



**OPEN SESSION
AGENDA ITEM V.E.
JUNE 2024
COMMITTEE OF BAR EXAMINERS**

DATE: June 21, 2024

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Inspection Report – Pacific Coast University School of Law

EXECUTIVE SUMMARY

This item presents the inspection report for Pacific Coast University School of Law (PCU), a registered, unaccredited distance law school, as well as the law school's response to the report. The inspection took place on March 25-26, 2024. Based on the inspection team's observations, staff recommends that the Committee of Bar Examiners (committee) adopt this inspection report and its recommendations in full, that the law school's registration be renewed, and that the law school provide evidence as to completion of each recommendation when it files its 2024 Annual Report, due November 15, 2024. The next inspection is recommended for fall 2025.

BACKGROUND

Pacific Coast University School of Law (PCU) is an unaccredited, distance learning law school headquartered in Long Beach, California. The law school operated as an unaccredited, fixed facility law school for many years, then operated as an accredited law school starting in 2013 until its accreditation was terminated in August 2020 for failure to meet the minimum, cumulative bar exam pass rate required of accredited law schools.

In August 2020, PCU began operation as an unaccredited, fixed-facility law school. Since then, it has reorganized its schedule from semesters to quarters, taught classes online under a waiver

from the Committee due to the pandemic and, most recently, transitioned to a semester schedule. In June 2022, the Committee approved the law school's permanent transfer from the fixed-facility category to the distance category effective fall 2023. ([Item O-405, Committee of Bar Examiners Meeting, June 17, 2022](#)).

The law school enrolls 22 students in its JD program, and the cost to earn a JD is \$39,050. PCU's most recent pass rates on the First-Year Law Students' Examination were 50 percent in October 2023, and 16.7 percent for June 2023. Its most recent bar exam pass rate in February 2024 is 9.2 percent and its five-year cumulative bar pass rate is 33.3 percent. Note that for unaccredited law schools, the cumulative bar exam pass rate calculation includes all individuals who passed the bar exam during that five-year period regardless of when they graduated, including long-term repeaters.

Unaccredited law schools registered with the committee are inspected for compliance with the Rules for Unaccredited Law Schools (rules) and Guidelines for Unaccredited Law School Rules (guidelines) approximately every five years or on the schedule deemed appropriate by the committee.

This is PCU's first inspection while again operating in the unaccredited category. The inspection team included Educational Standards Consultant David Kelley and State Bar Staff Theresa Solenski.

The State Bar provided PCU with a copy of its inspection report on May 13, 2024 (Attachment A). Pursuant to Rule 4.244(F), within fifteen days of receiving an inspection report, a law school must notify the committee that it accepts the report or objects to it in whole or in part. PCU provided a timely report accepting most of the recommendations and objecting in part as listed below (Attachment B).

DISCUSSION

Inspections are an opportunity for law schools to affirmatively demonstrate their compliance with the applicable rules and guidelines. Prior to each inspection, a law school is invited to document its compliance in writing through its self-study. After reviewing the submitted self-study, an inspection team visits the law school. In the visit, the law school has the opportunity to provide verbal updates to support the self-study or describe additional updates after the self-study was submitted. Subsequent to the inspection visit, the team produces an inspection report assessing the law school's compliance with the rules and guidelines. The final inspection report documents the law school's compliance as of the time of the inspection.

Prior to the committee's review, the law school receives a copy of the inspection report and is asked to provide a response regarding its compliance within fifteen days, which PCU did. A response may include objections to the areas of non-compliance identified in the report, but the objection must be accompanied by full evidence to demonstrate compliance at the time of

the inspection for the inspection team to consider amending the report. A response may also include progress the law school made after the inspection in areas of non-compliance identified in the report, but these must also be accompanied by evidence.

The committee will review the inspection report and the law school's response to determine whether to continue the law school's registration, as well as any recommendations needed in relation to the law school's compliance.

SUMMARY OF REPORT

The inspection report includes thirteen recommendations corresponding to thirteen areas on non-compliance in a range of areas. Overall, the team observed that continued focus is needed to improve outcomes on State Bar exams, and to ensure stable long-term finances. The school is preparing to begin repayment on a significant loan taken out during the pandemic and is working to address its current operating deficit of over \$600,000 per year. While the loan will be paid in installments starting in July 2024, annual payments are expected to be approximately \$50,000 for the next three years. The law school advises that it has sufficient operating funds for the next two years and hopes that aggressive recruiting will further improve its operating position. The law school enrolls 22 students and has developed a marketing plan to expand its student body.

LAW SCHOOL RESPONSE TO REPORT

PCU provided a timely response to the inspection report on May 28, 2024, with a revision to amend a clerical error sent on June 6, 2024. PCU generally accepted the findings in all but four areas and provided information to assist staff in reviewing two of those objections (Attachment B). Because the information shared in the response conflicted with the information shared at the inspection and is not fully documented, staff recommends that the inspection report be adopted in its current format.

To recognize and appreciate the law school's response and steps toward improved compliance, its comments are summarized below, in addition to being set forth fully in Attachment B.

Of the four areas of non-compliance listed in the inspection report that PCU objected to, the law school substantiated their objections in the areas of maintaining a Grade Review Committee and conducting regular faculty evaluations.

Specifically, the law school's response to the inspection report clarified PCU has an Academic Council which conducts Grade Reviews and meeting minutes from 2022-2023 showing discussion of grade review were submitted to the State Bar to demonstrate compliance with Guideline 2.9(G)(H). However, the law school asserted in its self-study and 2023 annual report that it did not have—but intended to establish—a Grade Review Committee. The dean

reiterated to the inspection team on March 25, 2024 that the law school does not have a Grade Review Committee. The Academic Council minutes provided to the State Bar subsequent to the inspection demonstrate that it conducts a range of duties which include grade review, and provided minutes demonstrating four occasions on which grade review was conducted in the last two years. Due to the conflicting information provided, staff recommends that the report be accepted unchanged, and the law school can clarify the conflict and discuss its current status as part of its 2024 annual report.

The law school's response to the inspection report clarified PCU conducted faculty evaluations in 2022 and 2023 and evaluations were submitted to the State Bar to demonstrate compliance with Guidelines 4.8 and 4.9. In its self-study, the law school provided five pages of faculty evaluations which appeared to be missing signatures and/or meaningful feedback within a large file of student evaluations. At the inspection, the law school advised that the law school had no set schedule for future evaluations. Due to the conflicting information provided, staff again recommends that the report be accepted unchanged, and the law school can clarify any update and evaluation schedule as part of its 2024 annual report.

PCU's response also included updates towards compliance in three areas related to advertising, admissions, and electives. The law school included documentation to substantiate the update regarding guidelines 2.1 and 2.3(A)(C) related to advertising. The law school revised its advertisements to prospective students by removing reference to only specific State Bar exam results and updating materials to describe current admissions requirements. PCU included a copy of the revised advertisement with its response. To comply fully with the guidelines however, the law school's Rule 4.241 Disclosure Form must include the law school's bar exam pass rates for the past five years, or link to the bar exam statistics webpage on the State Bar's website. Therefore, the inspection team's original recommendation is recommended to be adopted unchanged, with the law school to provide an update its 2024 annual report.

PCU's response did not provide documentation to support its compliance updates in the area of its admissions policy and electives. These can be supported with the required evidence in its 2024 annual report.

NEXT STEPS

The inspection report identifies 13 areas of non-compliance, and PCU has already begun to address them. Several key areas require additional attention to achieve compliance, including complete disclosure of past performance on State Bar exams. This is particularly salient for PCU given the law school's 2020 termination of accreditation related to performance on State Bar exams. The law school's response to the team's recommendation is appreciated during this first inspection as a registered, unaccredited school. It is hoped that this will assist the law school to affirmatively demonstrate its compliance at its next inspection.

An inspection is suggested for fall 2025 to ensure compliance with the rules and guidelines identified in the 2024 inspection report and to further assess the law school's financial status, based on its assessment that it has the funds for two years of operation. Conducting an inspection on this timeline will support oversight of proper disclosure to prospective and current students, scheduling of classes to allow maximum transfer capability if needed, as well as determine what longer-term options are available to the law school so that both the students and the school can proceed in an orderly manner.

PROPOSED MOTION

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

MOVE, the Committee of Bar Examiners receive and file the inspection report of Pacific Coast University School of Law taking place on March 25 and 26, 2024 set forth in Attachment A, as well as the response set forth in Attachment B.

FURTHER MOVE, that the inspection report be adopted in full, including all recommendations, and that the law school be directed to address each as soon as possible, documenting completion and supporting evidence in its 2024 Annual Report to be filed by November 15, 2024. To the extent that a recommendation in the report has already been fully or partially addressed, continuing compliance must be documented in the annual report.

FURTHER MOVE, that the law school's registration as an unaccredited, distance learning law school be continued, and the next inspection set for fall 2025.

ATTACHMENT LIST

- A. March 2024 Periodic Inspection of Pacific Coast University School of Law
- B. Law School Response to March 2024 Periodic Inspection of Pacific Coast School of Law



The State Bar
of California

180 Howard Street, San Francisco, CA 94105

OFFICE OF ADMISSIONS

Natalie.Leonard@calbar.ca.gov
415-538-2118

May 13, 2024

Dean B. George Dezes
Pacific Coast University School of Law
1650 Ximeno Ave #240
Long Beach, CA 90804

RE: March 2024 Periodic Inspection of Pacific Coast University School of Law

Dear Dean Dezes:

Attached is a courtesy copy of the inspection report summarizing the inspection team's findings based on the material submitted by the law school and the visit that took place on March 25 and 26, 2024.

Under Rule 4.244(F), within fifteen days of receiving an inspection report, the law school must notify the committee that it accepts the report or objects to it in whole or in part. The law school may also provide updates or compliance enhancements that have occurred since the inspection visit. An objection or update must be supported by documentation.

Please forward any response to lawschoolregulation@calbar.ca.gov by May 28, 2024.

The Committee of Bar Examiners will review this report and any response provided by the law school at its Zoom meeting on June 21, 2024. The law school will have the option to attend and to provide a public comment of up to five minutes after the staff presentation of the item and prior to the committee discussion.

Sincerely,

Natalie Leonard

Natalie Leonard
Principal Program Analyst



The State Bar of California

Pacific Coast University School of Law

Periodic Inspection Report

Inspection conducted
Pursuant to Rule 4.244(A) of the
Unaccredited Law School Rules on:

March 25-26, 2024

Visitation Team:

David Kelley,
Educational Standards Consultant

Theresa Solenski,
State Bar of California Staff, Educational Standards

REPORT ON THE PERIODIC INSPECTION OF PACIFIC COAST UNIVERSITY SCHOOL OF LAW

INTRODUCTION

The State Bar conducted a periodic inspection of Pacific Coast University School of Law (PCU) on March 25 and 26, 2024 pursuant to Unaccredited Law School Rule 4.244(A) via videoconference. The inspection team consisted of educational standards consultant David Kelley, supported by State Bar staff Theresa Solenski, Natalie Leonard, and Cody Hounanian.

Background

This inspection is the law school's first periodic inspection as an unaccredited law school. The purpose of the inspection is to evaluate PCU's compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines).

PCU was founded in 1927. It operated as an unaccredited law school until the Committee of Bar Examiners (committee) accredited the law school in 2010. Later, in August 2020, the law school's accreditation was terminated because it was unable to meet the five-year cumulative California Bar Examination (bar exam) minimum pass rate (MPR) required of all accredited schools, despite attempting to do so over a period of years. At the same time, the Committee approved the law school's request to operate as an unaccredited, fixed-facility law school. In June 2022, the committee approved the law school transferring from the fixed-facility category to the distance category effective fall 2023.

The law school's administration includes Dean B. George Dezes, Associate Dean and Registrar Natalie Badillo-Casas, and Admissions Associate Toni O'Neal. Dean Dezes and Associate Dean Badillo-Casas are licensed attorneys in California. Dean Dezes and Associate Dean Badillo-Casas are full-time employees, while Admissions Associate O'Neal works part-time. The school also has an administrative assistant who works on ad-hoc projects on an hourly basis. Currently, there are 13 faculty members, including Dean Dezes. With the exception of Dean Dezes, all faculty work part-time.

PCU is organized as a 503(c)(1) not-for-profit university. The law school offers a four-year, part-time Juris Doctor (JD) degree program that satisfies the legal education requirement to establish eligibility to take the bar exam. The law school currently enrolls 22 students, including six students who recently transferred from Irvine College of Law after that law school announced it would voluntarily close at the end of its spring 2024 term. For the fall 2023 term, all students who applied for admission to PCU were admitted, whether as first-year students or transfer students.

Since June 2021, REDACTED PCU students have passed the First-Year Law Students' Examination (FYLSE). Pass results were as follows: June 2021 – REDACTED; October 2021 – REDACTED; June 2022 – REDACTED; October 2022 – REDACTED; June 2023 – REDACTED; October 2023 – REDACTED.

Since February 2021, 36 PCU graduates have passed the bar exam. Pass results were as follows: February 2021 – 18.8 percent of 32 takers; July 2021 – 16.7 percent of 60 takers; February 2022 – 10.3 percent of 29 takers; July 2022 – 5.8 percent of 52 takers; February 2023 – 17.5 percent of 40 takers; July 2023 – 5.4 percent of 56 takers; Subsequent to the inspection, results were released for the February 2024 bar exam as follows – 9.2 percent of 42 takers.

Submission of Self-Study Materials

In 2021, in order to undergo a confirming inspection, PCU submitted a self-study shortly after its transition to operating as a registered, unaccredited law school. The inspection was delayed while PCU underwent a transition that took the school from offering two JD law school tracks to one and scheduling classes in semesters rather than quarters. Shortly thereafter, the law school requested to transfer from the fixed-facility category to the distance category; the transition was originally planned to start in fall 2022, but it was delayed to fall 2023. Once those transitions were complete, the State Bar scheduled an inspection and provided the law school with an opportunity to update the self-study before the March 2024 inspection took place. The inspection team reviewed that self-study along with the law school's annual compliance reports for 2021 through 2023, course syllabi, and also observed two classes. Administrators responded to requests for revised financial projections and faculty evaluation forms from the inspection team, and the information provided was considered when drafting this report.

Conduct of Site Visit

The inspection took place via videoconference on March 25 and 26, 2024. Before the visit, the inspection team reviewed all materials described above.

During the visit, the inspection team met with administrators, faculty members, and six students, and attended a videocall tour of the law school's administrative headquarters.

After the visit, the inspection team reviewed course materials and completed a review of the law school's records from the self-study and requested during the inspection process, including faculty evaluation forms, course syllabi, and revised financial projections. At the consultant's request, PCU invited students to send comments about the law school; no comments were received.

The inspection team also observed Professor Kasamatsu's Torts class and Professor Olszewski's Criminal Law class. Overall, the inspection team found Professor Kasamatsu was knowledgeable and the class was interactive. However, the inspection team noted the challenge of reading the professor's class notes written physically on a whiteboard at the back of the room when the course was offered online. Professor Olszewski was also knowledgeable, although interaction with students during class was limited, and some students expressed concern that they had not received promised feedback on their exams.

INSPECTION OBSERVATIONS

Compliance Issues Observed in March 2024

1. Rule 4.241(A)–(B): The law school is not fully compliant with Rule 4.241. PCU’s Rule 4.241 Disclosure did not state FYLSX pass rates for the last five years, as required by section (A)(4) of the rule. The law school also does not provide the disclosure to each returning student each term, as required by Rule 4.241(B)(2).

While PCU’s Rule 4.241 Disclosure includes a section entitled “PCU’s Bar Examination Pass Rate,” it does not directly identify or link to any statistics, for either the bar exam or the FYLSX. The disclosure does link to the homepage of the State Bar’s website for statistics regarding the bar exam, however, bar exam statistics are not on the State Bar’s homepage; students would need to navigate through several additional links to find PCU’s bar passage data. The disclosure also does not reference or separately link FYLSX results for the last five years, as required by Rule 4.241(A)(4). Moreover, PCU’s administration confirmed they distribute the Rule 4.241 Disclosure to returning students once per year, rather than each term, as required by section Rule 4.241(B)(2).

This is a particularly significant omission because the law school has struggled to increase its pass rates, and failure to do so was the basis for the termination of its accreditation. Prospective students should clearly understand the law school’s outcomes prior to enrolling in the law school.

To comply with Rule 4.241, the law school must revise its disclosure to link to FYLSX results for the last five years, in addition to its bar exam results. It must also distribute the disclosure before each term and prior to accepting payment for the term and maintain copies of the disclosure to all students every term.

2. Rule 4.240(B); Guidelines 2.1 and 2.3(A)–(C): PCU is not compliant with Guidelines 2.1 and 2.3, which state a law school must be honest and forthright in all of its activities, including communication with its students, applicants, and prospective students. The law school has made some progress towards compliance since the time of inspection, detailed below.

PCU’s “Just the Facts” advertisement, submitted in its 2023 Annual Report, and which appears on its website, erroneously understated the JD tuition by \$550 less than the actual amount of \$39,050. The discrepancy was due to a change in the JD program which now requires mandatory participation in a prep course for the First-Year Law Students’ Examination, at a rate of \$550. After the discrepancy was pointed out to the law school’s administration, they updated the price of the JD program within one day.

Nonetheless, PCU remains out of compliance with Guidelines 2.1 and 2.3. due to other misleading information in the “Just the Facts” sheet. For example, the law school includes bar exam pass rates for first-time exam takers from October 2020, February 2021, and February 2023. However,

the law school omitted bar exam results from July 2021, February 2022, July 2022, and July 2023 exams which are significantly lower than the results included in the fact sheet. Therefore, only the best exam results are shown, masking variability in scores from exam to exam. This leaves prospective students without a full understanding of the law school's performance over the advertised four-year period. The "Just the Facts" advertisement also includes the 25th, 50th, and 75th percentile LSAT scores of students admitted from 2022 - 2023; however, the law school no longer requires LSAT test scores in its admissions process and these figures appear outdated, thereby potentially misleading prospective students as to the admissions requirements.

The law school's Rule 4.241 Disclosure also violates Guidelines 2.1 and 2.3. The section titled "PCU's Bar Examination Pass Rate," required by Rule 4.241(A)(4), neither explicitly states the law school's bar exam pass rate for the past five years, nor links to the bar exam statistics webpage on the State Bar's website. Rather, the disclosure links to the State Bar's homepage as described above. This requires students to click the link, navigate to the statistics section, and search for the exam results by the law school's name. As such, the disclosure is not transparent because it does not state exam results in the disclosure itself or directly link the statistics section of the State Bar website.

Furthermore, the disclosure doesn't cite or link to FYLSX pass rates for the last five years, as required by Rule 4.241 and discussed in section one of this report.

To comply with Guidelines 2.1 and 2.3, the law school must revise its advertisements to prospective students to accurately reflect bar exam results and admissions requirements. It must also revise its Rule 4.241 Disclosure to transparently and honestly state bar exam and FYLSX pass rates.

3. Rule 4.240(C); Guidelines 2.9(G)(H): PCU is not compliant with Guideline 2.9(G) and 2.9(H), which requires a law school to establish a Grade Review Committee with written procedures for processing grade review requests. The law school's 2023 Annual Report and statements made by the Dean during the inspection confirmed the law school does not have a Grade Review Committee. While the Dean identified creating such a committee as a future goal, no plan or timeline was provided.

In lieu of a Grade Review Committee, the dean stated that he reviews all grades to ensure there is no grade inflation and that no grades are posted until he approves them. His process involves comparing all grades within a cohort against one another. He also examines grades from the same student across courses and between the current and previous terms. If the dean notices a grade that is out of line with historical trends, he calls the course professor and asks them to review and re-confirm the grade.

While these efforts are appreciated, the law school is not complying with the guidelines. PCU must establish a Grade Review Committee and institute standard processes to process and review requests from students.

4. Rule 4.240(D); Guideline 4.8 and 4.9: PCU is not compliant with Guidelines 4.8 and 4.9, which state that a law school must adopt written procedures for the regular evaluation of instructor competence (Guideline 4.8), and the basis for instructor evaluations should include observation in the classroom and review of course materials and grades (Guideline 4.9).

Students evaluate PCU faculty regularly at the end of each course, and the law school provided these evaluations to the inspection team. The Faculty Manual states that faculty will be evaluated by the dean at least every two years. However, the law school is not conducting peer or dean-led evaluations of faculty. The administration could not provide a faculty evaluation schedule for the current academic year, although the faculty includes two new staff members.

While the law school has a written procedure for the evaluation of faculty and shared a blank faculty evaluation form, the law school is not compliant with Guidelines 4.8 and 4.9 because there is no evidence the school implements its own policy. To become compliant, the law school must evaluate faculty every two years, as is the written policy, using the factors listed in Guideline 4.8, and must retain the evaluation records to demonstrate compliance in the future.

5. Rule 4.240(E); Guideline 5.1 and 5.2: The law school is not compliant with all parts of Guidelines 5.1 and 5.2. Guideline 5.1 states that a law school must maintain a qualitatively and quantitatively sound program of legal education. Guideline 5.2 states that in assessing the soundness of the law school's program the committee can consider, 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.

Below is a list of determining criteria, provided by Guideline 5.2, where the law school failed to demonstrate compliance thus putting the soundness of the legal program in question:

Guideline 5.2(B): The law school failed to demonstrate qualitatively the competency of the instructors, due to the fact that it lacked timely and informative faculty evaluations as described above in section four related to Rule 4.240(D) and Guidelines 4.8 and 4.9.

Guideline 5.2(E): The law school failed to demonstrate qualitatively the soundness of its admissions requirements including minimum levels of prior education, preparation, or training. As discussed in section nine regarding Rule 4.240(H) and Guidelines 5.26 and 5.27, low bar passage rates over a multi-year period call into question the timing of its recent policy change removing the LSAT requirement for admission. While the law school is not required to use the LSAT, the guidelines recommend it, and it may assist the law school in determining the course offerings needed to offer those admitted a reasonable prospect of completing the degree program.

Guideline 5.2(H): The law school failed to demonstrate qualitatively the soundness of its grading system as described in section three on Rule 4.240(C) and Guideline 2.9(G)(H), section seven on Rule 4.240(E) and Guideline 5.17, and section eight on Rule 4.240(E) and Guideline 5.25. PCU does not have a Grade Correlation Committee, nor a written grade correlation policy to ensure the

scores of all instructors who teach the same group of students have a “reasonable” correlation to one another. The lack of correlation between final grades for 1L courses and passage of the FYLSX suggests that the law school may suffer from grade inflation. Overall pass rates on the FYLSX have varied widely, from very low to well above the average.

Guideline 5.2(J): The law school failed to demonstrate the adequacy of its finances, as described in section 10 on Rule 4.240(K) and Guideline 8.1. PCU is currently operating at a yearly loss of \$663,000 for 2024. The inspection team noted the significant magnitude of this deficit for a law school enrolling a total of 22 students. To help manage operating expenses, in 2022, PCU took out a 30-year Small Business Administration (SBA) Covid Economic Injury Disaster Loan (EIDL) of \$2,100,000 with a 2.75 percent interest rate. Although repayment has been deferred, it is to commence in July 2024. Dean Dezes indicated that the law school has enough funds through the loan and tuition revenue to operate for two and a half to three years. Although the law school hopes to increase enrollment for fall 2024 to increase revenue, it has not taken the minimal effort to calculate a breakeven enrollment number. Due to its debt and lack of anticipated revenue to repay its SBA loan, the law school has not demonstrated it has the funds to provide currently enrolled students with the four-year JD program it offers.

Guideline 5.2(K): The law school failed to demonstrate quantitatively that the program is sound by virtue of the cumulative success of the law school's graduates on the bar exam. PCU's 2023 five-year cumulative bar pass rate is 33.3 percent, and in the last three years and seven administrations of the exam, pass rates have declined further. PCU's most recent bar pass rate for the February 2024 exam was 9.5 percent.

PCU's educational program must ensure that students have a meaningful opportunity to pass the bar exam. The law school identified several actions to improve student success on bar exams including standardizing exams and syllabi. PCU also offers a voluntary bar exam prep course on Tuesdays and Thursdays in an effort to improve bar exam outcomes, but the law school has not taken steps to quantify the impact of its preparation program on bar exam results. Nonetheless, all students who attended this bar exam prep course that the inspection team spoke to stated they found it very helpful. PCU also has a “Baby Bar Boot Camp,” to help students prepare for the First-Year Law Students' Examination, newly mandatory since July 2023. The law school does not have metrics in place to evaluate the success of the program, but it is encouraged to implement a plan to do so and make adjustments suggested by the data.

In summary, PCU has failed to demonstrate quantitatively and qualitatively the soundness of its academic program as evidenced by its lack of routine faculty evaluation, unsound admissions and grading policies, inadequate financial resources, and low State Bar exam outcomes. To address these concerns, the law school must institute a Grade Review Committee and improve its grading and admissions policies, regularly evaluate its faculty for competency, and demonstrate that it has the financial resources to provide an academic program in which all entering and returning students have a reasonable opportunity to license.

6. Rule 4.240(E); Guidelines 5.11: The law school is not compliant with Guideline 5.11, which requires a law school to offer a balanced and comprehensive curriculum, including the opportunity to take elective courses in a variety of subjects.

PCU does not offer electives to students at any point in the JD program. Dean Dezes stated that the academic program is “jam-packed” with necessary courses for the CBX, and he believes it is better for the students to know the fundamental concepts concretely than reduce student time in necessary courses by adding electives. The dean also mentioned the low student count makes it difficult for the law school to offer electives.

The dean’s preference cannot override the requirements of the Rules and Guidelines. PCU should offer students the opportunity to take elective courses to provide a balanced curriculum and comply with Guideline 5.11.

7. Rule 4.240(E); Guideline 5.17: The law school is not compliant with Guideline 5.17, which states that a law school must adopt written grading standards that ensure accuracy, validity, reliability, and consistency in the evaluation of student performance. The guideline also states, “there should be a reasonable correlation among the grades of all instructors teaching the same group of students”.

While PCU does have written grading standards listed in its Faculty Handbook, they are not comprehensive enough to ensure accuracy, validity, reliability, and consistency as required by the guideline. For example, the grading standard assigns subjective words like “outstanding,” “adequate,” and “poor” to numeric grade values, but it provides no guidance or criteria for faculty to evaluate and differentiate student performance within this subjective scale, and faculty may interpret what constitutes an outstanding, adequate, or poor grade differently. Moreover, PCU does not have a written grade correlation policy to ensure the scores of all instructors who teach the same group of students have a “reasonable” correlation to one another, nor does it have a Grade Correlation Committee to meet this purpose. While Dean Dezes is an experienced dean who has led several law schools, the procedures Dean Dezes uses to correlate grades appear ad hoc, without a specific written procedure, as described in section three of this report.

Moreover, despite the majority of students receiving grades which—according to PCU’s grading scale—are “adequate” or better, very few students are passing the FYLSX and bar exam, as reflected in the law school’s cumulative five-year bar exam pass rates, the 2023 Annual Report, and the grade correlation study submitted by PCU. The lack of correlation between grades and FYLSX and bar exam pass rates suggests that the grading standards are not reliable in evaluating student performance.

The law school is undergoing efforts to improve its grading standards, including holding a grade calibration seminar and a grading meeting with faculty members in September 2023, however, as of yet, PCU’s grading standards are not compliant with Guideline 5.17.

To comply with the guideline, the law school must comprehensively revise its written grading standards to ensure accuracy, validity, reliability, and consistency in the evaluation of student performance. Further, the law school should institute a Grade Correlation Committee to assess the efficacy of its grading standards in ensuring grades accurately evaluate student performance.

8. Rule 4.240(E); Guideline 5.25: PCU is not compliant with Guideline 5.25, which sets out the criteria for evaluating the quality of examinations and accuracy and reliability of grading, including the degree of correlation between the grades received by students in the first-year courses of Torts, Contracts, and Criminal Law and their passage or failure of the FYLSX.

REDACTED of the REDACTED students who took the June 2023 FYLSX passed, despite all being in good standing with average grades ranging from adequate to excellent, according to PCU's grading standards. This lack of correlation between final grades and passage of the FYLSX suggests the law school may suffer from grade inflation and/or poor exam quality. Similarly, the law school's grade correlation study of 2023 graduates, which was provided to the inspection team, shows a weak correlation between final law school GPA and bar exam passage.

To comply with the Guideline, the law school must review its grading policies to standardize its grading approach and implement a strategy to reduce grade inflation. The law school must document the use of a sound and effective grading policy and strategy to reduce grade inflation and ensure proper course content and demonstrate that the policy has been implemented and is being monitored effectively. The committee may assess the effectiveness of the policy using the correlation between first-year course grades and FYLSX pass rates as one criterion.

9. Rule 4.240(H); Guidelines 5.26 and 5.27: The law school is not compliant with Guideline 5.26, which states that the law school must adopt and maintain a sound written admissions policy, or Guideline 5.27, which states a law school must adopt adequate and appropriate screening procedures to ensure that persons who clearly lack the ability or the educational background to study law are not admitted or allowed to continue as students. A 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.

While PCU does have a written admissions policy, it is not sound. According to its 2024 Business and Professions Code section 6061.7 Disclosure Form, the law school's acceptance rate was 100 percent. Admissions Associate O'Neal stated that when reviewing applicants, PCU considers applications "as a whole," rather than assessing whether individual components of the applications meet a specific threshold of student performance.

Moreover, recent student outcomes indicate the admissions policy is unsound, and not compliant with Guideline 5.26. PCU's 1L attrition in 2023 was 57 percent; its 2L attrition for the same year was even higher. The high rate of student attrition in the first half of the JD program suggests the admissions policy does not appropriately screen individuals. Further, PCU's 2023 five-year cumulative bar pass rate is 33.3 percent, and more recent bar exam results are even lower. In the last three years and seven administrations of the bar exam, the law school's highest pass rate was

17.5 percent, in February 2023. Its most recent bar exam pass rate was 9.5 percent in February 2024 against a pool of 42 exam takers. The State Bar has been in frequent communication with the law school since at least 2016 regarding its pass rate on State Bar exams.

Despite poor and declining bar exam outcomes over the past three years, the law school decided to remove the LSAT requirement from its admissions requirements for its fall 2024 cohort without adding other means of evaluating the applicants' intent and capacity to study law. Dean Dezes stated that the requirement was an obstacle for applicants, but did not explain how, and did not explain how the law school planned to effectively conduct its admissions policy without those scores.

In light of recent student performance and the recent policy change to remove the LSAT requirement, it does not appear that PCU has adequate and appropriate screening procedures to ensure that persons who clearly lack the ability to study law are not admitted or allowed to continue as students, as required by Guideline 5.26. To comply with Guidelines 5.25 and 5.27, PCU must develop admissions criteria to more reasonably and effectively assess its applicants and demonstrate that this admissions policy is sound.

10. Rule 4.240(K); Guideline 8.1: The law school is not compliant with Guideline 8.1, which requires that a law school must have adequate present and anticipated financial resources to support its programs and operations.

PCU's three-year financials, submitted as part of its self-study materials and later revised at the State Bar's request for more detail, show the school is currently operating at a \$663,000 yearly loss. Projections show the school's deficit shrinking by 18 percent in the next two years by greatly increasing the size of its student body, however, even at that rate, PCU estimates it will be operating at a loss of \$549,000 in 2026. The estimate does not appear realistic because its student body has not been growing.

To cover its deficit incurred so far, the law school has taken out a 30-year Small Business Administration (SBA) Covid Economic Injury Disaster Loan (EID) of \$2,100,000 with a 2.75 percent interest rate. Loan repayment is slated to begin in July of 2024, at which time PCU's expenses will increase by approximately \$55,000 per year or approximately \$3,000 per student. PCU also began working with a consultant to improve its marketing strategy and increase enrollment, although the results of the campaign have yet to be seen. PCU projects that marketing efforts will account for approximately one percent of the law school's expenses in the next three years. In 2022, the school also significantly downsized its office space to reduce rent; its facilities account for approximately 12 percent of expenses. The school's largest expense is compensation and benefits, which account for 42 percent of the total deficit.

Against this background of an ongoing and serious deficit, and looming loan repayment, Dean Dezes stated that the law school has two and a half to three years of funds with which to operate the law school and hopefully improve the law school's financial position. As such, PCU does not have the anticipated financial resources to support its programs and operations for students

already enrolled in the law school and has not clearly advised students of this fact, including its seven current 1Ls, and is therefore not compliant with Guideline 8.1.

Moreover, the assumptions built into PCU's financial projections suggest the law school's finances will not support two and a half to three years of operation, as some of the assumptions of the projections do not appear to be realistic. For example, the law school projects it will increase revenue in 2025 and 2026 by increasing student enrollment to cohort sizes of 25 to 30 students. However, PCU did not provide a tangible plan on how it will achieve this cohort size over the current size of 17 as reported in the 2023 annual report, which increased to 22 more recently after accepting transfers from Irving College of Law due to its closing. Moreover, the projections did not account for any attrition of current students, although its 1L and 2L attrition rates in 2023 are considerable –57 percent and 80 percent, respectively. More realistic and conservative enrollment projections such as maintaining enrollment size and accounting for attrition may reveal a smaller operational runway than what the law school has projected.

PCU's debt and lack of anticipated financial resources raise concerns as to whether it can offer a sound educational program to its current and prospective students.

The law school must produce reasonable evidence of its financial position to its current and prospective students, demonstrating how it can continue to operate to provide a sound legal education to students and ensure all enrolled students have a reasonable opportunity to graduate with a degree and license.

CONCLUSION AND RECOMMENDATION

The inspection team found PCU to be not fully compliant with Unaccredited Law School Rules 4.240 and 4.241. Noncompliance was found in six of the 14 standards of Rule 4.240 as described in the report:

- (B) Integrity, based on misleading communications in its advertisements and in Rule 4.241 Disclosures
- (C) Governance, because the law school has not instituted a Grade Review Committee
- (D) Dean and Faculty, based on lack of completed and regularly scheduled faculty evaluations to assess competency.
- (E) Educational Program, due to low cumulative success on the CBX, contributed by unsound admissions and grading policies
- (H) Admissions, due to a lack of sound applicant screening procedures, high attrition, and poor student outcomes
- (K) Financial Resources, based on the documentation showing that the law school is operating at a significant deficit, without a realistic and tangible plan to bring the school back to profitability.

PCU is also noncompliant with 13 Unaccredited Law School Guidelines: Guidelines 2.1, 2.3, 2.9,

4.8, 4.9, 5.1, 5.2, 5.11, 5.17, 5.25, 5.26, 5.27, and 8.1.

Overall, the inspection team found the law school's administration and board to be enthusiastic about its JD program. For example, the law school has implemented two programs to improve student FYLSX and CBX success, namely, its mandatory "Baby Bar Boot Camp" and its voluntary CBX prep course. While the CBX prep course is not mandatory, all students the inspection team spoke to stated they attend and find it very helpful.

These particular programs are a testimony to the law school's effort to provide students with a reasonable opportunity to license. However, the inspection team also has serious concerns about the compliance issues observed, and the law school's ability to address them. In particular, the law school does not have the financial resources to operate its four-year JD program for even its current students, as the school's operational runaway is two and a half to three years. The law school must address its compliance challenges in a manner that aligns with its available finances.

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**AMENDED
RESPONSE OF PACIFIC COAST UNIVERSITY
SCHOOL OF LAW
TO PERIODIC INSPECTION REPORT**

In consultation with the staff of the Committee of Bar Examiners of the State Bar of California (hereinafter referred to as the "Committee") – and pursuant to Rule 4.244(F) of the *Unaccredited Law School Rules* -- Pacific Coast University School of Law (hereinafter referred to as "PCU") hereby submits to the Committee its *amended* response to the Periodic Inspection Report issued in connection with the inspection of PCU conducted March 25 and March 26, 2024 – as follows:

Except for the objections set forth below, PCU accepts the Periodic Inspection Report.

I. Objections to the Inspection Report

3. Rule 4.240(C); Guideline 2.9(G)(H):

This section of the Periodic Inspection Report (hereinafter sometimes referred to as the "Inspection Report") asserts that "PCU is not compliant with Guideline 2.9(G) and 2.9(H), which requires a law school to establish a Grade Review Committee with written procedures for processing grade review requests." The Inspection Report further concludes that "the law school does not have a Grade Review Committee."

In fact, however, PCU most certainly does maintain a grade-review committee as required by Guideline 2.9 (G) and (H), called the "Academic Council." That committee is composed of faculty members and the dean -- and it operates in strict accordance with the comprehensive and highly particularized written procedures set forth in PCU's Student Information Handbook, which is accessible online on PCU's website.

At the request of Committee staff, in fact, the Student Information Handbook was submitted to the staff with the subject written procedures highlighted as part of the document request propounded to PCU in advance of the March 25-26 site visit. Also as part of that document production, the minutes of PCU's Academic Council meetings convened over the past two years

– during which meetings the Council took up such matters as student petitions for grade changes and for readmission after academic disqualification – were provided to Committee staff.

For the Committee’s ease of reference, those minutes are attached to the email covering this Response -- and the pertinent provisions of PCU’s Student Information Handbook setting forth the written procedures governing the Academic Council in these matters, commencing at page 33, are replicated below:

“PETITIONING FOR A GRADE CHANGE

“A grade once entered into the official transcript may be changed only upon a showing of good cause. The policy set forth below under grading errors is the procedure to be followed to apply for and approve transcript change.

“Petitions to the Academic Council Regarding Course Grades or Examination Grades

“Professors do not possess the authority or power to change any grades -- whether the grade is assigned to an examination or for a course -- after such grade has been submitted by the professor to the registrar. Students are not permitted to lobby professors for their support of any request on a student’s part for a grade change. Once a grade has been released, it will not be changed unless one of the following situations exists:

1. **Error:** A student claiming that an examination grade or a course grade was the product of clerical, recordation, or computational error in the calculation of the grade should, within two weeks after the grades are released, inform the School of Law office and request that the matter be investigated. If the matter is not resolved to the student’s satisfaction, the student may petition the Academic Council for relief. This petition must be filed within one week after the School of Law notified the student of the results of the investigation. (The Academic Council is composed of faculty members.)
2. **Unfairness or Departure from Established Grading Policy:** A student claiming that an examination grade or a course grade was the product of unfairness or was a departure from established grading policy may, within 15 calendar days after the grades are released, petition the Academic Council for relief. For purposes of this section, “unfairness” means that the grade under review constitutes an abuse of the grader’s professorial discretion in that no reasonable professor would award that grade under the circumstances.

“The student is strongly encouraged to meet with the relevant instructor in order to discuss the basis of the grade prior to petitioning the Academic Council. As stated hereinabove, the professor does not possess the authority or power to change the grade. If the student did not meet with the instructor, the student must state in the petition the reason(s) why such a meeting did not take place.

“In any event, the petitioning student must present clear and convincing factual evidence supporting the claim that a grade was unfair or was a departure from established grading policy.

“If the student fails to state a proper basis for the petition, fails to present clear and convincing factual evidence to support the petition, or fails to act timely, the Academic Council may deny the petition summarily.

“If, however, the student satisfies the procedural and substantive requirements of the petition process, the Council may request a statement from the instructor involved. The Council may also request other information it deems appropriate.

“The dean or registrar will notify the student in writing of the outcome. The Academic Council’s decision on the student’s petition is final.”

Subsections (G) and (H) of Guideline 2.9 provide in pertinent part as follows:

“(G) Grade Review Committee.

A law school must establish a committee consisting of faculty, and, if the law school chooses, one or more members of the administrative staff ... to handle student requests for grade reviews.

“(H) Grade Review Procedures.

A student who claims that an examination or course grade resulted from unfairness, a departure from established grading policy, or a clearly shown mistake, and presents credible evidence in support of such claim, may have the claim considered by the Grade Review Committee. A law school must establish written procedures for processing requests for the review of grades by the Grade Review Committee. Grade review procedures need not require a hearing.”

In view of the foregoing, therefore, PCU submits that it is in fact in compliance with the applicable guidelines.

In conclusion, PCU suggests that the Inspection Report’s inaccurate observation that “the law school does not have a Grade Review Committee” may have been the result of a misunderstanding as to the intended meaning and use of the term “Grade Review Committee” in discussions had among the site-visit team members and the dean – to wit: a possible confusion or conflation of a committee that “reviews” a faculty member’s proposed grades ahead of publishing them to the students, on the one hand, and a committee, such as PCU’s Academic Council, whose charge it is instead “to handle student requests for grade reviews,” on the other hand. (During the first Lincoln-Douglas debate, Mr. Lincoln cautioned the audience against confusing a “chestnut horse” with a “horse chestnut.”)

4. Rule 4.240(D); Guidelines 4.8 and 4.9:

In this section of the Periodic Inspection Report, on page 6, it is asserted that PCU “is not conducting peer or dean-led evaluations of faculty” and that “While the law school has a written procedure for the evaluation of faculty and shared a blank faculty evaluation form, the law school is not compliant with Guidelines 4.8 and 4.9 because there is no evidence the school implements its own policy.”

Actually, however, PCU regularly conducts faculty peer evaluations (in addition to faculty student evaluations conducted at the end of every course). As part of its pre-inspection document-production request, Committee staff requested “Copies of all faculty evaluations completed in the past two years for three faculty members, full-time and adjunct if applicable.” (The request did not specify or distinguish between peer evaluations or student evaluations.)

The law school duly complied with that request, submitting faculty evaluations of Profs. Peter Lee, Francis Logan and Richard Rosas, which included both peer evaluations and student evaluations. (For the Committee's ease of reference, those previously submitted evaluations are attached to the email transmission covering this Response.)

At no time did either the Committee staff or the site-visit inspection team request production of any other completed peer- or student-evaluation forms.

Following is a listing of the instructors of whom peer faculty evaluations were conducted at PCU during the past two years:

Fall 2022

Prof. Jordan Eisen (2)
Prof. Robert Kasamatsu (2)
Prof. Francis Logan (2)
Prof. Mark Velez (2)
Dean George Dezes
Prof. Katie Olszewski
Prof. Ann Lakhman
Prof. Robert Lee

Fall 2023

Prof. Joachim Ro (2)
Prof. Katie Olszewski

Due to the size of the file, digital copies of the completed evaluation forms for the above-listed evaluations were previously sent under separate email cover, on May 28, 2024.

Based on the foregoing, PCU is compelled to respectfully register its objection to the Inspection Report's contentions that it "is not conducting peer or dean-led evaluations of faculty" and that "there is no evidence the school implements its own [faculty-evaluation] policy."

6. Rule 4.240(E); Guideline 5.11:

In section 6 of the Inspection Report, at page 8, it is asserted that "The law school is not compliant with Guideline 5.11." That assertion is apparently based on the purported ground that Guideline 5.11 requires PCU to offer its students "the opportunity to take elective courses in a variety of subjects." In fact, however, neither that guideline nor Rule 4.240(E) imposes any such mandate.

More specifically, Guideline 5.11 provides in its entirety as follows:

A law school *must* offer a balanced and comprehensive course of study with materials presented in an organized and logical manner and sequence. The curriculum *should* also offer students the opportunity to take elective courses in a variety of legal topics.

(Emphasis added.).

Thus, although Guideline 5.11 begins by employing the mandatory word “must” to require “a balanced and comprehensive course of study,” the guideline thereafter conspicuously utilizes the altogether different, precatory word “should” -- in the very next sentence, on the immediately following line -- with respect to the offering of elective classes. PCU submits that in accordance with the traditional fundamental rules of statutory construction, where a different word is used within the same statutory provision or rule, it must be assumed that two different meanings were intended. As such, “should” cannot be properly interpreted as synonymous with “must.”

Also in section 6, the Inspection Report references the discussion of this issue had during the site-visit inspection by noting that:

Dean Dezes stated that the academic program is “jam-packed” with necessary courses for the CBX, and he believes it is better for the students to know the fundamental concepts concretely than reduce student time in necessary courses by adding electives. The dean also mentioned the low student count makes it difficult for the law school to offer electives.

The Inspection Report then goes on to conclude that, “The dean’s preference cannot override the *requirements* of the Rules and Guidelines.” (Emphasis added.)

But as stated above, neither the Rules nor the Guidelines include such a “requirement.” Indeed, it has been in specific reliance upon Guideline 5.11’s conspicuous use of the non-mandatory term “should” that the dean has exercised his academic and pedagogical judgment -- based on his more than 20 years of experience as a legal educator and law school administrator, and 17 years as a litigation practitioner before that – in determining how to best prepare PCU’s students for both the California Bar Examination and the competent and ethical practice of law.

Moreover, PCU further submits that its curriculum – including, as it does, courses in all the myriad and varied Bar Exam-tested subjects, legal research and writing classes, and competency training – constitutes by any standard an altogether “sound program of legal education” and “balanced and comprehensive course of study” as expressly required by Rule 4.240(E) and Guideline 5.11, respectively.

And finally, as discussed during the site-visit inspection, polling of PCU’s students has indicated a very low interest in taking elective courses.

* * *

That said, and although the offering of elective courses is patently not required and is inconsistent with the dean’s academic and pedagogical judgement, PCU will acquiesce in the Committee’s curricular preference. Accordingly, PCU will endeavor to reduce the student time currently devoted to the required, fundamental concepts of legal education and training in order to “make room” in the curriculum for a useful elective class or two with an eye to avoiding any resulting excessive prejudice to the students.

9. Rule 4.240(H); Guidelines 5.26 and 5.27:

The Inspection Report's conclusion that PCU does not maintain a sound admissions policy is based in part on: (1) the fact that the law school's 2024 Business and Professions Code Disclosure form reports its application-acceptance rate was 100 percent; and (2) PCU's recent removal of the LSAT from its admissions requirements.

First, and as to PCU's acceptance rate:

During the site-visit inspection, the reasons for the 100% acceptance rate were specifically discussed. In particular, it was explained to the inspection team members that the acceptance rate reported is the percentage of prospective students and "inquirers" who actually submitted formal applications for admission. It was further explained that although many prospective students regularly inquire about the law school and express their interest in applying, it is often the case that the PCU staff advises them against applying (and against paying the \$35 admissions fee) because they would not qualify for admission. Thus, had the PCU staff permitted every interested prospective applicant to apply, the reported PCU acceptance rate would be much lower.

At PCU, it is important that our practices are consistent with our mission. We do not wish to cause any undue hardship to prospective students by giving them the false impression or hope that they will qualify for admission -- nor do we wish to accept a \$35 processing fee for an application that in all likelihood will be denied.

Following are just a few examples of prospective students who were advised not to apply:

(1) In one instance, a prospective student sought admission based on completion of 60-plus units of undergraduate study at a community college. The admissions committee determined that her application would be premature because she did not possess the educational or employment experience necessary for her to succeed in law school. Accordingly, that prospective student was counseled and advised not to apply;

(2) On a separate occasion, a prospective student who had scored in the 40th percentile on the LSAT but had passed only two of the three required CLEP examinations expressed his interest in applying for admission. The PCU staff informed him that his application was not ripe, and counseled him to apply after he had completed the third exam; and

(3) There have been numerous prospective students having prior law-school experience who have expressed interest in applying to PCU but who did not meet the admissions criteria set forth in Guideline 5.34, which governs admission of applicants previously disqualified for academic reasons. PCU did not accept applications from these prospective students -- for the precise reason that those applications would have been rejected.

Conversely, the following is a list of the educational and professional backgrounds of prospective students who were encouraged to apply for admission as first-year law students and whose applications were accepted for this, the 2023-to-2024, academic year:

1. The vice president of a mortgage company;
2. A forensic scientist with a Master of Science degree;
3. An airman with eight years of service in the United States Air Force and an MBA degree;
4. A BA-degree holder and business owner;
5. The owner of a construction company;
6. A therapist for psychiatric patients, who holds a BA degree;
7. A nurse with a master's degree;
8. A police lieutenant; and
9. An optometrist who owns her own optometry office and has a doctoral degree.

Accordingly, PCU respectfully objects to this section of the Periodic Inspection Report on the ground that by omitting mention of PCU's explanation of the 100% application-acceptance rate, the Inspection Report -- however inadvertently and unintentionally -- creates the false and negative impression that PCU maintains an "open door," standard-free admissions policy.

In addition, PCU would respectfully point out that neither the Rules nor the Guidelines obligate an unaccredited law school to require the LSAT as part of the admissions-application process. That said, however, PCU will reinstate the LSAT requirement as soon as practicable.

II. Updates and Compliance Enhancements

2. Rule 4.240(B); Guidelines 2.1 and 2.3(A)-(C):

As reflected in section 2 of the Periodic Inspection Report, the site-visit team expressed valid concern over a PCU advertisement circular titled "Just the Facts." One of those concerns related to the inadvertent understatement of the total JD tuition by \$550, such amount representing the portion of total tuition allocated to PCU's prep-course for the First-Year Law Students' Examination (*i.e.*, the "BabyBar Boot Camp"). As pointed out in the Inspection Report, once the mistake was detected, it was corrected "within one day." (This added cost became effective only as of this academic year, when participation in the BabyBar Boot Camp became mandatory.)

The inspection team also deemed problematic certain other statements included within the "Just the Facts" advertisement as described in the Inspection Report. All references to those identified matters have been removed from the advertisement. (A copy of the revised and current "Just the Facts" circular is attached to the email covering this Response.)

6. Rule 4.240(E); Guideline 5.11:

As is stated above, and although the offering of elective courses is not required by the *Rules* or *Guidelines* and is inconsistent with the dean's academic and pedagogical judgement, PCU nevertheless will acquiesce in the Committee's curricular preference. Accordingly, PCU will endeavor to reduce the student time currently devoted to the required, fundamental concepts of legal education and training in order to "make room" in the curriculum for a useful elective class or two with the aim to avoid any resulting excessive prejudice to the students.

9. Rule 4.240(H); Guidelines 5.26 and 5.27:

As set forth above, PCU will reinstate the LSAT requirement as soon as practicable.

Dated: June 6, 2024

Respectfully submitted,
PACIFIC COAST UNIVERSITY SCHOOL OF LAW

B.G. Dezes

Basil G. Dezes,
Dean, President and Professor of Law

Attachments: As Noted