



OPEN SESSION
AGENDA ITEM O-400
APRIL 2022
COMMITTEE OF BAR EXAMINERS

DATE: April 22, 2022

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Probation or Termination of Registration for San Francisco International University College of Law

EXECUTIVE SUMMARY

San Francisco International University College of Law has not responded to multiple communications inviting the law school to undergo a final follow-up inspection regarding its compliance status, or any other prior communications from the Committee on this topic. The Committee may now proceed to the next step of the noncompliance process and determine whether it should impose probation or termination.

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 an unaccredited correspondence law school.

When the school was initially registered, it agreed to under an inspection within two years of the start of operation in order to confirm its compliance with the Rules for Unaccredited Law Schools. When that inspection took place on December 1, 2020, the consultant observed significant compliance issues, and some of the information needed was not available at the inspection due to technical issues. The law school was provided with time to forward the information before the inspection report was written.

The law school has not responded to the draft version of the report, or the Committee's subsequent related Warning Letter (Rules 4.260, 4.263); Item [O-400, Committee of Bar Examiners' Meeting, Dec. 3, 2021](#)), Notice of Noncompliance(Rule 4.260; Item [O-401, Committee of Bar Examiners' Meeting, Jan. 28, 2022](#)), or invitation for a follow-up inspection ([Item O-402, Committee of Bar Examiners' Meeting, March 18, 2022](#)). These notices and the opportunity for inspection were provided pursuant to the procedures set forth in the Rules for Unaccredited Law Schools and their guidelines. The law school was directed to respond to each of these documents by a specific deadline, but no response was received.

In addition, the law school did not pay its most recent annual fee or file a 2021 Annual Report. Its website is unavailable, the phone is disconnected, and messages left with the dean's law office were not returned. Emails are returning as undeliverable and the law school's headquarters appears to be closed based on visit to the location as of April 15, 2022. Copies of the documents were sent to the dean's law firm and it appears those copies were received.

The law school was contacted by phone, email and email to the dean's law school regarding the invitation to attend a law school. A physical mailing to the dean's law firm was not attempted, as packages destined for the law school have been returned. Also, the law school is required to keep its preferred email and phone on file.

Today, the Committee will review all evidence before it and determine whether probation or termination of registration is appropriate. (Rule 4.262).

DISCUSSION

While it is possible that the law school is already closed, the rules required the Committee to follow the full noncompliance process.

It appears that termination of registration is appropriate because the law school is unreachable, out of compliance with its current obligations, and unwilling to respond to Committee communications.

Terminating the registration of the law school will strip the law school of its authority to grant the JD degree and its ability to offer classes that satisfy the legal education requirement that is an element of establishing eligibility to take the California bar exam.

As far as protecting any current or prior students, it does not appear that the law school enrolled any students after spring 2021, so there are not current students in need of teach out options. It is unclear whether the records for the few students who attended were preserved, but none graduated, and State Bar staff has reached out to several who have transferred or decided to pursue options other than a legal education.

It would be appropriate for the State Bar to contact any students who attended the law school for any portion of the time to advise them of the closure as well as their transfer options.

It is also appropriate to advise the law school to maintain all student records to provide evidence of prior study upon request. This may be challenging under the current circumstances, but it will be attempted.

Staff will also advise the Secretary of State of the State of California.

RECOMMENDATION

It is recommended that the Committee of Bar Examiners terminate San Francisco International University College of Law's registration as an unaccredited law school effective immediately. This will immediately end the law school's ability to offer a JD program and any classes that satisfy the legal education requirement toward establishing eligibility to take the bar exam.

It is also recommended that the law school be directed to retain copies of all student records to date or designate a custodian to maintain those records.

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 is out of compliance with the Rules for Unaccredited Law Schools.

FURTHER MOVE, that after completing all steps in the noncompliance process and carefully considering all facts before it, the Committee of Bar Examiners terminates the registration of San Francisco International University College of Law effective immediately. This terminates the law school's ability to offer a JD program, and also terminates its ability to offer any educational classes that fulfill the legal education requirements toward establishing eligibility to take the examination.

FURTHER MOVE, that the law school retain all student records or otherwise designate a custodian to provide student records upon request.