approval of California Southern Law School – Request for Major Change: Waiver of Inspection Requirement and Deregistration in 2020

EXECUTIVE SUMMARY

It is recommended that the Committee of Bar Examiners (Committee) grant both of California Southern Law School's (CSLS) requests: 1) voluntary termination of registration and closure of the school effective September 1, 2020; and 2) waiver and cancellation of the school's five-year periodic inspection, in light of the school's requested closure. (Attachments A and B)

BACKGROUND

Originally founded as The Citrus Belt Law School in Riverside in July of 1971, the CSLS changed its name to California Southern Law School in 1991. Over 440 of its alumni have been licensed to practice law in California.

CSLS seeks the Committee's permission to seek voluntary termination of its registration pursuant to Rule 4.268 which states, "The Committee will terminate a law school's registration on a specific date, at which time it will also terminate its degree-granting authority." The school is prepared to teach out all enrolled students and its Registrar & Assistant to the Dean Greg Rich is prepared to serve as permanent custodian of records after the school closes.

The school decided to begin the closure process after its founder, the Hon. Elwood M. Rich, passed away in 2016. Since that time, the school has not enrolled new students, but it has continued to teach its current students. Currently, five students are scheduled to graduate in Spring 2019, and the remaining final fifteen students are scheduled to graduate by Spring 2020.

Since the school is planning to close shortly, it seeks a waiver of the requirement to undergo the periodic inspection that would normally be scheduled in 2019, but otherwise plans to comply with all Rules and Guidelines for Registered Unaccredited Law Schools.

These schools normally undergo periodic inspections at least every five years under Rule 4.244 (A) of the Unaccredited Law School Rules, which states:

A registered law school must be inspected every five years or more frequently if the Committee determines that an inspection is required to assess compliance with these rules

The purpose of a five-year periodic inspection is to confirm the school's compliance with the Rules and Guidelines for Unaccredited Law Schools in order to renew the school's registration for five additional years.

Here, because it was last inspected in April 2014, CSLS is due to be inspected in 2019. CSLS seeks a waiver of this inspection requirement because it plans to close permanently as soon as the final class graduates in Spring 2020, so five-year renewal of its registration is not needed. The Committee has the authority to waive the inspection requirement under Rule 4.208, which allows the waiver of a Rule or Guideline for good cause shown.

DISCUSSION

Staff recommends that the Committee accept the school's request to voluntarily terminate its registration effective September 1, 2020 and to designate Registrar & Assistant to the Dean Greg Rich as permanent custodian of records to fulfill any future records requests from students.

Staff also recommends that the Committee grant the school's request for a waiver canceling the five-year periodic inspection of the school that would normally be scheduled in 2019, since the school is not seeking to renew its registration. The school has remained in compliance with all applicable Rules and Guidelines since it began the teach out process in 2017, and it represented that it will continue to do so until it closes on September 1, 2020.

The school points to its strong results and student loyalty in support of its request. The school has indicated that its cumulative California bar pass rate for the last five graduating classes is 72% (26 of 36), though no minimum bar passage rate is required of registered, unaccredited schools. In addition, only two students transferred after the announcement of the closure in 2016, though other transfer options were available. Those options included transferring to an online J.D. program or to the hybrid online/fixed facility program at a registered school about sixty miles away.

The school will still be required to fulfill all regulatory requirements until it closes, including filing a full annual report in November 2019, and filing disclosures in January 2020 pursuant to California Business & Professions Code section 6061.7.

Under these circumstances, staff recommends waiving the school's inspection requirement.

RECOMMENDATION

Staff recommends that the Committee grant both of CSLS's requests by accepting the voluntary termination of the school's registration effective September 1, 2020 and waiving and canceling the school's inspection that would have been planned to take place in 2019.

MOTION

If the Committee agrees with the staff recommendation, the following motion is recommended:

Move that the Committee GRANT California Southern School of Law's request to terminate its registration voluntarily effective September 1, 2020, with the custodian of records to be designated as Registrar & Assistant to the Dean Greg Rich; that the law school's name be removed from the list of registered, unaccredited law schools maintained by the State Bar of California on September 1, 2020; and that the school be granted a waiver canceling its five-year periodic inspection that was to be scheduled in 2019.



CALIFORNIA SOUTHERN LAW SCHOOL

3775 Elizabeth Street
Riverside, CA 92506
951-683-6760

Elwood M. Rich, Founder (1920-2015)
Jim D. Bishop, Dean
www.cslawschool.com

January 15, 2019

Committee of Bar Examiners of
the State Bar of California
180 Howard Street
San Francisco, CA 94105

Dear Committee Members:

California Southern Law School, founded on July 23, 1971 by my father Honorable Elwood M. Rich (1920-2015), will be turning off the lights after the last class graduates in May 2020 after nearly 50 years of providing legal education in the Inland Empire area. Judge Rich founded the law school to provide adults the opportunity to study law while taking into consideration the necessities of working at a full time job and the responsibilities of raising a family. To date over 440 of our graduates have been admitted to the practice of law. The cumulative pass rate of our last five graduating classes is 72% (26 of 36).

Pursuant to Unaccredited Law School Rule 4.268 California Southern Law School respectfully requests a voluntary termination of it's law school registration effective June 1, 2020.

Pursuant to Unaccredited Law School Rule 4.208 California Southern Law School respectfully requests a waiver of Rule 4.244 regarding inspection scheduled to occur in April 2019, as there is obviously not a need to have an inspection conducted prior to the law school's formal closing.

In April 2019 we will have about fifteen students completing 3rd year and about to enter 4th year. We will have five students completing 4th year and about to graduate, and there are no 1st or 2nd years law students enrolled.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory A. Rich", is written over a horizontal line.

Gregory A. Rich
Registrar, and Assistant to the Dean



CALIFORNIA SOUTHERN LAW SCHOOL

3775 Elizabeth Street
Riverside, CA 92506
951-683-6760

Elwood M. Rich, Founder (1920-2015)
Jim D. Bishop, Dean
www.cslawschool.com

February 27, 2019

Attn: Natalie Leonard
Committee of Bar Examiners of
the State Bar of California
180 Howard Street
San Francisco, CA 94105

Dear Committee Members:

After reconsideration, and pursuant to Unaccredited Law School Rule 4.268 California Southern Law School respectfully request a change of date of the voluntary termination of our law school registration from June 1, 2020 to September 1, 2020.

On September 1, 2020 the custodian of records contact mailing address should be as follows:

Attn: Gregory A. Rich, Custodian of Records
California Southern Law School
P.O. Box 2306
Riverside CA 92516-2306

Our contact email address shall remain cslawschool@gmail.com.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Rich", is written over a horizontal line.

Gregory A. Rich
Registrar, and Assistant to the Dean