



**OPEN SESSION**  
**AGENDA ITEM O-402**  
**MARCH 2022**  
**COMMITTEE OF BAR EXAMINERS**

**DATE:** March 18, 2022

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

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

**SUBJECT:** Action on Response to Notice of Noncompliance for San Francisco International University College of Law

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**EXECUTIVE SUMMARY**

In December 2021, the Committee of Bar Examiners (Committee) issued a Notice of Noncompliance to San Francisco International University College of Law. (Attachment A). The Notice directed the law school to respond within 30 days regarding the status of numerous compliance issues documented during the law school's most recent periodic inspection in order to help the Committee determine whether probation or termination of registration were appropriate. The law school did not respond. Therefore, it is appropriate for the Committee to proceed to the next step of the noncompliance process and schedule an inspection.

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**BACKGROUND**

San Francisco International University College of Law is a for-profit registered, unaccredited correspondence law school that was first registered with the Committee of Bar Examiners in April 2017.

As a condition of the initial registration, the Committee required that the law school undergo an inspection within two years of the start of operation in order to confirm the law school's compliance with the Rules for Unaccredited Law Schools. After a number of schedule and technical delays on the part of the law school, the inspection took place on December 1, 2020

and was completed over the ensuing months. The inspection documented significant concerns regarding the law school's compliance in the law school's inspection report.

The State Bar provided a copy of the report to the law school prior to sharing it with the Committee in order to provide the law school the opportunity to correct or object to any of the observations documented in the report. While the law school received the report, it did not respond.

In December 2021, the Committee reviewed the inspection report and issued a warning to the law school to take immediate action to correct the deficiencies noted in the inspection report. The Committee further directed the law school to respond within 30 days documenting compliance or the law school's current status. (Rule 4.244(G)(4)). The warning letter advised the law school that the Committee intended to pursue probation or termination of registration pursuant to Rule 4.263. (Item [O-400, Committee of Bar Examiners' Meeting, Dec. 3, 2021](#)). The law school did not respond.

In January 2022, The Committee proceeded to the next step of the compliance process and issued "written Notice of Noncompliance that states the reasons for its belief" as to why the law school was not in compliance. (Rule 4.260; Item [O-401, Committee of Bar Examiners' Meeting, Jan. 28, 2022](#)). The law school was directed to respond within 15 days, as required by the rules. (Rule 4.261). Again, the law school did not respond.

It should also be noted that the law school also did not file an Annual Report, due in November 2021, or pay the most recent annual fee, also due in November 2021, and the law school also did not pay the deposit associated with the Notice of Noncompliance. At this time, the law school's website has been taken down, emails sent to the law school bounce back, and the law school's phone appears to be disconnected. The dean of the law school has received all of the communications listed above at his immigration law practice.

Today, the Committee will review all evidence before it and accept the response, though no response was received, or order an inspection to determine whether probation or termination of registration is appropriate. (Rule 4.262).

## **DISCUSSION**

Because the law school did not respond, the Committee does not have a basis to find the law school's response to be satisfactory.

While it is possible that the law school is already closed, the rules require the Committee to seek an inspection before deciding whether probation or termination are appropriate.

It is proposed that staff will attempt to contact the law school as required to propose a remote inspection. At the Committee's April meeting, staff will report whether an inspection was scheduled, or the law school failed to respond, allowing the Committee to proceed to the final step of the noncompliance process, imposing probation or termination of registration.

## **FISCAL/PERSONNEL IMPACT**

None

## **RECOMMENDATION**

It is recommended that the Committee finds that San Francisco International University College of Law has not responded to the Notice of Noncompliance issued by the Committee.

It is also recommended that the Committee directs staff to attempt to schedule a remote inspection to further confirm the noncompliance, and that if the law school does not respond prior to the next Committee meeting, the Committee will consider whether to take final action to impose termination of registration.

## **PROPOSED MOTION**

Should the Committee of Bar Examiners agree with the staff recommendation, the following motion should be made:

**MOVE**, that the Committee of Bar Examiners find that San Francisco International University College of Law has not responded to the Notice of Noncompliance issued by the Committee.

**FURTHER MOVE**, that the Committee direct staff to attempt to schedule a remote inspection of the law school to offer a final opportunity to the law school to address its status.

**FURTHER MOVE**, that at its next regularly scheduled meeting, the Committee will take notice that an inspection has been scheduled, or, if the law school has not responded to schedule an inspection by that time, that the Committee will consider whether to take final action to impose termination of registration.

## **ATTACHMENT LIST**

- A. Notice of Noncompliance Issued to San Francisco International University College of Law



# The State Bar of California

## OFFICE OF ADMISSIONS

180 Howard Street, San Francisco, CA 94105

natalie.leonard@calbar.ca.gov  
415-538-2118

February 4, 2022

Dean Matus Varga  
San Francisco International University College of Law  
One Sansome Street  
San Francisco, CA 94104

RE: Committee Action on Notice of Noncompliance

Dear Dean Hutton:

At its meeting on January 28, 2022, the Committee of Bar Examiners (Committee) directed that the attached Notice of Noncompliance and invoice be issued to the law school as follows:

**MOVE**, that the **Committee of Bar Examiners** find that the law school did not respond to the Committee's warning letter issued pursuant to rule 4.244(G)(4), did not file an annual compliance report for 2021 and did not pay an annual fee for 2021;

**FURTHER MOVE**, that the Committee issue a Notice of Noncompliance to the law school based on these findings as well as the recommendations listed in the law school's inspection report adopted at the Committee's December 2021 meeting and summarized above.

The Notice of Noncompliance is attached to this letter. It contains the reasons upon which the finding is based. Within 15 days of the date of this letter, please file a response that either confirms the school's compliance or documents the steps being taken to return to compliance, provides an estimated timeline to return to compliance, and provides the evidence upon which any estimated timeline and results are based.

Within 30 days, please return the requested deposit related to the Noncompliance process noted on the attached invoice. Total agency time will be billed to the law school according to the Schedule of Charges and Deadlines for Accredited Law Schools. Alternatively, the law school may voluntarily surrender its registration as an unaccredited law school by informing the State Bar of California in writing at [lawschoolregulation@calbar.ca.gov](mailto:lawschoolregulation@calbar.ca.gov), noting the individual or entity who will maintain custody of student records and transcripts, to avoid further charges after the document is received.

Natalie Leonard

August 21, 2020

Page 2

Sincerely,

*Natalie Leonard*

Natalie Leonard

Principal Program Analyst

Enclosure