



The State Bar *of California*

OFFICE OF ADMISSIONS

**OPEN SESSION
AGENDA ITEM V.A.
OCTOBER 2023
COMMITTEE OF BAR EXAMINERS**

DATE: October 13, 2023

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Major Change of Administrative Headquarters – Taft Law School

EXECUTIVE SUMMARY

Taft Law School (Taft), a registered, unaccredited correspondence law school, has filed the major change motion set forth in Attachment A requesting approval from the Committee of Bar Examiners (committee) to move its administrative headquarters from its current headquarters to a smaller headquarters two blocks away, in order to address long-term habitability concerns in the current space including problems with heat and pests. A three-year lease is proposed, and the new address would be 3000 W MacArthur Boulevard, Suite 300, Santa Ana, California, 92704.

BACKGROUND

Under Unaccredited Law School Rule 4.246 “[a] registered law school contemplating a major change must notify the [c]ommittee 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 a law school’s request to change the location of the law school’s administrative office.

DISCUSSION

Historically, Taft's headquarters has been located has taught its JD program in a 4,865 square foot office suite in an office building in Santa Ana, California.

In recent years, the law school has experienced issues with faulty heating and cooling systems and pests. While these factors would be enough to consider a move, the law school also identified that, after its prior chancellor passed away and the prior dean retired suddenly, employees were not open to changes required to continue to update the law school's strategy. It is believed that a move to a new space will foster innovation and motivate staff.

The law school plans to select a three-year lease in a smaller space in a better-appointed office building. The new space appears to have proper heat and pest control, an elevator, 24-hour security, and ample parking. While the space is less than what is available at the current location, less space is needed because the law school no longer needs space to house its records, which are now digitized. The current space contains 4,865 square feet while the new space contains 3,179 square feet.

Taft would like to move at the natural end of its lease on October 31, 2023, and begin operation in the new space on November 1, 2023. The law school provided staff with a copy of the lease. It should also be noted that the move will reduce monthly rent.

The new space is located approximately 0.4 miles from the law school's current space. Taft 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 Taft services and classes are provided via correspondence, and students are not currently required to come to campus to complete their JD program or request support services.

A video visit with staff can be scheduled after the move.

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 Taft Law School's Request for Major Change seeking approval to move from its current location to 3000 W. MacArthur Boulevard, Suite 300, Santa Ana, California, 92704, as set forth in Attachment A and approve the request effective immediately, with operation to begin in the new space on November 1, 2023. The committee should require Taft to notify staff when the move is complete and undergo a video visit of the new location, or if the move does not take place by November 1, 2023.

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 approve Taft Law School's Request for Major Change Motion to move its administrative headquarters to 3000 W MacArthur Boulevard, Suite 300, Santa Ana, California, 92704 as set forth in Attachment A, and approve the move effective immediately to be implemented as of November 1, 2023.

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

ATTACHMENT LIST

- A.** Taft Law School Major Change Request – Move Administrative Headquarters

To the Office of admissions and all parties in this matter:

I am writing to formally request prior approval for a major change at Taft Law School (Taft), in accordance with rule 4.245. The request pertains to the proposed change of Taft's administrative office. I would like to address the reasons for this request, the challenges we have faced and the need for a more conducive environment for our staff and operations.

Background:

Over the past three years, Taft has encountered significant challenges with the leased facilities that have been impacting our operations and the well-being of our staff. Approximately five years ago, the building that Taft leased underwent a change of ownership. Since that time, our experience with the new owner has been marked by a series of ongoing issues that have hindered our ability to provide conducive environment for our employees.

While there have been numerous issues stemming from this change in ownership, I would like to highlight a few critical concerns: First, during the winter of 2022, our facilities were left without heat, leading to discomfort and inconvenience for our employees who resorted to wearing parkas, gloves and knit hats to combat the cold. Presently, as we are in the midst of warmer weather, our office space has experienced a lack of air conditioning, with temperatures reaching an uncomfortable 85 degrees Fahrenheit. This issue is not limited to our office space alone, as the hallways within the building are also without proper air conditioning.

However, perhaps the most distressing challenge we have faced is a persistent cockroach infestation. Over the past month, our suite has been plagued by a significant cockroach infestation that has severely disrupted our ability to maintain a sanitary and functional workspace, despite efforts on our part and those of the landlord, the infestation remains unsolved, posing threats to the health and safety of our staff.

While I only highlighted a few of the major issues we have encountered, I want to assure you that these challenges are indicative of a broader pattern of ongoing problems that are impacting Taft's operations. If you require further information or detailed documentation regarding the additional issues we have faced, I would be more than willing to provide a comprehensive account.

Per the instruction received by email dated August 21, 2023, from Principal Program Analyst, Educational Standards Ms. Natalie Leonard I request a motion for approval as time is of the essence since our current lease ends October 31, 2023, and the issues Taft is facing as stated above. In support of Taft's motion, I have answered the following questions below:

1. The address of the new location is 3000 W. MacArthur Blvd, Suite 300 Santa Ana, California 92704.

All contact information - phone numbers, website, email - will remain unchanged.
The new location is conveniently situated across the street from our current leased facilities.

2. The terms of the proposed lease or purchase from the new facility including cost.

The terms of the new lease:

Lease duration: Three (3) years

Benefits of the new location:

Enhanced security: The new location has 24-hour security contributing to a safe environment for our staff and assets.

Elevator access: Unlike our current location, the new suite is equipped with elevators, providing improved accessibility and convenience for everyone utilizing the facilities.

Efficient parking: The new location offers ample and efficient parking facilities, ensuring ease of access for Taft's employees and any visitors we may receive.

3. A comparison of the facilities and costs at the new location versus the current location.

Facility Comparison

New facility at 3000 W. MacArthur Blvd, Suite 300 Santa Ana CA 92704

Total Area: 3, 179 square feet

Current Leased Facility

Total area 4, 865 square feet

Upper unit space (Taft has effectively transitioned to paperless student files, rendering the upper unit in its current suite unnecessary. Approximately 1,250 square feet have not been used since we have gone to paperless student files.

The cost of the facility:

New facility at 3000 MacArthur Blvd Suite 300, Santa Ana CA 92704

Monthly rent -REDACTED

Current Leased Facility

Monthly rent - REDACTED

4. Any helpful context as to why the move is being made, and why the new space will be appropriate for the law school.

As stated above, the decision to move to a new administrative space has been promoted by a series of challenges that have arisen over the past few years.

Notably, Taft has experienced ongoing issues with its current leased facilities, including persistent heating and air conditioning problems as well as pest infestation.

Furthermore, the unfortunate passing of Chancellor David Boyd and the retirement of previous Dean Robert Strouse, due to illness, has introduced an additional layer of complexity. Considering these challenges, it had become increasingly evident that a new location would be in the best interest of Taft, its employees, and its stakeholders.

5. Agreement to undergo a walkthrough of the new space (in-person or remotely) upon move. Any information as to how disruption to students will be avoided or mitigated.

Taft values your involvement and understanding in this significant transition. Taft does hereby extend an invitation to you and any representative from the Committee of Bar Examiners to visit our new site either personally or remotely. The visit will allow you to witness the features and benefits the new space offers to Taft, and its students.

Regarding any disruption to students:

Taft's transition to the new facility at 3000 MacArthur suite 300 will be conducted with meticulous planning to ensure a seamless experience for our students. Given our learning model and communication channels, there will be no disruption to our students during this process.

6. Demonstration as to how compliance will be maintained throughout the move.

I would like to provide you with a comprehensive overview with the measures that Taft has put in place to ensure continued compliance throughout our upcoming move to the new administrative facility across the street from our current location at 3000 W. MacArthur Blvd, Suite 300 Santa Ana CA 92704.

Commitment to compliance:

Compliance is paramount to Taft, and we are dedicated to upholding all necessary regulations, standards, and requirements throughout the transition process. Our commitment to compliance extends to all aspects of the move, including legal, operational, and administrative considerations both to the California Bar and our students.

Demonstration of Compliance:

All necessary documentation related to the move, including the lease agreement, and insurance policies, will be thoroughly reviewed and updated as required to reflect the new location.

Clear and transparent communication will be maintained with all relevant regulatory bodies, staff, students, and stakeholders.

Taft is committed to maintaining the same level of operational efficiency throughout the move. Our staff will receive training and instructions to ensure they are well-prepared to navigate any changes while adhering to compliance requirements.

Taft's goal is to have a seamless transition to ensure that the transition to the new administration facility will be carried out with meticulous detail and in full compliance with all governing bodies and regulations.

7. Staffing of the new space, and comparison to staffing at the prior space.

I am pleased to inform you that the staffing arrangements at the new location will remain unchanged. Our dedicated and experienced team members will continue to operate from the new administration facility, ensuring continuity in our daily operations. The goal of this transition is to optimize our resources, enhance our operational efficiency and create a productive and conducive environment for our staff. Taft is confident that this transaction to a new location will be executed with minimal impact on our staff.

8. Distance between the old and new space, and appropriateness of the location of the new space. For example, if some students come to the office to have exams proctored, will they be able to do so in the new space or take exams under an alternate arrangement.

The new administrative offices have been strategically chosen to be in close proximity to Taft Law School's previous location. (Approximately 2 blocks and across the street from previous location) The new space offers the convenience of minimal travel distance for staff, students and visitors. The new administration facility has been carefully selected to align with Taft's operational needs to provide an enhanced location for its staff.

If you have any further questions regarding this matter, please feel free to contact me at 714-850-4800

Thank you for your prompt attention to this matter.

Sincerely,

Melody Jolly, JD
Dean of Taft Law School