



AMERICAN INSTITUTE OF LAW

CONFIDENTIAL

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Dear State Bar:

INTRODUCTION

American Institute of Law wishes to thank the State Bar for its inspection report. We appreciate the State Bar's assistance and guidance. American Institute of Law accepts the report in part, while respectfully providing clarification to some of the questionable observations. American Institute of Law welcomes the observations and will provide solutions, immediately. Please find our acknowledgements, responses, solutions as well as timelines.

Since the inception of the school in 2016, we have sought to provide the best legal education. The signature line included in all of our outbound emails includes the tagline, "*Honesty and Integrity, One Student at a Time*". We wish to continue to maintain this transparency and integrity.

We have endeavored to create a law school that would provide legal education to working adults and to those who might not have otherwise been able to attend law school due to time or financial obstacles. It has always been our mission to provide an online education that is accessible and one that uses the full power of streaming lectures in both video and audio format. Our goal is to always strive to be extremely transparent and be a "shining" example of how a law school should operate. We acknowledge that we have a number of areas that require correction, and we are committed to correcting all areas immediately and to the best of our ability with the help of State Bar's guidance and oversight. As we seek to provide evidence of issues that we have already corrected or issues that we are in the process of correcting, we will inform the State Bar in our annual reports and meetings as to status of continued compliance until further notice. Our goal is to seek California Accreditation by achieving and maintaining a 40% pass rate and improving our education, support, mentorship and the use of external bar preparation such as BarBri, Flemings or other providers.

RESPONSE 1

We wish to inform the State Bar as to the status of the former Dean, Edward Green. On June 10, 2024, we were informed (all updates received via text message) by his family that he was transported to the hospital with an intestinal issue that required immediate surgical intervention. We were told that this issue will be resolved shortly and that he is expecting to return soon. Meanwhile, we continued to offer seamless education without interruptions. We requested that his family keep us informed every few days as to his status. This did not materialize as we had hoped, even after repeated requests as to his health status. As a result, we appointed Chester Zaluga as the acting Dean and informed the bar of Edward Green's status. We had also been in consultation with Michael Dowd. He was made aware at all times.

Unfortunately, Ed Green's family only provided sporadic updates, every few weeks. We were informed that Edward Green was admitted to intensive care for observation and further treatment. But he should be returning soon. As the weeks turned into months with no foreseeable improvement, we found it necessary to appoint Michael Dowd as the new Dean. He has been working with us since 2016 and has an extensive administrative, supervisory and teaching background.

We all continued to pray for Edward Green. In December 2024, we were then informed that Edward Green's health has been deteriorating significantly and that he was suffering from serious post-surgical complications. We were also informed that he was admitted to a long-term care facility, requiring personal care. In a subsequent text, we were informed that he was losing his memory and unable to speak coherently as well as various other serious complications. We all continued to pray, in the hope that he might recover. Unfortunately, we were made aware of some heart-breaking news! It is with great sadness that we were informed that Edward Green passed away peacefully. This was very hurtful as he had been a friend for 18 years.

Although these life issues were occurring before and during the inspection, we have always continued to provide an excellent education for our students. We have never intended to be misleading in any way. We have always impressed upon our students that this program requires extreme commitment and time. We are pleased to inform the State Bar that 3 more graduates have just passed the February bar exam and that our 1L to 2L attrition rate has decreased significantly. We are also pleased that our student population is continuing to grow.

Self-Correction Status

As result of the 2024 inspection findings, we learned that Edward Green failed to correct some areas noted by the bar in 2022 that required self-correction. The enter staff was unaware of these deficiencies as Edward Green had indicated that he was “taking care” of all follow-ups to our 2021 inspection as he was the only recipient of all emails from the bar regarding the 2021 inspection. We can only assume that he may have been declining or ill for the past 3 years and chose not to inform any of the staff regarding his health condition(s). It has always been our policy to correct issues immediately, and we are sincerely sorry for any oversights. American Institute of Law is respectfully requesting that we be allowed to immediately self-correct all compliance issues noted on the inspection report and commits to keeping the State Bar aware of our progress and preventing these issues from recurring.

RESPONSE 2

American Institute of Law acknowledges deficiencies in its disclosure statement and has made all necessary corrections. The corrected disclosure statement is located on the admissions tab, the footer of all webpages, on the signature line of all emails and on the enrollment agreement. We will ensure that updating and the extreme visibility and accuracy of the disclosure statement will be our top priority.

RESPONSE 3

American Institute of Law has already conducted its research and has found that ALL is in compliance with the classification of its employees and contractors based on California State Legislature AB 2257, which was passed in 2020. AB 2257 expanded the list of exemptions.

RESPONSE 4

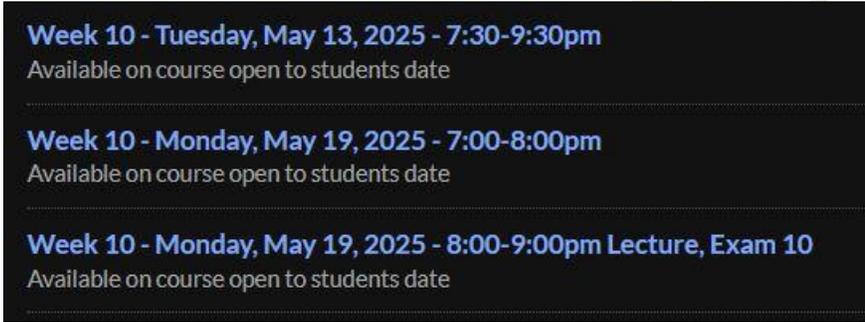
The former dean had requested that an 81.25% pass rate be displayed on the rotating banner. He indicated that he was intending to demonstrate that those students who had a 2.0 or greater resulted in this pass rate. To remove any confusion, American Institute of Law has removed all references to our pass rates and focus on tuition and our delivery system.

RESPONSE 5

American Institute of Law’s highlight of “100% Online, Live Interactive”, “on-demand” and “watch anytime, anywhere” was meant to inform applicants that they do not have attend onsite (100% online) and that we offer most of our classes live and then those classes are archived to be watched, on-demand, anytime, anywhere. All prospective students have always been made fully aware that they do not have to attend, live. All students are required to maintain a study log of their activities. To remove any confusion, American Institute of Law has removed these statements.

RESPONSE 6

American Institute of Law courses are delivered one course at a time, once per week. For example, we are teaching Real Property, Law 222, Week 10 this week on Tuesday evening, May 13th from 7:30 to 9:30PM PST and Sunday evening May 19th from 7:00 to 9:PM PST for live viewing. All students who wish to attend live may do so, with the archived version being made available by the end of the following business day by 5PM PST for those who prefer the archived delivery. We designed it this way to make study both unique and accessible.



The screenshot shows a dark background with white and blue text. It lists three course sessions for Week 10:

- Week 10 - Tuesday, May 13, 2025 - 7:30-9:30pm**
Available on course open to students date
- Week 10 - Monday, May 19, 2025 - 7:00-8:00pm**
Available on course open to students date
- Week 10 - Monday, May 19, 2025 - 8:00-9:00pm Lecture, Exam 10**
Available on course open to students date

archived version being made available by the end of the following business day by 5PM PST for those who prefer the archived delivery. We designed it this way to make study both unique and accessible.

To remove any confusion, American Institute of Law has removed “courses are delivered one course at a time, once per week”.

RESPONSE 7

American Institute of Law acknowledges the need for the establishment of a Grade Review Committee. We have created a formal Grade Review Committee, which consists of Dean Michael Dowd, Administrative Dean Chester Zaluga and Professor Sheldrin Ruiz. We are committed to providing minutes and other evidence of its progress, operation and implementation pf processes.

RESPONSE 8

The Dean is responsible for training and guidance regarding the use of our technology and the responsibilities of all professors. We do recognize the need to formalize our faculty evaluation process and intervals, and we have now done so. We are committed to using this tool to improve our faculty and to ensure that all faculty and staff function as a cohesive unit. Faculty evaluations will be conducted by the Dean a minimum of twice per year. Attached please find our new Instructor Evaluation.

RESPONSE 9

During the admissions process, American Institute of Law fully describes and explains our system. Our previous Admissions requirements included the following:

Pre-Legal Education

- **DEGREES:** Applicants must possess an associate degree or greater: Degree must be from an accredited US college or equivalent. You may confirm that your university or universities are approved by visiting [US Department of Education](#) or [DEAC](#) websites.
- **UNITS:** Applicants must have earned a combined total of 60 qualifying semester/90 qualifying quarter units/credits or greater: Units/credits Must be from an accredited US college or equivalent.
- **CLEP:** Applicants must complete CLEP Exams requirements (satisfactory completion of exams): this solution is for all students who do not possess sufficient units.
- **FOREIGN DEGREES:** If you possess foreign credentials, you must submit a Foreign Evaluation by one of the California Bar Approved Evaluation Providers.

Other Requirements

We have always required a resume, personal statement, official transcripts and an enrollment agreement followed by an official welcome letter.

We do realize that we must improve the screening of all law school applicants. American Institute of Law has now added additional, strict entrance requirements above the minimum standard previously required. These new requirements and policies have been added to the Admissions page, Catalog and all email communication to all prospective students. These requirements will be communicated on the website, through phone consultation, email and texts to all prospective students.

All admissions enrollment documents must include the following items:

1. Completed Admissions Application
2. Evidence of the minimum pre-legal education (all transcripts must demonstrate a combined minimum GPA of 2.0 or greater)
3. A minimum of 2 letters of recommendation
4. Personal Statement and Letter of Intent which fully answers ALL of the following questions: (1) Why do you want to become an attorney? (2) What makes you a good candidate for consideration into the AIL JD Program? (3) Are you willing to commit to the time and effort required to complete the JD program? (4) Are there any possible obstacles that might prevent you from completing the entire program? (5) Are you prepared and willing to commit to a minimum monthly tuition payment of \$333.85? (6) Are there any possible financial challenges that you believe may cause you to become unable to make timely tuition payments? (7) Are there any other issues or concerns that American Institute of Law needs to be aware of regarding your probability of successfully completing the JD program?
5. Resume or CV
6. All Official Transcripts
7. Proof of Catalog Receipt
8. Government Issued Photo Identification
9. Proof of BarBri 1L Success Account Creation
10. All Do-Over (Starting Over) students who wish to start the first year over must complete a Starting Over Petition and explain the reason for the request to re-start the first year of law school. If the applicant was dismissed and if the applicant is accepted by American Institute of Law, they will be placed on academic probation.
11. Admission's Decision
12. Welcome Letter
13. Receipt of signed Enrollment Agreement
14. Receipt of Tuition Payment Authorization

RESPONSE 10

American Institute of Law has always required that students take exams within a 60-minute period. We have never allowed any student to take any exam within a 24-hour window. Former Dean Edward Green was supposed to have been working with Populi to integrate with ExamSoft on our proctor system to be monitored by our professors. He had told us that he was working with the State Bar. Therefore, we assumed that Edward Green had been granted permission by the bar to use this testing system. We are now aware that this task was not completed.

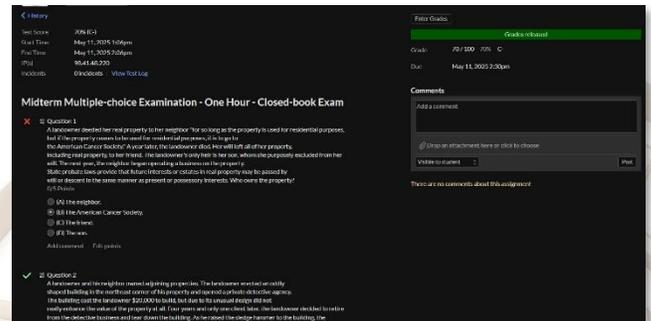
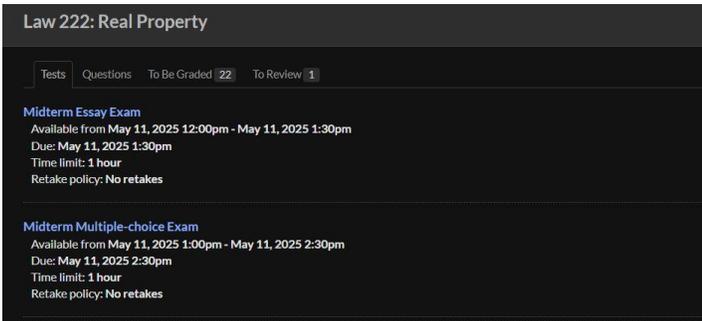
POPULI AI PROCTORING TESTING PROCEDURE All professors are required to monitor the Testing Integrity System. All students are required to submit their government-issued ID (i.e. Driver's License, Passport) in order to login and to be authenticated to use the password-protected Integrity Test System. To take any exam, students must (1) login to our secure learning management system, which requires a unique password and tracks the user IP address; (2) activate and authorize their web camera:

- **Webcam monitor:** At frequent and random intervals, the student's webcam will snap a picture, and store captures for professor or academic admin review.
- **AI Tracking:** System tracks and alerts the professor when students looks away from screen, stops and resumes exam and snaps pictures.
- **Fullscreen Requirement:** The student can't answer test questions unless his browser window is in full screen.
- **Track copy-and-paste:** If the student copies and/or pastes text into the test, that action is recorded and professor alerted.
- **Incident Log:** All violations/incidents are logged and flagged for professor or academic admin review.

Our latest exam was conducted over this past weekend, May 11, 2025. Please note the following screen captures:

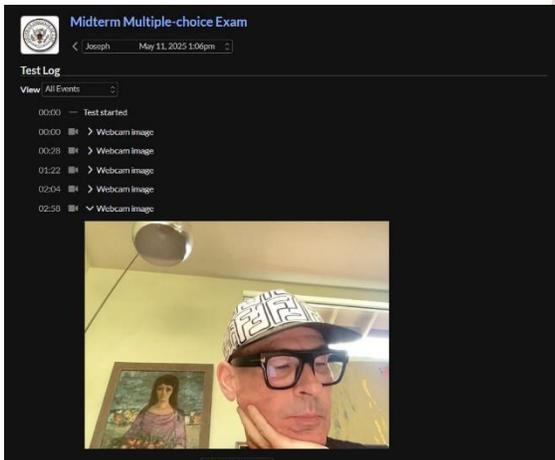
Course: Law 222

Professor/Admin Interface: Exam Backend System



Student Taking Exam

Student Government-Issued ID



We feel that our Populi Proctor System is an excellent test proctoring solution that is fully integrated with our learning management system and is able to be monitored by faculty. AIL is respectfully requesting that we be allowed to continue to use our current testing system. If our system is unacceptable, we will immediately implement ExamSoft. Should we be required to do so, we will execute immediately and provide evidence of our contract within one week.

RESPONSE 11

American Institute of Law will be implementing a rubric requirement for all 2nd through 4th year courses. AIL will be initiating yearly training on grading and analysis of bar exam questions that are being used by the State Bar. AIL will also be initiating yearly reviews of student exam grades for comparison with bar exam grades by graduating students to improve teaching and grading at the school. This review will be conducted by staff and faculty. AIL will be eliminating the use of bell curves until a Faculty Grade Correlation Committee is formed to adopt and implement a policy for calibration of such a curve system. AIL will be creating this Faculty Grade Correlation Committee to address this and other issues such as exploring and adopting a policy to coordinate grading between the classes and working on correlation of class grades with Bar grades. AIL will inform the State Bar as to our progress in our annual report.

RESPONSE 12

American Institute of Law is changing the syllabus for both the 1st and 4th year classes. These changes will reflect that we will be devoting time in each class to instruction on how to use Westlaw and how to conduct traditional legal research.

RESPONSE 13

American Institute of Law will be investigating the offering of specific electives, i.e. Family Law, Patent Law and Immigration. When employers announce the need for internships, we have always posted those opportunities directly with our Learning Management system bulletin board. We will commit to a more active role in this endeavor for upper-division students.

RESPONSE 14

In addition to our academic standing policies that are defined on page 14 and 15 of the catalog and our current graduation requirement, "Students become eligible to graduate provided each required course is completed with a passing grade and the student finishes their studies with a cumulative GPA of 2.0 or better. Should any modifications to the academic standing policy become necessary, all students will be notified prior to implementation." We will add the following graduation requirements to the catalog and website: All graduates must complete a Graduation Application to confirm that at least 864 institution annual clock hours have been completed (each year) and that they have successfully completed a minimum of 104 institution semester units and are in "Good" standing. The Graduation Application will also verify that all tuition has been paid in full and provide a mailing address for official transcript(s) and diploma.

RESPONSE 15

American Institute of Law will conduct quarterly governing board meetings. We will maintain detailed minutes of all meetings and keep permanent electronic copies of all meetings.

CONCLUSION

American Institute of Law trust that our responses have demonstrated our commitment to comply with all requirements, moving forward. We will keep the State Bar aware of our progress, and we hope to become California Accredited, soon.

Respectfully,



Michael Dowd