



**OPEN SESSION
AGENDA ITEM V.A.
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 Major Change – Change of Ownership and Administrative Office –
Abraham Lincoln University School of Law

EXECUTIVE SUMMARY

Abraham Lincoln University School of Law (ALU-Law), a registered, unaccredited distance learning law school, requests approval from the Committee of Bar Examiners (committee) for the following two actions: 1) change ownership from the current owners to their daughter Jessica Park, the law school's dean; 2) change administrative office from its current office building location to a nearby coworking facility. (Attachment A).

BACKGROUND

Under Unaccredited Law School Rule 4.245 “[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.” Rule 4.246 defines major changes to include a law school’s request to change ownership as well as a school’s request to change administrative office.

ALU-Law is a registered, unaccredited distance law school that is part of Abraham Lincoln University (ALU), a for-profit distance learning university headquartered in Glendale, California.

The university, including the law school, is accredited by the Distance Education Accrediting Commission (DEAC), a national institutional accreditor of distance learning programs. DEAC recently renewed the law school's institutional accreditation through January 2029. Due to this institutional accreditation, eligible students can participate in Title IV federal student loan programs.

The current owners of the law school are Young H. Park and Soonie S. Park. They wish to transfer ownership of the ALU, including the law school, to their daughter Jessica Park, currently dean of ALU-Law. The law school would continue to be a part of the for-profit corporation that encompasses the entire university. The portion that is under the State Bar's jurisdiction relates to the JD program. The other degree programs and schools that are part of ALU are registered with the Bureau of Private Post-Secondary Education (BPPE). ALU has sought permission from both BPPE and DEAC as to the move and change of ownership for the other parts of the university, and properly seeks permission from the committee as to ALU-Law.

Because the committee's jurisdiction is limited to the law school, the discussion below will focus on the law school only, but the full transaction will change ownership and location for the entire university, which is part of a single corporation.

DISCUSSION

ALU-Law seeks permission to change ownership of the law school. This would be effectuated through a stock transfer that will transfer full ownership of the law school from parents to daughter, and will relocate the law school and the rest of the university from its current office space in Glendale, California to membership in a coworking facility in Glendale with exclusive use of two offices and shared use of other facilities.

CHANGE OF OWNERSHIP

ALU seeks approval to maintain registration as an unaccredited distance learning law school as it transfers ownership of ALU-Law from parents to daughter and ALU-Law Dean, Jessica Park, via stock transfer. Dean Park has been involved with the law school for over ten years and serves as its dean. She is a California licensee who holds a JD from an ABA-approved school, Stanford Law School.

In addition to leading the law school, Dean Park also serves in leadership roles as an elected commissioner at DEAC, and she is completing a term as a member of the Committee of State Bar Accredited and Registered Schools.

Dean Park plans to continue to operate law school operations unchanged, and to retain experienced staff. She will continue to act as law school Dean and Vice President. The president will continue to work with the school. The current owners will remain on ALU's governing board.

While ownership of the university will be transferred in full, this motion properly seeks the committee's approval for the transfer of ownership as to the law school.

It is recommended that the committee approve this major change of ownership as set forth in Attachment A, for a number of reasons. The law school will continue to be operated in compliance with the Unaccredited Law Schools Rules; and the school will also be operated and owned by a leader with significant experience in legal education. Should minor adjustments be needed, these can be discussed at the law school's inspection, which will be scheduled within the year, and can take place after the transfer is complete.

ALU-Law should confirm to the committee completion of the ownership change, or a status update regarding the change, by August 15, 2024.

CHANGE OF ADMINISTRATIVE OFFICE

ALU's administrative office is currently located in an office building in Glendale, California. The entire university, including ALU-Law, seeks to move to a smaller, less costly space consisting of two dedicated offices in a shared coworking space, along with a coworking membership that gives limited access to shared conference rooms and office support, as well as meeting spaces at other coworking locations. The proposed headquarters is located at 500 N Brand Boulevard, Suite 2000, Office 12, Glendale, CA 91203, which is less than one mile from the current location.

While this is a significant change, since the pandemic, the law school has had few visitors to the building, and no student is required to complete any portion of their legal education in person. Staff has been working remotely for several years now. Based on that experience, they estimate that the location selected will provide sufficient space for its intended occasional use. The law school is prepared to update its communications to accurately describe its facilities, and to advise when the space is staffed or how to meet with a staff member in person when needed.

The proposed lease length would extend through at least January 1, 2026, with an option to renew the lease on a month-to-month length or for a longer period of time.

Staff recommends that the move be approved, with a status update to be provided by August 15, 2024, and that the law school participate in a videocall inspection confirming the move.

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 Abraham Lincoln University School of Law's request to change ownership to Dean Jessica Park via stock transfer. The law school is directed to provide an update as to the status of the transfer by August 15, 2024. The law school will retain its status as a registered, unaccredited law school and its inspection schedule will remain unchanged.

FURTHER MOVE, that the committee approve Abraham Lincoln University School of Law's change of administrative office to 500 N Brand Boulevard, Suite 2000, Office 12, Glendale, CA 91203. The law school is directed to advise staff of the status of the move by August 15, 2024, and to undergo a videocall inspection within 30 days of completion of the move or as soon as practicable thereafter as staff can schedule the inspection.

ATTACHMENT LIST

- A. Abraham Lincoln University School of Law School Major Change Request – Change Ownership and Change Administrative Office



June 13, 2024

Committee of Bar Examiners, Educational Standards
The State Bar of California Office of Admissions
180 Howard Street
San Francisco, CA 94105

Subject: Notification Under Rule 4.245 of Rule 4.246 (B) and (I) Major Changes for Abraham Lincoln University - Update

Dear Committee of Bar Examiners:

This letter updates one part of the change of location portion in the May 15, 2024 letter titled *Notification Under Rule 4.245 of Rule 4.246 (B) and (I) Major Changes for Abraham Lincoln University*.

ALU's new location is still at 500 N. Brand Blvd, Suite 2000, Glendale, CA 91203, but instead of Offices 35 and 36, ALU's offices will be Offices 12 and 36, with Office 12 being designated as the mailing address. ALU is providing an updated floor plan with key accordingly.

Industrious permits members to modify office spaces prior to the move. ALU saw that Office 12, an option that only became available recently, included more space (215 sq. feet) and city-view windows than Office 35, aligning better with ALU's goal to have one of two offices be a more welcoming space for staff and guests that visit ALU's new location.

Due to Industrious's processes, ALU cannot provide one lease document to show its current leasing of Offices 12 and 36; Industrious only removes Office 35 from the prior lease through a back-end process, not through any revised lease document.

Therefore, in order to provide an update of what ALU currently leases from Industrious in a clear way, ALU is submitting a letter from Industrious representative Liana Dickerson dated 6/13/2024 to evidence its leasing of Offices 12 and 36, along with its new lease for Office 12. Please note that ALU's prior-submitted lease remains in effect for Office 36, but that will not be evidenced in a revised lease since Industrious used back-end processes to remove Office 35 from ALU's lease rather than a revision of the prior lease file.

Please let me and ALU staff know if you have questions about this update and its attachments.

Best wishes,

A handwritten signature in black ink that reads "Jessica K. Park". The signature is fluid and cursive, with the first name "Jessica" and last name "Park" clearly legible.

Jessica K. Park

Vice President & Dean, School of Law

jpark@alu.edu

213-252-5100 ext. 201

ABRAHAM LINCOLN UNIVERSITY

Since 1996



May 15, 2024

Committee of Bar Examiners, Educational Standards
The State Bar of California Office of Admissions
180 Howard Street
San Francisco, CA 94105

Subject: Notification Under Rule 4.245 of Rule 4.246 (B) and (I) Major Changes for Abraham Lincoln University

Dear Committee of Bar Examiners:

In compliance with the *Unaccredited Law School Rules*, Title IV, Division 3, Rules 4.245 and 4.246, Abraham Lincoln University (ALU) is notifying the Committee of Bar Examiners to seek prior approval for two major changes in compliance with *Unaccredited Law School Rule 4.245 Prior approval of major change* and *Unaccredited Law School Rule 4.246 Major changes, and the defined (B) and (I) changes*.

Unaccredited Law School Rule 4.245 states: "A registered law school contemplating a major change must notify the Committee and obtain its prior approval before making the change. The notice must explain in detail any effect the change might have on the law school's compliance with the rules and be submitted with the fees specified in the Unaccredited Law School Fees (Schedule of Charges and Deadlines). The Committee may then require submission of additional information or an inspection."

Unaccredited Law School Rule 4.246 includes the following language for major change definitions in (B) and (I):

*"(B) changing the location of the law school's administrative office ..." and
"(I) changing the ownership of the law school."*

Guideline 4.11 Notice of Changes (B) states the following about notice of changes related to mailing address: "A law school must notify the Committee in writing of any change of mailing address, e-mail address, phone number, or fax number for the law school's primary administrative office, head administrator, dean and registrar. The written notice, explaining

the changes and their effective dates, must be sent no later than five (5) days before the specified effective dates.”

Pursuant to the rules applicable to unaccredited law schools, ALU is including in this notice a detailed explanation of any effect the changes might have on the law school’s compliance with the rules.

This notice is also provided in compliance with the *Accredited Law School Rules* applicable to ALU’s pending application for accreditation, which are the *Accredited Law School Rules* Title IV, Division 2, Rules 4.164 and 4.165 (B) and (I), as in effect until January 1, 2022, which state, in pertinent part:

Rule 4.164 Prior approval of major changes

An accredited law school contemplating a major change must notify the Committee and obtain its approval at least ninety days before making the change. The notice must explain in detail any effect the change might have on the law school’s compliance with the rules and be submitted with the fees specified in the Schedule of Charges and Deadlines. The Committee may then require submission of additional information or an inspection.

Rule 4.165 Major changes

The following are major changes:

(B) changing the location of the school, or the location of a branch campus or satellite campus or seeking Committee approval to open a new branch campus or satellite campus;

...

(I) changing the ownership of the school.

ALU wishes to submit the applicable fee for these major change requests, but needs the State Bar’s record of costs. The present Unaccredited Law School Fees, effective January 1, 2018, state that the fee for a 4.245 Request for approval of Major Change is not an amount but a rate of \$275/hour (see screenshot). ALU is ready to submit the applicable fees once it is invoiced for the number of staff hours expended on review and processing of these notifications.

Screenshot 1: Unaccredited Law School Fees published on State Bar website on 5/13/2024 with outlining of the row related to Unaccredited Law School Rule 4.245

TITLE 4, DIVISION 3

UNACCREDITED LAW SCHOOL FEES

*Fees previously adopted by the Board of Trustees or mandated by statute.
Amended effective **January 1, 2018.***

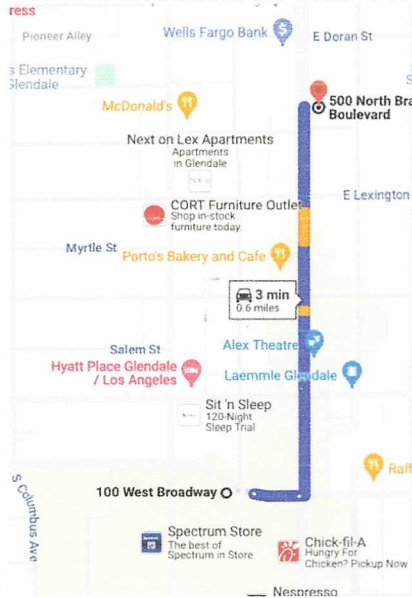
<i>Rule</i>	<i>Description</i>	<i>Amount</i>	<i>Deadline</i>
4.209(B)	Services of Senior Executive or consultant	\$275.00/hour	Not applicable
4.209(C)	Travel Expenses (per State Bar Travel Reimbursement policy)	Actual cost	Not applicable
4.221(A)	Application for Registration	\$2,310.00	Not applicable
4.221(B)	Inspection for Application for Registration	\$5,775.00	Not applicable
4.241(D)	Deadline for Disclosure Statement Certification and copy of Disclosure Statement	Not applicable	November 15
4.242	Annual Compliance Report	Not applicable	November 15
4.242	Category A law school fee	\$725.00	Not applicable
4.242	Category B law school fee	\$1,090.00	Not applicable
4.242	Category C law school fee	\$1,445.00	Not applicable
4.242	Late Filing of Annual Compliance Report	\$350.00	Not applicable
4.243	Self-Study (if separate from inspection)	\$275.00/hour	Not applicable
4.244(B)	Inspection Category A law school fee	\$6,925.00	Not applicable
4.244(B)	Inspection Category B law school fee	\$9,000.00	Not applicable
4.244(B)	Inspection Category C law school fee	\$11,000.00	Not applicable
4.245	Request for approval of Major Change	\$275.00/hour	Not applicable
4.261	Response to Notice of Noncompliance	\$924.00	Not applicable

Explanation of Major Changes on Any Effect on Compliance with Unaccredited Law School Rules and Guidelines

- I. Unaccredited Law School Rule 4.246 (B) changing the location of the law school's administrative office*

Abraham Lincoln University is seeking prior approval to change the location of the law school's administrative office from its current location at **100 W. Broadway, Suite 600, Glendale, CA 91210** to **500 N. Brand Blvd, Suite 2000, Office 35, Glendale, CA 91203.**

The new location is 0.6 miles away from the old location by car, as shown in this screenshot.



ALU is contemplating this change of office location because ALU's lease at the present Glendale Galleria office tower location is coming to an end. ALU has negotiated an option to extend its current lease for three months after its expiration on June 30, 2024 in case additional months would better support Committee review and pre-approvals of this change.

ALU is requesting approval of the proposed new location to be effective July 1, 2024, but that date can be extended up to October 1, 2024 if a later date better supports time for pre-approvals.

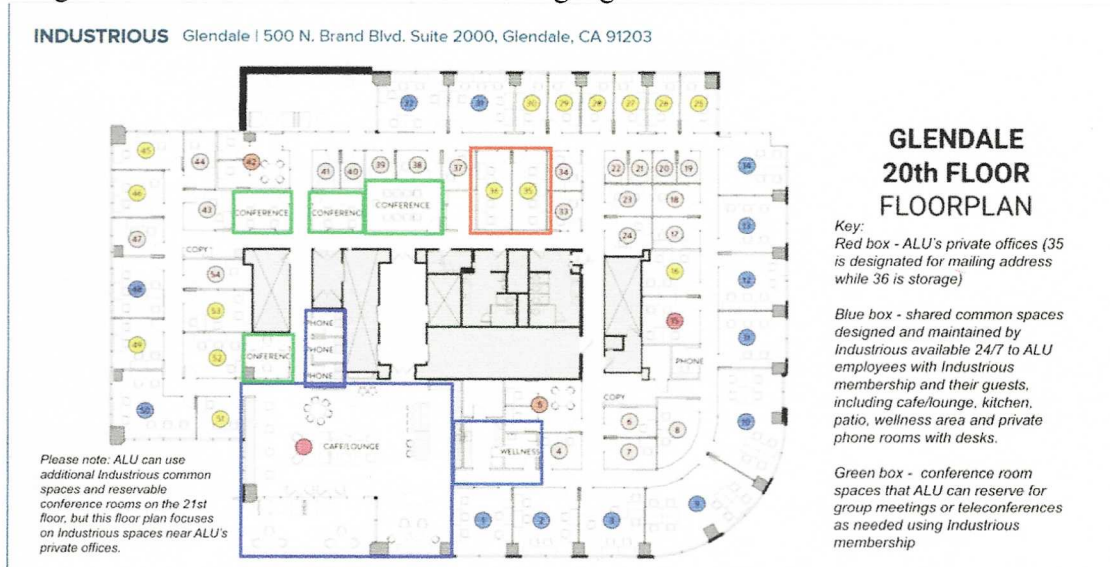
Compared to its current location, the new proposed location is better for ALU, and is expected to improve connectedness and student support and services. Like many firms -- and most schools predominantly delivering education online -- ALU has found that providing excellent support and service to its students requires smart technologies and much less physical office space than it presently leases. During and after the COVID pandemic, all but a few ALU staff worked remotely, and of course, ALU's online educational delivery remained fully online. Exploring options near the current office location, ALU found a Glendale location for offices with shared conference rooms and available co-working spaces which will allow ALU to gather employees together when needed without the expenses of continually leasing a larger footprint. Additional amenities of the new space include mail processing, access to a professional reception area, and a variety of options for as-needed conference and meeting rooms. The facility additionally offers a membership that permits ALU flexibility to increase office square footage if necessary during a lease, and allows ALU staff to access multiple Industrious locations throughout California. Since the Industrious membership includes not just access to reception areas at one location, but can simultaneously provide access to communal reception areas and conference rooms as needed at multiple locations, ALU views the Industrious membership as a way to help ALU staff

meet with ALU community members as needed in professional workspaces throughout California, which is in support of ALU's mission.

There are no anticipated effects that the change of location would have on compliance with unaccredited law school rules and guidelines. ALU is an online institution in which students study and receive services remotely. They do not access facilities or services at the office location; they receive them through distance learning and other industry-standard technologies. With employees in the vast majority working remotely, infrastructure for educational and service delivery is online, as is employee connectedness and collaboration.

While the mailing address for the new proposed location is 500 N. Brand Blvd. Suite 2000, Office 35, Office Glendale, CA 91203, ALU is actually renting two adjacent offices, Offices 35 and 36, in the same building, with each office having 165 square feet.

Image 1: Floor Plan with Offices 35 and 36 highlighted in the red box



ALU staff has sufficient space to locate required records, files and texts related to the law school to the new proposed location, as well as space for office staff to work at desks or to hold group meetings. In addition, due to the Industrious membership, ALU is able to use well-furnished reception areas (highlighted in the floor plan with a blue box) and add any needed conference room spaces flexibly for larger group meetings at the Glendale location (examples of spaces are highlighted in the floor plan with a green box) and other Industrious locations in California, as needed. In this way, the move improves ALU's capacity to use local facilities to support the mission of the institution and the advancement of the online JD program through professional workspaces to connect with the ALU community.

A copy of the lease is attached as Exhibit I.

ALU is submitting this change of location to the Distance Education Accrediting Commission (DEAC) 10 days ahead of the required 30 days' notice and to the Bureau of Private Postsecondary Education 10 days ahead of the required 30 days' notice. Fees specified for these changes by these entities have also been paid.

II. Unaccredited Law School Rule 4.246 (B) (I) changing the ownership of the law school

After founding Abraham Lincoln University in 1996, Mr. Young H. Park (formerly Hyung Joo Park) and Mrs. Soonie S. Park (formerly Soon Hee Park) owned and operated Abraham Lincoln University and its School of Law for 28 years of the institution's history. Jessica K. Park, their daughter, began working at the institution in 2010 and has a 14-year history as an ALU employee, now serving as the Vice President and the Dean of the School of Law at Abraham Lincoln University.

Mr. Park, Mrs. Park and Jessica K. Park agreed April 30, 2024 to Jessica K. Park's succession as owner of Abraham Lincoln University upon completion of all necessary approvals. The stock transfer agreement includes, in Section 1.5, the following timing provision, which all parties initialed: "[t]he transfer in this Agreement shall be contingent upon approvals by any and all government agencies and authorities; no closing shall occur until and unless there are approvals of those entities." A copy of the stock transfer agreement can be provided to State Bar staff upon request.

Other approving entities include the Distance Education Accrediting Commission and the Bureau of Private Postsecondary Education. These other entities have been similarly notified of the contemplated stock transfer between family members that has not yet become effective. ALU is providing a May 10, 2024 letter from the Distance Education Accrediting Commission staff, which cites 34 C.F.R. §600.31(e)(1) as DEAC's basis of an exemption to the reporting requirements for a change of ownership (Exhibit II). ALU is also providing the acknowledgement letter from the Bureau of Private Postsecondary Education of ALU's submitted Change of Ownership form with the \$250 fee that is the BPPE required fee for an institution approved by means of accreditation (Exhibit III). Since ALU is an institution approved by means of accreditation by DEAC, it is anticipated that BPPE will acknowledge the change of ownership in a fashion similar to that which is stated in DEAC's May 10, 2024 letter.

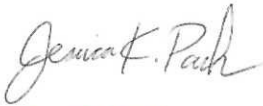
The Park family is committed to a positive and effective succession in ownership and leadership of the institution. It will handle the change of ownership process as smoothly and timely as possible with the U.S. Department of Education, other federal and state agencies who need notice or approval of the ownership change, and the State Bar of California. No adverse impact upon students or the school's compliance with the applicable State Bar and Committee of Bar Examiners rules and guidelines is anticipated.

Please do not hesitate to contact us directly if you have questions about this notice or require additional information.

Best wishes,



Young H. Park
Chairman, Board of Directors
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**GLENDALE
20th FLOOR
FLOORPLAN**

Key:
Red box - ALU private offices (12 is designated for mailing address while 36 is storage)

Blue box - shared common spaces designed and maintained by Industrious available 24/7 to ALU employees with Industrious memberships and guests, including cafe/lounge, kitchen, patio, wellness area and private phone rooms with desks.

Green box - conference room spaces that ALU can reserve using Industrious memberships for meetings or teleconferences as needed

Please note: ALU can use additional Industrious common spaces and reservable conference rooms on the 21st floor but this floor plan focuses on Industrious spaces near ALU's private offices.



- Small Office (1-2)
- Medium Office (3-4)
- Large Office (5+)
- XL Office (9+)
- Executive Office (4-6)

