



**OPEN SESSION**

**AGENDA ITEM V.B.**

**APRIL 2023**

**COMMITTEE OF BAR EXAMINERS**

**DATE:** April 21, 2023

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

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

**SUBJECT:** Action on Major Change of Administrative Headquarters – Irvine College of Law

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**EXECUTIVE SUMMARY**

Irvine College of Law (ICOL) has filed the major change request set forth in Attachment A requesting permission from the Committee of Bar Examiners (committee) to move its administrative headquarters from its current 6,000 square foot location in Cerritos to a single office in Irvine, California, with the option to use a shared conference room. The reason for the move is the law school's approved transition from the unaccredited fixed-facility category to the unaccredited distance learning category effective fall 2023, which reduces the law school's need for physical space. A lease through March 31, 2024 is proposed, while the law school evaluates its options to co-locate with Westcliff University, which is owned by the same parties. The proposed address would be 2102 Business Center Drive, Suite 154, Irvine, CA 92612.

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**BACKGROUND**

Under Unaccredited Law School Rule 4.246 "[a] registered law school contemplating a major change must notify the Committee and obtain its prior approval before making the change. The notice must explain in detail any effect the change might have on the law school's compliance." Major changes include the law school's current request to change the location of the law school's administrative office."

Irvine College of Law is a registered, unaccredited, distance learning category law school. The committee approved its transition from fixed-facility category to distance learning category effective fall 2022, and the distance learning program launched on time as scheduled.

## **DISCUSSION**

Historically, ICOL has taught its JD program in fixed-facility format in a 6,000 square foot facility in Cerritos, California. During the pandemic, the law school taught classes online under an approved emergency waiver. After having a positive experience with teaching in the distance learning format, the law school submitted a request to transition permanently to the unaccredited distance learning category, and the Committee approved that request effective fall 2022. ICOL's program launched as scheduled. Now, both courses and student services are provided online. Staff will work in the office occasionally on a hybrid basis.

As a result of these changes, the law school began searching for a smaller office space. On April 1, 2023, the law school executed a one-year lease through March 1, 2024 for an office at an office complex located in Irvine, California with [Airport Executive Suites](#), pending committee approval. This office building offers an array of small offices and virtual offices, with the option to rent additional space as needed. The law school plans to occupy office 154, a single office listed on the map in Attachment A. ICOL provided the contract for staff review and verify. The move will reduce costs significantly. It appears that total space will be reduced by at least 95 percent.

The new space is located approximately 20 miles from the law school's current campus in Cerritos, California in a central location near Westcliff University, another university that has the same owners as ICOL. The law school indicated that it may have a chance to move to a current or future space occupied by Westcliff University in the future, so a short lease from April 1, 2023 through March 31, 2024 was signed. If ICOL should co-locate with Westcliff University in the future, it will be important to ensure that there is no consumer confusion between ICOL, a registered, unaccredited distance learning category law school, and Western State College of Law at Westcliff University, an American Bar Association approved law school.

ICOL expects that student learning will not be disrupted in any way even though the move will take place during the semester. This is because all ICOL services and classes are fully online now, and students are not currently required to come to campus to complete their JD program or request support services.

The law school has submitted a proposed floor plan and lease contract, redacted for privacy, and a video visit with staff can be scheduled after the move.

While the law school has not yet moved, it executed a lease on April 1 and plans to move on May 1, 2023. The law school is required to seek advance approval; more time should be provided in the future to allow the committee to have sufficient time to consider the request and ask further questions if needed.

Because the new space appears to fulfill the law school's planned needs, while reducing overhead costs, staff recommends approval with certain conditions as noted below.

## **RECOMMENDATION**

It is recommended that the Committee of Bar Examiners receive and file Irvine College of Law's Request for Major Change seeking approval to move from its current location to 2102 Business Center Drive, Suite 154, Irvine, CA 92612, as set forth in Attachment A and approve the request effective immediately. The Committee should require ICOL to notify staff when the move is complete and undergo a video visit of the new location, or if the move is canceled for any reason prior to June 1, 2023.

Due to the temporary nature of the move involving a lease of less than one year, the law school should be advised of its obligation to keep students informed of its location and contact information, and to accurately describe its facilities.

## **PROPOSED MOTION**

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

**MOVE**, that the Committee of Bar Examiners receive and file Irvine College of Law's Request for Major Change seeking approval to move its administrative headquarters to 2102 Business Center Drive, Suite 154, Irvine, CA 92612 as set forth in Attachment A, and approve and ratify the move effective May 1, 2023 through March 31, 2024.

**FURTHER MOVE**, that the law school schedule a video visit of the new location with staff via videocall in May 2023 when the move is complete, or notify the State Bar promptly if the move does not complete by June 1, 2023.

**FURTHER MOVE**, that the law school provide an update to the committee on or before January 1, 2024 advising whether the law school plans to change its location, and that it request and secure prior approval of any future move.

## **ATTACHMENT LIST**

- A.** Irvine College of Law Major Change Request – Move Administrative Headquarters to 2102 Business Center Drive, Suite 154, Irvine, CA 92612



*Via Email and U.S.P.S.*

March 6, 2023

Natalie Leonard, Esq.  
Principal Program Analyst  
Office of Admissions, Educational Standards  
State Bar of California  
180 Howard Street  
San Francisco, CA 94105

Re: **Major Change Request for the Approval of the Committee of Bar  
Examiners for the Relocation of ICOL's Administrative Office.**

Dear Ms. Leonard:

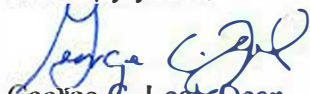
Pursuant to Rules 4.245 and 4.246(B) of the *Unaccredited Law School Rules*, Irvine College of Law (ICOL) respectfully seeks the approval of the Committee of Bar Examiners (CBE) of the following major change: 'To change the location of ICOL's administrative office located in Cerritos, California to a new location in Irvine, California, effective May 1, 2023.

In support, ICOL submits the enclosed explanation of both the need and the benefits associated with the move of its administrative office given the upcoming termination of its current lease.

To accommodate the practical realities of relocating an ongoing commercial entity, I further respectfully ask that ICOL's request be received and considered by the CBE at its meeting on April 21<sup>st</sup> so that its approval is granted before the move's anticipated May 1<sup>st</sup> effective date.

On behalf of ICOL's ownership and management, my personal thanks in advance for your assistance in having this major change approved by the Committee as requested.

Sincerely yours,

  
George C. Leat, Dean  
Irvine College of Law

GCL

cc: Edward Trent, Esq.

## **MAJOR CHANGE REQUEST OF IRVINE COLLEGE OF LAW**

### **Change of Location of ICOL's Administrative Office**

Pursuant to Rules 4.245 and 4.246(B) of the *Unaccredited Law School Rules*, Irvine College of Law (ICOL) hereby respectfully requests approval of the Committee of Bar Examiners (CBE) to make the following major change:

**To change the location of ICOL's current administrative office located in Cerritos, California to a new location located in Irvine, California, effective May 1, 2023.**

As described below, and in support of this major change request, ICOL's proposed new location of its administrative office will continue to comply with the relevant registration standard required by Rule 4.240(J): "The law school must have physical resources and an adequate infrastructure adequate for its programs and operations. The law school must, at a minimum, maintain its primary administrative office in the State of California."

#### **A. Current and Proposed, New Location**

Over the past ten years, ICOL (operating as Irvine University College of Law) has maintained a 6,000+ square foot campus in a commercial building located in Cerritos, California. In offering a fixed-facility J.D. program, ICOL operated compliantly by providing its students with adequate classrooms, library space and administrative offices when classes were taught, and students studied on campus. The current lease for the ICOL's campus will expire on April 30, 2023.

Effective July 1, 2022, and pursuant to the CBE's prior approval, ICOL began to operate as a registered, distance learning law school. As such, its need to maintain physical classrooms and a hard copy law library no longer exists. Moreover, in administering a distance learning program, the law school's need to provide its students with on-site access to ICOL's administrative staff (including its dean and registrar) has been greatly diminished.

Since the onset of the Covid pandemic three years ago, ICOL (like many other law schools) has learned to use online technology (Zoom, Google Drive, Moodle) far more effectively than when it operated from a physical campus. As a result, it is now able to operate more efficiently with far less office space since all meetings with students, staff and faculty now take place online. Similarly, the need for physical space to store records and transcripts is reduced since, as permitted by Guideline 9.1 of the *Guidelines for Unaccredited Law School Rules*, ICOL now uses an online, cloud-based facility to store all such records.

Given this new reality, and as other distance learning law schools governed by the CBE (both accredited and registered) have experienced for years, ICOL now needs significantly less office space to operate compliantly. Starting in March of 2020, all ICOL administrators began working off-campus, remotely. More recently, the dean and staff work on campus as needed and given ICOL's permanent distance learning designation, all will continue to work in a hybrid mode,

working both from home and from its administrative office on an as needed basis, although given its proximity to his home, the dean will work at the Irvine office once or twice a week.

Given this new workplace reality, ICOL is now able to operate with a single office that offers enough room for one or more desks, space for file cabinets containing older student and faculty files, and access to conference room space to hold occasional onsite meetings.

Thus, to reduce its overhead, significantly, the law school's ownership decided not to renew its lease in Cerritos and to move of ICOL's administrative office to a location better suited to its current needs and its name. As a result, on March 3, 2023, the chief financial officer of Irvine University Education Inc., dba Irvine College of Law, signed a one-year lease for an office located at 2102 Business Center Drive, Suite 154, Irvine, California. *See*, Attachment A.

As noted in its lease, ICOL will gain access to the office as of April 1<sup>st</sup>, which will provide 30 days to make all arrangements (the relocation of files, office furniture and installation of computers) so that it will be able to begin operating from its new administrative office effective May 1<sup>st</sup>.

The size, amenities and location of its new office will allow ICOL to operate more economically since the building in which it is located offers on-site mail and package delivery services metered access to high-speed copying, scanning, and printing (eliminating the need to buy or lease a new copier/scanner/printer) and free parking for staff and occasional visitors. Commute time for the dean will be reduced by more than half. Finally, additional office space, if needed, is readily available. *See*, Attachment B.

Finally, as noted in its prior major change requests, ICOL receives administrative support from a significantly larger academic institution, Westcliff University. As such, over the next year or so, ICOL may be offered office space in one of Westcliff's current or future campus locations.

In that event, operating under its current one-year lease will provide ICOL the flexibility to relocate (subject to new major change request) or to renew its lease at its new location.

#### **B. Conclusion**

Based upon its current needs to operate compliantly, and the benefits and amenities offered by the new administrative office selected in Irvine, ICOL respectfully requests the Committee of Bar Examiners, pursuant to Rules 4.245 and 4.246(B), to approve its major change request to change the location of its administrative office, effective as of May 1, 2023.

# Irvine University Education, Inc., DBA Irvine College of Law

Center:	AES - Airport Executive Suites	Contract Name:	Irvine University Education, Inc., DBA Irvine College of Law Contract 1
Contract Id:	27212	Agreement Date:	02/28/2023
Contract Type:	New	Initial Term:	12 Months
Contact Name:	George Leal	Start Date:	04/01/2023
Email Address:	georgeleal@irvine.edu	Expiration Date:	03/31/2024
Phone Number:	510-5999670	Property Address:	2102 Business Center Drive
Billing Address:	C/O Accounting Office 17877 Von Karmann Ave, Suite 400 Irvine CA 92614		Irvine, CA 92612

## PRODUCT SELECTION & SERVICES

Qty/Users	Product Description	Monthly Fee	Promotional Discount <sup>1</sup>	Monthly Fee After Discount <sup>2</sup>
1	Office 154	\$ XXXX	(X)	\$ XXXXX

Qty/Users	Amenity & Service Description	Occurrence	Fee
1	High Speed Internet, Per Person	Monthly	\$X
170	*CAM- Common Area Maintenance	Monthly	\$ X
1	*Commencement Fees	One Time	\$ X
1	*Kitchen Amenities	Monthly	\$X
	Security Deposit - Deposit	One Time	\$X

## RECURRING MONTHLY COSTS

Total Monthly Fee After Discount	\$ XXXX
Taxes	\$ 0.00
Total Monthly Costs	\$ XXXX

Remainder of contract provided but redacted

Attachment A



# Airport Executive Suites

2102 Business Center Drive, Suite 130, Irvine, CA 92612



## PRIVATE OFFICES

Highly professional private offices for individuals and teams that are flexible and scaled for growth.

## MEETING ROOMS

Spacious, well-appointed meeting rooms with on-site administrative support. Available for an hour, day or longer.

## VIRTUAL OFFICES

Establish a business presence with mail handling, phone answering or meeting room time.

## ABOUT THIS LOCATION

Grow in the same building! This 50,000 square foot property features individual offices and multi-room suites. Perfect for growing businesses and start-ups seeking scalability with proximity to major transportation routes and complimentary parking. It also features an on-site deli with options for any appetite. Airport Executive Suites is located steps away from John Wayne Airport as well as the 405 and 55 Freeways.

## CONTACT US

Let's touch base! Contact the on-site General Manager at 949-253-4616 or [AESmanager@premierworkspaces.com](mailto:AESmanager@premierworkspaces.com) to schedule a tour.





# Airport Executive Suites

2102 Business Center Drive, Suite 130, Irvine, CA 92612



## PREMIER AMENITIES

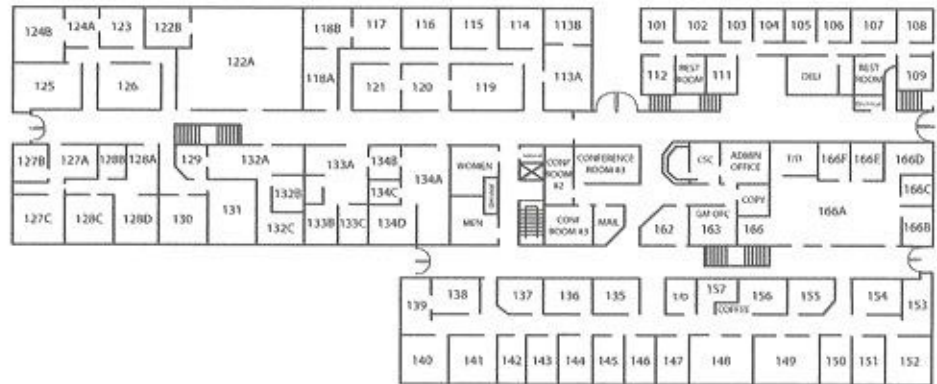
Our private suites can be easily customized to fit your desired aesthetic and brand.

- Private Offices
- Team Rooms
- High Speed Internet
- Telephone Answering
- Mail Collection
- Equipped Kitchen
- Day Offices
- Meeting Rooms
- Daily Janitorial
- Furnished or Unfurnished

## PREMIER DIFFERENCE

We've been perfecting the professional workspace for over 17 years.

- Highly-Professional Atmosphere
- On-Site Manager & Support Staff
- Scalable Solutions for Individuals and Teams
- On-Site Billing
- 90+ Locations Nationwide



## NEARBY AMENITIES

Irvine, California, is one of the nation's largest master-planned communities with outdoor recreation areas, shopping centers, and other amenities. Centrally located within Orange County, it's an ideal destination for businesses seeking a small-town feel with proximity to Los Angeles and San Diego.

### Nearby Amenities:

- Fashion Island
- Newport Beach
- Park Place (Michelson & Jamboree)
- South Coast Plaza
- Trade Marketplace
- University of California, Irvine (UCI)
- Upper Newport Bay Nature Preserve

### Nearby Transit:

- John Wayne Airport (SNA)
- Freeways – 73, 405, and 55
- Bus – OCTA