



OPEN SESSION

AGENDA ITEM O-404

June 2022

COMMITTEE OF BAR EXAMINERS

DATE: June 17, 2022

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Periodic Inspection - American Institute of Law

EXECUTIVE SUMMARY

The report summarizing the inspection report of American Institute of Law (American Institute) conducted on December 7-8, 2021 (Attachment A) and the law school's response and objection to the report (Attachment B) are presented for review by the Committee of Bar Examiners (Committee). The law school generally agrees with the recommendations, but disagrees with the team's recommendation to set the next inspection date for fall 2023 unless an earlier visitation is deemed necessary.

BACKGROUND

Unaccredited law schools registered with the Committee of Bar Examiners are inspected for compliance with the Rules for Unaccredited Law Schools (rules) and Guidelines for Accredited Law School Rules (guidelines) approximately every five years or sooner if deemed necessary by the Committee. Here, the law school was inspected on December 7-8, 2021.

American Institute was founded in 2015 as a for-profit S corporation by Dean Edward Green and Director of Admissions Melvin Morrison. Since 2016 the law school has been registered by the Committee as an unaccredited correspondence law school. The law school is not optionally accredited by or affiliated with any other entity. The law school does not participate in federal student loan programs.

The law school opened with a sizeable first-year class as well as transfers from other law schools. It has had significant first-year enrollment during each year it has been in operation, but also very significant attrition after the first year.

Dean Edward Green serves as Chief Academic Officer and is the instructor for all first-year courses. He holds a JD from Simon Greenleaf University School of Law, now Trinity Law School, a Committee-accredited school. He is licensed to practice law in Utah (inactive) and California.

The law school offers a part-time online Juris Doctor (JD) degree program that qualifies students to meet the legal education requirement to establish eligibility to take the California Bar Exam (bar exam).

Currently, the law school enrolls 79 law students in the JD program as follows: 1L – 64; 2L – 4; 3L – 10; 4L – 1. Despite enrolling large first-year classes every year since 2016, just a few students have taken the bar exam and none have passed yet.

JD students must complete a total of 104 semester units and at least 864 hours of study each year for four years. Total JD program tuition is \$21,960, based on per-year tuition of \$5,490, and estimated total program fees are \$1,100.

DISCUSSION

The law school submitted a self-study to assist the team in its assessment of the law school's compliance with the Rules and Guidelines. Administrators responded to requests for additional information and the information provided was considered when drafting this report.

The inspection was conducted by the team of Heather Georgakis, educational consultant to the State Bar, along with Committee member Bethany Peak.

As part of the inspection, the team reviewed the curriculum, learning platform, admissions, scholastic standards, legal research resources, facilities, records, and staffing plan.

It is recommended that the Committee receive and file this Periodic Inspection Report, approve the recommended and suggested actions, continue the registration of the American Institute of Law, and schedule its next periodic inspection in fall 2023 via an onsite inspection, unless an earlier visitation is deemed necessary by the Committee.

The team made sixteen recommendations as follows:

Recommended, Mandatory Actions

1. Guidelines 1.9 and 2.3(B): To comply more fully with Guidelines 1.9 and 2.3(B), the law school must ensure that the law school meets its obligations to evaluate disability accommodation requests based upon the circumstances of its own exams, and noting that the exam accommodations granted by the law school may not be the same as those granted

by the State Bar of California. The law school must create policies in the area of Equal Opportunity and non-discrimination to explain its practices and underscore its commitment in this area. The law school must also ensure compliance with applicable laws including ensuring that individuals are properly classified as contractors or employees.

The law school's amended response advises that each student must document the need for accommodations and they may differ from those granted by the State Bar. The law school must provide a full copy of its internal policy as implemented as part of its 2022 Annual Report. The law school also provided its perspective as to the classification of its staff in recommendation two below, and shared its nondiscrimination policies in recommendation sixteen below.

2. Guideline 1.9: The law school must review and, as necessary revise, its faculty payment practices to comply with federal and California law, take steps necessary to rectify errors, if any, and provide the Committee with a report as to its findings and actions.

The law school has sought advice from its financial advisor as to the status of their staff; however, it must also be sure to evaluate their obligation to classify staff in relation to statutory requirements. In addition, the law school asserts the classification of the administrator is proper and it maintains sufficient control over the administrator even though they are an independent contractor because they are an attorney exercising independent judgment. The law school is reminded that it has the responsibility to proactively ensure continuous compliance with all applicable authority.

3. Guidelines 2.9(B)(3) and 5.24: The law school must revise the Catalog to state the circumstances, if any, under which the law school requires and/or allows course repetition.

Subsequent to the inspection, the law school improved its documentation in this area. In its amended response it also included more detailed information as to how repeating a class could affect a student's progression. The law school further indicated that no one, to date, has yet used this policy.

4. Guidelines 2.9 and 5.19-5.20: The law school must revise the Catalog to define the term "successfully complete" for purposes of eligibility to graduate; inform students as to when their academic standing will be determined; and eliminate the ambiguous statement that a student may advance to the next year if "on probation as of the last class of the previous year."

Subsequent to the inspection, the law school clarified its policy. The graduation requirement should also note that to be eligible for graduation, the law student must not only earn at least the minimum grades and GPA, but also meet the other requirements (such as practical skills training). In addition, the law school must continue to evaluate whether 2.0 is the proper level for good standing as it adopts this policy, and provide an update to the State Bar as to the further clarification of the policy and evaluation of

results each year in the annual report until the law school is inspected again. Subsequent to the original response, the law school conducted an analysis demonstrating that those earning a 2.0 or more were very likely to pass the First-Year Law Students' Examination within the allowable time frame. Continued monitoring is suggested as part of the analysis of overall attrition, to be reported in the law school's progress report.

5. Guideline 2.9(D): The law school must revise its policy to state all steps taken by the law school to authenticate student work.

Subsequent to the inspection, the law school indicated that it was continuing to research options, but had not taken steps to authenticate student work. The law school's amended response indicates that it believes it will have a solution in place for the July examinations and it will advise the State Bar as soon as a vendor and timeline are confirmed. The results of the use of the new vendor should be included in the law school's progress report.

6. Guideline 2.9(F): The law school must adopt, implement, and publish a policy consistent with the guideline to inform students of the opportunity to review exam materials, including exam questions and their own answers.

Subsequent to the inspection, the law school adopted a compliant policy. The law school has included the policy in each of its syllabi to remind students that they have the opportunity to review their exam answers. The law school should further review its policy to the extent that it interacts with recommendation number 10 to ensure that examination security is maintained when implementing this policy, and should report as to this in its progress report.

7. Guideline 1.11: The law school must advise in its Periodic Compliance Report if it is using a waiver to include a required review course for the First-Year Law Students' Examination for credit as part of its curriculum.

Subsequent to the inspection, the law school reviewed the course and renamed it to better reflect its full purpose of improving analytical skills and provided the syllabus of the course.

8. Guidelines 5.11 and 5.12: The law school must review its curriculum, and consider ways in which to incorporate elective and additional practical skills opportunities into the JD program, and report its conclusions to the Committee in the next Annual Compliance Report.

Subsequent to the inspection, the law school indicated that it has begun to study this issue, and will provide its conclusions as part of its 2022 Annual Compliance Report. The school noted its view that finding adequate time for electives is burdensome for a part-time law program trying to maximize success in bar passage.

9. Guidelines 5.14 and 5.16-5.17: The law school must require written examinations in all courses that do not require substantial written or oral work and must require that student performance be evaluated in all courses based on ability and knowledge of fundamental principles.

Subsequent to the inspection, the law school amended the syllabi for its pass-fail courses to require homework assignments described in detail in the law school's response. The law school is encouraged to continue to evaluate the effectiveness of the homework as a means to assess student progress and achievement.

10. Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in the Faculty Handbook of the prohibition against using past bar exam and First-Year Law Students' Examination questions, and adopt, implement, and publish a policy precluding the use of previously published questions.

Subsequent to the inspection, the law school adopted a prohibition on using past State Bar exam questions on examinations. It also published a policy on reuse of questions, but more detail is needed as to how the policy will be implemented in a manner that maintains examination security.

11. Guidelines 5.26 and 2.3: The law school must publish its policy of requiring transfer students to complete at least two years of law study at American Institute.

Subsequent to the inspection, the law school published a compliant policy and provided a copy of that policy in its response.

12. Guideline 5.34: The law school must take steps to ensure that the reasons for admitting any previously disqualified applicant are properly documented in the applicant's file.

Subsequent to the inspection, the law school adopted a compliant policy. The law school must now demonstrate that it updated its previous files and demonstrate implementation of the policy as to new transfer students. The law school also advised that its process includes seeking a transcript evaluation from the State Bar and placing a copy of the reasons for admittance into the student's permanent file. The law school should document implementation of this policy in its progress report.

13. Guidelines 5.26-5.27 and 2.1: The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, and/or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

Subsequent to the inspection, the law school indicated that it has begun to study this issue and has made some changes to the first-year courses. The amended report identified specific changes. The law school is prepared to provide a report on its progress to the Committee as part of its progress report.

14. Rule 4.240(J): The law school should clearly inform prospective students and students as to the distributed nature of its facilities, including its nearly bare office on a month-to-month lease, the geographical dispersion of its key leaders and staff, and the limited office hours, if any, at a physical site. Given the small staff, it could be appropriate to affirmatively send copies of official transcripts to the students each semester and advise them to keep sealed copies in the event of a school closure in order to preserve their investment.

Subsequent to the inspection, the law school provided additional detail as to its facilities, and objected to the team's description. A video tour was provided with the amended report at www.americaninstituteoflaw.com/tour. The law school also provided evidence of a multi-year lease, and sufficient reserves to offer the JD course promised. The law school should evaluate its further projections taking into account the attrition issues at the school.

15. Rule 4.240(M): The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.

Subsequent to the inspection, the law school modified its curriculum to address this recommendation.

16. Rule 4.240(M) and guideline 10.1: The law school must create and publish a written policy regarding equal opportunity and non-discrimination.

Subsequent to the inspection, the law school modified its curriculum to address this recommendation.

Deans Green and Morrison are experienced administrators who were previously employed by both Abraham Lincoln University School of Law and American Heritage University School of Law prior to starting their own law school, American Institute of Law.

The law school's response and amended response demonstrate that the law school has collaboratively reacted to the team's suggestions, but has yet to take action on key recommendations, though more action was taken in recent weeks and documented in the law school's amended response set forth in Attachment B and provided in response to staff following questions and an invitation to revisit its timelines for addressing these recommendations. The law school quickly replied with updated responses and accelerated timelines.

The law school objects to the team's recommendation to set a second inspection in fall 2023, rather than 2026.

The team's recommendation is grounded in the key issues that it observed during the inspection, noting high attrition, limited grading opportunities, and lack of authentication of student work, which calls into question the law school's ability to accurately evaluate the law students, especially since some exams were based on questions that were readily available online. An inspection in 2023 will provide the opportunity for the law school to demonstrate that its communications, admissions, JD offerings, and policies combine to create a sound program of JD education. An additional inspection will offer the opportunity to ensure progress on the key elements addressed above, ensuring that the law school provides a sound program of education, student work is authenticated, exams are not based on published material that can be easily accessed, students are provided with enough graded work to understand their progress, and significant attrition is addressed.

RECOMMENDATION

It is recommended that the Committee receive and file this Periodic Inspection Report, approve the recommended mandatory actions, continue the registration of the American Institute of Law, and schedule its next periodic inspection in fall of 2023 via an onsite inspection, unless an earlier visitation is deemed necessary by the Committee. This will ensure that the law school properly completes the significant recommendations highlighted above with urgency. The law school should provide an update on its progress toward the recommendations noted as part of its 2022 Annual Periodic Compliance Report.

PROPOSED MOTION

If the Committee agrees with this recommendation, the following motion is suggested:

MOVE, that the Committee of Bar Examiners receives and files the 2021 Periodic Inspection Report of the American Institute of Law, and the response from the law school documenting its progress and objections.

FURTHER MOVED, that the report's recommendations be adopted and the law school be directed to document completion of the recommendations as part of the law school's 2022 Annual Periodic Compliance Report;

FURTHER MOVED, that the accreditation of American Institute of Law be continued; and that the law school's next periodic inspection be scheduled for fall 2023, unless the Committee determines that an inspection is needed sooner.

ATTACHMENTS LIST

- A. 2021 Periodic Inspection Report for the American Institute of Law
- B. Formal Response and Objections from the American Institute of Law



The State Bar of California

American Institute of Law Periodic Inspection Report Conducted Pursuant to Rule 4.244(A)

December 7 - 8, 2021

AMERICAN INSTITUTE OF LAW
PERIODIC INSPECTION REPORT
18411 Crenshaw Boulevard, Suite 416
Torrance, California 90504-5066

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A periodic inspection of the American Institute of Law (American Institute) was conducted from December 7-8, 2021, by Bethany Peak, a member of the Committee of Bar Examiners (Committee) and Heather Georgakis, Educational Standards Consultant.

The law school was last inspected in December 2017 and was found to be operating in compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines).

American Institute was founded in 2015 as a for-profit S corporation by Dean Edward Green and Director of Admissions Melvin Morrison and since 2016 has been registered by the Committee as an unaccredited correspondence law school. The law school is not accredited by or affiliated with any other entity and students have no access to federal student loans or veterans' benefits.

A single program is offered, a part-time online Juris Doctor (JD) degree program that qualifies students to meet the legal education requirement to establish eligibility to take the California Bar Exam (bar exam). At the time of inspection in December 2021, total enrollment was 89 students, including 65 first-year students. The school's mission is "to provide quality, affordable, legal education to qualified individuals, wherever located, using the most effective, state-of-the-art educational technology available."

To earn the JD, students must complete a total of 104 semester units and at least 864 hours of study each year for four years. Instruction is delivered by videoconference lectures, which students have the option to view in real time or as archived, and asynchronous activities such as assignments and exams.

The curriculum includes required courses in all subjects tested on the bar exam and practical skills topics. No elective courses are offered.

Dean Edward Green serves as Chief Academic Officer and is the instructor for all first-year courses. He holds a JD from Simon Greenleaf University School of Law, now Trinity Law School, a Committee-accredited school. He is licensed to practice law in Utah (inactive) and California.

Before founding American Institute, Dean Green worked for 20 years as the dean and law professor at two other Committee-registered law schools, Abraham Lincoln University School of Law and American Heritage School of Law. He is assisted by the school's co-founder, Director of Admissions and Deputy Registrar Mel Morrison, and Chester "Chet" Zaluga, who serves as the Dean of

Administration and Registrar (registrar) and as a faculty member. Mr. Morrison also holds a number of other roles at the law school as noted below.

The faculty includes the dean, registrar, and 3 adjunct instructors. All instructors are graduates of law schools approved by the American Bar Association (ABA), or accredited or registered by the Committee, and all are State Bar licensees.

American Institute admits students in all permitted categories, including special students who qualify for admission based upon test scores rather than college credits.

Forty-one of the law school's students are women and 67 percent self-identify with groups other than White. Of the five instructors, four are white men and one is a latinx woman.

Total JD program tuition is \$21,960, based on per-year tuition of \$5,490, and estimated total program fees are \$1,100.

On the First-Year Law Students' Examination, 14 percent of takers from American Institute passed the November 2020 exam while 30 percent passed the June 2021 exam. Of the law school's graduates who took the February 2021 bar exam, 33 percent passed, while 0 percent passed the July 2021 exam.

Though the law school graduated its first class educated fully at this law school in 2020, a number of students transferred to this school from the prior law school that leadership left. Therefore, it would have been expected that the law school would have produced more graduates by this time and had more data available as to the law school's ultimate ability to prepare students for licensure.

Recommended Action by the Committee

The inspection team recommends that the Committee receive and file this Periodic Inspection Report, approve all recommended and suggested actions, continue the registration of American Institute of Law, and schedule the next periodic inspection for 2023 unless an earlier visitation is deemed necessary.

Recommended, Mandatory Actions

1. Guidelines 1.9 and 2.3(B): To comply more fully with Guidelines 1.9 and 2.3(B), the law school must ensure that the law school meets its obligations to evaluate disability accommodation requests as to the circumstances of its exams by advising that the exam accommodations granted by the law school may not be the same as those granted by the State Bar of California. The law school must create policies in the area of Equal Opportunity and non-discrimination to explain its practices and underscore its commitment in this area. The law school must also ensure compliance with applicable laws including ensuring that individuals are properly classified as contractors or employees.

2. Guideline 1.9: The law school must review and, as necessary revise, its faculty payment practices to comply with federal and California law, take steps necessary to rectify errors, if any, and provide the Committee with a report as to its findings and actions.
3. Guidelines 2.9(B)(3) and 5.24: The law school must revise the Catalog to state the circumstances, if any, under which the law school requires and/or allows course repetition.
4. Guidelines 2.9 and 5.19-5.20: The law school must revise the Catalog to define the term “successfully complete” for purposes of eligibility to graduate; inform students as to when their academic standing will be determined; and eliminate the ambiguous statement that a student may advance to the next year if “on probation as of the last class of the previous year.”
5. Guideline 2.9(D): The law school must revise its policy to state all steps taken by the law school to authenticate student work.
6. Guideline 2.9(F): The law school must adopt, implement, and publish a policy consistent with the guideline to inform students of the opportunity to review exam materials, including exam questions and their own answers.
7. Guideline 1.11: The law school must advise in its Periodic Compliance Report if it is using a waiver to include a required review course for the First-Year Law Students’ Examination for credit as part of its curriculum.
8. Guidelines 5.11 and 5.12: The law school must review its curriculum, consider ways in which to incorporate elective and additional practical skills opportunities into the JD program, and report its conclusions to the Committee in the next Annual Compliance Report.
9. Guidelines 5.14 and 5.16-5.17: The law school must require written examinations in all courses that do not require substantial written or oral work and must require that student performance be evaluated in all courses based on ability and knowledge of fundamental principles.
10. Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in the Faculty Handbook of the prohibition against using past bar exam and First-Year Law Students’ Examination questions, and adopt, implement, and publish a policy precluding the use of previously published questions.
11. Guidelines 5.26 and 2.3: The law school must publish its policy of requiring transfer students to complete at least two years of law study at American Institute.
12. Guideline 5.34: The law school must take steps to ensure that the reasons for admitting any previously disqualified applicant are properly documented in the applicant’s file.
13. Guidelines 5.26-5.27 and 2.1: The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, and/or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

14. Rule 4.240(J) The law school should clearly inform prospective students and students as to the distributed nature of its facilities, including its nearly bare office on a month-to-month lease, the geographical dispersion of its key leaders and staff, and the limited office hours, if any, at a physical site. Given the small staff, it could be appropriate to affirmatively send copies of official transcripts to the students each semester and advise them to keep sealed copies in the event of a school closure in order to preserve their investment.
15. Rule 4.240(M): The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.
16. Rule 4.240(M) and guideline 10.1: The law school must create and publish a written policy regarding equal opportunity and non-discrimination.

Submission of Self-study

American Institute submitted a self-study to assist the team in its assessment of the law school's compliance with the Rules and Guidelines. Administrators responded to requests for additional information and the information provided was considered when drafting this report.

Conduct of Site Visit

The inspection occurred during the COVID-19 pandemic (pandemic) when travel options were limited. American Institute was given the choice to undergo a remote visit based on the same standards as an in-person visit, and the law school agreed. Before the visit, the team reviewed self-study materials and records, received training to allow review of the learning management system, and viewed a video tour of the Torrance headquarters.

The inspection visit took place via videoconference over a two-day period. The team met with Dean Edward Green, Director of Administration and Registrar Chester Zaluga, and Director of Admissions and Deputy Registrar Melvin Morrison, several faculty members, and a group of students. To conclude the visit, the team met with administrators for an exit interview.

After the visit the team observed archived class sessions online and completed a review of law school records. At the consultant's request, American Institute invited students to send comments about the law school, and comments received were reviewed.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

Below are the team's findings, conclusions, and recommendations as to the law school's compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules. (Guidelines.)

Rule 4.240(A): Lawful Operation. The law school must operate in compliance with all applicable federal, state, and local laws and regulations. (Guideline 1.9.)

American Institute is a for-profit, S corporation in good standing with the California Secretary of State. As reported to the state, the officers and directors for the corporation are Dean Green, Chief Executive Officer, and Director of Admissions Melvin Morrison, Secretary and Chief Financial Officer.

The law school operates under a current business issued by the City of Torrance, where its office is located, and appears to follow applicable federal, state, and local laws except as noted. (Guideline 2.4.)

Students with disabilities are accommodated pursuant to the Americans with Disabilities Act (ADA) and similar laws. The law school's practice is to grant disability accommodations to a student on a preliminary basis then, if applicable, to reduce them to the level granted by the State Bar on the First-Year Law Students' Examination. To comply more fully with Guidelines 1.9 and 2.3(B), the law school must instead ensure that the law school meets its obligations to evaluate requests under the circumstances of its exams, including advising that the exam accommodations granted by the law school may not be the same as those granted by the State Bar of California.

Reasonable measures have been taken to protect records against improper disclosure, including medical records submitted with ADA requests. Students are advised in the Catalog that sensitive material is kept on secure servers, accessible only by authorized personnel.

As required by with Civil Code section 1788.90, the law school does not withhold student transcripts based on debt owed or alleged to be owed.

Instructors are paid as independent contractors, not as employees. The law school must review and, as necessary revise, its faculty payment practices to comply with federal and California law, take steps necessary to rectify errors, if any, and provide the Committee with a report as to its findings and actions. (Guideline 1.9.)

Rule 4.240(B): Integrity. The law school must demonstrate integrity in all of its programs, operations, and other affairs. (Guidelines 2.1 – 2.3, 2.8 – 2.12.)

American Institute communicates with the public and its students through a website and Catalog and appears to do so honestly and forthrightly except as noted. (Guidelines 2.1-2.3.)

Financial matters are handled in a timely, appropriate manner with financial safeguards to protect financial assets against impropriety. (Guideline 2.2.) Tuition, fees, and terms of the tuition payment plan are stated in the Catalog and on the website.

Compliant refund policies are stated on the website and in the Catalog. (Guideline 2.2(B).) A student who withdraws or cancels within 7 days of signing the Enrollment Agreement is entitled to a full refund of money paid and a student who withdraws later is entitled to a pro rata refund of unused tuition and refundable fees. Refunds are processed within 30 days.

American Institute provides the disclosures required on the website and in the Catalog (Guideline 2.3(D)(1)), including the Business and Professions Code section 6061.7 Information Report.

A sample review of American Institute's records showed that the law school has complied with Rule 4.241 by obtaining student signatures on required disclosure statements in a timely manner and maintaining copies of the statements in students' files. (Guideline 9.1(C)(2).)

The law school operates as a for-profit entity (Guideline 2.4) and does not compensate individuals based on the number of persons enrolled, applying for admission, or registering. (Guideline 2.5.)

Under the policy on student discipline, students are subject to discipline for intentional misconduct such as cheating, plagiarism, or falsification of academic records. The discipline process includes the due process protections and potential sanctions required by Guideline 2.8.

Students are informed about grading policies in the Catalog (Guideline 2.9(B).) Most courses are graded alpha-numerically on a scale from A+ (4.3 points) to F (0.0 points), with stated levels of achievement (e.g., C- indicates a "fair level of achievement") (Guideline 2.9(B)(1).) Five courses are graded Pass/Fail. Most course grades are based on case briefs and midterm and final exams. Anonymous grading is used, and student papers are identified only by computer-generated random identification numbers. (Guideline 2.9(B)(5).)

The Catalog must be revised to state the circumstances, if any, under which the law school requires and/or allows course repetition. (Guidelines 2.9(B)(3) and 5.24.) The Catalog now states only that, after a course is repeated, the original grade is replaced by an "R" on the transcript and the new grade is used to calculate the GPA. The law school does not award duplicate credit. (Guidelines 2.9(B)(3) and 5.24.)

American Institute has published a compliant grade review policy. (Guideline 2.9(B) and (G).) Petitions are decided by a three-person Grade Review Committee, consisting of the dean, registrar, and one disinterested non-administrator faculty member.

To graduate, a student must maintain a minimum cumulative grade point average (GPA) of 2.0 and "successfully complete" all required courses. According to the dean, the undefined term "successfully complete" means to earn a D-, a grade which reflects "an inadequate but passing level of achievement" according to the Catalog. A 2.0 minimum GPA is also required for good standing, and a student who fails to maintain a 2.0 will be placed on probation and dismissed at the end of the next year unless good standing is achieved.

To comply more fully with Guidelines 2.9 and 5.19-5.20, the law school must revise the Catalog to define the term "successfully complete" for purposes of eligibility to graduate; inform students as to when their academic standing will be determined; and eliminate the ambiguous statement that a student may advance to the next year if "on probation as of the last class of the previous year."

Instructors use a standardized syllabus format and consistently inform their students of the factors used in determining the course grade and the relative weight of the factors in calculating the grade. (Guideline 2.9(C).)

The policy on authentication of student work explains that students enter unique passwords to access live lectures and the learning center but must be revised to indicate authentication steps taken by the school, such as proctoring conduct during examinations and using software and other means to check exams and assignments for plagiarism. (Guideline 2.9(D).)

Professors are obligated to submit exam grades according to deadlines set by the registrar and students receive their grades promptly. (Guideline 2.7(D).)

American Institute allows students to review certain exam materials, but the law school must adopt, implement, and publish a policy consistent with Guideline 2.9(F) to inform students of the opportunity to review exam materials, including exam questions and their own answers.

Student privacy is protected, and students are informed of their privacy rights. (Guideline 2.10.) Security and backup procedures are followed to protect records. (Guideline 2.11.)

Services available to students are described on the website and in the Catalog. (Guideline 2.12.) Faculty and staff members are available to provide academic counseling student and students appear to be satisfied with the availability of their instructors. No special support is provided for students on probation or in danger of being placed on probation. (Guideline 2.12.)

Rule 4.24(C): Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guideline 3.1.)

American Institute is a California for-profit, S corporation. Dean Edward Green is the President of the corporation and Director of Admissions Melvin Morrison is the Secretary and Chief Financial Officer, and they convene once a year as the Board of Directors. According to the self-study, the law school “is governed by its officers, Dean and administrators.” The law school has no board of visitors and is not required to have one. (Guidelines 3.1-3.3.)

Dean Green is law school’s Chief Academic Officer and is the instructor for all first-year courses. He works remotely from his home in Illinois and, before the pandemic, typically visited the Torrance campus monthly. The Dean is a graduate of Simon Greenleaf University School of Law, now Trinity Law School, a Committee-accredited entity. Although licensed to practice law in California and Utah (inactive), he works full-time and exclusively for the law school.

Before founding American Institute in 2015, Dean Green was a dean and law professor, serving for 15 years as founding dean at the Abraham Lincoln University Law School and for 5 years as the dean at American Heritage University School of Law. Both law schools are Committee-registered distance-learning entities. Prior to that, he worked for a commercial law review company.

Chester “Chet” Zaluga, Dean of Administration and Registrar, works half-time and visits the Torrance campus at least twice weekly. He also teaches Advanced Legal Research and Writing. A graduate of Abraham Lincoln University School of Law and a State Bar licensee, he is now semi-retired from a criminal defense and immigration law practice.

Melvin Morrison, Director of Admissions and Deputy Registrar, handles the admissions process, student program counseling, and most business and technology functions. He works full-time and remotely from his home in Hemet but travels to the law school's office every few months. Before co-founding American Institute, Director Morrison worked as the admissions director at the other law schools where Dean Green was the dean.

The law school appears to have adequate administrative capacity to operate the JD program in compliance with the Committee standards.

Rule 4.240(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.)

By virtue of his law degree and legal education experience, Dean Green is qualified for his role as American Institute's dean. Registrar Zaluga's law degree helps to qualify him to serve as the part-time administrator. (Guidelines 4.1 and 4.2.)

The credentials of the 5 faculty members satisfy Guideline 4.6. All instructors are graduates of law schools approved by the American Bar Association or accredited or registered by the Committee, and all are State Bar licensees. Non-administrator faculty graduated from the University of Houston, University of Michigan Law School, and American Heritage University.

When the law school was inspected in 2016, during its first year of operation, the law school's 69 students were taught by two instructors, with Dean Green teaching all first-year courses and Mr. Michael Dowd, a Chief Assistant City Prosecutor, teaching combined courses to a small group of second- and third-year students. The inspection report encouraged the hiring of faculty with relevant expertise and experience as number of third- and fourth-year students increased.

Three new instructors were hired as of the 2018-2019 academic year. Ms. Sheldrin Ruiz, a labor and employment attorney, now teaches Professional Responsibility and several other upper-level courses; Mr. Lawrence Markey, a family law attorney, teaches the civil litigation portion of Practical Skills Training; and Registrar Zaluga teaches Advanced Legal Research and Writing. Some courses are taught by faculty members with relevant law practice experience in the areas they teach, but others are not. The law school must evaluate whether this is a factor contributing to attrition.

The law school has not established a succession plan, but Dean Green acknowledged that faculty development and hiring for succession are issues that must be considered.

Faculty members confer with the dean and meet quarterly as a group, online. The dean appoints members to the Grade Review Committee and Honor Code Council as needed. (Guideline 4.3.)

American Institute employs enough instructors to meet student needs. (Guideline 4.4.) Enrollment averages 22 students per class, although first year classes are somewhat larger. Faculty course loads are reasonable. Most instructors teach only one course at a time and the course load of the dean, who teaches two courses at a time, falls within Guideline 4.5 limits.

The faculty evaluation process fulfills Guidelines 4.8 and 4.9. At least two instructors, typically including the dean, evaluate each instructor each year and written peer evaluation reports are held in faculty files. New instructors are evaluated during their first course. Student course evaluations are collected after each course and are considered in the peer evaluation process.

The Faculty Handbook does not address the duty of instructors to continuously improve their teaching skills and substantive expertise (Guideline 4.7), but states that instructors must be licensees of the State Bar in good standing. The law school supports faculty development through faculty meetings and performance evaluations, and by encouraging faculty to participate in Committee-sponsored bar exam calibration sessions.

An academic freedom policy is published in the Faculty Handbook. (Guideline 4.9.)

Rule 4.240 (E): Educational Program. The law school must maintain a sound program of legal education. (Guidelines 5.1-5.16.)

Students at registered, unaccredited correspondence law schools must complete, each year for four years, a minimum of 864 hours of “preparation and study” over an academic year of 48 to 52 weeks of study. (Guideline 5.9(B).)

American Institute students who complete the JD curriculum meet or exceed these hours requirements. The academic year spans 52 weeks and students must take 26 units each year. Each unit represents 40 hours of work, including required viewing of lecture sessions and additional preparation and study. Completion of 26 units during the academic year represents 1,040 study hours (26 units x 40 hours/unit = 1,040 hours) although American Institute requires students to account only for the 864 hours required by Guideline 5.9(B.)

The law school delivers instruction through synchronous and asynchronous distance-learning technology. Courses range in length from 2 to 18 weeks, with 2 weeks for each unit of credit, and students complete one course at a time.

In each course, the instructor conducts one or two live lecture sessions each week. First- through third-year courses hold two, 2-hour lectures each week, while fourth-year courses offer a single 2-hour-and-30-minute lecture. One-hour practice exam sessions are held in addition to first-year lectures but are incorporated into second- and third-year lecture sessions.

Lectures are recorded and archived for later viewing. Students must view the lectures but may do so either in real time or as archived. Students who attend in real time may submit questions using the MegaMeeting chat function but generally only the instructor can be seen and heard.

American Institute tracks students’ viewing of lectures through its learning management applications and verifies all student hours by requiring students to submit study logs through the learning management system. (Guidelines 2.3, 5.9(C), and 5.10.) As mandated by Guideline 5.3(C)(1), students are required to view at least 80 percent of the lecture sessions to earn course credit, and Director Morrison tracks compliance regularly.

The law school does not appear to have granted exceptions to hour and weeks requirements. (Guideline 5.6.)

The curriculum consists only of required courses and includes courses in all bar exam-tested subjects, including Professional Responsibility. (Guideline 5.10.) First-year students study the three subjects tested on the First-Year Law Students' Examination as 6- or 7-unit courses, and take Introduction to Law (1 unit), Legal Research and Writing (2), and First-Year Review (3) on a Pass/Fail basis.

All second- and third-year courses address bar-tested subjects. These courses range in unit value from 4 to 9 units and are taught on a two-year rotation to a combined class of second- and third-year students. Fourth-year students take Practical Skills Training (6 units) and Advanced Legal Research and Writing (2) and several bar-tested subjects with credit value of 4 to 6 units.

The First Year Review course does not comply with Guideline 1.11, which bars a law school from making a bar review course part of the credit requirements for the JD degree, but there is a current waiver of that guideline in place that unaccredited law schools may utilize. The law school should revise its most recent annual report to document use of the waiver and should be advised that the waiver is under active discussion by the Committee of Bar Examiners and may be modified.

Guideline 5.11 provides that elective courses in a variety of topics should be provided but the law school offers none. (Guidelines 5.11 and 2.3.) The Practical Skills Training course appears to offer instruction in some, but not all, of the skills that should be taught pursuant to Guideline 5.12.

The limited opportunities to explore the practical application of legal principles is a weakness in American Institute's program, particularly because numerous courses are taught by faculty members who do not have substantial law practice experience in some areas they teach. To comply more fully with Guidelines 5.11 and 5.12, the law school must review its curriculum and consider ways in which to incorporate elective and additional practical skills opportunities into the JD program.

Interactions among students and their instructors and classmates are made possible by the learning management system. (Guideline 5.13.) Students expressed a strong desire to have greater opportunities to interact with one another through the MegaMeeting platform and administrators are considering how such meetings might be arranged.

Most courses at American Institute have required textbooks, substantial readings, and evaluation based on exams, case briefing, and performance tasks. Some pass/fail courses are less rigorous. At least one course is graded based on attendance alone, and another is graded based on whether students made a "good faith effort" to complete written assignments, not whether they demonstrated ability or knowledge of fundamental principles. Some courses have no announced assigned readings and rely on handouts rather than textbooks.

Guideline 5.14 requires that written exams must be given in all courses except those in which substantial written or oral work is required. Midterm exams are given in longer courses, including

first-year doctrinal subjects, and typically count for up to 35 percent of the course grade. Final exams are given in most courses and typically count for at least 60 percent of the course grade.

Courses that are graded based on attendance, even Pass/Fail courses, are not compliant with Guideline 5.14 requirements and courses in which student performance is not evaluated based on ability and knowledge of fundamental principles are not compliant with Guidelines 5.16 and 5.17. To fully comply with Guidelines 5.14, 5.16, and 5.17, the law school must require written examinations in all courses that do not require substantial written or oral work and must require that student performance be evaluated in all courses based on ability and knowledge of fundamental principles.

Instructors submit their exam questions to the dean for review prior to the start of class. According to the dean, instructors are expected to draft their own exam questions and it appears that most instructors do so. The law school, however, does not bar instructors from using previously published essay or multiple-choice questions, including past bar exam or First-Year Law Students' Exam questions, a practice disallowed by Guideline 5.15. This lack of guidance raises concerns about exam security and fundamental fairness because answers to published questions are widely available on the Internet and otherwise.

Students take their exams online, in closed-book format. American Institute does not employ software to proctor student conduct during examinations or block access to other computer files during examinations, although the dean has considered adding ExamSoft to block such access. Cheating on exams has been suspected and, in the most recent confirmed cheating incident, the students involved were given failing grades and then withdrew.

To comply more fully with Guidelines 5.15 and 2.9(D), the law school must review and strengthen its policies and practices on exam security, inform faculty in the Faculty Handbook of the prohibition against using past bar exam and First-Year Law Students' Exam questions, and adopt, implement, and publish a policy precluding the use of all previously published questions.

A selection of essay exam questions and student answers was reviewed. Most questions were well-drafted and presented a fair test of the issues being examined. The rank order of student answers was reasonable but in some courses overall grades appeared somewhat higher than warranted. Grading is discussed below. (Guidelines 5.16 and 5.25.)

Rule 4.240(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 (or their equivalent) of course work designated to teach practice-based skills and competency training. Such competency training must teach and develop those skills needed by a licensed attorney to practice law in an ethical and competent manner. (Rule 4.240(F).)

Under Rule 4.240(F) the law school must require students to complete at least 6 semester units of practice-based skills and competency training. American Institute fulfills this mandate by requiring that all students must complete a 6-semester-unit course entitled Practical Skills Training in their fourth year. The 12-week course teaches day-to-day skills needed by an entry-level lawyer, addressing both criminal and civil litigation matters.

Rule 4.240(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.)

Grading standards must ensure accuracy, validity, consistency, and reliability in grading. Students must be realistically assessed and those who are unqualified must be promptly dismissed. (Guidelines 5.17 and 5.18.)

American Institute does not use a grade curve. Grading is anonymous and based on an alpha-numeric scale from A+ (97-100 and 4.33 grade points) to F (below 60 and 0.0 points), with levels of achievement (e.g., D- indicates an “inadequate but passing level of achievement”). Five courses are graded Pass/Fail, including Introduction to Law, First Year Review, two research and writing courses, and Practical Skills Training.

The Faculty Handbook offers grading guidance in terms of exams, not assignments. The core principle is that a grade of “70” or better (C- or above) indicates that an exam paper “demonstrates the ability of a student to achieve a passing grade on a question of comparable complexity on the California Bar Exam.” Grade distribution norms and avoidance of grade inflation are not addressed. According to Dean Green, because upper-level classes are small, at times grades are awarded in a tighter range than may be warranted by student achievement.

The 2021 Annual Report shows a tendency toward inflation in higher grade ranges, with 34 percent of grades given as A’s and B’s (“good” to “excellent”) as compared to 24 percent given as C/C+’s (“fair” to “adequate”). Grades below C, the good standing level, are high, at 43 percent.

The high percentage of low grades does not necessarily reflect unreasonable grading. Data with the self-study indicate that, for an unspecified period, 45 percent of the 11 First-Year Law Students’ Examination takers with GPA’s below 2.0 passed that exam, while data in the 2021 Annual Report show that only students with GPA’s at or over 2.0 passed administrations of that exam.

Current bar pass rate data provide little insight into the effectiveness of grading practices, as almost all takers from American Institute have been transfer students. Data attached to the self-study indicate that, for an unidentified period, the only graduate who passed the bar exam had the highest GPA at the law school and was the school’s only non-transfer taker.

As noted below, the law school’s high attrition rates do suggest that there is room for improvement in admissions screening and academic support, although the school also should continue to monitor grading practices and First-Year Law Students’ Examination and bar exam results to avoid grade inflation and ensure that students are effectively assessed.

American Institute must clarify some academic policies, as detailed above. (Guidelines 5.19-5.20.) The law school is compliant with the requirements of Guidelines 5.21 and 5.22 as to the First Year Law Students’ Examination.

Rule 4.240(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.)

Under Guidelines 5.26 and 5.27, a law school must admit only those applicants who reasonably appear qualified to study law and must adopt “adequate and appropriate screening procedures” to identify those who lack the necessary ability. American Institute has high attrition. The law school must address this problem through its admissions policies, communication policies, and academic programs.

While the law school opened relatively recently, its leaders are very experienced, having led at multiple law schools. The law school’s policies and outcomes should reflect this experience.

The law school admits students in all categories, including regular students with at least 60 qualifying college units, special students who qualify based on test scores, and transfer students. First-year students are admitted in fall and spring, and transfer students are admitted throughout the academic year when courses begin. Enrollment of special students is limited to no more than 5 percent of the student body and in 2021, one special student was enrolled (Guidelines 5.26 and 5.27.)

Based on its opportunity mission, the law school will admit any applicant with a prelaw GPA of 2.0 or higher, or minimum acceptable scores in College Level Examination Program (CLEP) tests, absent a record of a serious crime or misconduct. Current attrition rates suggest further refinement of the combination of the school’s overall offering is warranted.

On average, in the last two years American Institute has accepted 94 percent of applicants with completed files, and about 97 percent of admitted applicants have enrolled. For students entering in fall 2020, their 75th, 50th, and 25th percentile undergraduate GPAs were 3.48, 2.18, and 1.91, respectively, based on the 2022 Business and Professions Code section 6061.7 disclosure report.

Applicants are required to submit an application, transcripts, personal statement, and professional resume. The application asks about prior criminal conduct, dismissal from educational institutions, and, as Guideline 5.31 requires, prior law school history and exit status.

The law school does not require letters of recommendation or Law School Admissions Test (LSAT) scores, although applicants who have taken the LSAT are asked for their scores. (Guideline 5.29.) Individuals who completed courses in foreign countries are informed that they must have their transcripts evaluated by a credential evaluation service approved by the State Bar of California.

Admissions Director Mel Morrison conducts telephone interviews with all applicants and Registrar Chet Zaluga reviews all admission files to determine whether applicants have met minimum pre-legal educational requirements. This determination is based, at minimum, upon receipt of unofficial transcripts.

Applicants are informed that students will be dismissed if official transcripts or other qualifying documents are not on file within 45 days of the start of the student's first term. (Guideline 5.30.) Admissions decisions are made by consensus among the dean, registrar, and admissions director.

Based upon a sample file review, American Institute appears to comply with requirements that the law school receive in a timely manner, and maintain on file, "official transcripts of all prelaw studies or showing a bachelor's degree from a qualified institution and transcripts of any graduate studies" for admitted applicants and students. (Guidelines 5.30 and 9.1(B)(2) and (C)(2).)

American Institute admits transfer students from other law schools. The dean and registrar evaluate whether, and how much, transfer credit should be awarded. According to the self-study, "transfer students seeking transfer of more than two years of previous law school course work tend to be less successful in passing the bar exam" so the law school follows an unwritten policy that transfer students must complete at least two years of law study at American Institute. This policy should be published to comply more fully with Guidelines 5.26 and 2.3.

Students who have been academically disqualified from a prior law school must wait two years before seeking admission unless they wish to apply under the Committee's start-over policy. To comply more fully with Guideline 5.34, the law school must take steps to ensure that the reasons for admitting any previously disqualified applicant are properly documented in the applicant's file.

According to Director Morrison, half of the students admitted under the start-over policy remain in the JD program after the first year.

Attrition at American Institute is high, primarily occurring during or at the end of the first year. Data from the 2021 Annual Compliance Report show that attrition from first- to second-year ranged from 74 percent to 87 percent in the four most recent academic years. Overall, of the first-year students enrolled since 2017-2018, only 18 percent advanced into their second year. The website states that 72 percent of all students have not matriculated into subsequent years of law study.

To more fully comply with Guidelines 5.26-5.27 and 2.1, the law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

American Institute has taken some steps to address academic disqualification through efforts to incorporate regular practice test sessions as supplements to the live lecture schedule and to make BarBri commercial bar review materials available beginning in the first year. The law school should continue to inform applicants and students about the demands of its program and to expand opportunities for students to practice, and receive feedback on, the legal analytical skills they must develop to succeed.

The law school, however, also has an obligation to address high attrition through effective screening of candidates for admission or re-admission. (Guidelines 5.26-5.27.)

The Catalog sets forth a compliant policy on the admission of auditors. (Guideline 5.36.)

Rule 4.240(I) Library. The law school must maintain a library consistent with the minimum requirements set by the Committee. (Guidelines 6.1-6.6.)

Students and faculty members have electronic access to all library resources required by Guideline 6.2 through the law school's contract with Westlaw, for which students pay an annual fee of \$250. Individual Westlaw passwords are issued to students during their first course, Introduction to Law, and students retain access to the service while enrolled.

As required, hard bound copies of texts or treatises for courses in the JD curriculum are held at the law school's office. (Guideline 6.2.)

To fully comply with Guideline 6.3, the law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.

Records of library expenditures are properly maintained. (Guideline 6.6.)

Rule 4.240(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.)

American Institute maintains an administrative office in a commercial office complex in Torrance, California. The two-room, 630 square-foot, double suite was leased in 2016 pursuant to a three-year lease and tenancy is now month-to-month.

Registrar Zaluga works in the office at least two days each week. Student services are provided by telephone, email, or videoconference (Guidelines 7.1-7.2) and students are not required to visit the premises for class or administrative services.

In addition to three desks and a conference table, furnishings include lockable, fire-safe filing cabinets for safe storage of the law school's limited hard-copy records and a bookshelf for Committee-required textbooks. The office houses no computer systems or other technology except a printer/copier. (Guideline 7.2.)

The law school has allocated technical resources to support its distance learning technology. The JD program is delivered through applications that are up-to-date, secure, and adequate to meet institutional needs, including Populi for student records and learning management, MegaMeeting for presentation of live class sessions, and Excel for transcript creation.

Information resources have been protected by means of standard security protocols, such as firewalls, regular backups, and password procedures. Data are held securely in off-site servers through third-party vendors as well as redundant cloud and hard drive storage.

IT support is provided by Timothy Green, the dean's son. IT questions from students and instructors are handled by Director Morrison. (Guideline 7.2.) It is worthy of note that the State Bar's own experience is that the law school had difficulty with OneDrive, as well as US postal mail over the last several years. It may be helpful to encourage the law school to continue to monitor this area to ensure that students and staff have effective support for the law school's technology.

The law school should clearly inform prospective students and students as to the distributed nature of its facilities, including its nearly bare office on a month-to-month lease, the geographical dispersion of its key leaders and staff, and the limited office hours, if any, at a physical site. Given the small staff, it could be appropriate to affirmatively send copies of official transcripts to the students each semester and advise them to keep sealed copies in the event of a school closure in order to preserve their investment, as sealed official transcripts are a required step toward establishing eligibility to take the bar exam.

Rule 4.240(K) Financial Resources. The law school must have adequate present and anticipated financial resources to support its programs and operations. (Guidelines 8.1-8.3.)

As attachments to the self-study, American Institute submitted signature authorization forms for its 2019 federal and state taxes, a two-sentence financial projection, and a tuition history document. Other financial documents were found in the 2021 Annual Compliance Report, including a 2020 budget and signature authorization forms for 2020 federal and state taxes.

Dean Green stated during the visit that the school has earned a small profit each year since it opened. The self-study states that American Institute is financially solvent and sufficiently well capitalized with cash reserves of \$125,000 "as noted in its profit and loss statement and balance sheet." Those documents were not provided initially but the law school subsequently provided a full copy of the 2020 federal tax return, profit and loss statement, and balance sheet.

The 2020 tax documents reflect substantial income in 2019 but less than \$2,000 in 2020. The 2020 balance sheet showed no liabilities, current or long-term, and negative fixed assets of -\$2,000 after depreciation. Current assets consisted of \$2,000 in cash and substantial accounts receivable for anticipated tuition.

For 2021, American Institute again predicts net income in the range of \$2,000. Gross income is higher due to increased enrollment, but the law school intends to increase marketing expenditures and to add more educational tools to support student success and reduce attrition.

The law school derives its revenues entirely from tuition and fees. Enrollment has fluctuated over the past three years, dropping in fall 2019 by 11 percent and in fall 2020 by almost 13 percent before increasing in fall 2021 by more than 18 percent. The law school hopes to meet increased competition by remaining one of the most affordable law schools registered by the Committee while improving First-Year Law Students' Examination and bar exam pass rates.

Total JD program tuition is \$21,960, based on per-year tuition of \$5,490, and estimated total program fees are \$1,100. The law school raised annual tuition by \$500 recently and does not expect

to raise tuition again for at least three years. For 2022, scholarships of \$2,000 were given to all newly enrolled first-year students, while all continuing and new upper-level students were offered scholarships of up to \$1,000. The law school's most recent disclosure indicates that 85 scholarships were awarded for the 52 weeks ending September 15, 2021, for a total of \$116,500.

At the time of inspection, administrators were optimistic that demand for online legal education would continue to expand, and that American Institute would experience steady enrollment growth due to its flexible live-lecture attendance options and low tuition.

Despite cash reserves, the limited margins and the need to distribute significant funds call into question the long-term financial viability of the law school.

Rule 4.240(L) Records and Reports. The law school must maintain adequate records of its programs and operations. (Guidelines 9.1.)

Based upon review of representative records, except as noted above, American Institute has implemented appropriate recordkeeping practices and maintains records that are complete, accurate, accessible, and capable of being produced promptly when requested by the Committee. (Guideline 9.1.) They can be produced onsite via printer, copier, or screen when the registrar brings his laptop to the law school on his occasional visits.

Records were reviewed in all categories required by Guideline 9.1, such as applicant, admitted student, and enrolled student records (Guidelines 9.1(A)-(D)); class records, examinations, and grade tabulations (Guidelines 9.1(E)-(F)); administrative and faculty files (Guidelines 9.1(G)-(I)); Board Minutes and operating records (Guidelines 9.1(J)-(K)); and publications, Committee correspondence, and reports, including Annual Compliance Reports. (Guidelines 9.1(L)-(O).)

Responsibility for maintaining law school records is shared by Registrar Zaluga, who oversees compliance, and Director Morrison, who handles procedural execution. Records are held pursuant to a document retention policy that conforms to Guideline 9.1 requirements. All documents related to students are held indefinitely.

American Institute maintains permanent hardcopies, as well as electronic records, of all applicant and student files (Guideline 9.1(A)-(C).) Hard copy documents are held in lockable, fireproof cabinets in the Torrance office. Electronic records are held in Populi, the cloud-based student management system, uploaded to the law school's redundant storage platform, Google Drive, and stored on a hard drive. Appropriate protocols are followed to ensure that these documents are protected against loss, destruction, corruption, and unauthorized access.

Rule 4.240(M) Equal Opportunity and Non-Discrimination. Consistent with sound educational policy and these rules, the 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. (Guideline 10.1.)

American Institute lacks a written policy regarding equal opportunity and non-discrimination. It must create and post such a policy.

Of the students enrolled at American Institute in fall 2021, 41 percent were female. Students self-identified with various backgrounds, including Asian (9 percent), Black or African American (34 percent), Hispanic/Latinx (12 percent), Two or More Races (12 percent), and White (33 percent.)

The faculty includes 4 white men and 1 latinx woman.

The law school must create a policy in the area of Equal Opportunity and non-discrimination to explain its practices and underscore its commitment in this area.

Rule 4.240(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)-9.1(Q).)

American Institute has followed Rule 4.240(N). Generally, the law school has submitted Annual Compliance Reports and other documents as mandated by the Rules and Guidelines. Further, it has responded to requests by the Committee, including information requests from the consultant. The law school has had some issues with timely mailing of annual reports and technical issues uploading files to the State Bar's OneDrive. This is a matter for concern, as the law school primarily communicates with its students by mail and email technology, so proficiency in these areas must be a priority.

CONCLUSION AND RECOMMENDATION

It is recommended that the Committee receive and file this Periodic Inspection Report, approve the recommended and suggested actions, continue the registration of the American Institute of Law, and schedule its next periodic inspection in fall of 2023 via an onsite inspection, unless an earlier visitation is deemed necessary by the Committee. This will ensure that the law school properly completes the significant recommendations highlighted above with urgency. The law school should provide an update on its progress toward the recommendations noted as part of its 2022 Periodic compliance report.

AMERICAN INSTITUTE OF LAW'S RESPONSE TO INSPECTION REPORT

This document contains American Institute of Law's (AIL) responses to the California Bar Examiner's (CBE) Periodic Inspection Report conducted on December 7-8, 2021.

AIL has always endeavored to be in full compliance with all Guidelines and Rules since the inception of the school's registration (2016) as evidenced by the conclusions made in AIL's Inspection In Regard To Pending Application For Registration conducted on December 11, 2015 ("Based upon the inspection, AIL appears to be compliant with each of the registration standards set forth in each of the applicable Rules and their associated Guidelines.") and AIL's Interim Inspection conducted on December 5-6, 2017 ("Based upon the inspection, AIL is operating compliantly with each of the relevant requirements required by *Unaccredited Law School Rules* [Rules] and *Guidelines for Unaccredited Law School Rules* [Guidelines].").

AIL's responses contained herein will demonstrate AIL's continued commitment to be compliant with all mandatory CBE requirements.

1. Guidelines 1.9 and 2.3(B): To comply more fully with Guidelines 1.9 and 2.3(B), the law school must ensure that the law school meets its obligations to evaluate disability accommodation requests as to the circumstances of its exams by advising that the exam accommodations granted by the law school may not be the same as those granted by the State Bar of California. The law school must create policies in the area of Equal Opportunity and non-discrimination to explain its practices and underscore its commitment in this area. The law school must also ensure compliance with applicable laws including ensuring that individuals are properly classified as contractors or employees.

Response: *Item 1. contains three separate concerns, namely, 1. disability accommodations (discussed immediately below), 2. equal opportunity and non-discrimination (discussed in Item 16., below), and, 3. classification of workers as contractors or employees (discussed in Item 2., below).*

Subsequent to the inspection, AIL has added to the Catalog, on page 19, the following information that provides information pertaining to the granting of disability accommodations.

STUDENTS WITH DISABILITIES – ADA, HIPAA

American Institute of Law strives to provide a legal education to all with the desire and ability to pursue the study of law. In compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA). It is our practice to provide reasonable accommodations, when requested by a student, for temporary or permanent disabilities. American Institute of Law is committed to provide reasonable accommodations necessary for students with documented disabilities to pursue their legal studies. The student will need to provide documentation used to substantiate and verify the need for such accommodations. All documentation provided by the student or health provider will be protected under the Health Insurance Portability Accountability Act of 1996 (HIPAA). Student should be aware that any exam accommodations granted by the law school may not be the same as those granted by the State Bar of California. The Dean shall be responsible for implementing any adjustments or accommodations made pursuant to this policy.

2. Guideline 1.9: The law school must review and, as necessary revise, its faculty payment practices to comply with federal and California law, take steps necessary to rectify errors, if any, and provide the Committee with a report as to its findings and actions. (Also from Item 1., above, The law school must also ensure compliance with applicable laws including ensuring that individuals are properly classified as contractors or employees.)

Response: *AIL's key administrative members discussed this issue with our financial advisor, Richard Page. Richard Page is a C.P.A., an I.R.S. Enrolled Agent, has a Master's Degree in Taxation, an EJD from Concord Law School and is a retired I.R.S. Agent with 30-plus years of service. In lengthy and thorough discussions with Mr. Page, it was determined that AIL's current classifications of workers are correct and proper. We also determined that once AIL's enrollment reaches 100 students and we must change the administrator's position from part-time to full-time, AIL, at that time, would feel it appropriate to change the status of the administrator from independent contractor to employee.*

Although classified as an independent contractor, this does not mean that the school has relinquished control of the work performed by this person. The administrator/registrar is a licensed California attorney that exercises professional judgment in the performance of his duties. The school retains control over the finished product of his efforts and ensures that his work product is compliant with all guidelines without micro-managing these positions.

3. Guidelines 2.9(B)(3) and 5.24: The law school must revise the Catalog to state the circumstances, if any, under which the law school requires and/or allows course repetition.

Response: *Subsequent to the inspection, AIL has added to the Catalog, on page 14, the following information that states the circumstances, if any, under which AIL requires and/or allows course repetition. There have been no students that have repeated any course since the inception of the school.*

<p>R. Repeated Course</p> <p>A course with "R" as a grade indicates that the student has repeated the course at a latter time and received a passing grade in the subsequent class. No credit will be given for the initial course with the R designation. The points given for the subsequent, repeated course will be the points achieved on the repeated class.</p> <p>If a student fails a required class, then repetition is necessary.</p> <p>If a student wishes to repeat a class to improve a passing grade received, then the following circumstance apply. Repeated classes will only be allowed after analysis and the express written permission by the Dean of the Law School. These steps are necessary for the following reason. If a student receives a low passing grade (e.g., D-or D) and wishes to repeat the class to improve their grade-point average, the student must be informed of certain ramifications of this action, namely that, a student must attain 48-52 or 24-26 of consecutive weeks of passing credit to receive one year or one-half year, respectively, of law study to satisfy eligibility for bar examination purposes. If a student repeats a class and the previous class will then no longer represent passing credit, a gap may occur that could result in the loss of one-half to one full year of credit.</p>

4. Guidelines 2.9 and 5.19-5.20: The law school must revise the Catalog to define the term "successfully complete" for purposes of eligibility to graduate; inform students as to when their academic standing will be determined; and eliminate the ambiguous statement that a student may advance to the next year if "on probation as of the last class of the previous year."

Response: Subsequent to the inspection, AIL has added to the Catalog, on pages 14 & 15, the following information that clarifies statements regarding academic standing, academic probation, academic dismissal and graduation requirements. The statements simply clarify a policy that has always been in effect. The students are notified of the policy through issuance of a school catalog when enrollment occurs.

CATALOG, PAGE 14

ACADEMIC STANDING

Good academic standing is required for graduation and to be awarded the Juris Doctor degree. The following policy applies:

TIMING OF EVALUATIONS

- Students are enrolled at AIL for one academic year at a time. A student's academic status will be evaluated and determined at the end of each and every academic year.

GOOD STANDING

- A student who has a cumulative grade point average of 2.0 ("C") or better will be in good standing.

PROBATION

- When a student finishes an academic year with a cumulative grade point average of less than 2.0 ("C"), the student will be placed on academic probation for one year.

CATALOG, PAGE 15

ACADEMIC DISMISSAL

- If a student is placed on probation and fails to bring their cumulative grade point average up to 2.0 ("C") or better by the end of the probationary period, that student will be academically dismissed.

GRADUATION

- Students may become eligible to graduate provided each AIL required course is completed with a passing grade of at least a "D-". However, the student must finish their studies with a minimum GPA of 2.0 ("C") or better.

Should any modifications to the academic standing policy become necessary, all students will be notified prior to implementation.

5. Guideline 2.9(D): The law school must revise its policy to state all steps taken by the law school to authenticate student work.

Response: AIL's key administrative and faculty members discussed this issue and decided to pursue software programs that would fulfill not only student authentication issues but exam security as well. We have inquired into programs such as ExamSoft, Mettl, Microsoft Teams, Examonline, etc.

ExamSoft has shown that they may fulfill our requirements. ExamSoft has three modules that appear to seamlessly integrate with each other. 1. ExamID, digitally verifies the identity of each exam-taker, from any location; 2. Examplify, delivers exams to student devices; and 3. ExamMonitor, technology-enabled proctoring service that records all video and audio as well as screen activity throughout an exam. These files will be evaluated by ExamMonitor software.

Mettl seems to offer all the features that Examsoft contains with the additional benefit of being integrated into our current LMS (Learning Management System).

We are currently inquiring into 1. demonstrations of each product and their integration with our existing systems, and 2. costs associated with initial implementation and re-occurring costs including maintenance and updates/upgrades and cost per student.

AIL's next scheduled examination period will not occur until mid-July. We believe we will have a system fully implemented by that time. When a decision is made and implementation occurs, the CBE will be promptly notified.

6. Guideline 2.9(F): The law school must adopt, implement, and publish a policy consistent with the guideline to inform students of the opportunity to review exam materials, including exam questions and their own answers.

Response: *Subsequent to the inspection, AIL has added to 1. the Catalog, on page 13; 2. in every syllabus for courses that use graded exams as part of final grade determination (Law 101 - Contracts sample below); and 3. the Faculty Handbook, on page 6, as seen below.*

CATALOG, PAGE 13:

INSPECTION AND COPYING OF EXAMS

American Institute of Law allows students to inspect and copy examination questions and their answers to those questions (other than for multiple-choice) through the Student Center.

SYLLABUS SAMPLE, LAW 101 - CONTRACTS, PAGE 3:

- 4. INSPECTION AND COPYING OF EXAMS:** Students are allowed to inspect and copy examination questions and their answers to those questions (other than for multiple-choice) through the Student Center.

FACULTY MANUAL, PAGE 6:

Inspection and Copying of Exams. In order to comply with the Standards of the Committee of Bar Examiners of the State Bar of California, professors should be aware that AIL allows students to inspect and copy examination questions and their answers to those questions (other than for multiple-choice, true-false, and similar tests) through the Student Center. This policy is stated in applicable syllabi, and therefore, the students are aware of this policy.

7. Guideline 1.11: The law school must advise in its Periodic Compliance Report if it is using a waiver to include a required review course for the First-Year Law Students' Examination for credit as part of its curriculum.

Response: *AIL faculty members have discussed this issue and decided to modify one of the first-year course's name, description, objective and content whereas the primary goal of the course is not FYLSX preparation (Law 105 - First-year Skills Workshop–Page 1 of the syllabus is below). Therefore, AIL will not need or use a waiver for any current or future courses.*



LAW 105 - FIRST-YEAR SKILLS WORKSHOP SYLLABUS 2022 (6 weeks - 3 semester units)

DESCRIPTION:

This course is designed to assist the student in their preparation for their final examinations by distilling all the information learned in the first-year substantive law classes and using this as a basis for improving their analytical skills. Essay assignments and multiple-choice questions will be used as teaching tools to simulate fact patterns and challenges which the student may be confronted with in future examinations and as practicing attorneys.

All of the multiple-choice questions and essay exams will be of material never presented to the students in previous classes.

Every week students are required to write answers to two essays. Student answers **MUST** be submitted no later than the end of the week following the week the essays were assigned. The answers the students submit for the questions will be returned with answer material. The student's answers will be evaluated to determine adequate competence. Please submit answers to ERG@AILGC.com

OBJECTIVE:

The students will refine their analysis, reasoning and legal writing skills. They will strengthen their basic approach to legal philosophy, which will help them succeed in their future studies and continue the development of the analytical skills which will be needed to make them competent and successful attorneys.

CLASS SCHEDULE AND CONTENT:

The lectures will begin the first (1) week of class. Each week of class will consist of two class sessions. There will be one session of substantive law review lecture, discussion and note-taking (7:00-9:30pm), and one session of multiple-choice and essay review and analysis (7:00-9:00pm).

FINAL GRADE:

A passing final grade will consist of attending ALL twelve (12) sessions (either live or archive), answering the Preliminary Multiple-choice Exam (100 multiple-choice questions) **BEFORE** the first multiple-choice and essay review of the first week of class and answering ALL twelve (12) assigned essay assignments that show ability and knowledge of fundamental principles for each substantive area of law presented. Student answers **MUST** be submitted no later than the end of the week following the week the essays were assigned. Grading for this course will be on a Pass/Fail basis.

8. Guidelines 5.11 and 5.12: The law school must review its curriculum, consider ways in which to incorporate elective and additional practical skills opportunities into the JD program, and report its conclusions to the Committee in the next Annual Compliance Report.

Response: AIL’s key administrative and faculty members are committed to reviewing current curriculum and discussing if and how elective courses and additional practical skills opportunities may be offered. The difficulty facing a part-time law program is the burden of finding adequate time for electives after teaching all bar tested subjects, legal research and practical skills training adequately to maximize the potential for success on bar exams. AIL will report their conclusions to the CBE in our next Annual Compliance Report.

9. Guidelines 5.14 and 5.16-5.17: The law school must require written examinations in all courses that do not require substantial written or oral work and must require that student performance be evaluated in all courses based on ability and knowledge of fundamental principles.

Response: Subsequent to the inspection, AIL has added to every pass/fail course (Law 100, Law 104, Law 105 and Law 406), substantial written work that will be evaluated based on student performance, ability and knowledge of the subject matter. See excerpts from course syllabi, below.

LAW 100:

DESCRIPTION:

In this introductory course, the student discovers the basic concepts of law and the history of the American system of jurisprudence and juristic theory that originated from, and was developed and formulated through, the common law of England and is now recognized as an organic part of the jurisprudence of most of the United States. Students are introduced to important legal terminology, basic legal analysis, and practice of the law. An orientation to legal writing is presented with an emphasis on case briefing skills. Students will be required to submit case briefs, in the proper format as discussed in-class, for each of the three (3) substantive law subjects—Contracts, Torts and Criminal Law. The students’ submissions will be evaluated to determine adequate competence. Please submit answers to Homework@instituteoflaw.com

LAW 104:

DESCRIPTION:

This course will provide an introduction to both the concepts behind and the practical applications of legal analysis and writing. This course will include instruction in understanding and utilizing legal concepts in a factual setting. This course will introduce and develop the student’s skills in applying law to various fact patterns. The student will learn the importance of being able to spot issues, recall relevant law and to articulate their analysis and reasoning in a logical, lawyer-like manner. The skills learned in this class can be applied throughout law school and in the practice of law. Students will be required to submit “Issue/Rule Statements” for each of the three (3) substantive law subjects—Contracts, Torts and Criminal Law (further information as to the content of the “Issue/Rule Statements” will be discussed in-class). The students’ submissions will be evaluated to determine adequate competence. Please submit answers to Homework@instituteoflaw.com

LAW 105:

DESCRIPTION:

This course is designed to assist the student in their preparation for their final examinations by distilling all the information learned in the first-year substantive law classes and using this as a basis for improving their analytical skills. Essay assignments and multiple-choice questions will be used as teaching tools to simulate fact patterns and challenges which the student may be confronted with in future examinations and as practicing attorneys.

All of the multiple-choice questions and essay exams will be of material never presented to the students in previous classes.

Every week students are required to write answers to two essays. Student answers **MUST** be submitted no later than the end of the week following the week the essays were assigned. The answers the students submit for the questions will be returned with answer material. The student's answers will be evaluated to determine adequate competence. Please submit answers to ERG@AILGC.com

LAW 406:

DESCRIPTION:

This course will provide students with instruction related to both the concepts behind and the practical applications of legal research, writing and analysis. This course will include instruction in understanding and utilizing primary and secondary sources of law including case law, statutory and constitutional law. Students will also receive instruction related to the basics of legal research, both traditional and online (hard-copy and electronic), and its importance to the legal process. This course will include instruction as well as practice in the drafting of selected documents typically encountered in the routine practice of law.

Every week students will be required to write answers to two fact patterns or research assignments. The student's submitted answers will be evaluated to determine adequate competence and will be returned with answer material. Please submit answers to CZaluga@instituteoflaw.com

10. Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in the Faculty Handbook of the prohibition against using past bar exam and First-Year Law Students' Examination questions, and adopt, implement, and publish a policy precluding the use of previously published questions.

Response: *Subsequent to the inspection, AIL has added to the Faculty Handbook, on page 6, a statement prohibiting the use of past bar exam and First-Year Law Students' Examination questions, as seen below. Exam security was addressed in Item 5., above.*

Restrictions on Use of Past Examinations. The Committee's past California Bar Examination and past First-Year Law Students' Examination questions must not be used for any purpose that affects a student's grade.

11. Guidelines 5.26 and 2.3: The law school must publish its policy of requiring transfer students to complete at least two years of law study at American Institute.

Response: *Subsequent to the inspection, AIL has added to the Catalog, on page 13, the following policy statement that requires all transfer students to complete at least two years of law study at AIL.*

TRANSFER CREDIT

The school of law allows transferable credit of completed law course(s) from approved law schools that comparably meet law school course work requirements and standards, which are documented on official transcripts. A transfer student will be allowed a maximum of 2 years of qualifying legal education and must attend American Institute of Law for a minimum of 2 years. Each transcript must be evaluated by the State Bar of California. The completed State Bar of California evaluation and each transcript is also evaluated by the Office of the Registrar and the Dean to determine what course work can be transferred into the current program.

12. Guideline 5.34: The law school must take steps to ensure that the reasons for admitting any previously disqualified applicant are properly documented in the applicant's file.

Response: *As stated in Catalog, on page 13 (see "TRANSFER CREDIT" graphic posted in Item 11, above), all transfer students, whether disqualified from a previous law school or not, must have their transcript(s) evaluated by the State Bar of California. The completed State Bar of California evaluation is then evaluated by the Dean, Registrar and Director of Admissions to determine what course work can be transferred into the current program.*

In addition, if the student was dismissed from a previous law school, AIL must decide whether the student possesses the requisite ability for the study of law under factors outlined in Guideline 5.34 (A) & (B). If the student is admitted, then the reasons for admittance must be contained in a signed, written statement that will be part of the student's permanent file.

13. Guidelines 5.26-5.27 and 2.1: The law school must study the factors contributing to high attrition, both voluntary and involuntary, after the first year; consider changes to its communications, admissions process and standards, curriculum, and/or other program elements to improve both admission of qualified candidates and retention of qualified students, and report to the Committee, in its next Annual Compliance Report, the efforts being made to reduce attrition and the results of those efforts.

Response: *AIL's key administrative and faculty members are committed to reviewing our current admission process and standards, and curriculum and to study factors responsible high attrition rates.*

The changes are being implemented in the following first-year classes:

Law 100 - Introduction to Law

The students are now required to submit written case briefs for the six (6) cases discussed in class and used as material to teach case briefing. This will give the students a practical, hands-

on experience in briefing before their core substantive classes begin. The goal is to increase a student's confidence and lessen the chance of an early departure from their law studies.

Law 104 - Legal Analysis and Writing

The students are now required to submit written rule statements that they have learned during the course of the first twenty-plus weeks of substantive law. Their work will be evaluated and returned with constructive comments for improvement. This will help the students to have a greater sense that they will be properly equipped for their upcoming midterm exams (Week 29). This will help to reduce exam anxiety.

Law 105 - First-Year Skills Workshop

The students will be aided in distilling all the information learned in the first-year substantive law classes and using this material as a basis for improving their analytical skills through essay writing. These exercises will help the students refine their analysis, reasoning and legal writing skills that will be an asset for their upcoming final exams (Week 52).

These changes target first-year students as that group has the highest attrition rate. By implementing these changes, AIL feels that the student will be better prepared to successfully complete their first-year studies and move into the upper class.

AIL will report the results of these efforts to the CBE in our next Annual Compliance Report.

14. Rule 4.240(J): The law school should clearly inform prospective students and students as to the distributed nature of its facilities, including its nearly bare office on a month-to-month lease, the geographical dispersion of its key leaders and staff, and the limited office hours, if any, at a physical site. Given the small staff, it could be appropriate to affirmatively send copies of official transcripts to the students each semester and advise them to keep sealed copies in the event of a school closure in order to preserve their investment.

Response: *Rule 4.240 (J) states:*

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.

There are some comments and speculations which were made as a result of a misunderstanding of the current factual circumstances of the nature of the school premises and the financial underpinnings of the school.

In fact, the facilities at the school's administrative office in Torrance are fully furnished and adequate for all student needs. The office houses a computer with dual screens for the Dean and for live, on-line lectures (all current faculty members [except Michael Dowd] have lectured from the office using this computer). The office also has a complete desktop computer and all-in-one scanner/copier/laser printer for use by the school's Administrator (all the above is seen in the virtual tour submitted to the inspectors [www.americaninstituteoflaw.com/tour]). There is no need for the Administrator to "bring his laptop" (page 18, paragraph 5 in this Inspection Report), as no laptop has ever been issued or was ever mentioned to the inspectors during the visit. To categorize AIL's administrative office as a "nearly bare office" (above) and that "The

office houses no computer systems or other technology except a printer/copier” (page 16, paragraph 11 in this Inspection Report) are absolute falsehoods.

The physical files kept at that location, as well as electronic backup, are complete, not limited, and fully compliant and contain all documents identified in the guidelines. (See page 18, paragraph 5 in this Inspection Report [“Based upon review of representative records, except as noted above, American Institute has implemented appropriate recordkeeping practices and maintains records that are complete, accurate, accessible, and capable of being produced promptly when requested by the Committee.”]).

There is also no reason for concern about the school's financial stability, since the school has robust financial reserves, is fully licensed and is on a long-term lease for its offices. The office lease was originally for three years (starting in 2016) and the current lease extension, written in 2019, is for a five-year period ending in 2024 (see excerpt below).

FIRST AMENDMENT TO LEASE

THIS AMENDMENT TO LEASE, dated May 23, 2019, hereby amends
the Lease dated May 18, 2016, along with any subsequent addendums and amendments, by and between
Iowa Courthouse Building, LLC (“Lessor”)
and
American Institute of Law, Inc. (“Lessee”)
for the Premises located at 18411 Crenshaw Blvd., Suite 415 & 416, Torrance, California, 90504
consisting of approximately 630 rentable square feet.

It is mutually agreed by and between Lessor & Lessee that:

1. **Lease Term** – The lease term shall be for five (5) years effective July 1, 2019 and expiring on June 30, 2024.

All faculty members are licensed California attorneys, living in the local area (with the exception of the Dean) and are all subject to California Bar ethical standards. In addition, AIL’s key personnel have extensive experience and sound reputations related to the founding and operation of other law schools.

No academic institution that we are aware of is required to send an unrequested, official, sealed transcripts at the end of each semester. AIL will provide any student with official, sealed transcripts if a proper written and signed request is made with appropriate fees paid.

15. Rule 4.240(M): The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.

Response: *Subsequent to the inspection, AIL has modified Law 406 - Advanced Legal Research & Writing course, to include instruction related to both traditional and online (hard-copy and electronic) legal research. See excerpt from the course syllabus, below.*

DESCRIPTION:

This course will provide students with instruction related to both the concepts behind and the practical applications of legal research, writing and analysis. This course will include instruction in understanding and utilizing primary and secondary sources of law including case law, statutory and constitutional law. Students will also receive instruction related to the basics of legal research, both traditional and online (hard-copy and electronic), and its importance to the legal process. This course will include instruction as well as practice in the drafting of selected documents typically encountered in the routine practice of law.

16. Rule 4.240(M) and guideline 10.1: The law school must create and publish a written policy regarding equal opportunity and non-discrimination.

Response: *Subsequent to the inspection, AIL has added to the Catalog, on page 19 and in the Faculty Handbook, on page 2 a comprehensive non-discrimination policy statement. Both are seen below.*

CATALOG, PAGE 19:

NON-DISCRIMINATION POLICY

American Institute of Law is committed to providing an equal opportunity to study law to all students without regard to sex, race, color, ancestry, religious creed, national origin, disability, medical condition, age, marital status, political affiliation, sexual orientation, or veteran status.

FACULTY HANDBOOK, PAGE 2:

E. NONDISCRIMINATION AND ACADEMIC FREEDOM

1. AIL appoints qualified 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.

CONCLUSION AND RECOMMENDATION

It is recommended that the Committee receive and file this Periodic Inspection Report, approve the recommended and suggested actions, continue the registration of the American Institute of Law, and schedule its next periodic inspection in fall of 2023 via an onsite inspection, unless an earlier visitation is deemed necessary by the Committee. This will ensure that the law school properly completes the significant recommendations highlighted above with urgency. The law school should provide an update on its progress toward the recommendations noted as part of its 2022 Periodic compliance report.

Response: *As evidenced above in our responses, AIL has substantially complied with the Action Items listed above. In fact, the only Items that need current attention are Items 5. and 10., above (Authentication of Student's Exams, and Exam Security). These Items can be resolved without the need for an onsite inspection once a software solution is chosen and implemented.*

The CBE questions AIL's long-term financial viability (page 18, paragraph 3 in this Inspection Report) , and yet wishes to place an additional financial burden on the school (approximately \$10,000) by requiring an onsite inspection within 18 months from the date of your ruling on these findings.

Therefore, because of AIL's substantial compliance, AIL does not accept the recommendation of an onsite inspection on an accelerated schedule.