

Peoples College of Law
Educating People's Lawyers Since 1974
 660 S. Bonnie Brae, L.A., CA 90057 - Tel.: 213 483-0083
 administrator@peoplescollegeoflaw.edu

Student Tuition, Enrollment & Registration Agreement
Winter Quarter, 2023-2024 Academic Year

Revised December 2023

| |
|---|
| Student Name: |
| Telephone (Cell/Other): |
| Email Address: |
| Mailing Address: |
| Year in School as of (term) 2023 (e.g., 1L, 2L, 3L or 4L): |

Read this entire agreement carefully!

Please also read the PCL Handbook of Rules and Policies, Catalog, commonly known as the
 the
 “Student Handbook.” The handbook is on the PCL website
www.peoplescollegeoflaw.edu.

This agreement and the student handbook contain important information about requirements of the State Bar of California and Peoples College of Law (PCL).

IMPORTANT REQUIREMENTS AND OBLIGATIONS

- 1. BINDING CONTRACT:** This agreement is a legally binding contract when signed by the student and by Peoples College of Law (PCL).
- 2. PAYMENTS TO PCL MUST BE CURRENT:** A student must have paid all amounts owed to PCL in full, or be current in a written payment plan (i.e., a payment agreement), signed by an officer of PCL authorized to sign, before a student can do any of the following:

- a. advance to the next quarter or semester;
- b. be certified by PCL to take the First-Year Law Students' Exam;
- c. be certified by PCL to take the California Bar Exam;
- d. graduate from PCL and receive a J.D. degree or any other degree from PCL; or
- e. attend classes and receive instruction.

The State Bar will not allow a person to take the First-Year Law Students' Exam, or the Bar Exam, if the person's school does not certify the person to take the exam.

3. STUDENTS MUST SIGN NEW AGREEMENT BEFORE EACH FALL

QUARTER: To be eligible to enroll and take classes at PCL in any academic year, the student must sign and return the current, updated version of this Agreement before the fall quarter begins.

4. TUITION: The student must pay **five thousand dollars (\$5,000.00)** tuition each academic year.

5. ACCOUNTABILITY FEE: In addition to tuition, students are responsible for a **six hundred dollar (\$600.00)** annual Accountability Fee. **Except for new PCL students' first quarter at PCL, students can either pay the Accountability Fee, or satisfy it by performing activities that benefit PCL,** such as participating in a PCL committee, data entry and other assistance to the Administrator/Registrar, repair and maintenance of the PCL building, or other activities approved by PCL. Accountability work is credited at the rate of \$16.78 per hour. It can be applied to the academic quarter in which the activity is performed, or to subsequent academic quarters. **However, students beginning their first quarter at PCL, either as a 1L or a higher year, must pay the first quarter Accountability Fee by the due date for their first tuition payment.** If the student performs accountability activities thereafter, they are eligible for a pro rata refund of that first payment if they are current in all payments owed to PCL. Students should consult the Administrator/Registrar regarding opportunities to perform accountability work.

6. RAISING TUITION AND FEES: PCL may raise tuition and Accountability Fees, but only for students to whom PCL gives written notice of the increase at least 60 days before the beginning of the first quarter for which the increase will apply, and only for quarters that begin after the 60 days.

7. STATE BAR EVALUATION OF UNDERGRADUATE UNITS: A student or applicant for admission at PCL who has not submitted to PCL either, (a) transcripts showing that the student or applicant received a bachelor's degree from a school recognized by the State Bar for bachelor's degree purposes, or (b) documentation that the student or applicant has satisfied the State Bar's requirements for the College Level Equivalency Program (CLEP) examination, is required to have the State Bar formally evaluate the student's undergraduate units before the student or applicant can start or continue their education at PCL. If the State Bar determines that the undergraduate units do not meet the State Bar's requirements, State Bar rules prohibit the student from starting or continuing law school classes. To request an evaluation of undergraduate units, contact the State Bar Office of Admissions in Los Angeles at 213-765-1000.

8. STATE BAR EVALUATION OF TRANSFER UNITS FROM OTHER LAW

SCHOOLS: As a condition of admission to PCL, a transfer student applicant is required to have the State Bar formally evaluate the student’s law school units before the transfer student applicant can start their education at PCL. The decision on whether to admit a transfer student applicant to PCL will be based in part on the State Bar’s evaluation of the student’s law school units.

9. STUDENTS MUST REGISTER WITH THE STATE BAR: All California law students must register as law students with the State Bar of California. **PCL students must register promptly after the August start of their first PCL classes.**

10. SEPARATE REGISTRATION REQUIRED FOR FIRST-YEAR LAW STUDENTS’ EXAM: Students who intend to take the First-Year Law Students’ Exam (FYLSX, a.k.a. the “baby bar”) must submit a separate registration with the State Bar. As of winter 2023, the State Bar registration fees for the FYLSX are an exam fee of \$624.00 and a laptop fee of \$153.00. Please be further informed that, as of January 2024, the FYLSX will cost \$850.00 plus a laptop computer fee of 153.00. The State Bar can raise these fees after each exam. Students should devise and implement a financial plan as soon as possible to facilitate timely payment of the exam fees. The State Bar charges late fees for registrations submitted after the set deadline, and it also adheres to a final deadline after which no registrations will be accepted. Please consult the State Bar’s website for the current list of fees and deadlines. For more information visit:

<https://www.calbar.ca.gov/Admissions/Examinations>.

<https://www.calbar.ca.gov/Admissions/Examinations/First-Year-Law-Students-Examination/October-2023-First-Year-Exam>

11. SEPARATE REGISTRATION REQUIRED FOR GENERAL BAR EXAM: Similarly, students who intend to take the Bar Exam (a.k.a. the General Bar Exam) must submit a separate registration with the State Bar. As of January 1, 2024, the State Bar fees for the CA General Bar Exam are an exam fee of \$850.00 and a laptop computer fee of \$153.00. The State Bar can raise these fees after exams. Students should devise and implement a financial plan as soon as possible to facilitate timely payment of the exam fees. The State Bar charges late fees for registrations submitted after the set deadline, and it also adheres to a final deadline after which no registrations will be accepted. Please consult the State Bar’s website for the current list of fees and deadlines. For more information visit:

<https://www.calbar.ca.gov/Admissions/Examinations>.

https://www.calbar.ca.gov/Portals/0/documents/rules/Rules_Appendix_A_Sched-Chgs-Deadlines.pdf#page=17

12. GRADE AND ATTENDANCE REQUIREMENTS: A student must satisfy the minimum grade and attendance requirements of the State Bar and PCL, before a student can do any of the following:

- a. advance to the next quarter or semester;
- b. be certified by PCL to take the First-Year Law Students’ Exam;
- c. be certified by PCL to take the Bar Exam;
- d. graduate from PCL and receive a J.D. degree or any other degree from PCL;
- e. attend classes and receive instruction; or
- f. receive grades for exams and classes

The State Bar will not allow a person to take the First-Year Law Students’ Exam, or the Bar Exam, if the person’s school does not certify them to take the exam.

GRADE AND ATTENDANCE REQUIREMENTS FOR ALL STUDENTS:

- a. The student must comply with the State Bar's 80% attendance requirement. State Bar Guideline 5.3(A)(1), which is mandatory, "requires regular and punctual attendance of not less than eighty (80) percent of the regularly scheduled class hours in each course." For a course that extends over more than one quarter, for example, two quarters, this Guideline means that the student must attend 80% of the regularly scheduled class hours in each quarter of the course (The Guideline does not mean that the student must attend 80% of the total combined regularly scheduled class time of the two quarters.) If these requirements are not met, make-up classes may be required.
- b. The student must pass all courses. In other words, have no Fs or incompletes as final grades.
- c. The student must have grade point average of C or higher for all classes combined.

ADDITIONAL GRADE REQUIREMENTS FOR FIRST YEAR STUDENTS:

- a. The student must have not more than one final quarter grade below C minus (below 70).

13. APPLICATION FOR MORAL CHARACTER DETERMINATION: Every person applying for admission to the State Bar of California (i.e., applying to become a licensed California attorney) must apply for and satisfy the State Bar's Moral Character Determination. Usually, PCL recommends that students apply early to the State Bar for their determination, as early as their first year. Sometimes there are exceptions under which it is better for the student to apply later. Once the application is submitted to the State Bar, it could take several months for the determination to be completed. It may take longer for applicants who have a criminal conviction or another situation that the State Bar regards as significant in deciding one's determination.

14. STUDENTS' UNDERGRADUATE TRANSCRIPTS MUST BE RECEIVED BY PCL ON TIME: Under State Bar rules, PCL cannot permit a student to attend classes more than 45 days after the start of the fall quarter unless PCL has received the student's undergraduate transcripts showing that the student is eligible to attend law school under the State Bar's requirements regarding undergraduate education.

15. STUDENTS MAY NOT BEGIN CLASSES LATER THAN FALL QUARTER: If a student does not enroll and begin classes in the fall quarter or semester of an academic year, the student will not be permitted to enroll or take classes for any subsequent quarter or semester of the same academic year. However, as an exception, students who failed a PCL course and want to repeat the course can begin repeating the course later than the fall quarter or semester of an academic year, but this exception does not apply to students who have attended another law school. Another exception might allow students to start in the summer quarter when PCL offers summer course

16. PEOPLES COLLEGE OF LAW IS A PRIVATE, NONPROFIT CORPORATION:

PCL is a private, nonprofit corporation, and is not a government agency.

STUDENT'S PROMISE OF PAYMENT

17. STUDENT'S PROMISE OF PAYMENT: I hereby promise to pay to Peoples College of Law the amounts in the payment schedule stated below, within the times stated below. These amounts are tuition and Accountability Fees. Accountability Fees can be reduced by credits for Accountability

activities such as those described above, except that those students beginning their first quarter at PCL, either as a 1L or in a higher year, must pay the first quarter Accountability Fee by the due date for their first tuition payment. The payments can be made at dates later than those shown below only pursuant to a written payment plan (i.e., a payment agreement) approved by the PCL Executive Committee and signed by an officer of PCL.

FIRST YEAR (1L) STUDENT PAYMENT SCHEDULE

- \$1866.66 by the first day of the fall quarter unless PCL requires payment earlier, such as at Orientation. The first quarter \$200.00 Accountability Fee is also due on the same day.
- \$1866.67 by the first day of the winter quarter
- \$1866.67 by the first day of the spring quarter

UPPER DIVISION STUDENT (2L, 3L, 4L) STUDENT PAYMENT SCHEDULE

- \$1,866.66 by the first day of the fall quarter
- \$1,866.67 by the first day of the winter quarter
- \$1,886.67 by the first day of the spring quarter

A Late Fee of \$25 is imposed for each payment that is not made in full by the third business day after its due date, but that does not mean students have permission to pay late.

REFUNDS AND CANCELLATIONS

19. REFUNDS AND CANCELLATIONS: At any time beginning with the start of the fall quarter covered by this Agreement, the student may cancel this Agreement and receive a pro rata refund calculated based on a 9 month “refund year,” defined as the fall, winter, and spring quarters (i.e., excluding summer sessions, if any). For example, if a first-year student has paid all amounts for the academic year and cancels this Agreement at the end of the second month of the fall quarter, there would be seven months left in the refund year. Seven months is 7/9 of the refund year. Thus, the refund will be 7/9 of the amount the student has paid. The application fee is non-refundable.

20. WITHDRAWALS: Also, with the written permission of PCL and signed by an officer or the Registrar or Administrator, a student may withdraw from less than all the student’s classes and receive a pro rata refund calculated using the same framework as described in the preceding paragraph. For example, if the total a student has paid is for one quarter, and the student is taking three courses of 3 units each that quarter, and the student withdraws from one course halfway through the quarter, then the refund will be 1/6 of the amount the student has paid for the first quarter. But the application fee is not refundable. **Note, however, that withdrawing from less than all classes can jeopardize the ability of a student to complete their PCL education within four years, can result in increased tuition costs for the student, and can result in a student not being eligible to take the First-Year Law Students’ Exam or the Bar Exam.**

21. CANCELLATION OF THIS AGREEMENT MUST BE IN WRITING: This Agreement may be cancelled only if the cancellation is stated in writing, signed by the student who is cancelling, and delivered to the PCL Administrator, Registrar, or Dean,

whose signature must appear on the cancellation, indicating that it has been delivered.

22. NO REFUNDS EXCEPT AS DESCRIBED ABOVE: No refunds are allowed except those described in the three paragraphs immediately above. Refunds will be paid within 30 days after cancellation. The application fee is non-refundable.

IMPORTANT NOTICES AND DISCLOSURES

23. STUDENTS MUST HAVE PAID ALL AMOUNTS OWED TO PCL OR BE CURRENT IN A WRITTEN PAYMENT PLAN (I.E., A PAYMENT AGREEMENT), SIGNED BY AN OFFICER OF PCL AUTHORIZED TO SIGN, IN ORDER TO ATTEND CLASSES, RECEIVE INSTRUCTION, TAKE THE FIRST-YEAR LAW STUDENTS' EXAM, GRADUATE, RECEIVE ANY DEGREE, OR TAKE THE BAR EXAM: If a

student has not paid all amounts owed to PCL in full as required by this Agreement or by a written payment plan (i.e., a payment agreement) signed by an officer of PCL authorized to sign, the student will not be entitled to attend classes, receive instruction, be certified by PCL to take the California Bar Exam or First-Year Law Students' Exam, graduate from PCL, or receive any degree from PCL.

PAYMENT PLANS: In special circumstances, PCL may allow a student to make deferred installment payments of tuition and Accountability Fees upon a student's request, but only if the PCL Executive Committee agrees to a written payment plan (i.e., a payment agreement), and only if it is signed by an officer of PCL authorized to sign by the Executive Committee.

24. NO TUITION ASSISTANCE, FINANCIAL AID, OR LOANS: PCL does not participate in any governmental programs for tuition assistance, financial assistance, or loans.

25. ADVICE AGAINST STUDYING FOR A REPEAT ATTEMPT AT FYLSX WHILE ATTENDING PCL: If you have taken the FYLSX and did not pass, and you plan to continue as a PCL student *and* study for another FYLSX at the same time, you should think very carefully about it, because *it is risky*. State Bar statistics have shown that the chances of passing on a subsequent attempt are very low, less than 15%. Thus, if you have failed the FYLSX and you pay tuition for this academic year and you do not pass the FYLSX in the fall of this year or June of next year, you will have spent all that tuition money and done all that hard course work this year, but under the State Bar's rules you will **not** receive credit for your classes this academic year (i.e., no credit towards a J.D. degree or towards eligibility to take the Bar Exam). If your score on the FYLSX was very close to passing, that likely increases your chances of passing in a subsequent attempt, but the statistical chances of passing are likely still low.

26. FURTHER ADVICE AGAINST STUDYING FOR A REPEAT ATTEMPT AT FYLSX WHILE ATTENDING PCL: If you have taken the FYLSX and did not pass, it is *not* a good idea to take law school classes *and* study for the October FYLSX at the same time. The FYLSX is very difficult to pass, and it is a great deal harder if you are studying for your classes at the same time. Some PCL students have tried to do these two things together, but very few have succeeded. The better alternative is to take this academic year off and then take the FYLSX next June. You will have the 10 months between now and June to prepare for the FYLSX, and you won't be risking your money on this year's tuition.

27. STUDENTS MAY NOT BEGIN CLASSES LATER THAN FALL QUARTER: Even if you *do not* continue with your studies this fall but you pass the FYLSX this fall, you will have to wait until next year's fall quarter to resume classes at PCL (or next summer if

PCL has summer classes).

28. STATE BAR GUIDELINES ON FYLSX AND CREDIT FOR LAW SCHOOL CLASSES: Following are the State Bar’s mandatory Guidelines about the relationship between the FYLSX and whether a student can continue with law school classes and get credit for them. To make the Guidelines easier to read, we have added bolding and subdivisions in brackets like this: [A], [B], [C]. NOTE: 5.20 through 5.22 largely repeat 1.3.

STATE BAR GUIDELINE 1.3 FIRST-YEAR LAW STUDENTS’ EXAMINATION

The First-Year Law Students’ Examination, as referred to in the *Unaccredited Law School Rules*, is the examination specified in California Business and Professions Code § 6060(h) and Rule VIII of the *Rules Regulating Admission to Practice Law in California*. Students attending unaccredited law schools intending to qualify to take the California Bar Examination must take the examination upon successful completion of their first year of law study. **[A] Students who pass the examination within the first three administrations of the examination after first becoming eligible to take it will receive law study credit up to the time of passage of the examination. [B] Students who pass the examination on an attempt following the third administration of the examination after their first becoming eligible to take it will only receive credit for one year of law study toward qualifying to take the California Bar Examination.**

STATE BAR GUIDELINE 5.20 EVALUATION OF STUDENTS FOR
ADVANCEMENT AND RETENTION

A law school must evaluate students for advancement and retention at least as often as the end of each academic year. **[C] Students who have not maintained the grade average required for advancement or graduation or who have failed to pass the First-Year Law Students’ Examination within the required time frame must be promptly disqualified from the law school’s J.D. degree program.**

STATE BAR GUIDELINE 5.21 FIRST-YEAR LAW STUDENTS’ EXAMINATION

[D] An applicant who is required to take the First-Year Law Students’ Examination will not receive credit from the Committee for any law study until he or she has passed the examination. [E] Students successfully completing their first year of law study at an unaccredited law school must take and pass the First-Year Law Students’ Examination within three (3) administrations after first becoming eligible to take it. [F] Only one year of law study will be granted if the examination is passed on an attempt later than within three (3) administrations of the examination after the student becomes eligible to take it.

STATE BAR GUIDELINE 5.22 DISQUALIFICATION OF STUDENTS FOR FAILURE
TO PASS THE FIRST-YEAR LAW STUDENTS’ EXAMINATION.

[G] A student who does not pass the First-Year Law Students’ Examination within three (3) administrations after first becoming eligible to take the examination must be promptly disqualified from a law school’s J.D. program. [H] A student who passes the First-Year Law Students’ Examination within three (3) administrations after first becoming eligible to take it will receive credit for all legal studies completed to the time the examination is passed. [I] A student who does not pass within the three (3) administrations after first becoming eligible to take it, but who subsequently passes, is eligible for re-enrollment in the law school’s J.D. program, but will receive credit for only one year of legal study.

30. DISCLOSURES REQUIRED BY SECTION 2.3 OF THE GUIDELINES FOR UNACCREDITED LAW SCHOOLS, COMMITTEE OF BAR EXAMINERS OF THE STATE BAR OF CALIFORNIA:

- a. The method of instruction at this law school for the Juris Doctor (J.D.) degree program is principally in physical classroom facilities.
- b. Students enrolled in the J.D. degree program at this law school who successfully complete the first year of law study must pass the First-Year Law Students' Examination required by Business and Professions Code § 6060(h) and Title 4, Division 1, Chapter 1 Rule 4.3(I) of the Rules of the State Bar of California as part of the requirements to qualify to take the California Bar Examination. A student who passes the First-Year Law Students' Examination within three (3) administrations of the examination after first becoming eligible to take it will receive credit for all legal studies completed to the time the examination is passed. A student who does not pass the examination within three (3) administrations of the examination after first becoming eligible to take it must be promptly disqualified from the law school's J.D. degree program. If the dismissed student subsequently passes the examination, the student is eligible for re-enrollment in this law school's J.D. degree program but will receive credit for only one year of legal study.
- c. Study at, or graduation from, this law school may not qualify a student to take the bar examination or to satisfy the requirements for admission to practice in jurisdictions other than California. A student intending to seek admission to practice law in a jurisdiction other than California should contact the admitting authority in that jurisdiction for information regarding the legal education requirements in that jurisdiction for admission to the practice of law.

31. DISCLOSURES REQUIRED BY RULE 4.241 OF THE RULES FOR UNACCREDITED LAW SCHOOLS OF THE STATE BAR OF CALIFORNIA:

- a. PCL is not accredited by the State Bar of California. It is registered with, and regulated by, the State Bar of California under the category of unaccredited fixed-facility law schools.
- b. PCL has not applied for accreditation by the State Bar in the previous five years.
- c. The number and percentage of students who have taken and passed the First-Year Law Students' Exam in the previous 5 years is as follows. *Note that for each exam listed, the number of takers includes all PCL students who took that exam, whether they finished their first year just before the exam or up to a year before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, the total number of "Takers" in this chart is not equal to the total of all PCL students who took the exam in the past five years – the total number of "Takers" is a larger number because some students took the exam more than once in those five years.*

| First Year Law Students' Exam (FYLSX) | | | |
|--|---------------|----------------|-------------------|
| Exam Year | Takers | Passers | Percentage |
| June 2023 | 4 | 1 | 25% |

| | | | |
|---------------|----|---|--------|
| October 2022 | 6 | 2 | 33% |
| June 2022 | 13 | 5 | 38.46% |
| October 2021 | 14 | 0 | 0% |
| June 2021 | 14 | 1 | 7.1% |
| November 2020 | 0 | 0 | 0% |
| June 2020 | 0 | 0 | 0% |
| October 2019 | 0 | 0 | 0% |
| June 2019 | 14 | 5 | 35.7% |

- d. The number and percentage of students who have taken and passed the General Bar Examination in the previous 5 years is as follows. Note that for each exam listed, the number of takers includes all graduates of PCL who took that exam no matter what year they graduated, whether very recently before the exam or many years before. Also, if a person takes the exam on, for example, three different occasions, the person is counted as a taker on all three occasions. Thus, the total number “Takers” in this chart is not equal to the total of all PCL graduates who took the exam in the past five years – the total number of “Takers” is a larger number because some graduates took the exam more than once in those five years. Thus, this chart does not show PCL’s Bar Exam pass rate as calculated by the State Bar for purposes of accrediting law schools, which, in July 2022 was 79%. (PCL is NOT an accredited law school.)

| California General Bar Examination (CBX) | | | |
|---|---------------|----------------|-------------------|
| Exam Year | Takers | Passers | Percentage |
| July 2023 | 4 | 0 | 0% |
| Feb 2023 | 0 | 0 | 0% |
| July 2022 | 4 | 0 | 0% |
| Feb 2022 | 4 | 1 | 25% |
| July 2021 | 5 | 2 | 40% |
| Feb 2021 | 6 | 1 | 16.7% |
| Oct 2020 | 13 | 2 | 15% |
| Feb 2020 | 4 | 0 | 0% |
| July 2019 | 14 | 1 | 7.1% |
| Feb 2019 | 7 | 1 | 14% |

- e. The approximate number of legal volumes in the PCL Library is 13,500.
- f. The educational background and qualifications of the present faculty, registrar administrator, and the Dean are as follows:

| ADMINISTRATION | | |
|---|--------------------------------------|----------------------|
| Name: | J.D. received from: | Bar Admission |
| Ana Maria Lobos, Esq. Interim Dean | Peoples College of Law, Los Angeles | CA |
| Roger Aramayo, Administrator & Registrar | Southwestern Law School, Los Angeles | N/A |
| | | |
| FACULTY | | |

| | | |
|----------------------|---|-----|
| Laura Boudreau, Esq. | Harvard Law School; Cambridge, MA | CA |
| Michael Blue, Esq. | Northwestern University School of Law; Chicago, IL | CA |
| Onica Cole, Esq. | Loyola Law School; Los Angeles, CA | CA |
| John Duane, J.D. | Peoples College of Law; Los Angeles, CA | N/A |
| Nathan Gordon, Esq. | Peoples College of Law; Los Angeles, CA | CA |
| Stephen Ilg, Esq. | NYU School of Law; New York, NY | CA |
| Dan Kapelovitz, Esq. | University of California, Los Angeles; Los Angeles, CA | CA |

| | | |
|------------------------|--|--------|
| William Maestas, Esq. | Peoples College of Law; Los Angeles, CA | CA |
| Hector Peña, J.D. | Peoples College of Law; Los Angeles, CA | N/A |
| Robert D. Skeels, Esq. | Peoples College of Law; Los Angeles, CA | CA |
| Pasqual Torres, Esq. | Peoples College of Law; Los Angeles, CA | CA |
| Sydney Wilberton, Esq. | University of California, College of the Law; San Francisco, CA | CA |
| Misty Wilks, Esq. | Howard University School of Law; Washington, D.C. | CA, MD |

- g.** The ratio of faculty to students for the previous 5 years is approximately one instructor to eight students.
- h.** The education and degree provided by Peoples College of Law may not satisfy the requirements of other jurisdictions for the practice of law and applicants should contact the jurisdiction in which they may wish to practice for that jurisdiction's requirements.
- i.** The following are attrition rates of enrolled students in subsequent years of law study for the preceding 5 years. In accordance with Guideline 5.22 of the Guidelines for Unaccredited Law School Rules: "A student who does not pass the First-Year Law Students' Examination within three (3) administrations after first becoming eligible to take the examination must be promptly disqualified from a law school's J.D. program." Other reasons for student attrition vary and include, but are not limited to, students voluntarily withdrawing from law school due to personal, family, business, career or financial issues and students who may have been dismissed by the law school because the students did not maintain academic good standing or who were unable to complete the mandatory curriculum requirements to earn a Juris Doctor degree.

| Attrition Rate | | | | |
|-----------------------------|-------------------|--------------------|-------------------|--------------------|
| Student Count As Of: | First Year | Second Year | Third Year | Fourth Year |
| 08/08/2019 | 8 | 10 | 2 | 2 |
| 08/24/2020 | 13 | 4 | 2 | 2 |
| 08/30/2021 | 14 | 9 | 5 | 3 |
| 08/30/2022 | 8 | 9 | 2 | 1 |
| 09/05/2023 | 2 | 0 | 4 | 2 |

- j.** The School has been issued a Notice of Noncompliance by the Committee of

Bar Examiners (“CBE”; a committee of the State Bar of California).

PCL is taking active steps to achieve compliance and remedy all issues identified by the CBE.

- k. **Peoples College of Law is on probation through May 30, 2024 by order of the Committee of Bar Examiners at its December 2022 meeting.** At this meeting, the CBE moved that the law school must demonstrate that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school’s progress to be reviewed at the Committee meeting in October 2023 and April 2024, and agree to submit to annual inspections thereafter until the Committee is satisfied that compliance is likely to be sustained.

PCL is working very hard to make sufficient progress and correct all areas of improvement identified by the CBE.

l. Attached below are notices from the Committee of Bar Examiners to regarding the Notice of Noncompliance and probation since December 2022. These can also be found on PCL’s website at www.peoplescollegeoflaw.edu

Your signature at the end of this agreement signifies that you have read the contents of this Tuition, Enrollment, and Registration Agreement in its entirety. Please read through the following communications from the State Bar to PCL and then sign on the last page of this agreement BEFORE making a tuition or accountability fee payment.

**NOTICE OF
NONCOMPLIANCE AND
NOTICE PURSUANT TO UNACCREDITED LAW SCHOOL RULE
4.263 TO
PEOPLES COLLEGE OF THE
LAW JULY 1, 2022**

NOTICE OF NONCOMPLIANCE

Pursuant to Rule 4.260, of the State Bar of California's Unaccredited Law School Rules ("Rules"), the Committee of Bar Examiners ("Committee" or "CBE") finds that Peoples College of Law ("Peoples College" of "PCL"), a registered unaccredited fixed facility law school, is not in compliance with Rules and the Guidelines for Unaccredited Law School Rules ("Guidelines"):

1. Guideline 1.9 and 2.10: To achieve full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy.
2. Guideline 2.2(B): To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.
3. Guideline 2.3(B): To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability.
4. Guideline 2.3(D): To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated.
5. Guidelines 2.9(A)-(B) and 5.24: To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated.
6. Guideline 2.9(C): To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades.
7. Guideline 2.9(D): To bring itself into full compliance, the school should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam-security software.
8. Guidelines 2.10 and 5.17: To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.

9. Guidelines 2.11, 7.1, and 9.1: To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records.
10. Guideline 3.1: To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions.
11. Guidelines 4.8 and 4.9: To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements.
12. Guidelines 5.3(A)(1) and 5.9: To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities.
13. Guideline 5.8: To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of records for each student in the course.
14. Guidelines 5.17, 5.18, and 5.25: To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance.
15. Guidelines 5.18–5.20: To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines.
16. Guideline 5.24: To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline.
17. Guidelines 6.2–6.4: To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not

validate that statement.

18. Guidelines 7.1 and 7.2: To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students.

APPLICABLE AUTHORITY

A copy of the applicable Rules and Guidelines are enclosed with this notice. Additionally, the Rules and Guidelines may be accessed on the State Bar's website.

The applicable Rules are available on the State Bar's website at:

https://www.calbar.ca.gov/Portals/0/documents/rules/Rules_Title4_Div3-UnAcc-Law-Sch.pdf.

The applicable Guidelines are available on the State Bar's website at:

<https://www.calbar.ca.gov/Portals/0/documents/admissions/GuidelinesforUnaccreditedLawSchoolRules.pdf>

FINDING OF NONCOMPLIANCE

The Committee's finding of noncompliance is supported by the Periodic Inspection Report resulting from the January 14-16, 2020 inspection, Peoples College's July 20, 2020 response to the inspection report, 2020 Progress Update, 2020 Annual Report, Amendment to Annual Report May 2020, December 4, 2021 Progress Report and Annual Report, and the June 2022 Progress Report, as well as additional written submissions made between May 23, 2022 and June 7, 2022.

Pursuant to Rule 4.261, a law school that receives a Notice of Noncompliance must file a written response within fifteen days of the Notice of Noncompliance demonstrating that it is in compliance, or is taking steps to achieve compliance, with the Rules, along with the required deposit of \$924. (Rule 4.261.) Should the law school acknowledge that it is not in compliance, the Committee asks that the law school's response detail the school's intent, capacity, method, and best effort as to timing to return to compliance. Following receipt and review of the law school's response, the Committee must either notify the school within thirty days that the

response is deemed satisfactory, or if the Committee deems the response unsatisfactory, it must schedule an inspection within thirty days. (Rule 4.262.)

If the Committee believes that the inspection report demonstrates that the law school is not or is not likely to be in compliance with the Rules, the Committee will notify the law school that it recommends probation or withdrawal of registration. (Rule 4.263.) The law school may request a hearing before the Committee within fifteen days of being sent a notice that the Committee is recommending probation or withdrawal of registration. (Rule 4.264.) Within sixty days of receiving a timely request for hearing, the Committee will schedule a hearing at a time that is mutually agreeable to the Committee and the law school. (Rule 4.265(A).) Following the hearing, based on the entire record, the Committee

will determine whether the law school is in compliance with the Rules. (Rule 4.266(A).) The Committee may take any action affecting the law school's registration that it considers appropriate, including termination of registration. (Rule 4.266(B).) If the Committee determines that the law school is not in compliance or has not taken adequate steps to comply with the Rules but has made "perceptible progress toward compliance," the Committee may place the law school on probation and impose probation conditions on the law school. (Rule 4.267.)

NOTICE PURSUANT TO UNACCREDITED LAW SCHOOL RULE 4.263

On June 17, 2022, the Committee moved to provide notice to Peoples College of the Law that it intends to pursue probation or termination of registration unless the law school can demonstrate compliance in its timely response pursuant to Unaccredited Law School Rule 4.263. Peoples College of the Law is not required to submit a separate response to the notice under Rule 4.263.



The State Bar
of California

OFFICE OF ADMISSIONS

180 Howard Street, San Francisco, CA 94105

Natalie.L
eonard
@calbar.
ca.gov
415-538-
2118

February 8, 2023

Dean Edith
Pomposo Peoples
College of Law 660 S
Bonnie Brae
Los Angeles, CA 90057

RE: O-400 Action on Probation – Peoples College of Law

Dear Dean Pomposo:

The Committee of Bar Examiners met on December 2, 2022 and took the following action

regarding Peoples College of Law. Please review the motion and the attached Notice of Probation and invoice. The Committee moved as follows:

FURTHER MOVE, that the Committee places the law school on probation through and including May 30, 2024, with the understanding that the law school must demonstrate that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school's progress to be reviewed at the Committee meeting in October 2023 and April 2024, and agree to submit to annual inspections thereafter until the Committee is satisfied that compliance is likely to be sustained.

FURTHER MOVE, that the law school be directed to provide monthly progress reports to the State Bar on the first of the month as to each element of probation during the full term of probation, and to provide a self-study and submit to an inspection in 2023.

FURTHER MOVE, that the law school be directed to clearly advise the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures, web disclosures, the web home page, and communications shared with prospective students.

FURTHER MOVE, that the Committee reserves the right to terminate this probation prior to its scheduled conclusion if the law school fails to make or sustain adequate progress.

This letter also confirms the receipt of progress reports as requested by the Committee for January 2023 and February 2023. The law school is reminded to include in future reports status as to all items identified in the 2020 inspection, including the law school's steps to affirmatively establish or sustain compliance, as well as the status of all pending staff requests.

Attached in the invoice related to this matter through the date of this letter, which is due within 30 days.

Sincerely,

Natalie Leonard

Natalie Leonard
Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

Peoples College of Law
O-400 Action on Probation

Date: 2/8/202

Invoice Number: 2023-002

INVOICE

| Description | Amount |
|---|----------|
| 57.75 Hours Staff Time @ \$275 per hour 10/22-2/8/23 | \$15,400 |
| (Includes CBE item preparation, follow-up and monitoring) | |
| Total Deposit: | |
| Total due if paying by check: | \$15,400 |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | |

Make checks payable to The State Bar of California and submit payment with this form to:

The State Bar of California, Educational
Standards 180 Howard Street
San Francisco, CA 94105-1639

OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number:

Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:



The State Bar
of California

OFFICE OF ADMISSIONS

April 5, 2023

180 Howard Street, San Francisco, CA 94105
Natalie
.Leonard
@calbar.
ca.gov
415-538-
2118

Dean Edith

Pomposo Peoples
College of Law 660 S
Bonnie Brae
Los Angeles, CA 90057

RE: O-402 Action on Probation – Peoples College of Law

Dear Dean Pomposo:

The Committee of Bar Examiners met on March 24, 2023 and adopted the following motion regarding Peoples College of Law. Please review the motion, the actions and responses included therein, and the attached invoice due within 30 days of this letter. The Committee moved as follows:

MOVE, that the Committee of Bar Examiners receive and file the probationary reports filed by Peoples College of Law in January, February, and March 2023.

FURTHER MOVE, that in response to Peoples College of Law's March 2023 letter seeking information as to its compliance status and required actions, that staff transmit to the law school the annotated summary and restatement of the probationary order set forth in Attachments E (amended to be due, EOD, April 4).

FURTHER MOVE, that Committee direct the law school to take prompt action to establish full compliance and take the actions noted in Attachment E, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide an update and documentation in its April 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

FURTHER MOVE, that Peoples College of Law must clearly and fully document compliance with Rule 4.241 and California Business and Professions Code section 6061 in its April 2023 progress report by providing evidence that the procedures set forth in California Business and Professions Code 6061 and Rule 4.241 were followed or that refunds were issued. Failure to do so will be taken as evidence of noncompliance and the Committee may move to terminate the law school's registration.

Staff confirms that the law school filed a partial progress report received on April 3, 2023, and indicated it would provide additional information after on April 5, 2023, after the stated deadline of April 4, 2023. As of the time of the writing of this letter on the afternoon of April 5, 2023, no additional information has been received.

As requested by the Committee, a copy of Attachment E discussed at the meeting is attached for the law school's reference.

Attached in the invoice related to this matter through the date of this letter, which is due within 30 days of the date of this letter.

Sincerely,

Natalie Leonard

Natalie Leonard

Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

Peoples College of Law
O-402 Action on Probation
Date: 4/5/2023
Invoice Number: 2023-006

INVOICE

| Description | Amount |
|--|---------|
| 21 Hours Staff Time @ \$275 per hour 2/9/23-4/5/23 | \$5,775 |
| | |
| Total Deposit: | |
| Total due if paying by check: | \$5,775 |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | |

Make checks payable to The State Bar of California and submit payment with this form to:

The State Bar of California, Educational
Standards 180 Howard Street
San Francisco, CA 94105-1639

OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

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Billing City, State, Zip:

Telephone Number:

Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:

**PROPOSED ANNOTATED SUMMARY AND RESTATEMENT
OF PEOPLES COLLEGE OF LAW PROBATIONARY
STATUS EFFECTIVE DECEMBER 2, 2022 – MAY 30,
2024**

RESOLVED, that the Committee of Bar Examiners finds that Peoples College of Law (PCL) is not in compliance with the unaccredited law school rules, but it has made perceptible progress toward compliance.

FURTHER RESOLVED, that the Committee places the law school on probation through and including May 30, 2024, with the understanding that the law school must demonstrate that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school's progress to be reviewed at the Committee meetings in October 2023 and April 2024, and the law school must agree to submit to annual inspections thereafter until the Committee is satisfied that compliance is likely to be sustained.

FURTHER RESOLVED, that the law school be directed to provide monthly progress reports to the State Bar on the first of the month as to each element of probation during the full term of probation, and to provide a self-study and submit to an inspection in 2023.

FURTHER RESOLVED, that the law school be directed to clearly advise the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures, web disclosures, the web home page, and communications shared with prospective students.

FURTHER RESOLVED, that the Committee reserves the right to terminate this probation prior to its scheduled conclusion if the law school fails to make or sustain adequate progress.

To ensure maximum clarity, the items are numbers to track the recommendation numbers in the original January 2020 inspection report:

Mandatory Actions Adopted August 2020

1. **Guidelines 1.9 and 2.10:** To demonstrate full compliance, the school should demonstrate that it has adopted adequate procedures to properly document applications for accommodations and decisions in student files, to secure health records against unauthorized disclosure, and to effectively administer the school's privacy policy.

While the law school advised that as of November 2022 it had adopted and posted a

compliant policy, later status reports indicate that the policy is in draft stage and is still being finalized as of March 1, 2023.

Since the December 2, 2022 committee meeting, staff has received two complaints from students regarding the policy's availability and application, and State Bar staff requested information related to these complaints. (Student A complaint, January 2023; Student B

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complaint, March 2023.)

Outstanding Action: The law school must demonstrate in its April 2023 progress report that it has created and implemented compliant procedures for reasonable accommodations and responded to the compliance issues raised by the student complaints, and resolve the conflict that appears to be present in the law school's prior responses.

2. **Guideline 2.2(B):** To bring itself into full compliance, the school should demonstrate that its refund policies have been stated clearly and consistently in its publications.

The law school appears to have a compliant refund policy regarding those who withdraw. The law school does not appear to have a compliant policy of providing refunds to students when the law school does not comply with Rule 4.241 and California Business and Professions Code section 6061. See item 4 for more detail.

Outstanding Action: The law school must document full compliance with Rule 4.241, including providing any refunds that are required under the rule, and provide evidence of compliance in its April 2023 progress report.

3. **Guideline 2.3(B):** To bring itself into full compliance, the school should remove from the Catalog any electives not offered in the past three years or not expected to be offered in the next two years, and inform students in the Catalog that electives are not are taught each year, but are offered from time to time based on student interest and instructor availability. *Subsequent to the inspection, the school adopted a compliant policy and updated the Catalog in this area.*
4. **Guideline 2.3(D):** To bring itself into full compliance, the school should demonstrate that the disclosure statements required by Guideline 2.3(D)(1)-(3), Business and Professions Code section 6061.7, and Rule 4.241 have been implemented accurately, completely, consistently, and as mandated.

A. Compliance with Business and Professions Code 6061.7(a)

During 2022, the State Bar observed that PCL's Business and Professions Code section 6061.7(a) web disclosures and handbook were found to be out-of-date on the law school's website from January through June 2022. Staff reminded the law school to update the disclosures throughout the first half of 2022. PCL did so in May and June 2022. In November 2022, staff informed the law school via email that outdated disclosures appeared

again in November 2022. PCL updated the disclosure and advised that this was due to reliance on volunteer work to update the website and that they would contract with information technology professionals to update the website. Since that time, the law school advises that as of March 1, it had selected a vendor and placed a deposit, but a timeline was not available.

Outstanding Action: In its April 2023 progress report, the law school must demonstrate that it is in compliance with the data and posting requirements of California Business and Professions

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Code section 6061.7(a), and document a specific timeline for its updated process, since it advises that the current process is insufficient to ensure sustained compliance.

B. Compliance with Rule 4.241

It appears from data provided by the law school that it is not in full compliance with Rule 4.241. This rule requires the law school to: (1) provide specified comprehensive disclosures to students prior to them making a payment for any term, which would be a quarter in the case of PCL; (2) have each student sign a copy of the disclosure statement; and (3) provide each student with a copy of their signed disclosure statement as a receipt. If the school fails to comply, it must refund all fees for that term, including tuition, to the student. Additionally, noncompliance with this rule is cause for withdrawal of registration.

The data PCL has provided to date indicates that several students are owed refunds for one or more quarters. The law school updated its disclosure statement policy in January 2023, but it does not appear that PCL has been acting in accordance with its policy.

State Bar staff has taken significant action to address this issue:

On December 8, 2022, State Bar staff requested the signed disclosures for one particular student who had completed three years of study. On December 30, the law school advised that it forwarded all disclosures that it had in its possession for the student, delivering one unsigned disclosure for one term, without evidence that it had been distributed to the student. On January 6, State Bar staff advised the law school that the disclosure was unsigned and asked the law school to provide evidence of compliance or provide a refund to the student by January 13 for that term as well as for any other term for which the law school did not comply with the Rule 4.241 process.

The law school did not respond by January 13.

On January 18, State Bar staff repeated its request regarding that student, and expanded the request by asking the law school to demonstrate compliance as to Rule 4.241 for all students enrolled during the 2022-2023 school year or provide refunds as required by the rule.

Later that day, on January 18, PCL's dean advised that the response had been completed but was still lodged in her draft folder. When she sent it, the response only addressed the disclosures for the original student, indicating that some more information had been found, and did not respond to the request as to the other students.

On January 26, PCL provided additional information regarding the first student including a recently located signature page, but still did not provide information regarding the other students enrolled during the 2022-2023 school year.

On February 1, PCL provided additional disclosures for the original student with the subject line "Newly Found – Tuition Enrollment Agreements."

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On February 7, State Bar staff was scheduled to meet with PCL to determine why the law school had not demonstrated compliance. The law school postponed the meeting, rescheduling to February 13.

On February 13, 2023, State Bar staff met with the law school. PCL provided a spreadsheet with some, but not all, of the information requested.

Based on the data PCL provided it appears that:

- At least 6 students did not sign disclosures for the Fall 2022 term
- At least 6 students did not sign disclosures for the Winter 2023 term
- Of the students above, 4 students did not sign a disclosure for either the fall 2022 or winter 2023 terms
- At least one student did not sign a disclosure for the spring 2020 term
- For the fall 2022 term, 13 out of 14 students who signed their disclosures did so in December 2022 or January 2023, which was well after the start of the term and likely after the students had paid tuition for the term
- For the spring 2023 term, 12 of 13 students signed the disclosures between September and December 2022. Significantly, in many cases, the documents reflect that students signed the spring 2023 disclosure before they signed the fall 2022 disclosure. Additionally, the spring 2023 term disclosures appear to have been signed during the period when the Committee was considering whether to terminate the school's registration and before a decision had been made, and it is unclear whether students were provided with full information as to the law school's status.

The spreadsheet provided at the meeting was not fully responsive to the State Bar's requests. The law school needs to show for each student, for each term, that the student received a timely and complete disclosure prior to making a payment for that term, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term.

The law school also indicated that it implemented a new procedure in January 2023 to ensure compliance, but PCL's data indicates that not all students signed the disclosure

for the term beginning in January 2023, so that procedure appears to need further modification.

At the meeting, PCL agreed to provide an update demonstrating compliance complete its analysis, but no update has been received. after the exam period and include it in the March progress report. The law school did provide a copy of the disclosure that they indicate was distributed to all students at the start of the fall 2022 term, but no further update has been received since February 13.

Staff provided courtesy reminders on February 21 and March 16.

Outstanding Action: The law school must demonstrate for the original student identified and for each student enrolled during the fall 2022 or spring 2023 term, for , that the student

received a timely and complete disclosure prior to making a payment, signed it, and received a copy of the signed disclosure. For any instance where PCL cannot demonstrate compliance, it must provide a refund to the student for that term. PCL must document compliance it is April 2023 progress report.

5. Guidelines 2.9(A)-(B) and 5.24: To bring itself into full compliance, the school should demonstrate that the Catalog and other publications set forth the school's academic standards and student assessment policies accurately, clearly, consistently, and as mandated.

The law school's catalog was posted on its web site in draft form, including notes, and included noncompliant policies, from January through May 2022. After multiple staff reminders and a directive from the Committee in March 2022, the law school posted an updated document in May 2022.

Many of the law school's website pages appear out of date, potentially confusing prospective or current students as to PCL's current academic policies. Examples include: the law school's homepage indicates that [the admission season for 2021-2022 is open, with the next class starting in fall 2021](#); [recent bar passage data stops with 2019](#); and many pictures on the [virtual tour](#) show the library, which has been unavailable for a number of years after a fire, and the law school is operating under a waiver regarding its library. The law school's progress reports indicate that the law school intends to hire information technology experts to assist with website updates, and to adopt a web platform that can be more easily updated by staff and volunteers, , but no timeline is provided for this action.

Outstanding Action: The law school must update its website and publications and provide a timeline as to when this process will be complete, in its April 2023 progress report.

6. Guideline 2.9(C): To bring itself into full compliance, the school should adopt, publish, and implement a policy, including oversight provisions, to ensure that students are provided with written statements of the components of course grades. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

- 7. Guideline 2.9(D):** To bring itself into full compliance, PCL should adopt, publish, and implement a policy on authentication of student work, and discontinue its current practice of allowing students to take in-class exams using devices that are not protected by exam- security software.

After the inspection in 2020, the law school purchased commercial software that provided exam security. During the fall semester in 2022, the law school had a technical issue with its software and ordered students to come in to take their exams, though another technical solution was found. The law school is again considering changing its vendor to a vendor it previously rejected. It is unclear whether the switching represents a technical issue or an evolving process. In addition, the law school's policy includes significant exceptions that allow

students to take exams unmonitored, limiting the law school's ability to authenticate student work.

Outstanding Action: The law school must document how it ensures exam security and authentication of student work, and document its policies and their implementation, and explain how often the exceptions to the policy are invoked and how exam security and authentication of work is handled in those cases, and document this as part of its April 2023 progress report.

- 8. Guidelines 2.10 and 5.17:** To bring itself into full compliance, the school should review, revise, and republish its grade review policy to meet guideline requirements.

A student complaint alleged that forms related to grade review were inaccessible during the first part of 2022. (Student Complaint, March 2023.)

Outstanding Action: The law school must document the grade review process, and establish whether the policy and related forms are available to students, and document this in the law school's April 2023 progress report.

- 9. Guidelines 2.11, 7.1, and 9.1:** To bring itself into full compliance, the school should adopt policies and procedures that are adequate to protect the school's digital records. *Subsequent to the inspection, the school purchased Populi, a commercially available package designed for schools containing the safeguards identified in the law school's inspection report.*
- 10. Guideline 3.1:** To bring itself into full compliance, PCL should demonstrate that it has sufficient administrative capacity to achieve and sustain compliance with the CBE's standards, including written job descriptions for the dean and registrar, and adequate oversight provisions. *Subsequent to the inspection, the school increased the paid hours of the administrator, and secured significant volunteer assistance from the dean, the Board, and alumni, resulting in significant progress seen since the inspection. The school also created compliant job descriptions for both the dean and the registrar.*

A. Impact of Reliance on Volunteer Work

In 2022, the law school advised that it hired additional support staff, but eliminated those roles in 2023 without identifying other sources of volunteer or paid staff. Yet, the law school cited reliance on volunteer labor as the reasons for its noncompliance in a number of areas including:

1) the ability to create courses required for students; 2) the ability to keep the website updated; 3) the ability to issue grades timely. Reliance on volunteers does not excuse compliance.

Outstanding Action: While the law school is not required to have a particular number of staff, it must have sufficient capacity available to maintain compliance. The law school should demonstrate how it estimates its needs and fulfills those needs, explaining changes in support from 2022 to 2023, and document this in its April 2023 progress report.

B. Impact of Reliance on Student Volunteer Work

PCL's current model relies on significant student volunteer work. For example, students must perform volunteer work 15 hours per week or pay an additional fee, and students also serve on the governing board. This impacts the time that students have available, and the law school acknowledges that it feels students are already busy, noting in its March 2023 report that students are too busy to fill out faculty evaluations. There is also the potential for conflict of interest or violation privacy.

Outstanding Action: The law school must evaluate the role of student participation to ensure that students have sufficient time to devote to their studies, and the law school has sufficient resources available to sustain compliance. The State Bar remains concerned at the potential for conflict of interest or violation of student privacy, as was expressed at the January 2020 inspection, and seeks further comment from the law school.

C. Overall Ability to Maintain Compliance

It is unclear whether the law school has sufficient resources to maintain compliance. Examples include:

- a. The law school has not been able to create a fourth-year program of study for a student who was due to begin that study in September 2022.
- b. The law school has not fully implemented its testing accommodation policy first considered in 2020, but not yet implemented. Two complaints regarding the law school's current process have been received since the Committee's December 2022 meeting.
- c. When asked to document compliance with Rule 4.241, the law school was challenged to locate the relevant records and has not been able to locate all records after three months of efforts.
- d. The law school admitted at least one student on the first day of her classes in fall 2022, and no orientation was provided for her after orientation was conducted one week prior for other students. (Student Compliant January 2023; Staff meeting with Peoples College of Law, February 13, 2023.)
- e. The law school did not respond to several requests from State Bar staff to complete its

demographic reporting spreadsheet that is part of the law school's annual report. After first requesting updates on December 6, and reminding the law school in writing on several occasions, the material was ultimately provided on February 16, 2023.

- f. Outstanding Action: The law school must engage sufficient staff and administrative support to maintain compliance with all Rules and Guidelines including responding to State Bar staff requests and probation requirements in a timely manner, and documenting its process to track status, complete and close requests in its April 2023 progress report.

11. Guidelines 4.8 and 4.9: To bring itself into full compliance, the school must adopt and implement a faculty evaluation policy that meets guideline requirements. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

Between January 2020 and May 2022 PCL failed to release grades on time for one or more classes. PCL has indicated that the delay is due to the fact that volunteer professors have other time commitments. The law school reports it is working with professors to implement quality control procedures for class and exam creation and grading.

The law school advised that it has created a backup procedure to be implemented if a professor cannot grade exams on time. It also advised that it continues to seek student feedback.

Outstanding Action: The law school must establish a meaningful faculty evaluation process that sets expectations for professors, and holds them accountable, advise whether faculty grades were released on time, and, if not, advise the results of implementing the backup procedures, and document status as to all of these elements in its April 2023 progress report.

12. Guidelines 5.3(A)(1) and 5.9: To bring itself into full compliance, the school should adopt, implement, and publish attendance policies and procedures that: require student attendance at no less than 80 percent of the regularly scheduled class hours for each course during a particular term, not a series of courses over two or more terms; provide for accurate and timely maintenance of records; and eliminate the policy of permitting students to make up absences from regularly scheduled class hours with alternate activities.

The law school's current policy does not comply with the guideline because it does not require students to attend 80 percent of regularly scheduled classes. Rather, students can petition to replace regularly scheduled class hours with alternative classes taught by other professors at any time, even after the conclusion of the course or academic term.

Outstanding Action: The law school must update its policy to require a student to attend 80 percent of regularly scheduled class hours for each individual class and address all elements of this guideline, and document the new policy and its implementation in its April 2023 progress report.

13. Guideline 5.8: To bring itself into full compliance, the school should demonstrate that its clinical courses meet all Guideline 5.8 requirements, including maintenance of

records for each student in the course. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

14. Guidelines 5.17, 5.18, and 5.25: To bring itself into full compliance, the school should review, revise, and republish its exam and grading policies and procedures, taking action as necessary to improve the quality of exams, curb grade inflation, and ensure that students receive adequate feedback on their exam performance.

This policy appears to have changed as staff has changed. Recently, the law school reported that it documented a policy and held faculty trainings on how to implement that policy, focusing on grading standards and providing useful feedback on exams.

The law school also indicated that at times the dean or administrator have reviewed grades before they are released.

Outstanding action: The law school should describe the processes used to meet this recommendation so far in the fall 2022 quarter, what is planned for the spring 2023 quarter, and explain how the law school will continue to determine whether grading results correlate with outcomes on State Bar exams, and document this in the law school's April 2023 progress report.

15. Guidelines 5.18-5.20: To bring itself into full compliance, the school should adopt, publish, and implement policies for academic advancement that adhere to the school's academic standards and comply with the guidelines, and eliminate policies that do not adhere to the guidelines.

The law school allowed a student to take a non-standard schedule but did not ensure that it had a program of study of 270 hours available to the student for their fourth year as required by California Business and Professions Code section 6060. As a result, the student was not able to continue their education at the law school in fall 2022. Currently, the law school advised staff that it has identified four course titles that it plans to create and offer beginning in fall 2023, but it has not discussed the course topics with the student or updated the student since September 2022. The law school must administer a compliant plan of study for all students.

Outstanding action: The law school must demonstrate that it has available a program of 270 hours per year for four years to all students, and document this in its April 2023 progress report.

16. Guideline 5.24: To bring itself into full compliance, the school should revise and republish its course repetition policy to meet all requirements of the guideline. *Subsequent to the inspection, the school adopted a compliant policy and provided the State Bar with a copy of that policy.*

Outstanding Action: The law school should provide an update as to whether any students have utilized this policy, the notice provided by the law school as to the implications of taking the leave, and the proposed plan that the student will be undertaking after the leave, as part of the law school's April 2023 progress report.

17. Guidelines 6.2-6.4: To bring itself into full compliance, the school must devise a plan and a timeline to return to compliance regarding the library by owning and maintaining its own hard copy library as required under Guideline 6.2 and provide this timeline and proof of library purchase to the CBE; however, it may be appropriate to provide a waiver for this academic year while the law school teaches courses online due to the pandemic. In addition, to bring itself into full compliance, PCL should also demonstrate that students are receiving instruction in both physical publication and electronic-based legal research, as required by Guideline 6.3. The Catalog states that legal research is taught in several courses, but a review of syllabi attached to the self-study did not validate that statement. *Subsequent to the inspection, the school did confirm that legal research is being taught*

using both hard copy and electronic resources, and the syllabi are being updated appropriately.

The law school advised in its March progress report that it may comply with the guideline or apply to change its educational category to the distance learning category and comply with that library requirement.

Outstanding Action: If the law school plans to change categories, it must file an application to do so as soon as possible to ensure timely consideration, or the law school may not have a determination prior to the start of the law school year. The law school has been advised in 2020, 2021, Summer 2022, and again via this summary that sufficient notice must be provided to allow the Committee to evaluate the law school's request. If the law school plans to implement this transition, it must include its application in full with its April 2023 progress report.

18. Guidelines 7.1 and 7.2: To bring itself into full compliance, the school should maintain essential and permanent hard-copy records in fire-safe lockable cabinets, maintain all electrical equipment in working order, and provide digital projection equipment adequate to meet the needs of faculty and students. *Subsequent to the inspection, the school adopted a compliant policy and provided a copy of that policy to the State Bar.*

Outstanding Action: Given the challenges that the law school experienced locating paper documents related to disclosures, the law school must document in its April 2023 progress report whether files are stored in such a manner that they can be located and produced quickly enough to meet the needs of students, faculty, and the State Bar, and document its implementation and organization in the law school's April 2023 progress report.

19. Guideline 9.1: To bring itself into full compliance, the school should adopt and implement a policy to ensure that records are fully compliant with Guideline 9.1, that the law school has adopted written procedures, including oversight provisions, of record-keeping processes and record retention requirements, and that it has adopted a written policy on transcript changes, as required by Guideline 9.1(D) *Subsequent to the inspection, the school adopted compliant policies and provided the State Bar with copies of those policies.*

Outstanding Action: Ensure that all materials identified in the guideline are stored in an

organized manner and easily accessible to the law school and readily produced to State Bar staff upon request.

Adopted Suggestions to Enhance Compliance

1. Pursuant to Guidelines 2.9(C) and 5.13, it is suggested that the school requires faculty to use a standard syllabus template to promote consistent communication of course requirements. *Subsequent to the inspection, the school purchased a commercially available software package that includes a standard syllabus template which was adopted.*

Outstanding Action: Please confirm whether this template is being used for all classes, and, if not, which classes use it and what system is in place for the other classes, and document the law school's response in the April 2023 progress report.

2. Pursuant to Guidelines 2.11, 7.1, and 9.1, it is suggested that the school bases its data security policies and procedures upon the recommendations of generally accepted industry standards, consulting with an expert if the expertise is not available within the school. *Subsequent to the inspection, the school purchased commercially available software package with these features included, and purchased the appropriate storage cabinets to protect hard copy files.*

Outstanding action: Please continue to document the law school's status of implementation of the software and secure storage, as part of the April 2023 progress report.

3. Pursuant to Guidelines 5.14 through 5.16 and 5.25, it is suggested that the school adopts and implements a procedure requiring that exam questions, accompanied by issue outlines or model answers, must be reviewed, and approved by the dean or another legal educator before being administered. *Subsequent to the inspection, the school began evaluating this suggestion.*

Outstanding Action: Please advise the status of a policy and implementation of that policy, including which staff or volunteers will carry it out and their qualifications to do so, and document these efforts in the April 2023 progress report.

4. Pursuant to Guidelines 5.17, 5.18, and 5.25, it is suggested that the school adopt and implement a procedure requiring grades and student exams papers to be reviewed and approved by the dean or another legal educator before being posted. *Subsequent to the inspection, the school began evaluating this suggestion.*

Outstanding Action: The law school must continue to evaluate its process for grade and exam review and approval, and document its process as part of its April 2023 progress report.



The State Bar
of California

OFFICE OF ADMISSIONS

180 Howard Street, San Francisco, CA 94105

April 26, 2023

Dean Edith
Pomposo Peoples
College of Law 660 S
Bonnie Brae St Los
Angeles, CA 90057

RE: April 2023 CBE Action – Review of Probationary Progress Report – Peoples College of

Law Dear Dean Pomposo:

The Committee of Bar Examiners met on April 21, 2023 to discuss the law school's compliance status and contents of the probationary progress reports received through the date of the Committee's meeting. After careful consideration, the Committee took the following action:

MOVE, that the Committee of Bar Examiners receive and file Peoples College of Law's probationary progress report filed in part on April 1, 2023 and in part on April 5, 2023.

FURTHER MOVE, that the committee advises that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether the law school is able to achieve and sustain compliance.

FURTHER MOVE, that the law school be directed to document compliance status as to Rule 4.241 and California Business and Professions Code section 6061 in its May 2023 progress report, including documenting: 1) whether the law school provided the specified law student with a disclosure for the spring 2020 term; 2) whether it has received a signed disclosure from the student who did not sign a disclosures for the fall 2022 term as of the date of the April 2023 progress report; 3) whether that the law school has "clearly advis[ed] the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures;" 4) whether it refunded the tuition of the students who made a payment prior to receiving a disclosure, or a full explanation for each of those students as to why the refund was not issued; 5) providing consistent and complete information, including any disclosures omitted from the April 2023 progress report; and 6) explaining discrepancies between the disclosure status charts provided in March 2023 and April 2023.

FURTHER MOVE, that the law school continue to be directed to take prompt action to establish full compliance and take the actions noted in Attachment E from the committee's March 2023 meeting, as well as any other steps necessary to avoid noncompliance with any other Rule or

Guideline, and to provide evidence of this in its May 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

The invoice related to this matter is attached and due within 30 days of the date of this letter. The law school's prior invoice from March 2023 is due on May 5, 2023.

Regarding the law school's request that all deadlines be in writing, the law school will be responsible for all deadlines adopted by the Committee, whether or not received in writing. The State Bar will strive to forward deadlines in writing, but the Committee did not agree to the law school's request that it only be bound by deadlines in writing. The law school is responsible for following the Committee's directives. It is the Committee's practice, as was done in April, to involve the law school in discussion when setting a deadline, to show the deadline on a screen, and to have a recording of the meeting available where the verbal and written discussion can be accessed. The recordings are available online at <https://board.calbar.ca.gov/Committees.aspx>. The law school may invite any number of staff and volunteers to attend the meetings and review the recordings in order to ensure that the law school is apprised of Committee directives.

Sincerely,

Natalie Leonard

Natalie Leonard

Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

Peoples College of Law

VD Review of Progress Report – Peoples College of Law – April 2023 CBE

Meeting Invoice Date: 4/27/2023

Invoice Number: 2023-009

INVOICE

| Description | Amount |
|---|-----------|
| 13.75 Hours Staff Time @ \$275 per hour | \$3781.25 |
| * Note: Separate invoice related to March 2023 CBE Meeting due May 5. | |
| Total Deposit: | |
| Total due if paying by check: | \$3781.25 |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | |

Make checks payable to The State Bar of California and submit payment with this form to:

The State Bar of California, Educational
Standards 180 Howard Street
San Francisco, CA 94105-1639

OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number: Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:



The State Bar
of California

OFFICE OF ADMISSIONS

**OPEN SESSION
AGENDA ITEM
IV.B. JUNE 2023
COMMITTEE OF BAR EXAMINERS**

DATE: June 23, 2023

TO: Members, Committee of Bar Examiners

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

SUBJECT: Action on Probation and Progress Report, Request for Waiver to Teach
Classes Online Due to COVID, and Major Change – Change of

EXECUTIVE SUMMARY

The Committee of Bar Examiners (committee) placed Peoples College of Law (PCL) on probation effective December 2, 2022 through May 30, 2024, and directed the law school to file monthly progress reports on the first day of each month. Since the last committee meeting, the law school filed a timely, but materially incomplete progress report in May 2023 (Attachment A) and did not update the report when staff identified the missing portions in a communication to the law school (Attachment B). The June 2023 progress report (Attachment C) addressed more of the issues, generally listing future timelines when progress is projected. The law school also requested extension of a waiver to teach classes online due to the pandemic (Attachment C, Att. H), as well as a major change request involving the sale of the law school building and move to a new space not yet identified. (Attachment C, Att. G). Staff and PCL exchanged three emails regarding the June progress report (Attachments D-F).

BACKGROUND

Peoples College of Law is a registered, unaccredited fixed-facility law school founded in 1974 and located in Los Angeles, California. It is a stand-alone law school and solely offers a JD program.

Volunteer faculty teach the students in a building owned by the law school.¹ (PCL 2022 Annual Report). During the fall 2022 term, PCL enrolled 21 students (9 1L; 9 2L; 2 3L; and 1 4L); during the spring 2022 term, PCL enrolled 14 students (4 1L; 7 2L; 2 3L; 1 4L). ([Jan. 2023 Cal. Bus. & Prof. Code section 6061.7\(a\) disclosure; email from Peoples College of Law Administrator, March 24, 2023, 5:45 p.m.](#)).

SUMMARY OF PROBATION CONDITIONS

On December 2, 2022, the committee placed PCL on probation through May 30, 2024. ([Item O- 400](#), Committee of Bar Examiners Meeting, Dec. 2, 2022). The probationary order set forth the following conditions of probation:

RESOLVED, that the Committee of Bar Examiners finds that Peoples College of Law is not in compliance with the unaccredited law school rules, but it has made perceptible progress toward compliance.

FURTHER RESOLVED, that the committee places the law school on probation through and including May 30, 2024, with the understanding that the law school must demonstrate that sufficient progress has been made toward compliance, or its registration as an unaccredited law school will be withdrawn, with the law school's progress to be reviewed at the committee meeting in October 2023 and April 2024, and agree to submit to annual inspections thereafter until the committee is satisfied that compliance is likely to be sustained.

FURTHER RESOLVED, that the law school be directed to provide monthly progress reports to

the State Bar on the first of the month as to each element of probation during the full term of probation, and to provide a self-study and submit to an inspection in 2023.

FURTHER RESOLVED, that the law school be directed to clearly advise the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures, web disclosures, the web home page, and communications shared with prospective students.

FURTHER RESOLVED, that the committee reserves the right to terminate this probation prior to its scheduled conclusion if the law school fails to make or sustain adequate progress.

([Committee of Bar Examiners' Minutes, December 2, 2022 Meeting](#)).

Though the committee's original order contemplated a review in October 2024, PCL requested clarification of the order and review in a letter on March 1, 2023.

At its March 2023 meeting, the committee responded to PCL's letter by confirming that, consistent with its prior directives issued since 2020, PCL's progress reports must include status as to "each element of probation," which is each recommendation noted in its 2020 inspection

¹ Classes have been taking place online since Spring 2020 under an emergency waiver approved by the committee due to the pandemic. This waiver expires in August 2023.

report². The committee also confirmed that in areas where PCL had demonstrated compliance following the 2020 inspection report, PCL must sustain compliance and avoid falling out of compliance with other rules or guidelines. If the law school falls out of compliance, it must include a plan and timeline to come into compliance in that area in the monthly progress report. As a courtesy, the committee provided the law school with another copy of each of the recommendations from the 2020 inspection report and a summary of PCL's compliance or lack thereof for each recommendation (derived generally from their prior submissions). (See [O-402 Attachment E](#), Committee of Bar Examiners Meeting, March 24, 2023).

The committee also reviewed PCL's January, February, and March 2023 progress reports and requested more information to give the law school another opportunity to demonstrate whether its disclosure practices comply with Rule 4.241 and California Business and Professions Code section 6061.

The committee adopted the following motion at its March 2023 meeting, extending the deadline for the April 2023 progress report to April 4 as a one-time courtesy:

MOVE, that the Committee of Bar Examiners receive and file the probationary reports filed by Peoples College of Law in January, February, and March 2023.

FURTHER MOVE, that in response to Peoples College of Law's March 2023 letter seeking information as to its compliance status and required actions, that staff transmit to the law school the annotated summary and restatement of the probationary order set forth in Attachment E (amended to be due, EOD, April 4).

FURTHER MOVE, that committee direct the law school to take prompt action to establish full compliance and take the actions noted in Attachment E, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide an update and documentation in its April 2023 progress report. If the law

school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

FURTHER MOVE, that Peoples College of Law must clearly and fully document compliance with Rule 4.241 and California Business and Professions Code section 6061 in its April 2023 progress report by providing evidence that the procedures set forth in California Business and Professions Code [section] 6061 and Rule 4.241 were followed or that refunds were issued. Failure to do so will be taken as evidence of noncompliance and the committee may move to terminate the law school's registration.

(Committee of Bar Examiners' Meeting, March 24, 2023, adopted motion posted onscreen, posted via meeting recording).

² Prior to the imposition of probation, PCL was already required to write annual progress reports addressing each recommendation identified in the law school's inspection report. ([Minutes of Meeting of August 20, 2020 Meeting](#), Adopted at Committee of Bar Examiners Meeting, October 16, 2020).

The law school's April progress report included timelines in some areas but not others, and continued to omit topics requested. After reviewing the report, the committee adopted the following motion at its April 2023 meeting, urging the law school to file complete, consistent reports with timelines. The committee also asked a series of specific questions related to disclosures and providing notice to students about the law school's probationary condition and disclosure compliance, and repeated its admonishment to the law school to maintain full compliance with disclosure requirements:

MOVE, that the Committee of Bar Examiners receive, and file Peoples College of Law's probationary progress report filed in part on April 1, 2023 and in part on April 5, 2023.

FURTHER MOVE, that the committee advises that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether the law school is able to achieve and sustain compliance.

FURTHER MOVE, that the law school be directed to document compliance status as to Rule 4.241 and California Business and Professions Code section 6061 in its May 2023 progress report, including documenting: 1) whether the law school provided the specified law student with a disclosure for the spring 2020 term; 2) whether it has received a signed disclosure from the student who did not sign a disclosures

for the fall 2022 term as of the date of the April 2023 progress report; 3) whether that the law school has “clearly advis[ed] the public, prospective students, and current students of its status on probation affirmatively and clearly, including attaching a copy of the probationary terms to student disclosures;” 4) whether it refunded the tuition of the students who made a payment prior to receiving a disclosure, or a full explanation for each of those students as to why the refund was not issued; 5) providing consistent and complete information, including any disclosures omitted from the April 2023 progress report; and 6) explaining discrepancies between the disclosure status charts provided in March 2023 and April 2023.

FURTHER MOVE, that the law school continue to be directed to take prompt action to establish full compliance and take the actions noted in Attachment E from the committee’s March 2023 meeting, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide evidence of this in its May 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

DISCUSSION

This discussion reviews PCL’s updates contained in its May and June 2023 Progress report, which include as part of the June 2023 progress report, a request to extend its emergency waiver to teach classes online as a fixed-facility law school due to the COVID pandemic, and a major change request identifying the sale of the building already in progress, with the criteria for a subsequent space yet to be shared.

PCL’s MAY AND JUNE 2023 PROGRESS REPORTS

On May 1, 2023, the law school filed a timely but materially incomplete progress report. Staff provided a detailed list of omissions as a courtesy, referencing the committee’s original requests. For example, the law school did not address the specific questions asked by the committee in paragraph 3 of its April 2023 motion. The law school did not amend or complete the report.

On June 1, 2023, the law school filed a report that responded to more of the identified issues and contained more timelines than the prior report.

On June 13, 2023, the law school paid its overdue invoices related to the work presented and discussed at the March and April committee meetings.

A summary of key outstanding issues after reviewing the reports is below using the item numbers identified in the original inspection report for clarity and consistency between filings each month.

Item 1 Testing Accommodations

In response to prior inquiries to the State Bar from students who were not able to

understand the law school's testing accommodations process, the law school posted a Testing Accommodations request form on its new website which will be helpful to students. The law school should also advise students about what information they must submit from their treating professionals, as this was an issue identified in two student complaints raised to the State Bar this year. One of those complaints has been resolved, and the law school is reviewing the other complaint.

Item 2/4 Disclosures

Issues still exist with the law school's disclosures required to be distributed to students pursuant to Rule 4.241 and those disclosures required to be posted on the law school's website pursuant to Business and Professions Code section 6061.7(a).

Under Rule 4.241 and Business and Professions Code section 6061, unaccredited law schools must provide a specific disclosure statement to students prior to each term before the student makes a payment for that term. The student must sign the statement and receive a copy of the signed disclosure. This disclosure informs law students of the responsibilities and possible limitations of attending an unaccredited law school, the resources available at the law school, as well as the law school's performance and compliance status. The remedy for failure to comply or to issue refunds in the event of noncompliance warrants a result of termination of registration under Rule 4.241 (E).

Staff has been requesting compliance since December 2022 and the committee has been requesting compliance since January 2023. At this point, the law school has determined the

status of its distributed disclosures, and needs to file the necessary refunds. It must also present a compliant plan for the fall 2023 term since its new process set in place for the winter 2023 term did not result in full compliance.

Each month, so far until June, the law school indicated that it was researching the status of its distributed and signed disclosures. In the May 2023 Progress report, PCL stated that "PCL is working with CBE staff on the analysis of the Fall [2022] and Winter [2023] disclosures. Data to be provided to the CBE." No data was provided following the submission of the May Progress Report. As a result, State Bar staff used the data already provided to create a list of those who did not appear to receive a disclosure or a signed disclosure. (Attachment B). It also directed the law school to respond to the questions enumerated in the Committee's April motion, which were not included in the May progress report.

In its June 2023 progress report, the law school created a list of missing disclosure documents and students entitled to refunds, and indicated that it will provide the refunds in twelve weeks, so long as PCL's governing board approves when it meets on June 18. Staff has asked for an update after PCL's governing board meets. The timeline seems generous, allowing twelve additional weeks to process the refunds.

In June 2023, after a direct Committee order and a follow-up from staff, PCL responded to the majority of the questions posed in the committee's April motion, though it did not respond to the final question asking why there were discrepancies in the data provided

from month to month.

Because the law school will not be issuing refunds until the end of August, it should plan ahead to include the status in its September 1 progress report.

The law school does not appear to be solving this issue accurately or expeditiously, and appears despite the repeated direction from the committee.

In addition, on June 8, 2023, State Bar staff discovered that the law school's web disclosure required under California Business and Professions Code section 6061.7(a) contains an error as to the amount of tuition and fees charged to earn a JD degree, appearing to overstate it. The law school was advised to correct and repost this disclosure as soon as possible.

Item 7 Secure Testing

The law school now uses security software and proctoring for exams. The June progress report references a procedure in which an instructor may delay exams at their discretion for one or more students, and the law school does not appear to have limitations related to timing, fairness, or examination security as to that policy. The policy should be evaluated and studied during the inspection if the law school does not revise it.

Item 10 Staffing

The law school admits noncompliance in the area of staffing. While the May 2023 progress report did not directly address the committee's question as to why the exam coach position was not continued, when the law school previously identified that position as important to maintaining a sound program of education, after a further reminder from staff, the law school did respond. (Attachment C, p. 63). They advised that "PCL has integrated curriculum alignment faculty meetings with the 1L faculty this year. The purpose of these meetings was to support first-year exam preparation efforts taking place on Saturdays with the resource coordinator and academic preparation in the classroom." (Attachment C, p. 82).

The June 2023 progress report also indicates that additional full-time hires are expected by mid- August 2023.

Item 11 Faculty Evaluation

The law school described a more robust faculty evaluation process, but in May was nonresponsive to the State Bar's request to understand whether and to what extent the policy has been implemented, and whether it has helped the law school to deliver grades on time. In June, PCL advised that fall grades were delivered on time, and in spring grades for one class are delayed. (Attachment C, p. 69). The law school previously indicated that it had created a backup plan to provide course grades on time if a professor was unable to do so. The law school does not advise why that policy was not used here, or whether that policy has been effective.

A supplement later in the report describes the process in more detail, and indicates the

dates that student feedback was sent. To date, the law school does not provide any evidence that it has issued evaluations to instructors, though it suggests that evaluations may issue at the end of this school year, and that satisfactory evaluation will be a factor in determining whether an instructor will be invited back to teach in future terms. (Attachment C, p. 110-111).

Item 13 Clinical Courses

The law school was asked to identify who was overseeing students' clinical work currently, since PCL's policy describes a temporary procedure implemented by a prior dean, but does not describe what is being done now. The law school's May report was nonresponsive, as noted by staff. In the June 2023 report, the law school advised that the policy related to clinical course oversight is not compliant, but a compliant policy will be created later this summer.

Item 14 Grade Review

The law school has posted a policy for administrative grade appeal. The policy for reviewing grades prior to issuing them to students does not state who will be reviewing or what their qualifications are, noting that students may be part of the grading team. The law school has been asked to advise who is conducting the reviews currently. While the May 2023 report was nonresponsive, the June report advises in that "[t]he revision [to the school's current policy] adds the requirement that student examinations papers, as well as grades, must be reviewed and approved by the Dean or other legal educator before grades are posted. Adoption of a revision

is scheduled to be considered at the next meeting of our board of directors," but does not list the date, the qualification of the reviewers, or the methods used.

Item 16 Course Repetition

The law school updated its course repetition policy to ensure compliance. However, it mentions a policy in which a student that earned a failing grade could raise the grade by doing extra credit or repeating the final, so further revision is needed. Guideline 2.9(B) provides that "[a] law school must adopt written policies on examinations and grading that are fair and . . . [g]rades should indicate . . . the student's level of achievement." Here, the law school has had an issue with grade inflation that has spanned several inspections, resulting in grades that did not realistically help students assess their progress, and this practice may contribute to that issue.

Item 18 Library

The law school is not in compliance with the library requirement. It indicates that it will be in compliance by the end of August by securing a line of credit on its property, but also indicated that it is in the process of selling its property and will use part of the proceeds to purchase the library volumes. It is unclear which course of action the law school is taking. (Attachment C, p. 113-114). It is also concerning that they were advised of this need in January 2020, and are planning the volumes needed just now.

Item 19 Record Storage

The law school indicates that it must enhance its recordkeeping to comply with guideline 9.1 and proposes to do so by September 1. (Attachment C, p. 114-115).

PCL Describes Improvement

PCL filed timely progress reports in May 2023 and June 2023.

The law school's technical website migration is complete, and the law school indicates that the website technical architecture and content have been fully updated and should be easier for PCL staff and volunteers to update in the future versus the prior website.

By the time of the committee meeting, the law school may also be able to document a more complete plan for compliance with Rule 4.241, first requested in January, since PCL's Board will meet on June 18 to discuss that matter, though it still estimates that compliance is several months away.

It will also have posted the job descriptions for additional full-time employees, and they may be available to share with the committee.

The law school indicates that it has completed the fourth-year JD course curriculum required for a student who lacked courses to take in fall 2022 and is in the process of reaching out to the student through the registrar.

REQUEST FOR WAIVER TO TEACH CLASSES ONLINE

The law school's June 2023 progress report included a request to extend its waiver to teach classes online due to the pandemic emergency.

Since March 2020, registered, unaccredited fixed-facility law schools have been allowed to teach via distance learning under emergency waivers due to the pandemic. A blanket waiver applying to all schools was in place initially. Then schools were asked to apply individually and advised that they should make permanent decisions appropriate for their schools and file any major changes needed to operate in the law school's preferred format beginning in fall 2023.

This decision has further implications for Peoples College of Law because the school's library is out of compliance, and PCL must know whether to meet the requirements for a fixed-facility law school or a distance learning law school.

Staff has been periodically reminding the law school of the need to make a permanent election since 2021, noting that absent the filing of a major change, the law school is expected to return to fixed-facility teaching in fall 2023. PCL previously indicated it would be returning to fixed-facility teaching and purchasing the required library volumes.

Consistent with the practice applied to other schools, the law school has had sufficient time

to file a major change to adjust its category, and there is still time for the law school to make an application to be considered at the committee's August 2023 meeting if the law school acts quickly and files a complete request early in July 2023. Staff has already sent the law school a courtesy notice of the past reminders. (Attachment D).

Under Rule 4.208, "[a] law school may request that the Committee waive any rule or guideline. The request must clearly show that the law school otherwise complies with the rules. (B) The Committee will allow a law school a reasonable time to comply with the rule or guideline for which it has granted a waiver, but a waiver is temporary."

On June 13, 2023, the law school sent an email advising that they would be ready to teach classes in-person in fall 2023, presumably withdrawing this waiver request. (Attachment E).

It is recommended that the committee deny this emergency waiver for clarity, and require the law school to file a major change requesting a change of category if it wishes to offer a distance learning program.

REQUEST FOR MAJOR CHANGE OF ADMINISTRATIVE HEADQUARTERS

Under Rule 4.246, a law a school must file a request for major change if it plans to "chang[e] the location of the law school's administrative office."

At several committee meetings, PCL advised that it planned to sell its building. The law school was advised to file a major change request to request the required approval.

Instead, the law school listed its building for sale, and placed it into escrow, ignoring repeated verbal and written requests to file a major change.

As part of the June 2023 progress report, the law school included a major change request advising that it would be selling the building and was planning to move, but has not yet located a space. It is unclear what type of space the law school is seeking. The law school indicates that it is open to renting a space if it has not found a permanent space in time to operate for the fall 2023 term.

It is recommended that the committee seek more information before deciding whether to approve this major change. PCL should be asked to confirm: 1) its category and provide a major change request if that category is distance or correspondence instead of the current fixed- facility; 2) its plans to fulfill the library required by its category choice; 3) the contingency plan if a space is not found; 4) the criteria being used to seek a permanent location; and 5) how those criteria are appropriate for the category selected, whether fixed-facility or distance learning.

COMPLIANCE CONCERNS REMAIN

In March 2023, the committee directed the law school "to take prompt action to establish full compliance and take the actions noted in Attachment E, as well as any other steps necessary to avoid noncompliance with any other Rule or Guideline, and to provide an update and documentation in its April 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation

and detailed, documented timeline and action plan as to when compliance is expected to be achieved.”

The committee and staff have spent a significant amount of time describing and repeating compliance concerns. The law school frequently ignores these requests until multiple reminders have been issued, including committee motions. The June 2023 progress report captures some progress during the past five months, but does not project additional significant progress until the end of the summer. It is also unclear where the law school will operate in the fall, what category of instruction it plans to use, or whether the library will come into compliance.

Given the amount of progress made or sustained over the last three years, there is a serious question as to whether the law school will be able to fulfill its compliance responsibilities.

RECOMMENDATIONS

It is recommended that the Committee of Bar Examiners receive and file Peoples’ College of Law’s May 2023 progress report, the June 2023 progress report, the Request for Waiver to Teach Classes Online due to the Pandemic Emergency, and the Major Change to the Administrative office filed along with the June 2023 progress report.

It is also recommended that the committee again remind PCL that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee’s assessment of whether PCL is able to achieve and sustain compliance.

It is further recommended that the law school update the committee as to its compliance in general, but in particular with the student disclosures required by rule 4.241 and California Business and Professions Code section 6061.7(a), requested by the committee since January 2023, for which failure to comply can result in termination of registration.

It is further recommended that the law school file as soon as possible and no later than its July 1, 2023 progress report a motion for permanent change to the distance learning category if it intends teach classes online in fall 2023, or alternatively affirm in its July 1, 2023 progress report that it will be teaching classes in-person in a fixed-facility category in fall 2023.

It is further recommended that the law school supplement its major change request to change its administrative office as soon as possible and no later than its July 1, 2023 progress report to confirm: 1) its category and provide a major change request if that category is distance or correspondence instead of the current fixed-facility; 2) its plans to fulfill the library required by its category choice; 3) the contingency plan if a space is not found; 4) the criteria being used to seek a permanent location; and 5) how those criteria are appropriate for the category selected, whether fixed-facility or distance learning.

In addition, consistent with the committee’s guidance in March 2023, PCL should be reminded of its responsibility to take prompt action to establish full compliance, as well as any other steps necessary to avoid noncompliance with any other rule or guideline, and to provide evidence of this in its July 2023 progress report. If the law school cannot

document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

PROPOSED MOTION

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

MOVE, that the Committee of Bar Examiners receive and file the following documents from Peoples College of Law: May 2023 progress report, June 2023 progress report, including Attachment H Request for Waiver to Teach Classes Online due to the Pandemic Emergency, and Attachment G Major Change to the Administrative Office.

FURTHER MOVE, that the committee again remind PCL that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

FURTHER MOVE, that the law school update the committee as to its compliance in general, but in particular with Rule 4.241 and California Business and Professions Code 6061.7(a), requested since January, for which failure to comply can result in termination of registration.

FURTHER MOVE, that the law school be directed to file, as soon as possible and no later than its July 1, 2023 progress report, a motion for permanent change to the distance learning category if it intends teach classes online in fall 2023, or alternatively affirm in its July 1, 2023 progress report that it will be teaching classes in-person in a fixed-facility in fall 2023.

FURTHER MOVE, that the law school supplement its major change request to change its administrative office as soon as possible and no later than its July 1, 2023 progress report 1) confirm its category and provide a major change request if that category is distance or correspondence instead of the current fixed-facility; 2) its plans to fulfill the library required by its category choice; 3) the contingency plan if a space is not found; 4) the criteria being used to seek a permanent location; and 5) how those criteria are appropriate for the category selected, whether fixed-facility or distance learning.

FURTHER MOVE, that consistent with the committee's guidance in March 2023, PCL should be reminded of its responsibility to take prompt action to establish full compliance, as well as any other steps necessary to avoid noncompliance with any other rule or guideline, and to provide evidence of this in its July 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

ATTACHMENTS LIST

- A. May 1, 2023 Peoples College of Law Progress Report

- B. Staff Response to May 1, 2023 Peoples College of Law Progress Report
- C. June 1, 2023 Peoples College of Law Progress Report
- D. Staff Preliminary Response to June 1, 2023 Progress Report
- E. PCL Response to Staff Preliminary Response to June 1, 2023 Progress Report
- F. Staff Second Response to June 1, 2023 Progress Report



The State Bar of California

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

June 28, 2023

Dean Edith
Pomposo Peoples
College of Law 660 S
Bonnie Brae St Los
Angeles, CA 90057

RE: June 2023 CBE Action – Review of Probationary Progress Report – Peoples College of

Law Dear Dean Pomposo:

The Committee of Bar Examiners met on June 23, 2023 to discuss the law school's compliance status and contents of the probationary progress reports received through the date of the Committee's meeting. After careful consideration, the Committee took the following action.

Please note that in several instances, the Committee rejected the law school's proposed timelines. Please be sure to adhere to the Committee's directions in its motions.

The motion as adopted at the June 23, 2023 meeting is as follows:

MOVE, that the Committee of Bar Examiners receive and file the following documents from Peoples College of Law: May 2023 progress report, June 2023 progress report, including Attachment H Request for Waiver to Teach Classes Online due to the Pandemic Emergency, and Attachment G Major Change to the Administrative Office.

FURTHER MOVE, that the committee again remind PCL that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

FURTHER MOVE, that the law school update the committee as to its

compliance in general, but in particular with Rule 4.241 and California Business and Professions Code 6061.7(a), requested since January, for which failure to comply can result in termination of registration.

FURTHER MOVE, that the law school be directed to file, as soon as possible and no later than its July 1, 2023 progress report, a motion for permanent change to the distance learning category if it intends teach classes online in fall 2023, or

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Los Angeles, CA 90017

alternatively affirm in its July 1, 2023 progress report that it will be teaching classes in-person in a fixed-facility in fall 2023, with the understanding that the law school will not be permitted to change to the distance learning category until a proper motion has been reviewed and approved by this committee.

FURTHER MOVE, the law school is directed to supplement its major change request to change its administrative office as soon as possible and no later than its July 1, 2023 progress report with sufficient detail for the committee to evaluate the proposal including: 1) confirming its category and providing a separate major change request if that category is distance or correspondence instead of the current fixed-facility; 2) documenting its plans to fulfill the library required by its category choice; 3) describing the contingency plan if a space is not found; 4) documenting the criteria being used to seek a permanent location and the location in which classes will be taught in fall 2023; and 5) documenting how those criteria are appropriate for the category selected, whether fixed- facility or distance learning. The law school will not be permitted to change its administrative headquarters until a proper motion has been reviewed and approved by the committee.

FURTHER MOVE, that consistent with the committee's guidance in March 2023, PCL should be reminded of its responsibility to take prompt action to establish full compliance, as well as any other steps necessary to avoid noncompliance with any other rule or guideline, and to provide evidence of this in its July 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

FURTHER MOVE, that the law school be required to provide a copy of this order to all current and prospective students until further notice, and post this motion prominently on its website home page along with the original

probationary order, and attach this motion to student disclosures.

FURTHER MOVE, that all outstanding requests and compliance actions, except as noted, must be completed and documented by the law school in the August 1, 2023 progress report.

The invoice related to this matter is attached and due within 30 days of the date of this letter.

As a reminder, as stated in prior committee meetings and in the law school's last summarization letter, that:

“The law school will be responsible for all deadlines adopted by the Committee, whether or not received in writing. The State Bar will strive to forward deadlines in writing, but the Committee did not agree to the law school's request that it only be bound by deadlines in writing. The law school is responsible for following the Committee's directives. It is the Committee's practice . . . to involve the law school in discussion when setting a deadline, to show the deadline on a screen, and to have a recording of the meeting available where the verbal and written discussion can be accessed. The recordings are available online at <https://board.calbar.ca.gov/Committees.aspx>. The law school may invite any number of staff and volunteers to attend the meetings and review the recordings in order to ensure that the law school is apprised of Committee directives.”

Thank you for your prompt attention to this matter.

Sincerely,

Natalie Leonard

Natalie Leonard

Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

Peoples College of Law

June 2023 Review of Progress Report – Peoples College of Law – June 2023 CBE Meeting

Invoice Date: 6/28/2023

Invoice Number: 2023-011

INVOICE

| Description | Amount |
|---|-----------|
| 22.75 Hours Staff Time @ \$275 per hour | \$6256.25 |
| * Note: Separate invoice related to March 2023 CBE Meeting due May 5. | |
| Total Deposit: | |

| | |
|--|------------------|
| Total due if paying by check: | \$6256.25 |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | |

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180 Howard Street
San Francisco, CA 94105

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Office 845 S.
Figueroa Street
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to: The State Bar of California, Educational Standards
180 Howard Street
San Francisco, CA 94105-1639

OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number:

Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:



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Natalie.L
eonard
@calbar.
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415-538-
2118

June 28, 2023

Dean Edith
Pomposo Peoples
College of Law 660 S
Bonnie Brae St Los

RE: June 2023 CBE Action – Review of Probationary Progress Report – Peoples College of

Law Dear Dean Pomposo:

The Committee of Bar Examiners met on June 23, 2023 to discuss the law school's compliance status and contents of the probationary progress reports received through the date of the Committee's meeting. After careful consideration, the Committee took the following action.

Please note that in several instances, the Committee rejected the law school's proposed timelines. Please be sure to adhere to the Committee's directions in its motions.

The motion as adopted at the June 23, 2023 meeting is as follows:

MOVE, that the Committee of Bar Examiners receive and file the following documents from Peoples College of Law: May 2023 progress report, June 2023 progress report, including Attachment H Request for Waiver to Teach Classes Online due to the Pandemic Emergency, and Attachment G Major Change to the Administrative Office.

FURTHER MOVE, that the committee again remind PCL that the submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

FURTHER MOVE, that the law school update the committee as to its compliance in general, but in particular with Rule 4.241 and California Business and Professions Code 6061.7(a), requested since January, for which failure to comply can result in termination of registration.

FURTHER MOVE, that the law school be directed to file, as soon as possible and no later than its July 1, 2023 progress report, a motion for permanent change to the distance learning category if it intends teach classes online in fall 2023, or

alternatively affirm in its July 1, 2023 progress report that it will be teaching classes in-person in a fixed-facility in fall 2023, with the understanding that the law school will not be permitted to change to the distance learning category until a proper motion has been reviewed and approved by this committee.

FURTHER MOVE, the law school is directed to supplement its major change request to change its administrative office as soon as possible and no later than its July 1, 2023 progress report with sufficient detail for the committee to evaluate the proposal including: 1) confirming its category and providing a separate major change request if that category is distance or correspondence instead of the current fixed-facility; 2) documenting its plans to fulfill the library required by its category choice; 3) describing the contingency plan if a space is not found; 4) documenting the criteria being used to seek a permanent location and the location in which classes will be taught in fall 2023; and 5) documenting how those criteria are appropriate for the category selected, whether fixed- facility or distance learning. The law school will not be permitted to change its administrative headquarters until a proper motion has been reviewed and approved by the committee.

FURTHER MOVE, that consistent with the committee's guidance in March 2023, PCL should be reminded of its responsibility to take prompt action to establish full compliance, as well as any other steps necessary to avoid noncompliance with any other rule or guideline, and to provide evidence of this in its July 2023 progress report. If the law school cannot document compliance in a particular area, the law school must provide an explanation and detailed, documented timeline and action plan as to when compliance is expected to be achieved.

FURTHER MOVE, that the law school be required to provide a copy of this order to all current and prospective students until further notice, and post this motion prominently on its website home page along with the original probationary order, and attach this motion to student disclosures.

FURTHER MOVE, that all outstanding requests and compliance actions, except as noted, must be completed and documented by the law school in the August 1, 2023 progress report.

The invoice related to this matter is attached and due within 30 days of the date of this letter.

As a reminder, as stated in prior committee meetings and in the law school's last summarization letter, that:

"The law school will be responsible for all deadlines adopted by the Committee, whether or not received in writing. The State Bar will strive to forward deadlines in writing, but the Committee did not agree to the law school's request that it only be bound by deadlines in writing. The law school is responsible for following the Committee's directives. It is the Committee's practice . . . to involve the law school in discussion when setting a deadline, to show the deadline on a screen, and to have a recording of the meeting available where the verbal and written discussion can be accessed. The recordings are available online at

Natalie Leonard

June 28, 2023

<https://board.calbar.ca.gov/Committees.aspx>. The law school may invite any number of staff and volunteers to attend the meetings and review the recordings in order to ensure that the law school is apprised of Committee directives.”

Thank you for your prompt attention to this matter.

Sincerely,

Natalie Leonard

Natalie Leonard
Principal Program Analyst



The State Bar
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Peoples College of Law

June 2023 Review of Progress Report – Peoples College of Law – June 2023 CBE Meeting

Invoice Date: 6/28/2023

Invoice Number: 2023-011

INVOICE

| Description | Amount |
|---|-----------|
| 22.75 Hours Staff Time @ \$275 per hour | \$6256.25 |
| * Note: Separate invoice related to March 2023 CBE Meeting due May 5. | |
| Total Deposit: | |
| Total due if paying by check: | |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | |

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San Francisco, CA 94105

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OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number:

Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:



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Natalie.L
Leonard
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415-538-
2118

August 28, 2023

Dean Edith Pomposo
660 S. Bonnie Brae
Street Los Angeles,
CA 90057

RE: Month 2023 CBE Action – Action on Probation Progress Report

Dear Dean Pomposo:

The Committee of Bar Examiners met on August 18, 2023 to discuss the law school's probation progress report. After careful consideration, the committee took the following action:

MOVE, that the Committee of Bar Examiners receive and file Peoples College of Law's July 2023 and August 2023 progress reports, reminding PCL that submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

FURTHER MOVE, that the committee direct PCL to update the committee as to its compliance in general, and as to each aspect noted above, including confirming whether any additional refunds are due pursuant to rule 4.241, and explaining why at least one student was not included on its original refund list when the law school was aware that a refund was due for that student.

FURTHER MOVE, that the committee direct the law school to conduct an immediate analysis to determine whether the transcripts are correct and complete for each student who has attended the law school for any period of time since summer 2020, offering each student or former student the chance to review their transcript for accuracy, and providing results of the analysis to the committee in the September 1, 2023 progress report, advising whether each student's transcript is now correct, or identifying the changes that are still under review and the timeline for completion of the review.

FURTHER MOVE, the committee direct the law school update the committee no later than the September progress report progress report as to its space plans and provide documentation of its right to access the space, filing a timely major change as soon as practicable.

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845 South Figueroa Street
Los Angeles, CA 90017

Page 2

FURTHER MOVE, the committee the committee direct the law school to be prepared to undergo the inspection contemplated by its probation terms, to be conducted as soon as staff can assemble the inspection team, relying upon the law school's progress reports, newly redesigned website, and updated catalog in lieu of a traditional self-study, as these documents should fully describe the law school's best efforts to sustain compliance in full detail.

Attached is the invoice for work completed to date related to monitoring of probation. The invoice is due within 30 days from the date of this letter.

Sincerely,

Natalie Leonard

Natalie Leonard

Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

People's College of Law

Action on Probation Progress Report – August 2023 CBE Meeting

Invoice Date: 8/28/2023

Invoice Number: 2023-015

INVOICE

| Description | Amount |
|--|---------------|
| 33 Hours Staff Time @ \$275 per hour | \$9,075.00 |
| Total Deposit: | \$0 |
| Total due if paying by check: | \$9,075.00 |
| Add 2.5% to the total if paying by credit card | |
| Total if paying by credit card: | \$9,301.88 |

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 90017

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OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number: Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:



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Natalie.L
eonard
@calbar.
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2118

October 20, 2023

Interim Dean Ana Maria
Lobos 660 S. Bonnie Brae
Street
Los Angeles, CA 90057-3700

RE: October 2023 CBE Action on Progress Report – Peoples College of Law

Dear Dean Lobos:

The Committee of Bar Examiners met on October 13, 2023, to discuss the law school's September and October progress reports and the law school's probationary status. After careful consideration, the Committee took the following action:

MOVE, that the Committee of Bar Examiners receive and file Peoples College of Law's September 2023 and October 2023 progress reports, reminding PCL that submission of late, incomplete, or inconsistent progress reports will contribute to the committee's assessment of whether PCL is able to achieve and sustain compliance.

FURTHER MOVE, that the committee direct PCL to update the committee as to its compliance in general, and as to each open issue noted in the staff report, as part of the law school's November progress report.

FURTHER MOVE, that the committee direct the law school to continue its analysis of transcripts to determine whether the transcripts are correct and complete for each student who has attended the law school for any period of time since summer 2020, offering each student or former student the chance to review their transcript. This includes contacting alumni who have not yet responded, and determining which students completed summer clinics. The results should be included in the law school's November 1, 2023 progress report, identifying status, the transcripts that are still under review, and the timeline for completion of the review.

FURTHER MOVE, that the committee direct the law school to continue to update the committee as soon as practicable on its plan to locate new space and to file the required major change, since the building is already in escrow for sale.

FURTHER MOVE, that the committee direct the law school to continue to cooperate with the inspection team, providing information in a forthright manner that will assist the team to evaluate the law school's compliance status throughout the probation period.

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845 South Figueroa Street
Los Angeles, CA 90017

April 5, 2023

Page 2

Natalie Leonard

Attached is the invoice for work completed to date related to the review of the law school's progress reports and probationary status. The invoice is due within 30 days from the date of this letter.

Sincerely,
Natalie Leonard

Natalie Leonard
Principal Program Analyst



The State Bar
of California

OFFICE OF ADMISSIONS

People's College of Law
Action on Progress Report – October 2023 CBE Meeting
Invoice Date: 10/20/2023
Invoice Number: 2023-019

INVOICE

| Description | Amount |
|--|-------------|
| 55.5 Hours Staff Time @ \$275 per hour for Action on September and October 2023 Progress Reports | |
| Total due if paying by check: | \$15,262.50 |
| Add 2.5% Convenience Fee to the total if paying by credit card | |
| Total if paying by credit card: | \$15,644.06 |

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Office 845 S.
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180 Howard Street
San Francisco, CA 94105-1639

OR: Fill out credit card information and fax with cover letter to 415-538-2361, but do not email. **Please note: The school will be charged a fee of 2.5% of the total amount for any credit card transactions.**

CREDIT CARD INFORMATION

Name on Card / Bank Account:

Billing Address:

Billing City, State, Zip:

Telephone Number:

Email Address:

Credit Card Type: MasterCard Visa Amex

Discover Credit Card Number:

Credit Card Security Code: Expiration

Date: Signature of Card/Account Holder:

TO THE STUDENT SIGNING THIS AGREEMENT: Your signature on this Agreement acknowledges: (a) that you have been given reasonable time to read and understand all pages of this Agreement, front and back; (b) that you agree to this entire Agreement; (c)

that you have been given a schedule of classes for the first quarter after the date you sign; and (d) that you have received the PCL Student Handbook & Catalog by email or some electronic means (it is also on the PCL website). You will be given a copy of this Agreement to retain for your records.

Signature of Student:

Date:

Peoples College of Law Agrees to This Entire Agreement.

Signature of Peoples College of Law Representative



Ana Maria Lobos, Esq.
Interim Dean