

4.5 Action on Inspection Report – American Institute of Law



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



The State Bar of California

180 Howard Street, San Francisco, CA 94105

OFFICE OF ADMISSIONS

natalie.leonard@calbar.ca.gov
415-538-2118

April 28, 2025

Dean Dowd
American Institute of Law
18411 Crenshaw Blvd #416
Torrance, CA 90504

RE: 2024 Periodic Inspection of American Institute of Law

Dear Dean Dowd:

Attached is a 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 September 25 and October 16, 2024.

Unaccredited Law School Rule 4.244(F) requires a law school to notify the Committee that it accepts the report or objects to it in whole or in part, and include supporting documentation within 15 days of receiving the inspection report. Thus, the Rule provides all law schools an equal opportunity to respond to the Committee.

AIL has the opportunity to provide written response to the inspection report within 15 days of today. Written response should be emailed to lawschoolregulation@calbar.ca.gov by May 14, 2025.

While the law school must notify the Committee if it accepts or objects to the inspection report within 15 days, AIL may submit additional information to the Committee in written public comment which can be emailed to CBE@calbar.ca.gov. Please note that the deadline to submit written comments is 24 hours before the start of the meeting. The law school will also have the opportunity to provide verbal public comment at the June 20, 2025 meeting. You can sign up for verbal public comment using this [form](#), although advance sign up is not required.

Sincerely,

Natalie Leonard
Principal Program Analyst II



The State Bar of California

American Institute of Law

Periodic Inspection Report

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

September 25 & October 16, 2024

REPORT ON THE PERIODIC INSPECTION OF AMERICAN INSTITUTE OF LAW

INTRODUCTION

The State Bar conducted an inspection of American Institute of Law (AIL) on September 25 and October 16, 2024, pursuant to Unaccredited Law School Rule 4.244(A), to assess its compliance with the Rules and Guidelines for Unaccredited Law Schools. The inspection took place via videoconference and was conducted by the inspection team of educational standards consultant Sue Lunbeck and Committee of Bar Examiners Member Ashley Silva-Guzman, supported by State Bar staff Cody Hounanian and Theresa Solenski.

BACKGROUND

Unaccredited law schools registered with the Committee of Bar Examiners (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 sooner if deemed necessary by the committee.

AIL is a registered, unaccredited correspondence law school with an office in Torrance, California. It was founded in 2015 as a for-profit S corporation by former Dean and Professor Emeritus Edward Green and Director of Admissions Melvin Morrison, both of whom had served in leadership roles at two other unaccredited law schools prior to opening AIL¹. The school was registered by the committee in 2016.

AIL was last inspected in 2021 with a report presented to the committee in June 2022. The committee renewed the law school's registration and set its next inspection date for two years into the future rather than the standard five years based on the serious nature of recommendations highlighted in the report, including the need to operate a sound program of legal education, offer a reasonable opportunity to license, effectively authenticate student work, and ensure that exams are not based on published material that can be easily accessed by students. In addition, the law school was asked to ensure that students are provided with enough accurately graded work to understand their progress toward licensure. The law school's attrition was also high from first- to second- year ranging from 74 percent to 87 percent in the four most recent academic years prior to the 2021 inspection.

The law school offers one program, a four-year part-time online Juris Doctor (JD) degree program that qualifies graduates to meet the legal education requirement to establish eligibility to take the California Bar Exam (bar exam).

¹ Owners Edward Green and Mel Morrison served in leadership roles at both Abraham Lincoln University School of Law and American Heritage University School of Law.

At the time of inspection, total enrollment was 85 students. To earn a JD at AIL, students must complete a total of 104 semester units and at least 864 hours of study each year for four years, which complies with applicable rules and guidelines. Students may attend lectures live, but the law school does not take attendance and advised that most students watch the lectures on demand, as allowed as a correspondence law school.

Since October 2021, 218 students have started their first year of study. Thirty-six of these students completed the first year and took the First-Year Law Students' examination, and 18 of the students have passed that exam, which is required to continue with one's education. Pass results were as follows: October 2021 – REDACTED; June 2022 – REDACTED; October 2022 – REDACTED; June 2023 – REDACTED; October 2023 – REDACTED; June 2024 – 42.6 percent of 13 takers; October 2024 – REDACTED.

Since July 2021, 5 graduates out of 14 takers passed the California bar exam. Pass results were as follows: July 2021 – REDACTED; February 2022 – REDACTED; July 2022 – REDACTED; February 2023 – REDACTED; July 2023 – REDACTED; February 2024 REDACTED. Subsequent to the inspection, July 2024 results were released and REDACTED passed the bar exam.

Submission of Self-Study Materials

To prepare for the inspection, the team reviewed the law school's self-study, 2023 Annual Compliance Report, website, Catalog, Student Handbook, Faculty Handbook, student results on State Bar exams, and records requested by the State Bar, including syllabi, course examinations and their graded responses, faculty evaluations, and meeting minutes from various committees.

At the State Bar's request, the law school invited all current students to submit confidential comments via email. The team reviewed all 13 comments received and the feedback was considered when drafting this report.

Conduct of Site Visit

The inspection took place via videoconference on September 25 and October 16, 2024. During the visit, the inspection team met with administrators, faculty members, and 11 students, and attended a video tour of the law school's administrative headquarters.

The school was undergoing significant staff change during the inspection. While preparing for the inspection, in June 2024, founder and longtime dean, Edward Green, took a leave of absence from the law school, and the State Bar inquired on multiple occasions as to how leadership was being handled because the law school has a small staff. On September 20, 2024, just before the first day of the inspection, the law school advised that Registrar Chet Zaluga would become acting dean, effective immediately. Five weeks later, on October 15, 2024, the day before the second set of inspection meetings, the law school advised that Professor Michael Dowd would become the law school's dean, effective immediately, and he continues in this role.

The inspection team observed three classes on the law school's learning management system, Populi: Introduction to Law (101); Agency & Partnership (234); and Community Property (403). Each class used a lecture format along with active learning exercises, and although there was some variation in teaching strategies, each instructor utilized effective methods of instruction based on the students' level of knowledge and analytical skill.

In sum, the inspection team found that the faculty's teaching ability was appropriate for the classes observed and instructors developed comprehensive and detailed syllabi, as well as assignments designed to teach substantive knowledge and analytical and writing skills.

INSPECTION OBSERVATIONS

COMPLIANCE ISSUES OBSERVED IN SEPTEMBER - OCTOBER 2024

1. Rule 4.241(A)(3-4) & (10): AIL is not fully compliant with Rule 4.241, which requires law schools provide students with a disclosure statement that includes key law school information such as pass rates, attrition rates, and student-faculty ratio, among other things, or with the requirements for its website disclosure, as discussed below.

The Rule 4.241 disclosure is an important disclosure that students must receive prior to payment of a registration fee and any fee for an academic term, so they understand the academic performance of the law school and rights, responsibilities, and limitations of attending an unaccredited law school. AIL's Rule 4.241 Disclosure lacked required elements and included elements that were outdated. The following required elements were omitted: 1) Last five years of bar exam pass rates; 2) last five years of First-Year Law Students' Examination pass rates; 3) attrition rates by year for the last five years.

The Rule 4.241 Disclosure as it appeared in the enrollment agreement also incorrectly stated that "no pass rates are available for students who have taken the California Bar Examination (GBX) since the establishment of the law school. American Institute of Law pass rate of students who have taken the GBX will be provided as soon as available from the State Bar of California." AIL's first cohort of students graduated in 2020, and bar exam results were available to the law school as of the October 2020 administration. FYLSX results were available to the law school as of the June 2017 administration. The law school has since updated the disclosure to include FYLSX and GBX rates for the last five years.

The law school also incorrectly stated in the disclosure that "[t]he current attrition rate of students who have enrolled in the school and do not matriculate into subsequent years of law study is 48% since the establishment of the law school," without specifying a time period.

As a result of these omissions and errors, prospective students enrolling may not have been aware, for example, that the law school's cumulative five-year bar exam pass rate is 28.6 percent, or of the law school's attrition rates, which, for example, were 89 percent for the 2021 cohort, 66 percent for the 2022 cohort, and 71 percent for the 2023 cohort.

Moreover, AIL has not updated its statement of assets and liabilities, which is required to be included the Rule 4.241 Disclosure for all law schools that have operated for less than ten years. Rather, the same asset and liabilities figures have appeared on the disclosure for several years.

To comply with Rule 4.241, the law school must revise its disclosure to include all elements of the disclosure, including FYLSX and general bar exam pass rates for the last five years, as dictated by section 4 of the rule. It should also update its attrition rates for the last five years, as dictated by section 10 of the rule. AIL's assets and liabilities must also be updated for accuracy as required by section 3 of the rule.

Subsequent to the inspection and at the State Bar's request, on March 18, 2025, the law school provided an updated Rule 4.241 disclosure statement, however, it continued to be noncompliant in the areas noted above. On March 20, 2025, AIL further revised its disclosure statement at the request of the State Bar and it is being assessed for full compliance with the rule.

2. Rule 4.240(A); Guideline 1.9: It is unclear whether AIL is compliant with Guideline 1.9, which states that law schools must operate in compliance with all applicable federal, state, and local laws and regulations.

As part of the recommendations in its 2021 inspection report, the law school was required to review its faculty classification and payment practices to determine whether they complied with recent changes in the law related to whether instructors should be classified as contractors or employees. The law school did not conduct the mandatory review.

To ensure compliance with Guideline 1.9, the law school must review its practices in this area and determine whether any changes should be made.

3. California Business and Professions Code section 6061.7: At the time of the inspection, the law school was not compliant with Business and Professions Code section 6061.7, which states that a law school not approved by the American Bar Association shall publicly disclose a set of specific information detailed in the code on its website.

At the time of the inspection, the law school did not publish an active link to its Business and Professions Code Section 6061.7 disclosure on its website homepage under the "Admissions" tab, as required by Guideline 2.3(D)(2). Subsequent to the inspection, the law school added a link entitled "Business Professions Code," however, accessing the disclosure requires two clicks: first, clicking on "Admissions" and then "Business Professions Code." This is made more confusing by the fact that it is preceded by two links that can only be clicked together which are entitled "Disclosure" and "Disclosure Statement," which appear to connect one to incomplete versions of the student enrollment disclosure required by Rule 4.241, discussed above.

At the time of the inspection, AIL's Business and Professions Code Section 6061.7 disclosure contained technical inaccuracies in the employment outcomes section, in violation of Guideline

2.3(B) and (C). Employment outcomes are to be reported as percentages, but they were not reported in this manner despite the form containing percentages to guide schools. In discussions with the administration during the inspection, the law school cited confusion on how, at what frequency, and from which cohort employment data should be collected, raising concern about the accuracy of the data reported, despite the plain language of the statute and leaders' experience at three different law schools.

Subsequent to the inspection, the law school posted its January 2025 Business and Professions Code Section 6061.7 disclosure, which repeated this error, and also contained a new error by omitting its five-year cumulative bar exam pass rate, leaving it blank on the posted form.

After additional follow up with the law school, as of March 2025, it appears that the web disclosure posted pursuant to Business and Professions Code 6061.7 is now correct. While the law school has now placed its Business and Professions Code Section 6061.7 form correctly under the admissions tab on the law school's homepage, it also must ensure the form is complete and accurate to be compliant.

4. Rule 4.240(B); Guideline 2.3: AIL is not compliant with Guideline 2.3, which states a law school must be honest and forthright in communication to prospective and current students, including in its disclosure statements, and website, as described below. The law school has made some progress towards compliance since the time of inspection, but additional steps are needed.

The website's home page contains a rotating banner of five statements, the first two of which do not appear to be forthright.

The first banner discusses pass rates but does so in a manner that does not appear to provide sufficient context for a prospective student to understand their opportunity to license after attending this law school. It announced that "students that have finished their first-year of study with a GPA of 2.0 or greater have achieved an 81.25% FYLSX overall pass rate." While the statistic is accurate, it is not forthright. Although 59 students have collectively taken 115 exam attempts as of October 2024, only 16 met the criteria of a GPA of 2.0 or greater. It also does not advise how long it took students to pass which is critical as those who do not pass within their first three administrations of the exam for which they are eligible must be disqualified from the law school's JD program. In the October 2024 administration of the FYLSX, REDACTED percent of takers passed; in June 2024, REDACTED percent of takers passed; in October 2023, REDACTED percent of takers passed. It also does not take into account the attrition between the first and second years at the law school—71 percent in 2024—who never took the FYLSX, which may artificially inflate overall pass rate of those beginning study at the law school.

Additionally, the statistic has "81% percent pass rate" in larger text than the description, which states it is the FYLSX pass rate for students with a GPA of 2.0 or greater. Students may see just the larger text and assume the pass rate that it refers to is the general bar exam, rather than the FYLSX. As the law school's bar exam pass rate is much lower than 81 percent, the statistic is not forthright to prospective students. Following the inspection, the law school updated the

incomplete statistic and added the disclosure link discussed above.

At the time of the inspection, the law school also included bar exam statistics on its “Pass Rate Disclosure” webpage that were not forthright. It stated that “students that have finished their first-year of study with a GPA of 1.5 or greater have achieved a 61.54% overall pass rate” and that its “overall Pass rate for all students is 49.09%”. However, these statistics pertained to the FYLSX, and like the statistic presented on its homepage, represent a small sample of AIL’s student body. The information is not forthright as it does not clarify that the webpage is only referring to the FYLSX, and includes words like “overall pass rate.” AIL’s most recent five-year cumulative bar exam pass rate is 28.6 percent amongst those graduating in the last five years and choosing to take the bar exam. The law school has now removed this webpage.

The second banner advertises “100% Online, Live Interactive”. The law school knows, however, that as a correspondence law school it does not require students to attend live tapings, no attendance is taken, and that most students do not attend live. This also conflicts with last banner which states that the program is “on-demand”, and students can “watch anytime, anywhere”. The law school is a correspondence law school but chooses to hold live classes for students, although attendance during the live class is not mandatory. AIL should clarify on its website for prospective students that while courses are offered live, students might not attend, therefore limiting live interaction.

The second banner also indicates that students take one course per week and one class at a time, which could make it sound like the students meet one night per week, which is not true as attendance in live lecture is not mandatory, or can complete all assignments in one evening, which would not be feasible.

To comply with Guideline 2.3, the law school must revise its website to be both accurate and forthright to prospective and current students. For example, it must properly contextualize bar exam statistics that it presents on its website.

5. Rule 4.240(C); Guideline 2.9(G): AIL is not compliant with Guideline 2.9(G), which requires the law school to establish a committee consisting of faculty, and, if the law school chooses, one or more members of the administrative staff and one or more students, to handle student requests for grade reviews.

AIL’s Student Policy Manual implies that it has a Grade Review Committee and states “[t]he process for a review of grades is for the student to petition the Grade Review Committee, within 30 calendar days of the publication of the grades, and present credible evidence in support of such a claim that a course grade resulted from unfairness, a departure from established grading policy, or a clearly shown mistake.”

However, this committee and process have not been implemented as described in the policy. The law school stated that student requests for grade review are often dealt with between the student and faculty member themselves, without escalating further, contrary to what AIL’s policy

states. Occasionally grading matters might be escalated to the faculty committee that the law school stated predominately focuses on school-wide topics, rather than a specific Grade Review Committee. Faculty minutes from 2022 – 2024 that were reviewed by the inspection team did not include any discussions of grade review petitions from students.

To comply with Guideline 2.9(G), the law school must demonstrate and document that it has an active grade review committee, providing minutes and other evidence of its progress and operation.

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

At the time of the inspection, Deans Zaluga and Morrison were not familiar with any faculty evaluation policy. The team observed that page 4 of the Faculty Manual references faculty evaluation stating that the Dean of the law school is responsible for ensuring that all faculty adhere to strict policies and procedures. However, the written policy does not specify a regular interval at which dean-led faculty evaluations occur, and it did not appear that they were occurring. Some faculty members mentioned being informally observed by the prior dean, but the acting Dean at the time, Dean Zaluga, had not evaluated any faculty members during his time as acting dean, nor was he aware of any faculty evaluation forms or processes the prior dean may have had during which time Dean Zaluga had been, and now is again, the registrar.

AIL hired two new faculty members in Fall 2024 who began teaching courses that same term without training. Acting Dean Zaluga stated he intended to evaluate new faculty in their first semester, although no plans had been formalized. Shortly thereafter, he was replaced by Michael Dowd and no update as to the plan was provided. In March 2025, the State Bar further inquired about faculty evaluation plans under Dean Dowd, but the school did not have an evaluation schedule in place.

Students evaluate AIL faculty regularly at the end of each course in form of a survey on Populi, and the inspection team reviewed these responses. Responses were largely positive, with students indicating they were satisfied with their professor, assignments, technology, and assessments. Thirteen students also provided written feedback to the inspection team, all of which were complimentary towards faculty and the remote classroom experience. While the student evaluations are appreciated, the law school must take additional steps to come into compliance.

To become compliant, the law school must revise its faculty evaluation policy to include the regular interval at which faculty will be evaluated, develop an evaluation form to include substantive feedback using the factors listed in Guideline 4.8, and implement the policy with reviews at regular intervals.

7. Rule 4.240(E); Guidelines 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. Below is a list of determining criteria, provided by Guideline 5.2, that the law school does not currently appear to be meeting, raising serious concern as to the law school's ability to provide a sound legal education:

Guideline 5.2(B): The law school failed to qualitatively demonstrate the competency of the instructors, due to the fact that it lacked timely and informative faculty evaluations as described above in section six related to Rule 4.240(D) and Guidelines 4.8 and 4.9. While the observed classes were evaluated favorably, there must be a system in place to ensure effective teaching.

Guideline 5.2(E): The law school failed to qualitatively demonstrate the soundness of its admissions requirements including assessing minimum levels of prior education, preparation, or training.

As discussed in section 11 regarding Rule 4.240(H) and Guidelines 5.26 and 5.27, low bar passage rates over a multi-year period and persistently high attrition rates suggest the law school's admissions policy is either not adequately communicating the program's format and responsibilities; not adequately screening applicants for success in AIL's JD program; or not adequately supporting them once enrolled, or some combination of these factors. Few students advance beyond the first year and few of those graduating pass the bar exam and license.

As described in section four regarding Rule 4.240(B) and Guideline 2.3, the law school's communications do not appear to forthrightly describe the program and may mislead prospective students. This failure could also be a contributing factor to the voluntary portion of the law school's high attrition rate, particularly after the first year.

AIL appears to have chosen an open admissions policy, accepting all those who meet the minimum pre-legal education requirements. Without requiring additional information such as a resume, personal statement, or GPA, the law school cannot easily assess prospective students' motivations for attending, likelihood of success, or potential strengths and weaknesses as a law student. The Admissions Director does not believe entry exams such as the LSAT are predictive of success at the law school and thus, does not use them, but could not articulate any other factors that he found to be effective or appropriate.

The law school also indicated that it believes that many students withdraw for financial reasons. While the law school provides payment plan options with options ranging from approximately \$300 to \$400 monthly, continued withdrawals due to financial pressure suggests additional counseling may be needed during the admissions process.

The law school must accurately describe its program, assess its students' needs at the start of the program and throughout, provide the appropriate academic services, and provide the academic support that would be needed under an open admissions policy like this one.

The law school identified a mentorship program and a question-and-answer session as two academic support initiatives, but the law school's mentorship program contains one mentor, and the question-and-answer session was not well-attended.

Guideline 5.2(G): The law school failed to demonstrate that its examinations accurately measure student knowledge and analytical ability. After the law school's last inspection in 2021, it was required to create and implement a policy to authenticate student work. While it has created a policy, it does not appear to be reasonably effective. The proctoring element mentioned in the policy does not appear to be implemented. Exams are currently un-proctored and available to all for a 24-hour window, calling into question the security of the exam and the authentication of the work.

The Catalog indicates that students are charged a fee for the use of ExamSoft, but neither ExamSoft nor any other proctoring product is used. During the inspection AIL mentioned that the school is waiting to learn which software the Bar Examiners choose so that students can be instructed in its use, but the State Bar can change vendors at any time and this does not excuse the law school's practice of charging for a service it does not provide or continuing without authentication. The law school must take objectively reasonable steps to ensure exam security and authenticate student work.

Guideline 5.2(H): The law school failed to demonstrate the soundness of its grading system as described in section five on Rule 4.240(C) and Guideline 2.9(G) and section ten on Rule 4.240(E) and Guideline 5.17.

AIL 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. AIL faculty have not received formal training on how to implement AIL's grading standards nor has the law school ever attempted grade calibration. Moreover, in 2024, the law school conducted a study indicating final exam essay grades beyond the first year are inflated when compared to actual essay scores from the bar exam on the same subject, however, the law school has not made any changes to its grading policy.

Guideline 5.2(I): The law school failed to demonstrate the availability of adequate legal research resources in its curriculum. This is discussed further in section 12 on Guideline 6.3.

Guideline 5.2(K): The law school failed to quantitatively demonstrate that the JD program is sound based on the limited cumulative success of the law school's graduates on the bar exam. Since the law school opened in 2015, it has enrolled approximately 300 first-year students. Seventeen of these students have graduated and six have licensed since the law school opened approximately ten years ago.

In summary, AIL has failed to demonstrate quantitatively and qualitatively the soundness of its academic program due to incomplete information provided to prospective students, an open admissions policy without further analysis of student needs, no routine faculty evaluation,

admissions and grading policies that lack analytic rigor, omission of required legal research from the curriculum, exam procedures that call into question exam security, 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 can provide an academic program in which all entering and returning students have a reasonable opportunity to license.

The law school must create an effective academic plan to improve program outcomes, implement the plan, and document the plan and its outcomes in the law school's annual report until further notice.

8. Rule 4.240(E); Guideline 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.

AIL does not consistently offer electives, internships, or externships to students in the JD program. The law school has offered electives on rare occasions for students with special circumstances. The law school may offer few electives because such a low number of students progress beyond the first year. The law school must clearly communicate its offerings and should consider expanding its offerings as its second- through fourth-year class size grows.

9. 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".

The inspection team reviewed a sample of first year exam questions and graded answers for Torts, Contracts, and Criminal Law. The scope of the coverage in the exam questions was representative of that generally presented on the FYLSX. Grades ranged from B- to D. Grades were assigned as a percentage that aligned with FYLSX grading. A letter grade based on AIL's grading system was also provided. Each graded student answer included a rubric of specific issues, applicable rule of law, and conclusions based on analysis. Student performance on each was integrated into the rubric. The graded exams indicate that students are accurately assessed on issue-spotting ability, knowledge of the law, and the ability to analyze the questions presented.

However, the 2021 inspection report noted grade inflation in the advanced courses and this observation was borne out in an analysis conducted by AIL which compared the bar exam essay scores of its graduates to their course essay exam scores. A review of graded exams in one of the subjects analyzed in the AIL analysis confirmed a 10–20-point difference in the course scores compared with bar exam grades. Yet despite the law school's own analysis and conclusion of grade inflation, it has not implemented, nor has it planned any changes to its grading practices.

The law school uses a bell curve to grade, but it does not appear to be calibrated appropriately to inform students of their progress in advanced courses.

AIL 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. The school has never attempted to calibrate grades among professors and there appears to be little guidance given to faculty members on grading other than a definition for a grade of 70 or better in the faculty handbook. The 2021 inspection team did note that faculty had attended State Bar exam calibration sessions, however, these sessions are no longer open to law school faculty, nor are State Bar calibration sessions a substitute for faculty training, and this is not a barrier to properly calibrating grades at the law school.

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.

10. Rule 4.240(E); Guideline 5.19: AIL is not compliant with Guideline 5.19, which requires that a law school have a written policy clearly defining academic standing, academic disqualification, advancement in good standing, and the requirements for graduation.

While AIL does have a written policy defining academic standing, academic disqualification, and advancement in good standing, the law school does not have a written statement of graduation requirements on its website or in its catalog. Page 15 of the catalog states that students must complete required courses and earn a 2.0 GPA to graduate, but it does not specify the other requirements. Without these requirements available to prospective and current students, students may be confused as to the number of credits, verifiable study hours required each year for four years, and other requirements needed to graduate from the law school.

To comply with the guideline, AIL must revise all its publications and website to detail the law school's graduation requirements.

11. 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 AIL does have a written admissions policy, its lack of specificity and its outcomes detailed in the section on 5.1 and 5.2 suggest that it is not sound and therefore not compliant with Guideline 5.26.

AIL's 1L attrition in 2023 was reported in its 2024 annual report to be 71 percent. This is significantly higher than the average 1L attrition at unaccredited law schools, which is 51 percent, despite two years focused on addressing this issue at the direction of the committee. Moreover, AIL's 1L attrition has increased from 67 percent reported in 2023 to 71 percent reported in 2024. The high and increasing rate of student attrition in the first year of the JD program suggests that modification of the admissions policy or student support services is necessary.

In its 2021 inspection report, the law school was required to investigate the reason for high voluntary and non-voluntary attrition in the first year and include its findings in its 2022 Annual Report. However, that report did not include such an investigation. During the 2024 inspection, Director of Admissions Melvin Morrison stated that the majority of students who attrite in the first year do so for financial reasons, but did not indicate that any financial counseling was offered. Voluntary non-academic attrition has increased since the last inspection despite the committee's requirement to address it in the 2021 inspection, and while the law school identified finances as a cause of voluntary non-academic attrition, it has not changed its admissions process to address this.

Beyond attrition, AIL's student performance suggests an unsound admissions policy, as stated in the section on guideline 5.2(K). Since its opening as a law school in 2016, the law school has enrolled approximately 300 students, graduated 17 students, and six of those have licensed.

In light of student performance and persistent attrition, it does not appear that AIL 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. The law school must assess the students' readiness to study law and progress consistent with its open admissions policy. To comply with Guidelines 5.26 and 5.27, AIL must develop admissions criteria to reasonably and effectively assess its applicants and demonstrate that this admissions policy is sound, including communication with prospective students, evaluation of application, and ensuring the law school has the resources needed for the students it accepts to have a reasonable opportunity to license.

12. Rule 2.240(I); Guideline 6.3: AIL did not demonstrate compliance with Guideline 6.3, which states that a law school must provide students with instruction in both physical publication and electronic-based legal research.

The law school asserts legal research skills are taught to students in two courses: a first-year course—Legal Analysis and Writing—and a fourth-year course—Advanced Legal Research. However, the syllabus for Legal Analysis and Writing did not reference legal research topics and while the Advanced Legal Research course syllabus stated, "Students will also receive instruction related to the basics of legal research, both traditional and online (hard-copy and electronic), and its importance to the legal process," it did not demonstrate how students would learn legal research.

To comply with the guideline, the law school must demonstrate that it teaches students legal research instruction in both physical publication and electronic-based means. The law school must revise the syllabi for these first and fourth -year courses to explicitly include the legal research topics and methods covered.

13. Rule 2.240(L); Guideline 9.1(J): AIL is not compliant with Guideline 9.1(J), which requires that a permanent file must be maintained of the minutes of all meetings of the governing board. The law school's governing board is composed of President and former Law School Dean Edward Green and Vice-President and Director of Admissions Melvin Morrison. However, the board does not hold formal meetings or take any meeting minutes, as required by the guideline.

To comply with the guideline, AIL's governing board must document meetings conducted with board members appropriately.

CONCLUSION

Upon renewing its registration in 2022 following its 2021 inspection, the committee set AIL's next inspection for 2024 to provide the law school with an opportunity to self-correct sixteen areas of noncompliance identified by the 2021 inspection team.

Between 2021 and 2024, the law school corrected ten of the instances of noncompliance specified in the 2021 inspection report; the corrections pertained to the addition of policies such as course repetition, minimum residency required for transfer students, equal opportunity and nondiscrimination policy, and students' rights to review examination questions and answers. The remaining corrections AIL made after the 2021 inspection were clarifications of language in its handbook, such as when academic standing is evaluated and the conditions of probation.

The law school also made substantive changes to its academic program in response to the 2021 inspection. For example, AIL raised the level required for good standing from 0.67 to 2.0 GPA and now disqualifies any student with a cumulative GPA under 1.5. To improve accuracy in grading, the law school stopped awarding credit for attendance and participation, though they were previously significant factors in grading.

Furthermore, the 11 students and alumni the inspection team spoke to during the inspection appeared to be enthusiastic about AIL's JD program. Students highlighted the correspondence modality in which they can watch lectures asynchronously, cost, and faculty responsiveness as strengths of the program. The inspection team notes that of this group, half were first-year students who had just started the JD program, and two were alumni who had successfully completed the program.

Despite the changes it made after the 2021 inspection and student's enthusiasm for the program, the law school did not address six instances of noncompliance identified in the 2021 inspection report critical to providing a sound legal education which continue to this day. These included ensuring that the faculty's designation as contractors complies with California law (guideline 1.9),

incorporating electives into the curriculum (guideline 5.11), investigating and reducing attrition (guideline 5.26-5.27), representing its physical facilities in a forthright manner (Rule 4.240(J), guideline 2.3), and adding instruction of physical and electronic-based research into the curriculum (Rule 4.240(E), guideline 6.3).

Moreover, the 2024 inspection team identified eight new areas of noncompliance that have arisen since the 2021 inspection. These include inaccurate 6061 and Rule 4.241 disclosure statements, lack of forthright communication on its website (guideline 2.3), irregular faculty evaluation (guidelines 4.8-4.9), deficient grading standards (guideline 5.17), unclear graduation requirements (guideline 5.19), deficient record-keeping (guideline 9.1), and an unsound academic program (guidelines 5.1-5.2).

AIL's failure to address serious areas of noncompliance identified in its 2021 inspection and falling out of compliance in additional areas in this two-year period, raises concerns regarding its ability or willingness to comply with the committee rules and provide a sound legal education. The law school's outcome data substantiates this concern as the vast majority of students enrolling as 1Ls at AIL do not complete the program and license. Since the law school opened in 2015, it has enrolled approximately 300 first-year students who would likely have graduated by 2024 if following the school's 4-year JD program. Of those students, only 17 graduated, and six have licensed in California. This means six percent of students who enrolled at AIL have graduated and two percent of 1L students enrolled in AIL have gone on to become licensed California attorneys.

To summarize, the 2024 inspection team found AIL to be not fully compliant with a significant portion of the responsibilities of unaccredited law schools set forth in Unaccredited Law School Rules 4.240 and 4.241 and Business and Professions Code Section 6061.7. Noncompliance was found in eight of the 14 standards of Rule 4.240 as described in the report:

- (A) Lawful operation, based on failure to demonstrate it has complied with state laws regarding faculty compensation
- (B) Integrity, based on misleading communications on its website and in Rule 4.241 Disclosures as well as omissions in the 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, resulting in part from admissions and grading policies
- (H) Admissions, due to a lack of sound applicant screening procedures, high attrition, and poor student outcomes
- (I) Library, due to the law school's lack of legal research topics integrated into its curriculum as required by the committee.
- (L) Records and reports as the law school has not maintained adequate records of its board meetings.

AIL is also noncompliant with 14 Unaccredited Law School Guidelines: Guidelines 1.9, 2.3, 2.9, 4.8, 4.9, 5.1, 5.2, 5.11, 5.17, 5.19, 5.26, 5.27, 6.3, and 9.1, as described above.



AMERICAN INSTITUTE OF LAW

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18411 Crenshaw Boulevard, Suite 416, Torrance, California 90504-5066
Telephone (888) 412.4593, Fax: (888) 657.1895, Web: www.instituteoflaw.com

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 AIL 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

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

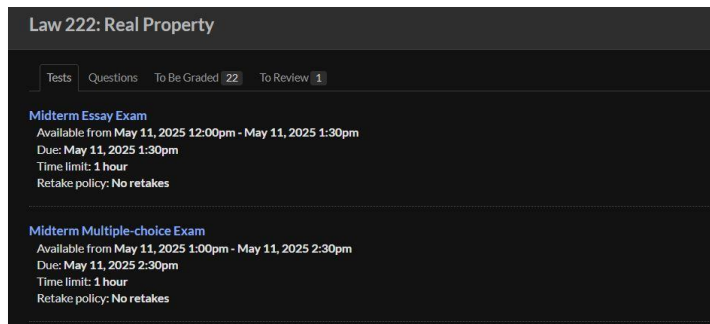
American Institute of Law has always required that students take exams within a 60-minute period. We have never allowed any student to take any exam within a 24-hour window. Former Dean Edward Green was supposed to have been working with Populi to integrate with ExamSoft on our proctor system to be monitored 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:

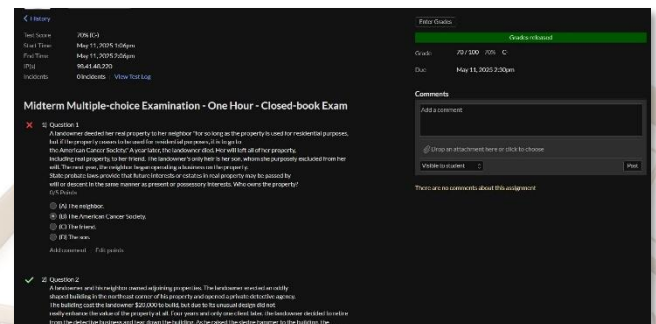
- **Webcam monitor:** At frequent and random intervals, the student's webcam will snap a picture, and store captures for professor or academic admin review.
- **AI Tracking:** System tracks and alerts the professor when students looks away from screen, stops and resumes exam and snaps pictures.
- **Fullscreen 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:

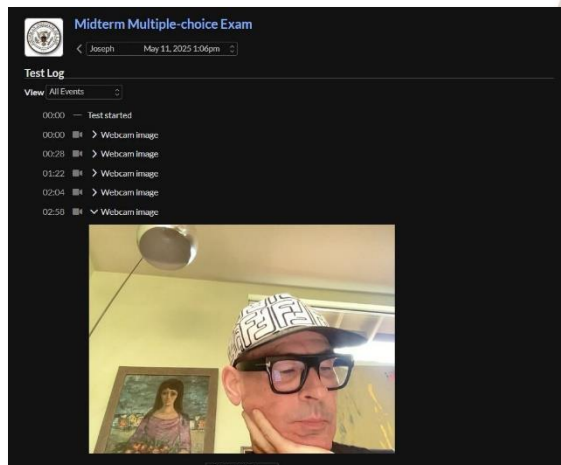
Course: Law 222



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

W Peer-to-Peer Faculty Evaluation

Dear State Bar:

American Institute of Law wishes to keep the State Bar informed as to the status of all corrective measures, modifications or improvements to our systems, technology, compliance and the soundness of our educational program.

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 use 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.

We have completed and will continue to use our new faculty evaluation system to improve our program and faculty. Please find our new electronic faculty evaluation form, attached. The Dean can now evaluate any professor, at any time. An electronic copy will be stored within our Learning Management System and paper copy will be added to the faculty member's personnel file. Any professor may view and provide comments or request explanations at any time.

The screenshot shows a web browser window with the URL <https://www.aie-law.com/peer-to-peer>. The page is titled "AMERICAN INSTITUTE OF LAW" and "Faculty Evaluation: Peer-to-Peer". It contains three evaluation sections, each with a "Name" field and a "Score" field.

Section	Name	Score
The Professor as Learning Facilitator * Select item(s) in circle(s) (optional) <input type="text"/>		
Communication of Expectations * Communication of expectations and/or objectives Select all that apply <input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Needs Improvement <input type="checkbox"/> Unsatisfactory		
Student Academic Achievement * Give a letter grade for the academic growth of all students (optional)		

The bottom of the screen shows a Windows taskbar with various application icons.

[illegible]

The screenshot shows the American Institute of Law website. The top navigation bar includes links for Home, Files, Calendar, Financial, Search, Help, and a user profile icon. Below this is a secondary navigation bar with links for Home, My Profile, My Courses, Contacts, Academics, Campus Life, Communications, Advising, and Admissions. The main content area has a dark header with 'Dashboard', 'To-Dos', 'Groups', 'Links', 'Forms' (selected), and 'Manage News'. Under the 'Alerts' section, there are two notifications: one about a form waiting for review and another about continuing filling out a form titled 'AMERICAN INSTITUTE OF LAW - Started May 20, 2025 1:12pm'. The 'Available Forms' section contains a search bar and a list of forms. One form, 'AMERICAN INSTITUTE OF LAW', is highlighted with a button labeled 'Continue Filling Out This Form'. On the right side, there's a 'My Forms' section showing a list of forms submitted on May 20, 2025, with a button 'Rec Shields in Rule!'. At the bottom, there's a footer with links for Terms of Service, Acceptable Use Policy, Support, System Status, and © Populi 2025.

Forms

AMERICAN INSTITUTE OF LAW

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Faculty Evaluation - Peer-toPeer

The Professor as Learning Facilitator *

Select Name of Faculty Being Evaluated

Communication of Expectations *

Communicates course goals and expectations clearly.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Student Academic Achievement *

Give students opportunities for academic growth, critical thinking, and initiative.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Motivation *

Motivates best effort from students and relates to students.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Subject Knowledge *

Has a thorough current knowledge of subject matter and course of study

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Planning and Preparation *

Is well prepared for classes through daily and long-term planning.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Teaching Techniques *

Uses appropriate teaching techniques; presents subject matter in a variety of ways; makes relevant and appropriate assignments.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Attitude toward Students *

Demonstrates interest in students, empathizes, exhibits tolerance and fairness.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Attitude toward teaching *

Is enthusiastic in teaching; demonstrates self-improvement.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

The Professor as Member of the Law School Community

Attitude toward fellow Faculty and Staff *

Works as a team player; responds to requests for input or information; supports the work of others.
Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Attitude toward AIL's mission *

Follows college policies and procedures; supports the AILmission.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Documents and Preparation

Syllabi *

Prepares and maintains accurate syllabi.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Record keeping *

Keeps accurate class records, submits grades and reports punctually.

Select up to 1

- ☐ 5– Outstanding
- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Attendance and Punctuality *

Absent only when necessary. Reports absences according to policy.

Select up to 1

- ☐ 5– Outstanding

- ☐ 4– Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Comments

Dean Electronic Signature

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E-Signature *

If you accept and acknowledge, please type your legal first and last name below

Date Signed *

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Faculty Evaluation - Peer-toPeer

The Professor as Learning Facilitator *

Saved

Select Name of Faculty Being Evaluated

Q Sheldrin Ruiz

Communication of Expectations *

Saved

Communicates course goals and expectations clearly.

Select up to 1

- ☐ 5- Outstanding
- ☒ 4- Exceeds Expectations
- ☐ 3- Meets Expectations
- ☐ 2- Needs Improvement
- ☐ 1- Unacceptable

Student Academic Achievement *

Saved

Give students opportunities for academic growth, critical thinking, and initiative.

Select up to 1

- ☒ 5- Outstanding

☐ 2- Needs Improvement

☐ 1- Unacceptable

Comments

Saved

I have observed several your lectures. You continue to demonstrate your enthusiasm and loyalty to our school.

Dean Electronic Signature

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E-Signature *

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If you accept and acknowledge, please type your legal first and last name below

Mike Dowd

Date Signed *

Saved

May 20, 2025

American Institute of Law, 18411 Crenshaw Boulevard, Suite 416, Torrance CA 90504-5066

Web: www.instituteoflaw.com Tel: 888.412.4593 Fax: 888.657.1895

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