



OPEN SESSION
AGENDA ITEM IV.G.
AUGUST 2023
COMMITTEE OF BAR EXAMINERS

DATE: August 18, 2023

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Periodic Inspection – American International School of Law

EXECUTIVE SUMMARY

American International School of Law (American International) was inspected on August 11, 2022, as summarized in the attached inspection report. (Attachment A). Due to concerns regarding the soundness of the education offered, staff recommends that the Committee of Bar Examiners (committee) issue a warning letter pursuant to 4.244(G)(4) requesting a response to be submitted with the law school's annual report no later than November 15, 2023.

BACKGROUND

American International School of Law is a registered, unaccredited distance law school located in Irvine, California. It is a for-profit S Corporation in which President Patel is the sole shareholder. He also holds an interest in the building where the law school is located along with his law partners, who also occupy the building. According to its 2022 Annual Report, the law school enrolled a total of 22 students in its JD program as of fall 2022.

The law school's most recent pass rates on the First-Year Law Students' Examination were as follows: October 2022 – REDACTED percent, REDACTED takers; June 2022 – REDACTED percent, REDACTED takers; October 2021 – REDACTED percent, REDACTED taker; June 2021 – REDACTED percent, REDACTED taker. On the California bar exam, pass results were as follows: February 2023 – REDACTED percent, REDACTED takers; July 2022 – REDACTED percent, REDACTED takers; February 2022 – REDACTED percent, REDACTED takers; July 2021 – REDACTED percent,

REDACTED takers. It does not appear that the law school had any takers for the February 2021 exam.

Based on the nature of the compliance issues observed, there is reason to believe the law school may be out of compliance with the Rules for Unaccredited Law Schools. When it is determined that a registered law school may not be in compliance after observation at an inspection, the committee issues a warning pursuant to Rule 4.244 (G)(4)) “requiring immediate action to correct specified deficiencies within a certain number of days of the date of the warning. Here, those deficiencies are set forth in the inspection report and summarized in its Recommended Mandatory Actions. If the law school’s response does not demonstrate and document that the law school is in compliance, the committee will pursue probation or termination of registration.

DISCUSSION

American International is a correspondence law school. While it is contemplated that correspondence may be completed independently, this law school’s program does not appear to provide sufficient support for students to succeed or all components required.

This may explain the law school’s average yearly attrition rate of over 70 percent between the first and second years. Since 2019, while 76 students have entered the program, a cumulative total of ten students have reached the fourth year of study.

The law school’s JD program classes are generally lists of books, with few clear assignments, unproctored midterms, and final exams drawn largely from publicly available materials, including past State Bar Exams, where sample answers are readily available online. The law school should be providing assignments and feedback, as well as required course components such as practical skills training.

The majority of the coursework appears to be taught through the required purchase of a Fleming’s First-Year Law Students’ Examination Preparation course, a writing course from the same company, a multiple-choice preparation course, and legal research training offered by Westlaw.

Student support appears limited. The law school does not have an academic support program. Midterm exams and a small number of homework assignments are graded, with grades generally high, and comments limited. Since the midterm exams are unproctored, the law school cannot authenticate the students’ work.

Academic support comes in the form of the ability to text the President, or two additional faculty members, but such texts are rarely received.

Study logs are accepted on the honor system at the end of the semester. The law school advised that it recently began sending out pacing reminder emails, but it does not follow up to track students’ progress during the semester.

At the last inspection in 2016, the law school was directed to improve its JD program to reduce attrition and provide a reasonable opportunity for students to graduate and become licensed. The law school could not demonstrate steps taken to address this direction, other than to indicate it hoped to create a series of five-minute tip videos in the future. The law school says it has been losing money in recent years because it has been investing money in the design for the videos and also in search engine optimization.

Based on the lack of action taken since the last inspection, the extremely high attrition, limited guidance and support, and poor licensure outcomes, it does not appear that the law school's JD program provides the sound education required. While the cost to attend this law school is modest, it appears that this law school has not been able to provide a reasonable opportunity for licensure over an extended period of time and does not appear prepared to do so.

Significant change is needed in order for the law school to continue to operate.

The recommendations from the inspection report are summarized here:

1. Guideline 1.11: The law school requires purchase of an outside First-Year Law Students' Examination commercial preparation course. Until 2022, the law school was required to disclose this in its annual report, but the law school did not do so. In 2022, the rules and guidelines were amended to allow this practice without a waiver, but the law school must do so in accordance with the requirements of amended guideline 1.11, including describing this requirement and its cost in disclosures, the catalog, and any other descriptions of program requirements.
2. Guidelines 2.1-2.3: The law school must revise its publications to state clearly, consistently, and completely the required units of credit and hours of study for each year of the JD program; policies to offer tuition refunds to students who take and pass the First-Year Law Students' Examination or bar exam after completing certain review courses; and the tuition, fees, and other costs of obtaining the degree in the JD program including, for each academic year, the nature and costs of instructional materials required to be purchased from third-parties including review courses.
3. Guidelines 2.1-2.3: The law school must remove from all publications the statement that it charges "the lowest tuition compared to other online law schools and traditional law schools," as this is not correct.
4. Guideline 2.2(B): The law school must revise its website, catalog, and enrollment agreement form to clearly state the tuition refund policy, including the deadlines for partial refunds.
5. Rule 4.241, Guidelines 2.3(D) and 9.1(C)(2): The law school must revise its publications, including its website, catalog, and enrollment agreement form, to ensure that all disclosures are complete and correct and that they comply with disclosure requirements, as discussed in detail below.

6. Guideline 2.8: The law school must adopt, publish, and implement a written policy on student discipline that fulfills all requirements set forth in Guideline 2.8.
7. Guideline 2.9(B): The law school must revise the catalog to state that courses are not graded on a credit/no credit basis and that anonymous grading is used only for final exams.
8. Guideline 2.9(C): The law school must provide each student with a written statement of the basis for computing the final grade in each course, including the character, number, and relative weight of individual graded elements, the extent to which performance is evaluated by other than the course instructor, and any other consideration that might affect the grade.
9. Guideline 2.9(D): The law school must review and strengthen its policies and practices on exam security and authentication of student work.
10. 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.
11. Guideline 2.12: The law school must revise its publications to describe its program and services accurately. The school must make clear that it does not provide most course instructional materials, and that lectures, workshops, outlines, and textbooks must be purchased by the student from third parties, including Fleming's, a commercial bar review provider. As provided as to Guidelines 2.1-2.3 above, the costs of these materials must be disclosed. The school must describe the functionality of its learning management system honestly and disclose that chat sessions are handled by Mr. Patel, not course instructors.
12. Guidelines 4.8 and 4.9: The law school must adopt, publish, and implement a faculty evaluation policy consistent with guideline requirements.
13. Guidelines 5.1, 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 report or by any other deadline specified by the Committee of Bar Examiners. It must also ensure that each course syllabus provides meaningful direction and assignments in order to provide a sound education that offers a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence.
14. Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in writing 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 for any graded purpose.

15. Guideline 5.17: The law school should conduct a comprehensive survey of all grades issued to judge whether they are consistent and fair and whether there is any meaningful evidence of grade inflation in the number of top grades issued.
16. Guideline 5.25: The law school should track to the extent possible the performance of its students on the First-Year Law Students' Examination and bar exam and correlate results to the law school's grading practices.
17. Guidelines 5.26 and 5.27: The law school should not admit students "on probation" and should reject all applicants except those who appear reasonably qualified to succeed.
18. Guidelines 5.26-5.27 and 2.1: The law school must ensure that its admissions policy does not result in admission of students that are obviously unqualified or who do not have a reasonable prospect of completing the degree program using an appropriate screening process.
19. Guideline 5.31: The law school must revise the application form to ask directly whether the applicant has ever attended law school previously and, if so, whether the applicant was in good standing.
20. Guideline 5.34: The law school must take steps to ensure that applicants previously disqualified from law school for academic reasons are admitted only upon the affirmative showing required by the guideline and that the reasons for admitting such an applicant are properly documented in the applicant's file.
21. Guideline 6.2: The law school must maintain hard bound copies of texts or treatises for all courses in the JD curriculum at the law school's administrative office.
22. Rule 4.240(I) and Guideline 6.3: The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.
23. Guideline 9.1(D)(5): The law school must include all information required by the guideline on the transcripts of all transfer students who have been enrolled in the law school.

RECOMMENDATION

It is recommended that the committee receive and file the Inspection Report of American International School of Law and adopt the report's recommendations.

It is also recommended that the committee issue a warning letter to the law school pursuant to Rule 4.244 (G)(4) directing it to take immediate action to correct the deficiencies identified in the inspection report and adopted as mandatory actions, and to provide notice and documentary evidence to the State Bar in the form of a response to the warning letter, including updated syllabi for all courses containing meaningful

assignments appropriate to a sound legal education, to be provided with its 2023 Annual Report no later than November 15, 2023.

It is further recommended that the committee direct the law school to file a response to the warning letter no later than November 15, 2023, documenting the completion of all recommendations listed in the inspection report with supporting evidence. If the law school is unable to do so, the response will be deemed unsatisfactory, and the committee will pursue probation or termination of registration consistent with Rule 4.263.

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 the inspection report of American International School of Law conducted on August 11, 2022 and adopts its recommendations in full.

FURTHER MOVE, that that the committee issue a warning letter to the law school pursuant to Rule 4.244 (G)(4) directing it to take immediate action to correct the all deficiencies identified in the inspection report and adopted as mandatory actions no later than November 15, 2023. , and to provide notice and documentary evidence to the State Bar in the form of a response to the warning letter to be provided with its 2023 Annual Report no later than November 15, 2023.

FURTHER MOVE, that the committee direct the law school to file a response to the warning letter no later than November 15, 2023, documenting the completion of all recommendations listed in the inspection report with supporting evidence, including updated syllabi for all courses containing meaningful assignments appropriate to a sound legal education. If the law school is unable to do so, the response will be deemed unsatisfactory, and the committee will pursue probation or termination of registration consistent with Rule 4.263.

ATTACHMENT LIST

- A. American International School of Law Inspection Report



The State Bar of California

**American International School of Law
Report of Site Visit for Periodic Inspection
Conducted Pursuant to Rule 4.244(A)**

August 11, 2022

AMERICAN INTERNATIONAL SCHOOL OF LAW
REPORT OF SITE VISIT FOR PERIODIC INSPECTION
17762 Cowan, Second Floor
Irvine, California 92614

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Introduction

A site visit for the periodic inspection of the American International School of Law (American International) was conducted on August 11, 2022, by Don Ajené Wilcoxon, a member of the Committee of Bar Examiners (Committee) and Heather Georgakis, Educational Standards Consultant.

The law school was last inspected in June 2016 and was found to be operating in compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines).

American International was founded in 2009 as a for-profit S-corporation by President Nitesh Patel and has been registered by the Committee as an unaccredited correspondence law school since 2011. The law school is not accredited by or affiliated with another entity and students have no access to federal student loans or veterans' benefits.

Operations are conducted in an Irvine, California office building co-owned by Mr. Patel and the deans and instructors of the law school, Dean Andy Szeto, and Academic Dean Adrian Ibarra. Space is shared with the Shatford Law Firm managed by Dean Szeto.

The law school offers a four-year, part-time 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, total enrollment was 20 students, all of whom were admitted with a bachelor's degree or at least 60 acceptable college credits. The law school's annual disclosure lists 22 students as of the 52-week period ending September 15, 2022.

The institutional mission is "to provide the highest caliber legal training in a flexible, cost effective and yet a globally-collaborative environment, such that graduates will be able to apply theory and practice to significantly enhance not only their own lives, but the lives of others."

To earn the JD at this correspondence category registered, unaccredited law school, students must study a minimum of 864 hours each year for four years, completing 68 academic units with a cumulative grade point average (GPA) of at least 2.0. Students take four or five courses concurrently over a full year, working largely at their own pace.

The correspondence curriculum requires students to complete courses in all subjects tested on the bar exam and in legal writing. Elective courses are offered but students do not enroll in them because the mandatory courses leave no time for electives.

President Nitesh Patel works about half-time as Administrator and Registrar. He holds a JD degree from Abraham Lincoln University School of Law, a Committee-registered, unaccredited distance learning school, and an LLM degree from Thomas Jefferson School of Law, a Committee-accredited law school. Mr. Patel is not a licensee of the State Bar of California (State Bar) or any other jurisdiction.

President and Administrator Patel is assisted by three part-time administrators, including an office assistant and two deans. Each works several hours per week.

After the 2016 inspection, the law school adopted a new educational strategy in which instructors no longer create instructional materials for their courses. Instead, students are required to purchase almost all course content from third parties, including audio lectures, outlines, workshops, and writing assignments published by a commercial bar review provider. The law school did not file a major change request when this change was made.

According to Mr. Patel, the law school's distinguishing feature is accessibility to the faculty through one-on-one virtual "chat sessions" initiated by students. Mr. Patel handles almost all sessions, however, and students almost never interact with the faculty. Instructors' chief function is to grade exams, and, at the time of inspection, the law school had two faculty members for all 17 courses.

Total JD program tuition is \$9,200 plus annual fees of \$550. In addition, students incur additional materials costs, including at least \$2,000 for the purchase of required curricular materials from a commercial bar review provider.

As of fall 2022, 41 percent of the students were female and 59 percent self-identified with groups other than White. The faculty was also diverse.

Attrition is very high at this law school, averaging about 75 percent between the first year and the second year. For example, in 2021, the first-year cohort was 22 students, but the following year only five students in that cohort advanced to second year. Since 2019, a total of ten students have reached the fourth year, though 20-25 students begin class each year and first-year law students, with the exception of the most recent year, in which just nine students enrolled as first-year law students.

The law school's most recent pass rates on the First-Year Law Students' Examination were as follows: October 2022 – REDACTED percent, REDACTED takers; June 2022 – REDACTED percent, REDACTED takers; October 2021 – REDACTED percent, REDACTED taker; June 2021 – REDACTED percent, REDACTED taker. On the California bar exam, pass results were as follows: February 2023 – REDACTED percent, REDACTED takers; July 2022 – REDACTED percent, REDACTED takers; February 2022 – REDACTED percent, REDACTED takers; July 2021 – REDACTED percent, REDACTED takers. It does not appear that the law school had any takers for the February 2021 exam.

Recommended Action by the Committee

The site visit team recommends that the Committee receive and file this Periodic Inspection Report, approve all recommended and suggested actions, and issue a warning letter pursuant to Rule 4.244(G)(4) advising immediate action to “correct specified deficiencies within a certain number of days of the date of the warning,” with full correction and completion of all recommendations to be documented in the law school’s 2023 Annual Report due on November 15, 2023.

It is further recommended that the law school next be inspected in 2024 in order to confirm its assertions documented in response to the warning letter if the response is accepted as satisfactory.

Recommended Mandatory Actions

1. Guideline 1.11: The law school requires purchase of an outside First-Year Law Students’ Examination commercial preparation course. Until 2022, the law school was required to disclose this in this annual report, but the law school did not do so. In 2022, the rules and guidelines were amended to allow this practice without a waiver, but the law school must do so in accordance with the requirements of amended guideline 1.11, including describing this requirement and its cost in disclosures, the catalog, and any other descriptions of program requirements.
2. Guidelines 2.1-2.3: The law school must revise its publications to state clearly, consistently, and completely the required units of credit and hours of study for each year of the JD program; policies to offer tuition refunds to students who take and pass the First-Year Law Students’ Examination or bar exam after completing certain review courses; and the tuition, fees, and other costs of obtaining the degree in the JD program including, for each academic year, the nature and costs of instructional materials required to be purchased from third-parties including review courses.
3. Guidelines 2.1-2.3: The law school must remove from all publications the statement that it charges “the lowest tuition compared to other online law schools and traditional law schools,” as this is not correct.
4. Guideline 2.2(B): The law school must revise its website, catalog, and enrollment agreement form to clearly state the tuition refund policy, including the deadlines for partial refunds.
5. Rule 4.241, Guidelines 2.3(D) and 9.1(C)(2): The law school must revise its publications, including its website, catalog, and enrollment agreement form, to ensure that all disclosures are complete and correct and that they comply with disclosure requirements, as discussed in detail below.
6. Guideline 2.8: The law school must adopt, publish, and implement a written policy on student discipline that fulfills all requirements set forth in Guideline 2.8.
7. Guideline 2.9(B): The law school must revise the catalog to state that courses are not graded

on a credit/no credit basis and that anonymous grading is used only for final exams.

8. Guideline 2.9(C): The law school must provide each student with a written statement of the basis for computing the final grade in each course, including the character, number, and relative weight of individual graded elements, the extent to which performance is evaluated by other than the course instructor, and any other consideration that might affect the grade.
9. Guideline 2.9(D): The law school must review and strengthen its policies and practices on exam security and authentication of student work.
10. 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.
11. Guideline 2.12: The law school must revise its publications to describe its program and services accurately. The school must make clear that it does not provide most course instructional materials, and that lectures, workshops, outlines, and textbooks must be purchased by the student from third parties, including Fleming's, a commercial bar review provider. As provided as to Guidelines 2.1-2.3 above, the costs of these materials must be disclosed. The school must describe the functionality of its learning management system honestly and disclose that chat sessions are handled by Mr. Patel, not course instructors.
12. Guidelines 4.8 and 4.9: The law school must adopt, publish, and implement a faculty evaluation policy consistent with guideline requirements.
13. Guidelines 5.1, 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 report or by any other deadline specified by the Committee of Bar Examiners. It must also ensure that each course syllabus provides meaningful direction and assignments in order to provide a sound education that offers a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence.
14. Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in writing 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 for any graded purpose.
15. Guideline 5.17: The law school should conduct a comprehensive survey of all grades issued to judge whether they are consistent and fair and whether there is any meaningful evidence of grade inflation in the number of top grades issued.
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18. Guidelines 5.26-5.27 and 2.1: The law school must ensure that its admissions policy does not result in admission of students that are obviously unqualified or who do not have a reasonable prospect of completing the degree program using an appropriate screening process.
19. Guideline 5.31: The law school must revise the application form to ask directly whether the applicant has ever attended law school previously and, if so, whether the applicant was in good standing.
20. Guideline 5.34: The law school must take steps to ensure that applicants previously disqualified from law school for academic reasons are admitted only upon the affirmative showing required by the guideline and that the reasons for admitting such an applicant are properly documented in the applicant’s file.
21. Guideline 6.2: The law school must maintain hard bound copies of texts or treatises for all courses in the JD curriculum at the law school’s administrative office.
22. Rule 4.240(I) and Guideline 6.3: The law school must revise its curriculum to ensure that instruction is provided in both electronic and hard-copy legal research.
23. Guideline 9.1(D)(5): The law school must include all information required by the guideline on the transcripts of all transfer students who have been enrolled in the law school.

Submission of Self-study

American International 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 International was given the choice to undergo a remote site visit based on the same standards as an in-person visit, or to have an in-person site visit. The law school opted for the remote site visit. Before the visit, the team reviewed self-study materials and law school records, including the 2021 Annual Compliance Report.¹

¹ Due to the passage of time, this report not only includes information from the 2021 Annual Compliance Report, but also includes material from the subsequently issued 2022 Annual Compliance Report.

The site visit took place via videoconference over one day. The team met with all administrators and several students, took a virtual tour of the Irvine offices, and received an overview of the learning management system. To conclude the visit, the team held an exit interview with Mr. Patel.

After the visit, the team reviewed course materials and completed a review of law school records. At the consultant's request, American International invited students to send comments about the law school, and any comments received were reviewed.

SPECIFIC FINDINGS AS TO THE COMMITTEE'S RULES AND GUIDELINES

Below are the 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) of the inspection team and their State Bar staff support.

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 International is a for-profit, S corporation in good standing with California's Secretary of State. President Nitesh Patel is the sole shareholder and officer. The law school holds a business license for the City of Irvine where its offices are located, and it appears to follow applicable federal, state, and local laws. (Guideline 2.4.)

The Student Catalog (catalog) includes a policy for the reasonable accommodation of students with disabilities pursuant to the Americans with Disabilities Act (ADA) and similar laws. Accommodations appear to have been provided when appropriate. Students seeking accommodation are directed to contact Mr. Patel.

Appropriate measures have been taken to protect both hard copy and digital records against improper disclosure. Students are informed of their privacy rights in the catalog.

The law school does not withhold student transcripts based on debt owed or alleged to be owed, consistent with Civil Code section 1788.90.

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 International communicates with the public, prospective students, and enrolled students primarily through a website and catalog and must do so honestly and forthrightly. (Guidelines 2.1-2.3.) To comply more fully with these guidelines, American International must revise its practices with respect to disclosure of information about its educational program, tuition, and fees.

All publications must be revised to state consistently and completely the tuition, fees, and "cost of the requirements for obtaining the degree" in the JD program. (Guidelines 2.1-2.3) As detailed below, students must purchase required instructional materials from a third-party bar review

provider and other sources. American International must revise its website and catalog to disclose the nature and cost of these purchases for each academic year.

Further, the school must remove the statement that it charges “the lowest tuition compared to other online law schools and traditional law schools.” This statement is inaccurate based upon Business & Professions Code section 6061.7 forms filed by Committee-registered schools and is misleading because students must pay third parties for instructional materials that typically would be covered by tuition. (Guidelines 2.1-2.3.) The law school must also disclose whether it has any financial relationship with the third-party review company.

According to the self-study and Mr. Patel, American International offers full-year tuition refunds to students who take the school’s voluntary, non-credit First-Year Law Students’ Examination review course and any bar review program, and then pass the relevant exam on the first attempt. Such policies must be communicated in the catalog. (Guidelines 2.2(B) and 2.3.) Any such representation should be accompanied by relevant data helping prospective and current students to understand the law school’s current pass rates, which are quite low, especially when attrition is factored into the data.

The tuition refund policy provides for processing of refunds within 30 days and refunds are made within the time period specified. The policy must be revised to define deadlines more clearly for partial refunds and must be published on the website as well as in the catalog and enrollment agreement. (Guideline 2.2(B).)

The law school asserts that financial safeguards are in place to protect financial assets against impropriety. (Guideline 2.2.) It must disclose any relationship with third party review providers.

Disclosure statements required by Guideline 2.3(D)(1) must be corrected to state that the method of instruction is principally “by correspondence” not “distant (sic) learning” and to eliminate all non-conforming text, because disclosures must be made “without alteration.”

The law school has complied with Rule 4.241 by obtaining student signatures on certain disclosure statements and maintaining file copies. (Guideline 9.1(C)(2).) The enrollment agreement form must be amended to eliminate outdated and incorrect statements, such as claims that the law school is “newly-founded” or that the ABA and CBE do not allow accreditation of distance law study.

Of particular concern is the statement that it is not the law school’s responsibility to determine that a student is eligible “to begin and/or continue the study of law.” Guidelin8 imposes on law schools the duty to evaluate applicants’ pre-legal study to ensure compliance with the Rules Regulating Admission to Practice Law in California, or to seek an eligibility evaluation by the Committee. The law school meets this duty, but should not misrepresent its responsibility or mislead applicants to believe their credentials will not be carefully reviewed.

Corrections are also required to the 2022 Business and Professions Code section 6061.7 Information Report, which misstates the units required to graduate and the number of full- and

part-time administrators and faculty, and the catalog and hours log that imprecisely characterize the required hours of study.

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

The Honor Code, found in the catalog, states expectations for student conduct. The law school must adopt, publish, and implement a written policy on student discipline that fulfills Guideline 2.8, as previously required by the Committee in approving the 2016 Inspection Report.

Academic standing is calculated at the end of each student's academic year and a 2.0 grade point average is required for good standing. (Guidelines 2.9 and 5.20.)

The law school uses an alpha-numeric grading scale from A+ (4.33 points) to F (0 points), with stated levels of achievement (e.g., A+ is "Excellent" and C+ is "Satisfactory"). (Guideline 2.9(B)(1).) The catalog must be revised to state that credit/no credit grading is not used. (Guideline 2.9(B)(2).)

The catalog states that course grades are calculated based upon midterm exams (4 percent), final exams (95 percent), and other items, such as homework and quizzes (1 percent). To comply more fully with Guideline 2.9(C), students also must be informed in writing of how grades are calculated where written assignments are given in lieu of exams, as in the two writing courses. Further, students must be informed clearly as to the number and relative weight of all graded events, whether drafted by the school or a third-party content provider, and the extent to which performance is evaluated by other than the course instructor. (Guideline 2.9(C).)

Anonymous grading is used but apparently only for final exams, and this should be clarified in the catalog. (Guideline 2.9(B)(5) and (C).)

The course repetition policy states the circumstances in which a student may retake a course and the effect of repetition on the student's cumulative GPA, credit hours, and transcript. Duplicate credit is not awarded. (Guidelines 2.9(B)(3) and 5.24.)

To graduate, a student must pass the First-Year Law Students' Examination, maintain a minimum cumulative grade point average (GPA) of 2.0, pass all required courses with at least a grade of "D", and complete 68 units for a minimum of 864 hours each academic year. (Guideline 2.9(B)(4).) A student who fails to maintain a 2.0 GPA will be placed on probation and dismissed at the end "of the next course" unless good standing is achieved. Because all courses are completed concurrently, a student has one full year to establish good standing. (Guideline 2.9(B)(6)-(7).)

The grade review policy fulfills Guideline 2.9(B)(8) and (G). Petitions are decided by a three-person Grade Review Committee consisting of the president, dean, and academic dean. If the grade in question was issued by a dean, a substitute committee member is appointed.

To authenticate the identity of students submitting work, the law school monitors the proprietary dashboard and IP addresses through which students submit midterm exams and assignments.

(Guideline 2.9(D).) These efforts are inadequate, however, because the law school has given students many opportunities to submit and be graded on work that is not their own.

A survey of course exam materials confirmed that the law school has graded its students based largely on exam questions previously published by the Committee or commercial authors, including essay questions and performance tests the law school has reused year after year. The only assignments the law school apparently has not drawn from published sources are rote exercises, used in doctrinal courses, that require students to brief lists of cases and define sets of terms.

This practice raises concerns about exam security and fundamental fairness because answers to published questions are widely available on the Internet and otherwise. Guideline 5.15 disallows the use of the Committee's past bar exam and FYLSX questions for any purpose affecting a student's grade. A law school may reuse its own exams subject to other guidelines on grading, including the fairness and authentication requirements of Guideline 2.9.

Guidelines 5.15 and 2.9(D): The law school must review and strengthen its policies and practices on exam security, inform faculty in writing 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 for any graded purpose.

Faculty members must submit their exam grades according to deadlines set by the registrar. Students receive their grades within about a month. (Guideline 2.7(D).)

Guideline 2.9(F) requires that students be allowed to review specified exam materials, including exam questions and their own answers, and American International must adopt, implement, and publish a policy consistent with the guideline.

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

American International must more accurately describe the nature of its program and the services available to students. (Guideline 2.12.) The law school must disclose the fact that most instructional content for JD courses is not provided by the law school but must be purchased from a commercial bar review provider, and at what cost. Syllabi are largely undifferentiated lists of books and materials. Chat sessions must be described accurately as handled generally by Mr. Patel and only rarely by faculty members. The learning management system must be depicted as it functions now, not as it may work in the future. The school represents that the learning management system is a dynamic system through which students can engage with course materials, classmates, and faculty members but these claims were not borne out at the site visit. Only first-year syllabi and midterm exams are posted now, although the school represented eventually the school plans to make 5-minute instructional videos accessible through the LMS, without providing a timeline as to when this will happen.

No special support is provided for students on probation or in danger of being placed on probation. Students are reminded monthly, by email from Ms. Acosta, of their academic deadlines and the availability of chat sessions. According to the self-study, the law school offers a free, eight-week,

non-credit review program for the First-Year Law Students' Examination, in which Mr. Patel offers live, interactive sessions.

Rule 4.240(C): Governance. The law school must be governed, organized, and administered so as to provide a sound educational program. (Guideline 3.1.)

Mr. Patel, Dean Andy Szeto, and Academic Dean Adrian Ibarra serve as the board of directors, and they represented that they meet together frequently to develop law school policies. The law school could not provide minutes of their meetings to support this assertion. The law school is not required to have a board of visitors and it has none. (Guidelines 3.1-3.3.)

As the CEO, Administrator, and Registrar, Mr. Patel handles all day-to-day operations. He represented that he works about twenty hours per week on matters related to the law school. He described his duties as including maintenance of personnel and student files, faculty recruitment, oversight of the admissions process, and compliance with legal and regulatory requirements, including Committee standards. He is also CEO of a technology firm.

He meets the minimum qualifications required to serve as the law school's part-time administrator. (Guideline 4.1.) He holds a JD degree from Abraham Lincoln University School of Law, a distance-learning law school registered by the Committee and an LLM from Thomas Jefferson School of Law, a fixed-facility law school accredited by the Committee. He is not a State Bar licensee.

Dean Andy Szeto and Academic Dean Adrian Ibarra advised that they work for the law school, without compensation, about 5 hours per week. Both have served as deans and faculty members since 2011 and, with Mr. Patel, they serve as the Grade Review, Academic Standards, and Faculty Peer Review Committees, decide student matters, and reach consensus on admissions.

Both deans are State Bar licensees and hold JD and LLM degrees from Chapman University School of Law, which is approved by the American Bar Association (ABA). They work together in the Shatford Law firm, a 6-attorney law practice that handles estate planning, civil litigation, and workers' compensation matters. Each dean joined the practice shortly after completing law school and Dean Szeto is now the managing partner of the law firm. With Mr. Patel, they co-own the building that houses both the law firm and the law school.

Director of Operations Paola Acosta provides clerical assistance several hours a week. She works full-time for the Shatford firm and is not paid by the school.

Additional administrative capacity likely will be needed to bring the law school into full compliance with 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.)

Mr. Patel is the de facto law school dean. He provides leadership for the academic program, handles the administrative duties of being a dean, and is the chief architect of educational strategies.

(Guideline 4.2.) In addition, he assumes functions traditionally within the purview of course instructors, including designing course syllabi and counseling students on their coursework.

Dean Andy Szeto and Academic Dean Adrian Ibarra constitute the entire faculty; both are unpaid. Their credentials satisfy Guideline 4.6 except that, as graduates of the same ABA-approved law school, they do not possess the “diverse educational background” contemplated by the guideline.

Faculty members have almost none of the duties traditionally associated with teaching and they almost never interact with students. Dean Szeto stated that he had counseled no students in the past year while Dean Ibarra recalled no more than 1 or 2 student calls. Instructors’ essential function is to grade exams obtained by the law school from other sources, including State Bar exams.

Historically, the faculty has included six members, paid by stipend. As of fall 2021, most instructors were assigned to one or two courses, but Dean Szeto handled five bar-tested subjects (20 units), including all subjects tested on the First-Year Law Students’ Exam (FYLSE), and Dean Ibarra handled six subjects (24 units).

Under Guideline 5.2, the soundness of a law school is evaluated, in part, based on the competence of instructors with respect to subject matter knowledge. Although Mr. Patel has stated that he is actively recruiting for several faculty positions, the two deans now split grading duties for all 17 courses. Some of these subjects lie outside the deans’ areas of professional experience and practice, such as Criminal Law and Criminal Procedure.

Instructors have participated in governance through committee service with Mr. Patel and Dean Szeto on the Grade Review, Peer Review, and Academic Standards committees. Faculty meetings are held twice yearly but attendance is not required. (Guideline 4.3.)

A law school must employ sufficient faculty members to maintain a sound program of legal education, ensure timely response to and evaluation of students, and facilitate prompt return of assignments. (Guideline 4.4.) Mr. Patel appears to respond promptly when students request his “chat assistance,” and midterm and final exams are graded and returned to students within a month. The quality of these efforts, and overall soundness of JD program, are larger issues.

Guideline 4.5 requires limits on faculty “teaching responsibilities” so instructors have enough time to “adequately prepare and effectively teach,” and to be available to counsel students. The guideline contemplates a JD program in which students will be taught and counseled by course instructors, but these activities do not occur at American International.

Under Guideline 4.7, instructors are obligated to keep informed of changes in the law and to improve their expertise in the subjects they teach. According to Mr. Patel, American International contracts with Fleming’s for the law school’s use of course materials so “chat advisors” will be able to respond to student requests for assistance. Whether it is sound practice to offer students advisement by chat advisors with limited subject-matter knowledge and practical experience should be considered. (Guideline 5.2.)

Faculty evaluation has not occurred and the process, based on instructors' "pre-recorded lectures and content," is outdated. To comply more fully with Guidelines 4.8 and 4.9, the law school must adopt, publish, and fully implement an evaluation policy that fulfills guideline requirements. Some guideline factors do not apply to instructors who do not teach or design assignments, but other factors address subject-matter qualifications and grading competency, which remain concerns.

A policy on academic freedom is set forth in the catalog. (Guideline 4.10.)

This report recommends an overall review of the JD program to determine what changes are required to reduce attrition, improve student success, and meet obligations to offer a sound legal education. As part of that effort, the law school should evaluate what changes are needed to its faculty model, if any, to meet these goals.

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

The soundness of the law school's program takes into consideration, among other criteria, the content and scope of the curriculum; the subject matter knowledge and teaching competence of instructors; the materials used, including syllabi; the effectiveness of instructional methods; and the quality of exams and assignments. (Guideline 5.2)

Students at registered, unaccredited correspondence law schools must complete a minimum of 864 hours of "preparation and study" over an academic year of 48 to 52 weeks, each year for four years. (Guideline 5.9(B).) The law school's 68-unit JD curriculum requires 864 or more hours of study each year over the requisite number of weeks and, based on a sample file review, the law school accepts graduates' assertions that they have met guideline requirements for weeks and hours of study. (Guideline 5.9(B).)

All coursework is completed asynchronously. Students enter the program at their convenience and complete four or five courses concurrently over an individual academic year of 48 to 52 weeks. They study at their own pace with few written assignments or deadlines, although all written work must be submitted by the 48th week and each year final exams must be taken in the last month. The law school was unable to provide an analysis of student course pacing.

The law school asserts that each course awards 4 units of credit and should require 216 hours of work. This per-unit workload equates to 54 hours or 9 hours more than the standard semester unit, which demands 45 study hours. Thus, American International represents that its students study at least 864 hours in each of the first 3 years when their schedule includes 4 courses (4 courses x 216 required hours = 864 hours) and at least 1,080 hours in the fourth year, when they must take 5 courses (5 courses x 216 required hours = 1,080 hours.) As noted, the law school must eliminate from its publications inconsistent statements as to required units of credit and hours of study, particularly in the fourth year when the curriculum demands 1,080 hours.

American International verifies study hours by requiring students to submit hours logs, signed under penalty of perjury, at the end of each year. (Guidelines 2.3, 5.9(C), and 5.10.) Administrators review logs to validate that they assert that the students represent they have completed the required hours. There is no intermediate review that would allow the school to determine whether students are on track to complete their studies on time, to provide academic support, or to verify the students' assertions. The law school does not appear to have granted exceptions to hour and weeks requirements that must be placed in the logs. (Guideline 5.6.) The law school must be able to demonstrate how it estimates the coursework required relative to the syllabi, which are often very general.

The curriculum consists of required courses in all bar exam-tested subjects, including Professional Responsibility, and two writing courses. (Guideline 5.10.) First-year students study the three subjects tested on the First-Year Law Students' Examination and Introduction to Law & Legal Writing. All upper-level courses are in bar-tested subjects, except that fourth-year students also take a Performance Exam class. As noted, instruction in legal research is not provided although it is required by Guideline 6.3.

The Performance Exam course did not comply with Guideline 1.11 at the time of the inspection. Though the guideline has since been amended in 2022, it previously barred an unaccredited law school from making a bar review course part of the credit requirements for the JD degree, absent notation in the annual report of utilization of a waiver of that guideline. The law school should ensure that its use of this course complies with Guideline 1.11 as amended, which allows the use of required exam review courses under specified circumstances.

Guideline 5.11 requires a law school to offer a "balanced and comprehensive curriculum" including the opportunity to take elective courses "in a variety of subjects." Although the catalog lists seven elective courses, no students have ever enrolled in them. As noted in the 2016 Inspection Report, students can take such courses only by adding to their regular annual course load or by extending their studies beyond four years. (Guidelines 5.11 and 2.3.)

Under Guideline 5.12, a law school should offer instruction in "practical skills" such as legal research and advocacy, and in "professional skills" such as counseling and negotiation. The law school offers none of these except to the extent that Performance Exam addresses legal document drafting in preparation for State Bar exams.

The limited opportunities to explore the practical application of legal principles is a weakness in American International's program. 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.

After the 2016 inspection, the law school adopted a new educational approach by outsourcing almost all instructional content for its courses to Fleming's Fundamentals of Law (Fleming's). This change raises several concerns, including whether the structure of the JD program has been properly disclosed to prospective students and whether a sound legal education is offered by a program with a narrow focus on the analytical skills needed to pass the FLSX and bar exam and

few or no opportunities for client-centered professional development, elective courses, or formative assessment exercises with written feedback from instructors. The law school did not disclose this change in its annual reports, update its disclosures, or file a major change. The law school asserts that its curriculum has not changed but for the addition of the required commercial review course.

The law school represents that its JD program is taught through a dynamic learning management system (LMS), but functionality was limited at time of inspection. Students primarily exchange documents with the law school by email and access course content through technology supplied by Fleming's, including compact discs. Eventually the law school indicated that it plans to post five-minute videos on the LMS, but only first-year syllabi and midterm exams are now posted, and no further timeline is available. Representations that students can engage with classmates and faculty members through the LMS were not borne out according to the consultant's observations.

Students receive only a few course materials from American International, including course syllabi and in doctrinal courses, midterm, and final exams. Otherwise, students study materials purchased elsewhere, including textbooks, Gilbert's outlines, and Fleming's audio lectures, outlines, and workshops. The law school does not generally provide specific reading assignments or topic lists.

Course syllabi follow a standard format and are reused. Syllabi repeat general instructions for law study, list required course materials, and reference assignments in varying detail, but they do not explain how courses will be graded. As noted above, students must be informed fully about how their course grades will be calculated and this is not accomplished by the catalog. (Guideline 2.9(C).)

Syllabi for doctrinal courses require students to submit two assignments, including briefs for about 10 cases and definitions for 75 key terms, due in the third month for each class. In writing courses, syllabi provided little information about submission of work and no information about grading.

In doctrinal courses, student have an adequate amount of work although the learning mode is passive for the most part and only modest study guidance is given. Students are directed to read a standard casebook, use outlines, listen to audio lectures, brief cases, define terms, and engage with previously published exam questions. Accountability is limited. Students are expected to submit assignments after the third month and a midterm exam after the sixth month, but all work must be returned by the last month of the student's academic year.

The writing courses fall short on course content and academic rigor. In each full-year, 4-unit course, students earn academic credit by completing "workshops" that other law students typically attend over a weekend or 4 days as a supplement to regular studies. The Introduction to Law & Legal Writing course requires the purchase of a law dictionary and Fleming's 12-hour writing workshop while Performance Exam is based on Fleming's 4-day Performance Test workshop.

In each course, students receive a workbook with 13 to 15 essay or performance test questions, with answers, and they may submit 3 or 4 questions for critique by Fleming's staff. The introductory course also requires students to read school-assigned and student-located essay questions. The Performance Exam course makes no additional assignments. Neither course requires students to

complete writing assignments under timed, proctored conditions on questions they have never seen, or had the opportunity to see. It is unclear whether instructors give written feedback.

Under Guideline 5.13, student interaction with faculty members and other students is “critical to the development of lawyering skills.” American International represents in its promotional materials that students may initiate an unlimited number of chat sessions with the faculty, but instructors confirmed that they rarely interact with students.

Unless Mr. Patel decides otherwise, he himself handles all substantive questions. Chat sessions are not logged or otherwise quantified, and they are not evaluated for effectiveness as part of faculty evaluation. Students do not appear to make widespread use of chat sessions to understand the law, as Mr. Patel indicated that most students’ questions are administrative in nature.

Guideline 5.14 requires that written exams must be given in all courses except those in which substantial written or oral work is required. In each doctrinal course a midterm exam, consisting of a one-hour essay question, is made available at the outset of the course. Students have until the end of the seventh month to submit their unproctored response, which counts for 4 percent of the course grade. Students may receive multiple opportunities to rewrite their midterm responses.

In doctrinal courses, students must take final exams in person, under supervision of a proctor, by the end of a student’s academic year. Final exams consist of a one-hour essay question and a set of multiple-choice questions, which count as 95 percent of the grade.

As noted, for midterms and finals the law school has made extensive use of the State Bar’s released First-Year Law Students’ Examination and bar exam questions, and the law school was reminded that this is not allowed under Guideline 5.15. Mr. Patel acknowledged the potential for cheating arising from the use of previously published exam questions. He indicated that he was unaware of any misconduct, but did not demonstrate that there was any process in place to detect misconduct.

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), a law school must require students to complete at least 6 semester units of practice-based skills and competency training. American International offers two 4-unit courses that focus on the skills of legal analysis and writing, largely by providing practice questions for State Bar performance test exam questions, which does not appear to be in keeping with the rule.

In Introduction to Law & Legal Writing, students brief cases and complete essay-format exam questions while in Performance Exam they complete assignments modeled after the Performance Test section of the bar exam. As noted above, the law school did not properly disclose this use as

required by prior Guideline 1.11 and must demonstrate that its current use complies with Guideline 1.11 as amended.

These courses do not appear adequate in content to satisfy Rule 4.240(F). The law school should add at least the minimum 6 semester-unit requirement of Rule 4.240(F), 270 work hours expected in a 6-unit course based on the standard Carnegie semester unit.

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 International does not use a grade curve. Grades are assigned based on an alpha-numeric grading scale from A+ (4.33 points) to F (0 points), with stated levels of achievement (e.g., A+ is “Excellent” and D is “Inadequate”). (Guideline 2.9(B)(1).) Anonymous grading is used on final exams, which count for 95 percent of most course grades. As noted, the catalog should state that credit/no credit grading is not used.

The 2016 Inspection Report recommended that the law school correlate its grading practices with student performance on the First-Year Law Students’ Examination and bar exam and survey all grades to judge their consistency, fairness, and evidence of grade inflation. The self-study states that the law school will be taking steps to address these recommendations, but does not describe any steps taken since the 2016 inspection.

The law school has no faculty handbook and does not offer instructors written guidance on grading. Grading decisions do not appear to consider grade distribution norms or avoidance of grade inflation. Exams are graded by two instructors using a model answer and any grade difference is reconciled with Mr. Patel’s assistance.

According to Mr. Patel, written feedback on exams is not provided. Instead, students are encouraged to schedule chat sessions with Mr. Patel during which he counsels them on their exam performance. Under Guideline 5.14, an exam should be “an educational tool, enabling students to acquire further perspective through the process of analysis and exposition.” By his own admission, however, few chat sessions are conducted, suggesting that students lack meaningful feedback on their performance. American International must evaluate whether to employ additional or alternative feedback strategies as part of the law school’s larger effort to reduce attrition and improve student success.

The 2021 Annual Compliance Report showed a tendency toward inflation in higher grade ranges, with 42 percent of grades given as A’s and B’s (“good” to “excellent”) as compared to 8 percent given as C/C+’s (“satisfactory”), and this tendency was repeated in the 2022 Annual Report. Grades below good standing are very high, at 50 percent, with 42 percent being Failing grades. The high

number of failing grades reflects a serious disparity between the students' preparation and the law school's performance expectations.

The law school has not studied the factors that might be contributing to poor performance, but it must. Mr. Patel attributes failure to students' unwillingness to maintain an effective study schedule, and indicates that the law school has begun sending monthly reminders about due dates and the availability of chat counseling, but could not document how many had been sent out, the response to these reminders, or any support available to address this issue.

One factor worthy of study is whether the law school's curriculum is properly aligned with its assessment testing approach. Many first-year students perform particularly poorly on the multiple-choice section on the final exam at AISOL, and it is unclear how the curriculum promotes success in this area. The law school has encouraged students to take another third-party provider's Multi-State Bar Exam preparation course to address the issue. Students have limited opportunities to practice and receive meaningful feedback on their mastery of subject matter knowledge or analytical skills.

As noted below, the law school's high attrition rates do suggest that there is room for improvement in admissions screening, academic support, and overall educational approach. The law 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 instructed and assessed.

American International appears to be 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.)

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. (Guidelines 5.26 and 5.27.) American International has high attrition and must address this problem through its admissions, communications, and academic policies.

Applicants are considered for admission in all categories, including regular students with at least 60 qualifying college units, special students qualified based on test scores, and transfer students. No special students had been admitted at the time of the inspection report, but otherwise the law school will admit any applicant with a pre-law GPA of 2.0 or higher, absent a record of a serious crime or misconduct. Current attrition rates suggest further refinement of the law school's overall approach is warranted.

On average, in the last two years the law school has accepted 98.5 percent of applicants with completed files, and 100 percent of admitted applicants have enrolled. For students entering in fall

2021, their 75th, 50th, and 25th percentile undergraduate GPAs were 3.21, 2.97, and 2.39, respectively, based on the 2022 Business and Professions Code section 6061.7 disclosure report.

Applicants must complete an online application, take a 25-question admission test, and pay a \$50 fee. The application asks about prior criminal conduct and dismissal from educational institutions, but the application must be revised to ask directly whether the applicant has ever attended law school previously and, if so, whether the applicant was in good standing. (Guideline 5.31.) The 2016 Inspection Report recommended this change and the school stated that the application had been corrected, but a current review showed that these changes still needed to be made.

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

Mr. Patel conducts telephone interviews with applicants and reviews admission files to determine, based upon official transcripts, whether applicants have met minimum pre-legal educational requirements. Applicants are informed that a student 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.) American International appears to comply with requirements for the receipt and maintenance of official transcripts. (Guidelines 5.30 and 9.1(B)(2) and (C)(2).)

Admissions decisions are made by consensus among Mr. Patel, Dean Szeto, and Dean Ibarra, based on each applicant's academic record, admission test scores, and work history.

Transfer students are admitted from other law schools, but they must complete at least two years of law study at American International. Following a transcript evaluation by the State Bar, Mr. Patel determines whether, and how much, transfer credit should be awarded.

Students who have been academically disqualified from American International or another law school must wait two years before seeking admission. To comply more fully with Guideline 5.34, the law school must take steps to ensure that applicants previously disqualified from law school for academic reasons are admitted only upon the showing required by the guideline and the reasons for admitting such an applicant are properly documented in the applicant's file.

According to the self-study, applicants may be admitted "on probation" and informed thereafter of the "effects" of such status. This policy is unwritten and unused, according to Mr. Patel, and it is unsound. The law school should not admit students "on probation" and should reject all applicants except those who appear reasonably qualified to succeed. (Guidelines 5.26 and 5.27.)

Attrition at American International is high, occurring primarily during or at the end of the first year and generally hovering at around 75 percent between first and second year. Though first-year classes enroll over 20 students in most years, generally, by the fourth-year the class consisted of just one student, though five fourth-year students are enrolled this year.

Administrators are aware of the need to reduce attrition and to increase participation in, and pass rates on, the FYLSX and bar exam, but they could not document any action other than sending occasional reminders of due dates to students, so it appears that no effective action has been taken since the issue was identified in the last inspection in 2016. To improve student success, the law school developed an idea to create short, five-minute animated videos to illustrate key concepts in every course. The school indicates that the project has been delayed by the pandemic and other circumstances over the past six years, and no timeline or project plan or reason documenting the effectiveness of this solution has been offered. At the time of the inspection, the law school advised that it was seeking to hire instructors to record the videos Mr. Patel also indicated that he intended to hire a faculty member to be available for a number of hours each day to field student inquiries. The law school could not demonstrate any progress related to this program. The long timeframe without this or other action is of concern.

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. It also has an obligation to address high attrition through effective screening of candidates for admission or re-admission and improvement of its educational program. (Guidelines 5.26-5.27.)

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

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 \$75. Individual Westlaw passwords are issued to students upon initial enrollment, and students retain access to the service while enrolled.

The law school must maintain hard bound copies of texts or treatises for all courses in the JD curriculum at the law school's administrative office, as Guideline 6.2 requires. Mr. Patel stated that these texts are available but were not reshelfed after the law school was relocated in 2021, and therefore could not demonstrate compliance. No further evidence of the availability of these texts have been provided.

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

“legal research” was dropped from the title of American International’s first-year course, now called “Introduction to Law and Legal Writing,” and the subject is absent from the curriculum.

Notably, the law school does not provide its students with even a rudimentary introduction to the use of Westlaw. According to Mr. Patel, students are expected to learn the use of Westlaw outside the curriculum, through tutorials offered by the service itself.

Records of library expenditures are maintained, but the library does not appear available for use. (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 International has operated in Irvine, California since its founding. Operations were relocated in September 2021 from one Irvine office building to another, both owned by Mr. Patel at least in part, and the move was approved by the CBE. In the new facility, the law school has exclusive use of filing cabinets used for storage of law school records but otherwise shares the recently remodeled space with the Shatford Law Firm, which was not disclosed when the law school filed its motion to move. Rent, paid monthly without a lease, accounts for about one-tenth of the law school budget.

All administrators have private offices and work in the building. Student services are provided by email, telephone, or videoconference, but on occasion students choose to visit the premises to take proctored exams or meet with administrators. (Guidelines 7.1-7.2.)

The law school has allocated technical resources to support its technology systems. The JD program is delivered through software applications that appear to be secure, including proprietary systems for student records, and learning management and GoToMeeting for videoconferences. Unfortunately, however, it does not appear that the learning management system has been fully implemented and at present it provides access only to syllabi and midterm exams for the four first-year courses.

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. Hard-copy records are held in lockable, fire-safe filing cabinets in a private office and electronic records are held in cloud storage. (Guideline 7.2.)

The law school’s proprietary learning management system appears to be reliable although it offers limited information to students. Mr. Patel and Dean Szeto advise that they are qualified to promptly address any IT issues that may arise, and Mr. Patel and Ms. Acosta are regularly available to answer student questions about access to the learning management system and Westlaw access issues, but not research issues. (Guideline 7.2.)

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 International submitted a 2020 budget, balance sheet, profit, and loss statements for five years, and three-year financial projection. Budget results for 2020 and a 2021 budget were found in the 2021 Annual Compliance Report and updated budgets were included in the 2022 Annual Compliance Report.

American International operated at a profit for several years after the 2016 site visit. In 2019, Mr. Patel indicated that he decided to reinvest profits into a program to develop instructional videos to improve student success, but he could not produce evidence of those efforts. He advised that as a result of program development costs and marketing expenditures for search engine optimization, the law school has incurred losses in the past two years, though the law school was not able to show any output as to the programs developed. Mr. Patel projects additional losses for another two years before a return to profitability. These results, considered in conjunction with the law school's educational outcomes, raise concern as to whether it is able to offer a sound educational program that offers students a meaningful opportunity to graduate and license.

The law school asserts that it is adequately capitalized and has adequate present and anticipated resources to support its current program and operations. Current assets include software and \$167,000 in liquid assets; long-term liabilities consist almost entirely of a shareholder loan.

Revenues are derived from tuition and fees. Enrollments are low, fluctuating modestly since 2016, from a low of 18 in 2016 to a high of 23 in 2020, with 22 students enrolled in fall 2022. Administrators expect that American International will remain a small law school, but they hope the instructional videos program that it has been discussing for some years will help drive increased enrollments until the student body reaches 70 to 100 students if the videos are created.

Total JD program tuition at the time of the inspection was \$9,200, based on tuition of \$2,975 for the first year and \$2,075 for each of three subsequent years, though the purchase of a review course is also required. Total program fees were \$550. The law school offers interest-free financing, allowing students to make tuition payments over an entire year. The cost of third-party materials is in addition to tuition and fees and was not disclosed on the website or in the catalog, and it is unclear whether the increase in fees listed fully discloses these costs now.

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 International 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 from the Irvine offices.

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 to the limited extent available (Guidelines 9.1(J)-(K)); and publications, Committee correspondence, and reports, including Annual Compliance Reports. (Guidelines 9.1(L)-(O).)

Mr. Patel maintains all law school records with assistance from Ms. Acosta. All applicant and student files are held in both hard copy and digital format. (Guideline 9.1(A)-(C).) Hard copy documents are held in lockable, fireproof cabinets in the Irvine office. Electronic records are held in the law school's proprietary software program and appropriate protocols are followed to ensure that these documents are protected against loss, destruction, corruption, and unauthorized access. All student-related documents are held indefinitely.

Under Guideline 9.1(D)(5), the permanent student transcripts prepared by a law school must contain specific information about any academic credit allowed for study at another law school. To comply with the guideline more fully, American International must add all required information to its transcripts for transfer students, and also document the reasons for admission for students who were disqualified from law study at other institutions.

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.)

The law school's catalog sets forth a policy that explains its practices and underscores its commitment with respect to equal opportunity and non-discrimination, as follows:

American International School of Law is committed to providing an inclusive and welcoming environment for all members of our community and to ensuring that educational and employment decisions are based on individuals' abilities and qualifications. Consistent with this principle and applicable laws, it is therefore American International School of Law's policy not to discriminate in offering access to its educational programs and activities or with respect to employment terms and conditions on the basis of race, color, gender, national origin, age, religion, creed, disability, veteran's status, sexual orientation gender identity or gender expression. Such a policy ensures that only relevant factors are considered, and that equitable and consistent standards of conduct and performance are applied.

Of the students enrolled at American International in fall 2021, one-third were female. Students self-identified with various backgrounds, including Asian (17 percent), Black or African American (11 percent), Hispanic/Latinx (17 percent), Two or More Races (3 percent), and White (40 percent).

As reported in fall 2021, the faculty was diverse, consisting of 30 percent white men, 20 percent white women, and 50 percent men of color, though it appears that the faculty do not interact with the law students except to place a letter grade on their papers.

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 International 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 did not, however, file a major change request to seek approval for a major change to its curriculum, does not appear to offer a sound program of education containing all required components, and did not disclose that its new administrative headquarters would be a space shared with a law firm owned by the dean and faculty.

CONCLUSION AND RECOMMENDATION

It is recommended that the Committee receive and file this Periodic Inspection Report, approve the recommended and suggested actions, and issue a warning letter pursuant to Rule 4.244(G)(4) advising of the need for immediate action to “correct specified deficiencies within a certain number of days of the date of the warning” with full correction and completion of all recommendations to be documented in the law school’s 2023 Annual Report due on November 15, 2023.

It is suggested that the Committee place the law school on notice that it reserves the right to issue a Notice of Noncompliance if it does not document evidence of compliance as to each recommendation by November 15, 2023.

It is further recommended that, if the law school’s response is deemed satisfactory, that the law school still next be inspected in 2024 in order to confirm its assertions documented in response to the warning letter.