



The State Bar of California

OPEN SESSION

AGENDA ITEM

4.5 JUNE 2025

COMMITTEE OF BAR EXAMINERS

DATE: June 20, 2025

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Inspection Report – American Institute of Law

EXECUTIVE SUMMARY

American Institute of Law (AIL), an unaccredited, correspondence law school, was inspected on September 25, and October 16, 2024. The inspection report and the law school's response are attached for review by the Committee of Bar Examiners (CBE). (See Attachments A, B, and C). Staff recommends renewal of registration, with the next inspection to be set for spring 2026.

RECOMMENDED ACTION

Staff recommends that the law school's registration be renewed and the next inspection be set for spring 2026 and that the following actions be required: 1) the law school correctly post its disclosures in a forthright manner and provide evidence of completion to staff by July 1, 2025; 2) the law school provide in its 2025 annual report and all future reports until further notice, documentary evidence confirming satisfaction of the recommendations in the report, or reasons why the recommendations are not completed and timelines and plans for completion.

DISCUSSION

AIL is a for-profit correspondence law school last inspected in December 2021. The CBE reviewed the corresponding inspection report in June 2022 and set AIL's next inspection for fall 2023 to allow the law school the opportunity to demonstrate that it could self-correct 16

significant recommendations identified in that inspection. The inspection was scheduled for fall 2024, partially to accommodate AIL's request for an extension due to staff illness. When the inspection was conducted in fall 2024, six of 16 recommendations were still incomplete, and eight additional compliance issues were identified.

While the full list of compliance concerns observed at the 2024 inspection are documented in the attached inspection report, key areas of concern are summarized here: 1) the law school does not appear to communicate with prospective and current students in a forthright manner, obscuring required disclosures and leading students to believe that their ability to graduate from the law school and license is much greater than it is (pages 4 and 6 of report); 2) the law school generally accepts students who meet the minimum pre-legal criteria, but does not assess ongoing performance or provide adequate academic support to help students transition to graduate level performance (pages 12-13 of report); and 3) the law school does not appear to offer a sound educational program, based on long-term trends in which students are not able to progress, pass the First-Year Law Students' Examination, and license (pages 9-10). Approximately 300 students have enrolled since 2015, but only 17 have taken the bar exam, and only six have licensed as attorneys as of the July 2024 exam. The law school's results for the February 2025 exam were as follows: 2 out of 3 takers passed.

After the inspection, the team identified additional compliance issues during the document review. First, the law school's disclosures continue to be placed in a manner which is not forthright. An initial repost of the disclosures omitted the statutorily required web posting completely. When it was added back at the State Bar's request, it was not labeled as a disclosure, but instead labeled as "Business and Professions Code", while another item was labeled as a disclosure. In addition, the law school's admission application was removed from the admission tab where the disclosures are located, further reducing the possibility that a consumer would see it. Staff also encountered an instance in which the law school does not appear to be following the requirement to seek official transcripts within 45 days of enrollment.

AIL's response to the inspection report (Attachment B) contains promises to improve but generally lacks documentary evidence or timelines. Without this detail, the inspection team could not determine when or whether the law school would come into compliance. The law school's leadership team including Mel Morrison and Chet Zaluga have served at two prior law schools before coming to AIL, and Dean Michael Dowd was a faculty member prior to becoming dean. Despite the team's experience, AIL has not yet demonstrated full compliance.

AIL responds that now that its new dean is in place, appointed in fall 2024, the law school will be able to take the steps needed to come into compliance quickly.

Staff recommends that the law school's registration be renewed and the next inspection be set for spring 2026 and that the following additional actions be required: 1) the law school correctly post its disclosures in a forthright manner by July 1, 2025 and provide evidence of completion to staff; 2) the law school provide in its 2025 annual report and all future reports until further notice, documentary evidence confirming satisfaction of the recommendations in the report, or

reasons why the recommendations are not completed and timelines and plans for completion. This recommendation relies, in part, on the law school's assertion that the new leadership team is prepared to take significant action to affirmatively address the recommendations in the inspection report; the inspection timing will allow the law school to demonstrate that it has been able to come into compliance and maintain that compliance heading into the 2026-2027 school year.

Alternatively, if the CBE finds that the law school's assertion that it can come into compliance is not credible or that more formal action is warranted, the CBE can issue a warning that is the first step of the probationary process. The warning letter would "requir[e] immediate action to address specified deficiencies within a certain number of days of the date of the warning." (Rule 4.244(G)(4)).

If the law school is not able to address the deficiencies identified in the warning letter, then the CBE would issue a Notice of Noncompliance following the process set forth in [Rules 4.260-4.269](#). That process includes a response, a further inspection of the areas of noncompliance, a possible hearing, and then notice before probation or termination of registration is imposed.

PREVIOUS ACTION

[American Institute of Law Inspection, CBE Meeting June 2022, Item V.E. O-404](#)

FISCAL/PERSONNEL IMPACT

None

AMENDMENTS TO RULES

None

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

None – core business operations

RESOLUTIONS

Should the Committee of Bar Examiners concur with the staff recommendation of the option of renewal of registration and an inspection in spring 2026, it is:

RESOLVED, that the Committee of Bar Examiners receives and adopts the inspection report of American Institute of Law including all its recommendations as set forth in

Attachment A and receives and files the law school's response as set forth in Attachments B and C; and it is

FURTHER RESOLVED, that the law school's registration as an unaccredited correspondence law school be renewed, with the next inspection set for spring 2026; and it is

FURTHER RESOLVED, that the law school will correctly post its disclosures in a forthright manner by July 1, 2025, and provide evidence of completion to State Bar staff; and it is

FURTHER RESOLVED, that the law school provide in its 2025 annual report and all future periodic compliance reports, until further notice, documentary evidence confirming satisfaction of the recommendations in the inspection report presented to the Committee on this day, or reasons why the recommendations are not completed and timelines and plans for completion.

Should the Committee of Bar Examiners concur with the alternative recommendation to begin a probationary inquiry, it is:

RESOLVED, that the Committee of Bar Examiners receive and adopt the inspection report of American Institute of Law including all its recommendations as set forth in Attachment A and receives and files the law school's response as set forth in Attachments B and C; and it is

FURTHER RESOLVED, that the law school's registration as an unaccredited correspondence law school be continued pending the outcome of the Committee of Bar Examiners' inquiry related to the law school's level of compliance as described in the next paragraph; and it is

FURTHER RESOLVED, that the Committee of Bar Examiners issue a warning pursuant to Rule 4.244 requiring immediate action to correct the specified deficiencies enumerated in the inspection report presented to the Committee on this day, within a fifteen days of the date of the warning, or a period of days otherwise specified by the Committee of Bar Examiners, and provide notice to the law school that if the law school's response is not satisfactory, the Committee will move to initiate proceedings to withdraw registration for failure to comply with a warning.

ATTACHMENTS LIST

- A.** American Institute of Law 2024 Inspection Report
- B.** American Institute of Law 2024 Inspection Report Official Response - May 14, 2025
- C.** American Institute of Law 2024 Inspection Report Response Material Received After Response Deadline - May 20, 2025