



The State Bar of California

OFFICE OF GENERAL COUNSEL

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August 21, 2023

ANTITRUST DETERMINATION 2023-0002

A. Authority

This determination is made pursuant to California Supreme Court Administrative Order 2017-09-20 (the "State Bar Antitrust Policy"), which mandates that the State Bar Office of General Counsel ("OGC") provide a determination on issues submitted to it for resolution of potential antitrust concerns.

B. Issue Presented

Request for Antitrust Determination: On December 21, 2022, Todd Hill ("Requestor") submitted a Request for Antitrust Determination to the State Bar ("December 21 Request"), alleging antitrust violations based on the State Bar's purported inadequate regulation of Peoples College of Law ("PCL"), an unaccredited law school registered with the State Bar. On January 20, 2023, the State Bar provided an Antitrust Determination in response to the December 21 Request ("January 20 Determination"), concluding that no antitrust violation was stated because the State Bar's regulation of unaccredited law schools is grounded in statute and thus immune to the antitrust laws under the state action doctrine and because California Rule of Court 9.30 establishes active supervision of the State Bar's oversight of such schools by the California Supreme Court.¹ The January 20 Determination also informed Requestor that, per California Rule of Court 9.13, subsections (d) through (f), Requestor may seek de novo review of the determination by filing a petition with the California Supreme Court within 60 days of the date of the determination. Requestor did not file such a petition.

On July 22, 2023, Requestor requested via email a "revised" Antitrust Determination, purportedly based on the discovery of new facts ("Instant Request"). The Instant Request states that Requestor made a formal complaint to the State Bar and that "the VERY SAME State Bar investigator was assigned to review a case involving 1 of the named defendants [REDACTED] [REDACTED] in my case within less than 6 months and at the same time violating the State Supreme

¹ The January 20 Determination, and all of the State Bar's Antitrust Determinations, are available at <https://www.calbar.ca.gov/About-Us/Our-Mission/Antitrust-Determinations>. Requestor also made a previous request for Antitrust Determination on September 26, 2022. The State Bar provided that determination on October 20, 2022, which is also available at the above website.

Courts [sic] 2017 Executive Order detailing the mandatory recusal and COI avoidance requirements.”² (Emphasis in original). This statement is an apparent reference to the involvement of the same State Bar Special Deputy Trial Counsel in reviewing Requestor’s State Bar complaints against certain State Bar licensees as well as an unrelated complaint from a different complainant involving a defendant in a federal lawsuit originally filed by Requestor on February 20, 2023.³ The email further notes that the Requestor “has not been in possession of a single correct copy of my transcript [from PCL] since my matriculation in 2019” and that “PCL has not been in compliance a SINGLE day in 4 years. Unlawful unit awards, student harassment, extortion and intimidation, fraud.....the list is multitudinous and ongoing...” (Emphasis in original).

On July 27, 2023, Requestor sent an additional email to the State Bar’s antitrust email account, in addition to numerous other individuals, asserting that the State Bar engaged in the following “Potential...Anticompetitive Conduct”:

1. **Succession - The “Two Letters” Strategy** - as employed by culpable attorneys, involves the tactic of blaming a predecessor or a prior legal representative for any present-day issues or challenges faced by current obligee stakeholders. In this strategy, the current attorney(s) may send “two letters” to the opposing party, wherein they shift the responsibility for any alleged misconduct, errors, or shortcomings to the previous legal counsel or representation and if that fails, they will ultimately “take the blame” to allow their designated successor to assume control under the illusion of compliance.

By employing this deceptive tactic, the culpable attorneys aim to create a narrative that distances themselves or other operatives from any wrongdoing while portraying themselves as new representatives who are not responsible for the past actions or decisions. This strategy seeks to sow confusion and cast doubt on the opposing party's claims, using the pretext of a change in “legal” representation to deflect blame and undermine the credibility of the opposing party's case.

Moreover, the Two Letters Strategy also enables the culpable attorneys to stall the

² It is unclear to what document or order “the State Supreme Courts [sic] 2017 Executive Order” refers. To the extent this refers to the California Supreme Court’s 2017 State Bar Antitrust Policy, that order makes no mention of conflict of interest or recusal requirements.

³ Requestor attached a “Supplemental First Amended Complaint,” filed in the United States District Court for the Central District of California on May 5, 2023, Case No. 2:23-cv-01298-JLS-PD. A review of this docket shows that the original complaint in this suit was filed on February 20, 2023.

legal process by placing the onus on the opposing party to address or refute the alleged misconduct of the previous legal representatives. This tactic aims to create a perception of innocence and plausible deniability while strategically delaying the resolution of the matter.

Overall, the Two Letters Strategy serves as a duplicitous means for culpable attorneys to manipulate the legal landscape, evade accountability, and obscure the truth behind their client's actions. By shifting blame and responsibility to predecessors, they seek to gain an advantage in the legal proceedings and diminish the impact of any legal claims against their clients.

2. Two Letters and Latches: (sic) The Two Letters and Latches tactic is a deceptive strategy employed by culpable attorneys to exploit delays in the legal process by sending two letters to the opposing party. In these letters, the attorneys raise minor or frivolous objections, often unrelated to the substantive issues of the case. By doing so, they create the appearance of engaging in legitimate legal dialogue while intentionally stalling or hindering progress. This strategy aims to exhaust the opposing party's resources, patience, and time, ultimately leading to the expiration of relevant statutes of limitations or procedural timeframes. Through this tactic, the culpable attorneys seek to invoke the doctrine of laches, arguing that the opposing party's delay in responding to the initial letters constitutes a waiver of their rights or claims. (Dunn, Girardi)

3. Musical Chairs: The Musical Chairs tactic involves a calculated pattern of attorney substitutions by the culpable party. This strategy is designed to disrupt the continuity of legal representation for the opposing party, creating confusion and hindering the flow of information. By frequently changing legal counsel, the culpable party aims to complicate the case, delay proceedings, and impede the opposing party's ability to build a cohesive case. This tactic may also be employed strategically to distance the culpable party from any prior legal advice or decisions, shifting blame to previous attorneys and evading accountability for their actions.

4. Musical Chairs - Plausible Denial: In the variant of Musical Chairs - Plausible Denial, the culpable party deliberately switches legal representation in a manner that allows them to claim ignorance or lack of knowledge regarding the previous legal counsel's actions or conduct. By feigning lack of awareness about prior legal advice or strategies, the culpable party seeks to create plausible deniability and distance themselves from any potential wrongdoing. This tactic aims to obscure the chain of responsibility and evade accountability for their actions while creating doubt and confusion for the opposing party and the court. New Committee formations, appointments, etc.

5. Musical Chairs - No Duty Owed: In the Musical Chairs - No Duty Owed tactic, the culpable party intentionally hires attorneys on a limited or ad-hoc basis without granting them the full authority or capacity to represent their interests fully. This strategy allows the culpable party to claim that the attorneys had no fiduciary duty or agency relationship with them, despite their involvement in the case. By disavowing any duty owed to the attorneys involved, the culpable party aims to shield themselves from potential liability and legal consequences. This tactic seeks to exploit the lack of a formal attorney-client relationship to escape accountability and undermine the opposing party's case. Ad-hoc Committees are functional areas where this strategy is quite successful.

6. Sacrificial Lamb(s) – Use of Attorney State Bar Court process, prosecution or releases of newsworthy information timed to preempt or otherwise whitewash reporting of other issues. (LA Times and Girardi Investigation)⁴

Copies of these two emails, along with all of the attachments thereto, are attached to this determination.⁵

C. Analysis

1. The Requestor's Request for a "Revised" Determination of His December 21 Request Is Foreclosed Due to His Failure to Petition the California Supreme Court for a Review of the Determination Within Sixty Days of the Determination

As noted above, the State Bar issued its determination of Requestor's December 21 Request on January 20, 2023. The January 20 Determination provided Requestor information regarding the availability of review of the determination and noted that he was required to file a petition for review to the California Supreme Court within sixty days of the

⁴ Requestor's July 22, 2023 email attached six pdf files totaling 143 pages and two Excel files. Requestor's July 27, 2023 email attached sixteen files: fourteen pdf files totaling 181 pages, including five of the same pdf files attached to the July 22, 2023 email, as well as the same two Excel files. Neither email explained the relevance of these attachments to Requestor's request for an Antitrust Determination.

⁵ Under California Business and Professions Code section 6086.1(b), State Bar disciplinary investigations are confidential until formal charges are filed. As such, the State Bar has redacted references to the confidential contents of State Bar reviews of disciplinary complaints in this determination and in Requestor's submissions, including the identities of persons about whom disciplinary complaints were made.

determination under Rule of Court 9.13(d). Requestor filed no such petition within sixty days and is thus foreclosed from seeking review of the determination.

2. Requestor Does Not Identify the Newly Discovered Facts on Which He Purports to Rely for a “Revised” Antitrust Determination or How Such Facts Relate to the January 20 Determination or Otherwise Give Rise to an Antitrust Violation

Requestor does not specifically identify the newly discovered facts on which he relies in seeking a “revised” determination or how any such facts relate to the January 20 Determination regarding his allegations of inadequate regulation of PCL. To the extent Requestor is relying on the fact that the same State Bar Special Deputy Trial Counsel reviewed his disciplinary complaints against certain State Bar licensees as well as an unrelated complaint involving a defendant he named in a federal lawsuit he originally filed on February 20, 2023, Requestor does not explain how such “fact” relates to the January 20 Determination regarding his allegations of inadequate regulation of PCL, how such fact relates to any theory of antitrust liability, or how any market impact arises from this fact.

To the extent Requestor is relying on the assertions in his July 27, 2023 email recounted above, Requestor does not include any factual details in support of his general and conclusory assertions that such conduct occurred, any explanation of how such conduct relates to the January 20 Determination regarding his allegations of inadequate regulation of PCL, how such conduct relates to any theory of antitrust liability, or any market impacts arising from such conduct.

3. The State Bar’s Conduct of Attorney Discipline is Immune from Antitrust Liability

To the extent these facts relate to the State Bar’s responses to his disciplinary complaints against certain State Bar licensees, it is well settled that the State Bar’s conduct of attorney discipline is immune from the antitrust laws. The U.S. Supreme Court has held that the antitrust laws do not apply to state legislative enactments, regardless of anti-competitive intent or effect. (*See, e.g., Parker v. Brown* (1943) 317 U.S. 341, 350–51 [“We find nothing in the language of the Sherman Act or in its history which suggests that its purpose was to restrain a state or its officers or agents from activities directed by its legislature.”]; *Hoover v. Ronwin* (1984) 466 U.S. 558, 568–69 [“When the conduct is that of the sovereign itself . . . the danger of unauthorized restraint of trade does not arise. Where the conduct is that of the state legislature or supreme court, we do not need to address the issues of clear articulation and active supervision.”].) This immunity is known as the state action doctrine.

The State Bar is mandated by statute to investigate and recommend to the Supreme Court discipline of attorneys. (Bus. & Prof. Code, § 6078). The State Bar’s role in the attorney discipline process is merely precatory; the Supreme Court retains its inherent authority to regulate the practice of law and attorney discipline can only be effectuated by order of the Court. (*In re Rose* (2000) 22 Cal. 4th 430, 436 [“The State Bar Court exercises no judicial power,

but rather makes recommendations to [the Supreme Court], which then undertakes an independent determination of the law and the facts, exercises its inherent jurisdiction over attorney discipline, and enters the first and only disciplinary order.”]; *Brotsky v. State Bar of Cal.* (1962) 57 Cal. 2d 287, 301 [holding that “in matters of discipline and disbarment, the State Bar is but an arm of [the Supreme Court], and that this court retains its power to control any such disciplinary proceeding at any step.”]. In sum, the State Bar’s handling of attorney discipline complaints is state action immune from antitrust liability.

4. The State Bar’s Decisions Regarding Discipline of Individual Attorneys Do Not Impact the Market

Further, to the extent the purportedly newly discovered facts relate to the State Bar’s disciplinary decisions regarding particular individuals, courts have held that individualized decisions on attorney discipline do not have a market impact sufficient to raise antitrust concerns. (See 98 Ops. Cal. Atty. Gen. 12, at *5 (Sept. 10, 2015) [“[S]uspending the license of an individual license-holder for violating the standards of the profession is a reasonable restraint and has virtually no effect on a large market, and therefore would not violate antitrust laws.” [citing *Oksanen v. Page Memorial Hospital* (4th Cir. 1999) 945 F.2d 696]; *Petri v. Virginia Bd. of Medicine* (E.D. Va., Oct. 23, 2014) 2014 WL 5421238, at *5 [Virginia Medical Board’s discipline of an individual chiropractor did not impact overall competition]; *Robb v. Conn. Bd. of Veterinary Med.* (D. Conn. 2016) 157 F. Supp. 3d 130.)

D. Conclusion

Based on the foregoing analysis, there are no grounds to “revise” the January 20 Determination, nor does the Instant Request articulate an antitrust violation.

E. Reviewability

Without waiving the State Bar’s position that Requestor failed to seek timely review of the January 20 Determination by the California Supreme Court, as set forth in section C.1 above, the Requestor is advised of his right to request a de novo review of this determination by the California Supreme Court by filing a petition with the Court, pursuant to rule 9.13, subsection (d) through (f), California Rules of Court, **within 60 days of the date of this determination.**

From: [Todd Hill](#)
To: Antitrust@calawyers.org; [AntitrustRequest](#); fbi_ncra_duty@fbi.gov
Cc: j3fletch@lasd.org; matt.rodriquez@doj.ca.gov
Subject: Antitrust Determination Request
Date: Saturday, July 22, 2023 10:46:55 PM
Attachments: [REDACTED]
[email to spiro with SFAC 05052023.pdf](#)
[SPIRO MOTION IN OPPOSITION TO SUPPLEMENTED FAC 05212023.pdf](#)
[Todd Hill Criminal Defense Timesheet - Clinical Course v7.xls](#)
[TRANSCRIPT 08-29-22 with full Civ Pro Grades & cover letter \(2\).pdf](#)
[Todd Hill Eviction Defense Timesheet - Clinical Course v6.xls](#)
[HILL v STATE BAR and PEOPLES COLLEGE of LAW SFAC Complaint 223cv01298JLSPDx 050523 .pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is request for a revised Antitrust determination based on the discovery of new facts.

[REDACTED]

Of note is that the VERY SAME State Bar investigator was assigned to review a case involving 1 of the named defendants [REDACTED] in my case within less than 6 months and at the same time violating the State Supreme Courts 2017 Executive Order detailing the mandatory recusal and COI avoidance requirements.

Of course, correlation is not causation.

But the truth is that I have not been in possession of a single correct copy of my transcript since my matriculation in 2019.

4 years.

PCL has not been in compliance a SINGLE DAY in 4 years. Unlawful unit awards, student harassment, extortion and intimidation, fraud.....the list is multitudinous and ongoing...

Not just my experience..... but that of every student in my understanding since at least 2017 correspondent to a change in administrative control.

Importantly, two questions arise as beggars here?

1. When does individual or group negligence morph into willful misconduct and what is the standard for determination of the difference, if any, between sworn attorneys and the general public?

2. Is a transcript a document for the purposes of the California Corporations Code Section 2255, which makes alterations and omissions of documents a felony.

The irony here is a search warrant was already issued related to a CPC 637 in this matter....

Todd

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>
Date: Tue, Jul 18, 2023 at 7:32 PM
Subject: Re: You requested an informal transcript
To: administrator <administrator@peoplescollegeoflaw.edu>
CC: Kevin Clinton <antitrust@ftc.gov>, <Antitrust@calawyers.org>, Kevin Clinton <fbi_ncra_duty@fbi.gov>, Kramer, Paul <paul.kramer@calbar.ca.gov>, Kevin Clinton <Ruben.duran@calbar.ca.gov>, <Jorge.Navarrete@jud.ca.gov>, Kevin Clinton <leaht.wilson@calbar.ca.gov>, <melanie.shelby@calbar.ca.gov>, Sowell, Arnold <arnold.sowell@calbar.ca.gov>, <mark.toney@calbar.ca.gov>, Linda Keller <lkeller@tjisl.edu>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Negligence (§76, §94, §95, §106, §112, §114): As the entity responsible for regulating law schools and enforcing the State Bar Act of 1927, the State Bar could be held liable for negligence. This could be due to its alleged failure to take substantive action in response to the notifications about potential violations of California law by PCL's agents, Directors & Officers. It is also argued that the State Bar's gross negligence allowed PCL to operate irresponsibly and implement inappropriate public policies or regulatory rules, engaging in protracted egregious conduct.

Breach of Fiduciary Duty (§84, §103, §106): If the State Bar was aware of PCL's violations and failed to act, it might be seen as a breach of their fiduciary duty. This is especially applicable if they had constructive or express knowledge of PCL's non-compliant status and continued solicitation of students and board participation.

Conflict of Interest and Misrepresentation (§103, §84): The State Bar could be accused of a conflict of interest, particularly if they knowingly allowed PCL to recruit students without properly informing them of the institution's non-compliant status. In addition, if any of the individual defendants, including SPIRO, GONZALEZ, PENA, and others, made intentional misrepresentations of facts, it could lead to liability for those individuals as well as the institution they represent.

Violation of Fair Business and Debt Collection Practices (§97, §111, §104): PCL's failure to provide the plaintiff with accurate records and a proper accounting for the funds they claimed were owed could be seen as a violation of fair business practices and debt collection laws. Under California Business and Professions Code Section § 8330, businesses are required to maintain and provide access to accurate records.

Failure to Uphold Institutional Bylaws and Regulatory Rules (§78, §79, §89, §103): If PCL and the State Bar failed to uphold and enforce their own bylaws and regulatory rules, such as the "Unaccredited Law School Rules" or the egalitarian decision-making principles outlined in

PCL's bylaws, they could face additional liability.

Retaliation (§84): If the individual defendants retaliated against the plaintiff for trying to address compliance issues, this could lead to legal consequences. It's illegal for organizations to retaliate against individuals who attempt to exercise their legal rights or expose illegal practices.

Willful Negligence and Anticompetitive Behavior (§85): The plaintiff's allegations of a pattern of willful negligence and anticompetitive combinations that removed student consumer protections, if proven, could expose PCL and the individual defendants to additional liability, potentially under both state law and federal antitrust law.

d. Specific issues as to State Bar conduct:

Fraudulent Misrepresentation: If the law school administrators knowingly misrepresented the student's grades to them or any other party, there might be grounds for a claim of fraudulent misrepresentation.

Negligence: If there has been an error in recording or reporting the grades, then this could be seen as a form of negligence. If the administrators failed to provide a reasonable standard of care in recording and reporting the grades, the school might be liable for damages.

Breach of Contract: Most students and educational institutions have a form of contract, whether written or implied. The school promised and is required to accurately record and report grades, and failed to do so. More importantly, when the parties were made aware of the conflict or questions of law, they persisted in the conduct. When does mere negligence become gross or reckless? This question goes beyond breach of contract to inquire when something is identified in the civil and penal code.

Breach of Fiduciary Duty: Educational institutions often have a fiduciary duty to their students. If the administrators failed to act in the best interest of the students, they could be held liable for breaching their fiduciary duties.

Privacy Violations: If the administrators were discussing a student's grades inappropriately or sharing the grades without the student's consent, this could potentially be a violation of privacy laws or regulations, like FERPA in the U.S.

As for criminal activity:

Forgery: If an administrator or faculty member changed a student's grades without the student's knowledge or permission, this could potentially be considered forgery.

Identity Theft/Fraud: If any part of the grade-changing process involved impersonating a student or faculty member, or using their login credentials without their permission, this could potentially fall under identity theft or fraud.

Computer Crime/Cybercrime: Unauthorized access to, or manipulation of, computer systems or data may constitute a computer crime or cybercrime.

State Bar - Negligence (§76, §94, §95, §106, §112, §114): Being responsible for regulating law

schools and enforcing the State Bar Act of 1927, the State Bar might be held liable for negligence. The State Bar's alleged failure to respond substantively to the plaintiff's notifications of potential violations of California law by PCL's agents, Directors & Officers could be seen as such. Additionally, the claim that the State Bar, in a grossly negligent manner, allowed PCL to operate and implement inappropriate public policies or regulatory rules could be grounds for negligence.

State Bar - Breach of Fiduciary Duty (§84, §103, §106): If the State Bar knew about PCL's violations and didn't act, it might be considered a breach of their fiduciary duty. This liability becomes more potent if it can be proved that they had constructive or express knowledge of PCL's non-compliant status and its ongoing solicitation of students and board participation.

State Bar and Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Conflict of Interest and Misrepresentation (§103, §84): The State Bar might face accusations of a conflict of interest, especially if it knowingly allowed PCL to recruit students without properly disclosing the institution's non-compliant status. Moreover, if the individual defendants, including SPIRO, GONZALEZ, PENA, and others, intentionally misrepresented facts, it could lead to their individual liability as well as liability for the institution they represent.

PCL - Violation of Fair Business and Debt Collection Practices (§97, §111, §104): PCL's failure to provide the plaintiff with accurate records and a proper accounting for the funds they claimed were owed could be construed as a violation of fair business practices and debt collection laws. Under California Business and Professions Code Section § 8330, businesses are mandated to maintain and provide access to accurate records.

PCL and State Bar - Failure to Uphold Institutional Bylaws and Regulatory Rules (§78, §79, §89, §103): Potential liability could arise if PCL and the State Bar failed to uphold and enforce their own bylaws and regulatory rules, such as the "Unaccredited Law School Rules" or the egalitarian decision-making principles in PCL's bylaws.

Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Retaliation (§84): If the individual defendants retaliated against the plaintiff for his attempts to address compliance issues, this could lead to their individual liability. Retaliation against individuals who seek to exercise their legal rights or expose illegal practices is prohibited by law.

PCL and Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Willful Negligence and Anticompetitive Behavior (§85): The plaintiff's allegations of a pattern of willful negligence and anticompetitive combinations that removed student consumer protections, if proven, could expose PCL and the individual defendants to additional liability, potentially under both state law and federal antitrust law.

[REDACTED]

[REDACTED]

g. Spiro misrepresented the facts in his motion in opposition, indicating that I had never told

him or attempted to meet with him on the filing of the SFAC (attached); I have provided you with additional evidence of the false submission for you to further review. Below the list of accompanying documents, please also see a relevant email chain.

Thanks for the time and attention taken to re-open and review this matter.

When might I reasonably expect a response?

Todd

SPIRO MOTION IN OPPOSITION TO SUPPLEMENTED FAC 05212023.pdf (362K)

email to spiro with SFAC 05052023.pdf (77K)

TRANSCRIPT 08-29-22 with full Civ Pro Grades & cover letter (2).pdf (114K)

Todd Hill Eviction Defense Timesheet - Clinical Course v6.xls (208K)

Todd Hill Criminal Defense Timesheet - Clinical Course v7.xls

Email exchange below because I have NEVER received accurate transcripts. I claim the scheme was to disincentivize transfer. Waiting 3 years for a transcript?

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Mon, Jul 17, 2023 at 1:16 PM

Subject: Re: You requested an informal transcript

To: administrator <administrator@peoplescollegeoflaw.edu>

Cc: Edith Pomposo <dean@peoplescollegeoflaw.edu>, Kevin Clinton <natalie.leonard@calbar.ca.gov>, Kevin Clinton <leaht.wilson@calbar.ca.gov>, Kevin Clinton <hectorpena@ucla.edu>, Kramer, Paul <paul.kramer@calbar.ca.gov>, <melanie.shelby@calbar.ca.gov>, Sowell, Arnold <arnold.sowell@calbar.ca.gov>, <brandon.stallings@calbar.ca.gov>, Kevin Clinton <audrey.ching@calbar.ca.gov>, Elena Popp <elenaipopp17@gmail.com>, Héctor C. Peña Ramírez <hpena@peoplescollegeoflaw.edu>, <mark.toney@calbar.ca.gov>, Kevin Clinton <Ruben.duran@calbar.ca.gov>, <president@peoplescollegeoflaw.edu>, <president@peoplescollegeoflaw.edu>, Rebecca Hirsch <registrar@peoplescollegeoflaw.edu>

Dear Administrator,

While I acknowledge your response, I must say I find it exasperating in its tone and content.

You suggest that this process is subject to time-consuming procedures, with the handbook quote of the Dean needing 30 days to reach a decision on transcript changes. However, it's worth emphasizing that **my previous requests date back years, not days**. It's not as if this issue has suddenly sprung up out of nowhere. Your invocation of policy at this juncture seems more like a deflection rather than a genuine effort to solve the issue at hand and produce the required documents.

Your contention that former Dean Spiro does not issue grades is accurate but misrepresents the facts. The course logs provided should suffice for the validation of my clinical grades, and it's

unreasonable to require validation from instructors who may be difficult to reach years after the course completion. You may remember that both the clinicals in question were indeed offered by PCL and completed by me - facts that have not been contested.

I provided Ms. Popp's contact details to facilitate the process. However, it seems like you are using this as another delay tactic, rather than an opportunity to expedite the process. Moreover, there's no indication of a "dispute" related to Mr. Kapelovitz' Criminal Defense clinical; Please confirm and produce corrections for that uncontested work.

You mention keeping the board informed and planning to update them tomorrow. I would appreciate it if you could expedite this process, given my impending application deadlines and their assumed roles and statutory responsibilities.

In addition, your email didn't answer my earlier question about the names of the "current"; please provide them per school policy and as proscribed under statute.

Your communication, while appearing comprehensive on the surface, fails to address the central issue: the pressing need for a resolution. Your assertions of working on the issue don't equate to tangible progress. I still don't have a corrected transcript, and I am still unclear on when I will receive it.

I implore you to approach this issue with the urgency it deserves. The repercussions of this discrepancy are not merely theoretical; they have real present consequences and future negative implications for my educational and professional trajectory.

Remember, TIME IS OF THE ESSENCE!

I expect a prompt resolution and a rectified transcript without further delay.

Regards,

Todd

On Sat, Jul 15, 2023 at 8:54 PM administrator <administrator@peoplescollegeoflaw.edu> wrote:

As I indicated the information that I had on Elena Popp was not current. I have attempted to contact her office but that is going to take time. The fact that you gave me her name is good, but it is only step 1.

Former Dean Spiro did not and does not issue grades. Instructors do. The instructor must validate the grade.

The policy concern is that the Dean must investigate transcript discrepancies. By definition, this requires time and runs into the practical issue of former instructors who are attorneys responding to inquiries. See page 15, section E "changes to transcript" where the Dean investigates ("Dean must investigate the facts and circumstances" section 2) to the section where the Dean has 30 days to reach a decision on Transcript changes (section 3), in the handbook available online.

That's 30 days after you submitted a request.

Staff, including myself keep the board informed. Since you were on the board, you know of the general time frame. As I write this, I will be informing the board tomorrow.

I have been forthcoming with you as to the progress we are making. I am responding to your emails to let you know we are working on the issue. I have told you we contacted one of your instructors. I am communicating with you. However, I am limited by what exists before me in the record. I am doing my best to ascertain what happened but again, I am limited by the ascertainable facts.

Rest assured we will notify you of further progress.

On Jul 14, 2023, at 12:54 PM, Todd Hill <toddryangregoryhill@gmail.com> wrote:

Roger (although I am not sure who this is in fact.....)

The Board is already well aware of the issues here and has been for years. The deadline for Loyola is tomorrow, July 15, 2023. Of course, the courses requiring credit were definitively offered by PCL and taken by me, and there is no reason you have stated or expression of doubt related to any of what I have presented as untrue.....in fact it is clearly the opposite, for why would the Board have to approve a grade correction or approve that a transcript actually reflect the students PAST solicited and completed participation? And there is the matter of the "ultra vires" status of the Board, which no one has denied, even rhetorically. One point and five questions follow:

1. This seems like another stalling tactic. I have included Elena Popp so that you may be able to more quickly reconcile any concerns you may have and facilitate generation of the corrected records, now long overdue. That said:

It should not be necessary to "RECREATE" anything and SPIRO can certainly confirm the course of study, so reaching out to Ms. Popp should not be necessary; what if she was completely unreachable?

2. Please indicate what "policy concerns" there are and where they are located in the Student Handbook or other governing authority relevant to the school and this topic?

3. Who will be communicating with "the Board" and in what time frame?

4. When will you be able to provide me with an accurate transcript?

5. Please provide the names of the current individuals claiming Board Membership?

I look forward to receipt of the corrected record and transcript. I have already waited three years for an accurate copy of my record.

Thanks for the update. TIME IS OF THE ESSENCE.

Todd

On Fri, Jul 14, 2023 at 12:10 PM administrator

<administrator@peoplescollegeoflaw.edu> wrote:

I am making progress on recreating what happened. Unfortunately, I do not have current contact info for Elena Popp. Also, my work will have to be discussed with the board for policy reasons. I am mostly focused on the summer courses you indicated you took.

On Jul 12, 2023, at 3:37 PM, Todd Hill

<toddryangregoryhill@gmail.com> wrote:

Thanks, I look forward to hearing from you.

Todd

On Wed, Jul 12, 2023 at 3:11 PM administrator

<administrator@peoplescollegeoflaw.edu> wrote:

I should have an update for you by the end of the week.

On Jul 11, 2023, at 6:18 PM, Todd Hill

<toddryangregoryhill@gmail.com> wrote:

Roger,

Hope all is well.

Any updates?

Todd

On Mon, Jul 10, 2023 at 3:43 PM administrator

<administrator@peoplescollegeoflaw.edu> wrote:

I am looking into this. I will try and resolve this matter soon.

On Jul 10, 2023, at 12:49 PM, Todd Hill

<toddryangregoryhill@gmail.com>

wrote:

Roger,

Thank you for your email response. I attach the last record I received from one of your predecessors, Ms. Adriana Zuniga. I also attach the logs for the two clinicals

The PCL official record was clearly altered, since you can see that at least one grade is different. [see Real Property III C+ earned and known recorded versus C-entered.] My understanding is that access to make grade changes in Populi is closely held and extremely limited.

The two clinicals undertaken and performed in Summer 2020 are missing. (Dan Kapelovitz - Criminal Defense) and (Elena Popp - Eviction Defense) I presume were P/NP for grading purposes, but the units are still viable. I have included my complete time and activity logs from Summer 2020, prior timely issued to the faculty, including Mr. Spiro, at course completion. You see that essentially

Eviction Defense: 120.5 hours / 8 weeks \approx 15 hours per week - 5 unit course?.

Criminal Defense: 117.8 hours / 11 weeks \sim 10 hours per week - 4 unit course?

Hope this helps. It would be nice to know the record is corrected in all of the appropriate places for purposes of posterity. I believe it is a duty you have assumed and thus you have a duty to provide the appropriately corrected documents and to see to the changes being applied.

Your status as "new" is not lost

upon me.

The circumstances here are unfortunate but I bear no grudge against PCL, as an entity, or those who reasonably support its mission.

I am not vindictive nor am I in the wrong. We do not know each other, and I am inclined to believe in your good intent or that "nice words and lulling tones" and a "past history" convinced you to take on a challenging role for the cause. There is nothing non-laudable in the intention. I have no interest in promulgating false or frivolous claims.

In my experience at the school, what happens is that one is placed in a series of "uncomfortable", "last minute", and "impossible workload" paradoxes, and that through negligence or good intent poorly applied end up "mired in the bog" because no one told them (intentionally) that there was a bog under the carpet in their office. Once clearly liable, the "logic of the culpable" and a series of rationalizations follows inappropriate conduct.

Unfortunately, I believe it is a fairly argued question that when a person assumes a role they might necessarily subsume certain duties and obligations and that this may at times give rise to joint and several liability because issue or enterprise is ongoing. For rhetorical example, it is impossible to ratify an ultra vires Board; What are your duties if you have knowledge that one is operating? Who are they to?

I hope this assists you in providing me with a correct and updated record promptly, as the application

deadlines for Loyola and other schools are imminent.

TIME IS OF THE ESSENCE!

Thank you for your time and attention.

Todd

On Mon, Jul 10, 2023 at 11:07 AM
administrator
<administrator@peoplescollegeoflaw.edu>
wrote:

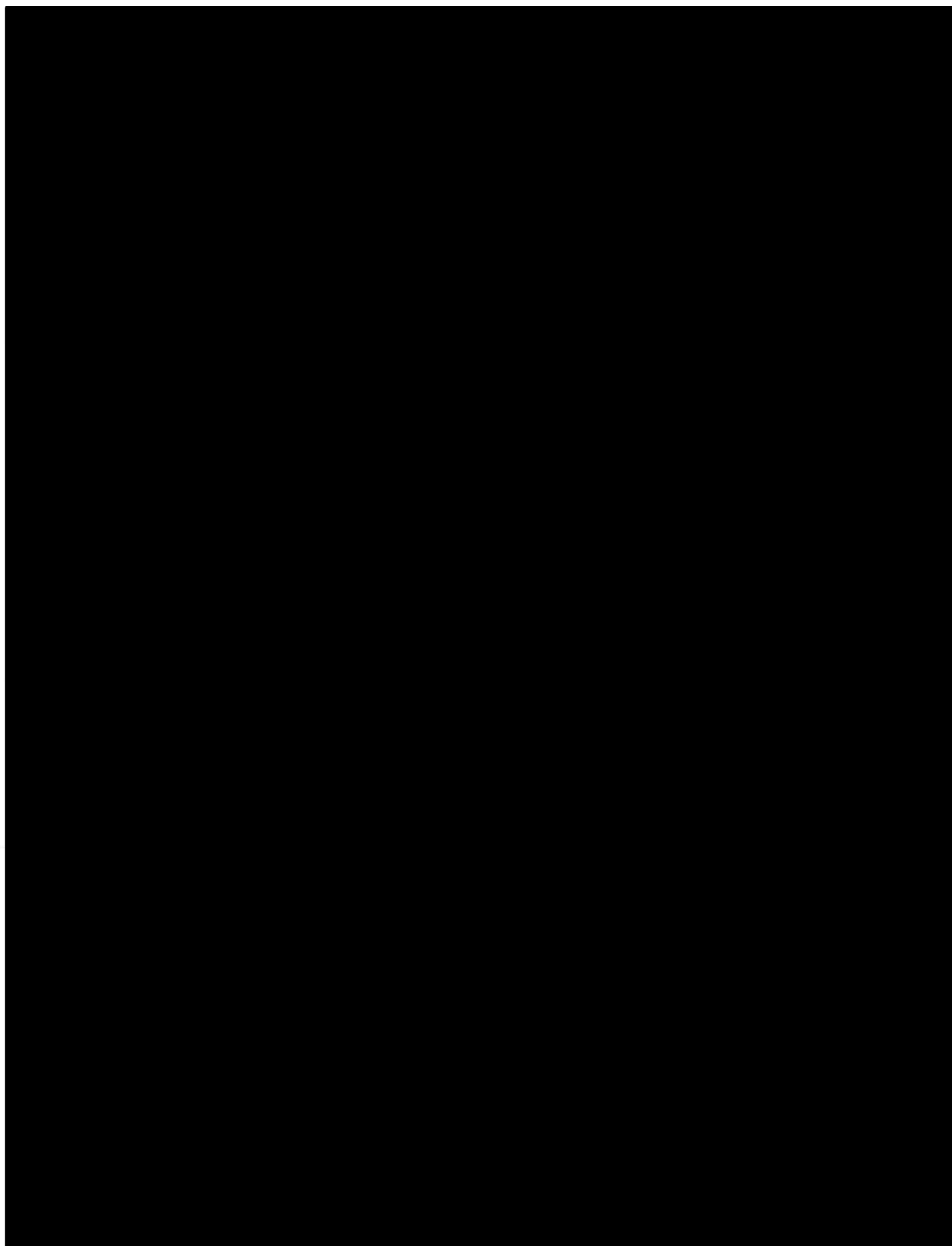
Hello, Todd. Attached is a PDF
and a letter explaining and
memorializing what we talked
about.

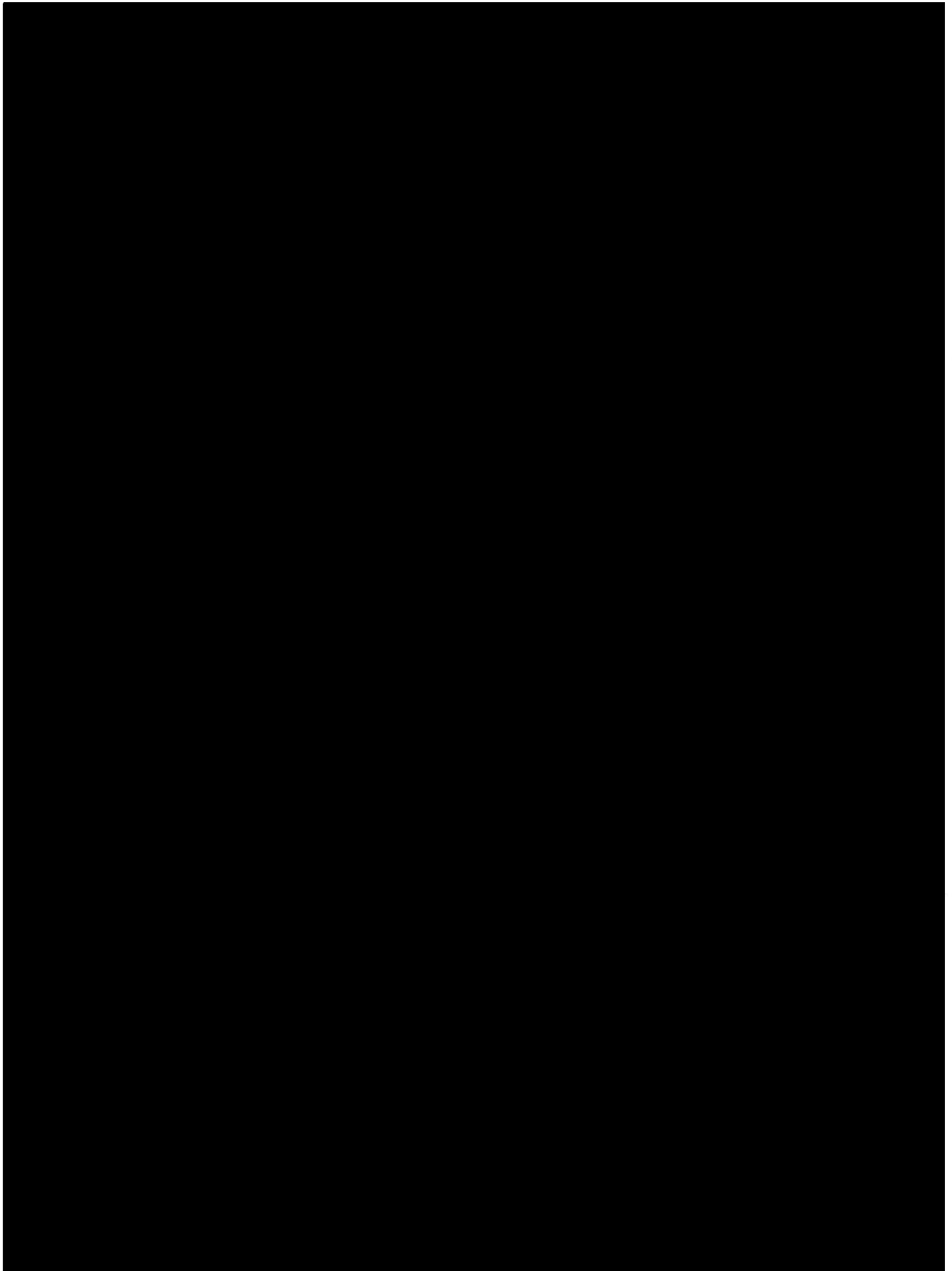
Hope this finds you well.

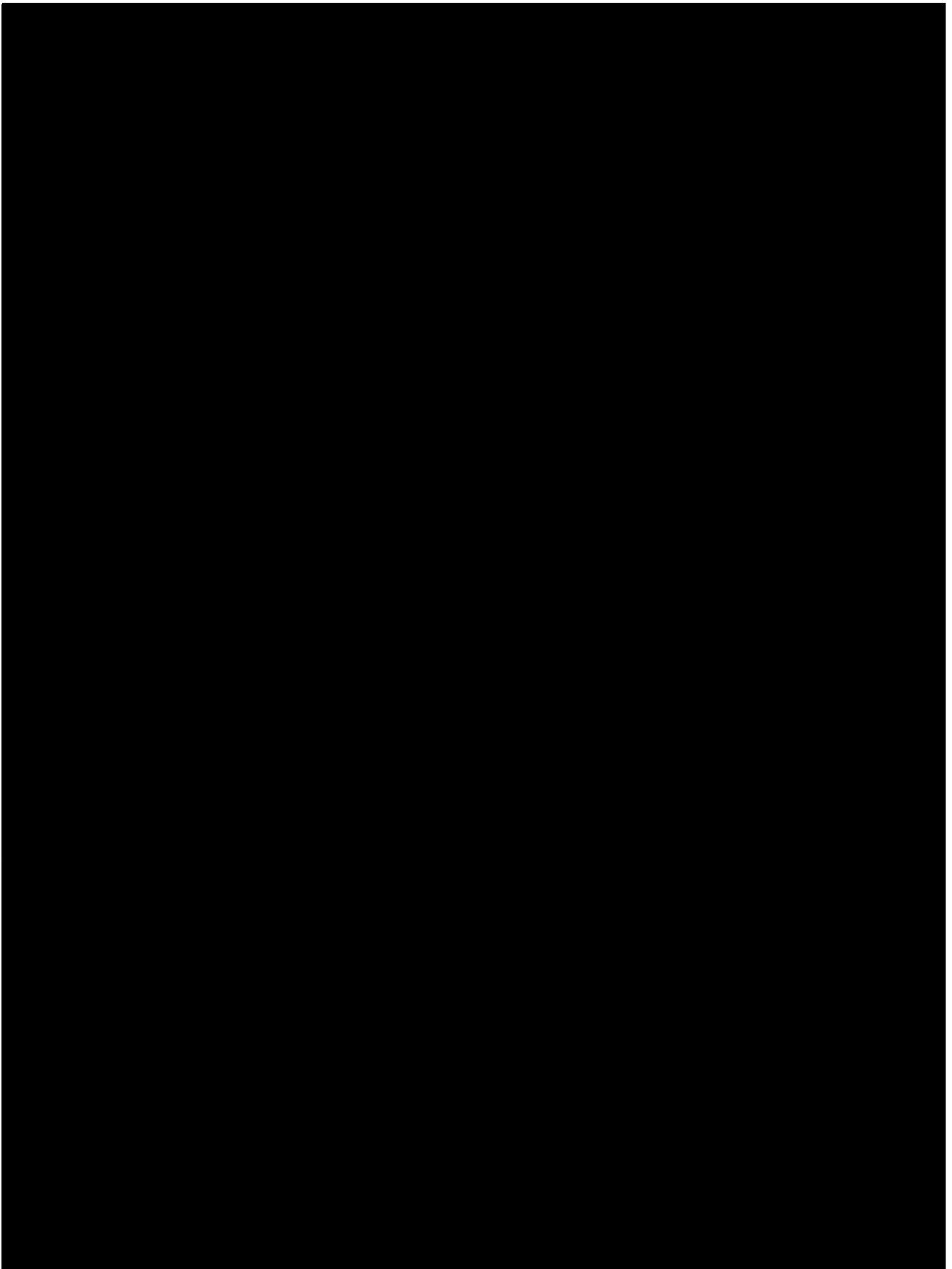
...R.

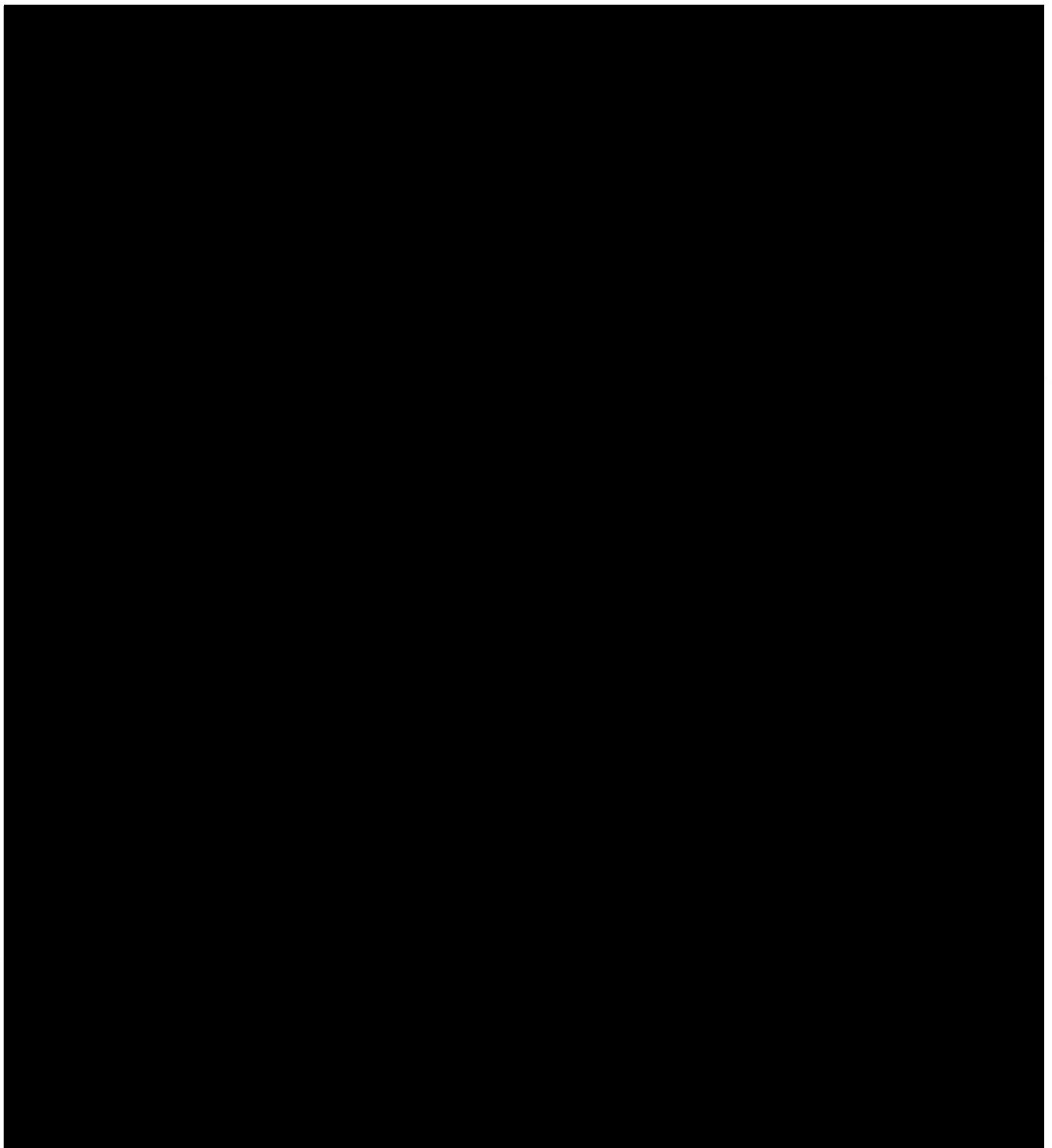
<TRANSCRIPT 08-29-22 with full
Civ Pro Grades & cover letter
(2).pdf><Todd Hill Criminal
Defense Timesheet - Clinical
Course v7.xls><Todd Hill Eviction
Defense Timesheet - Clinical
Course v6.xls>

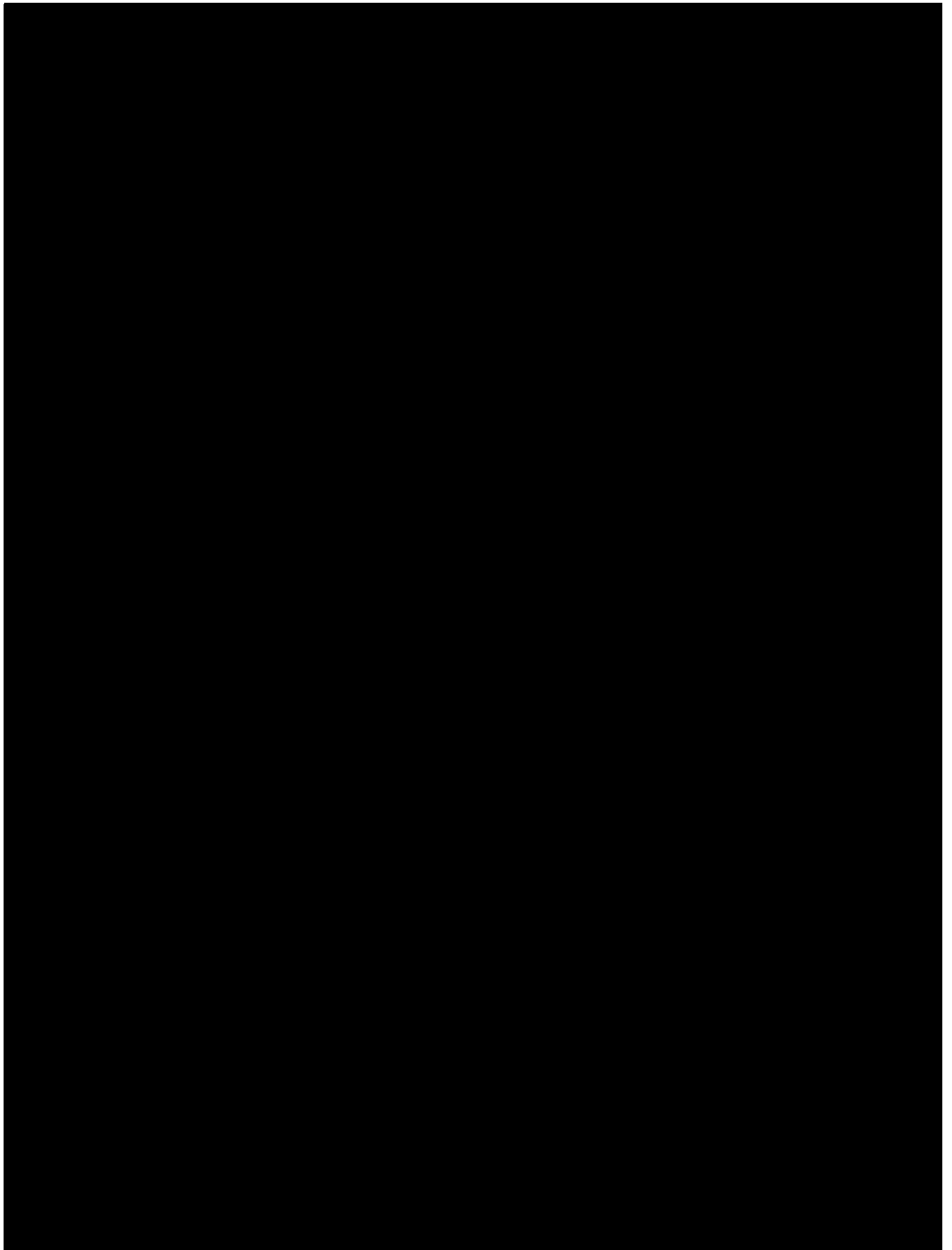
ATTACHMENT 1

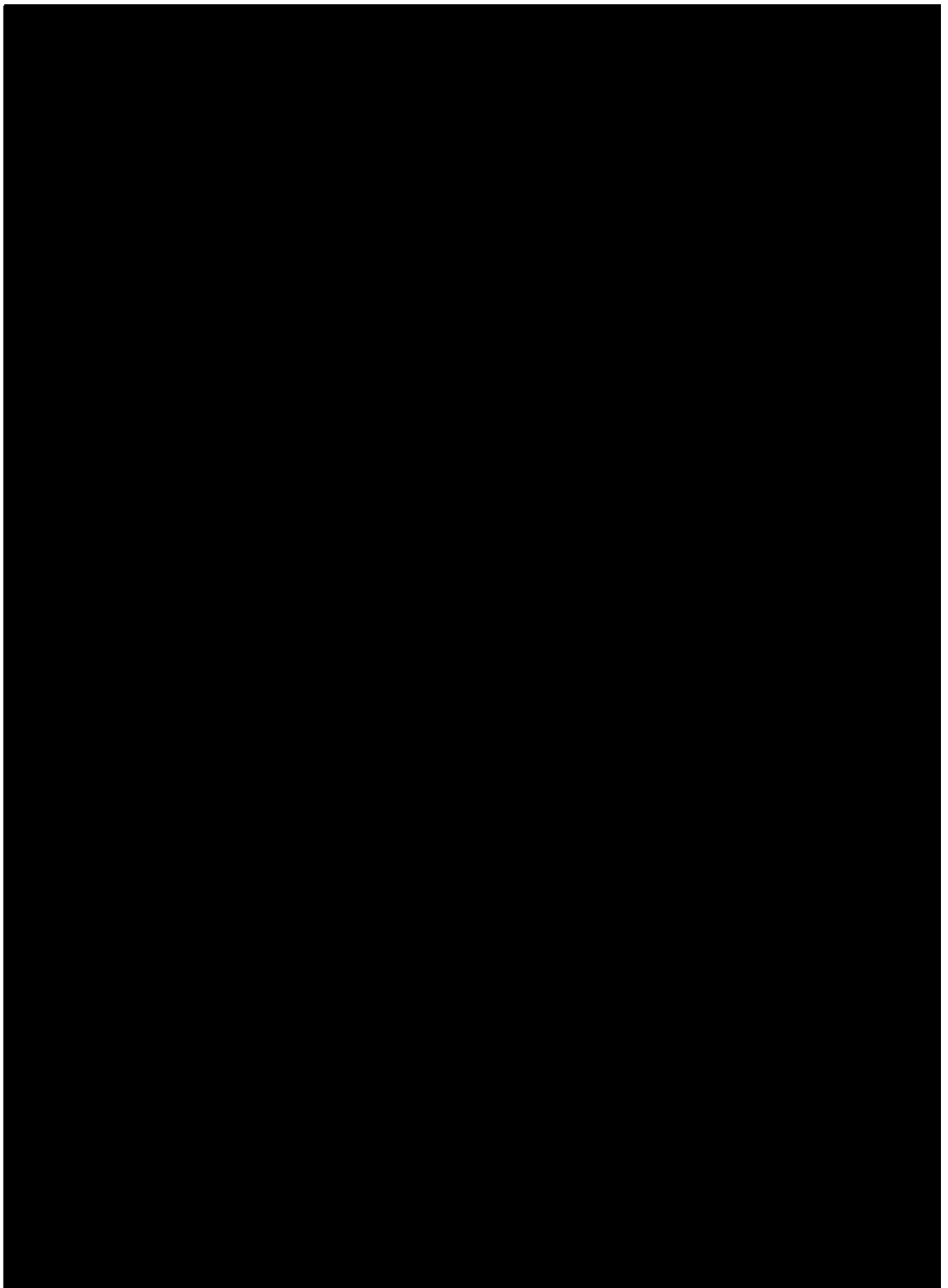


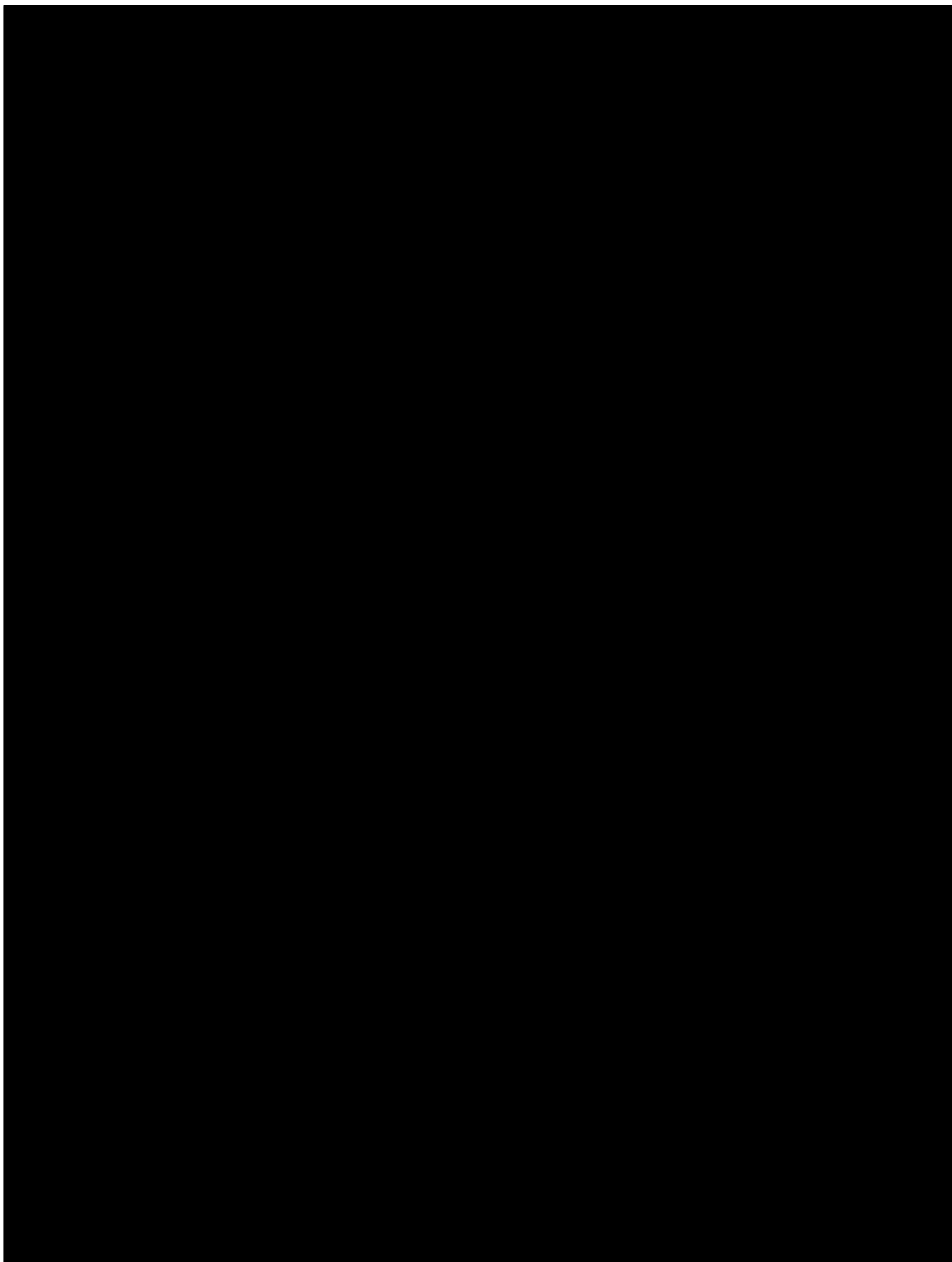


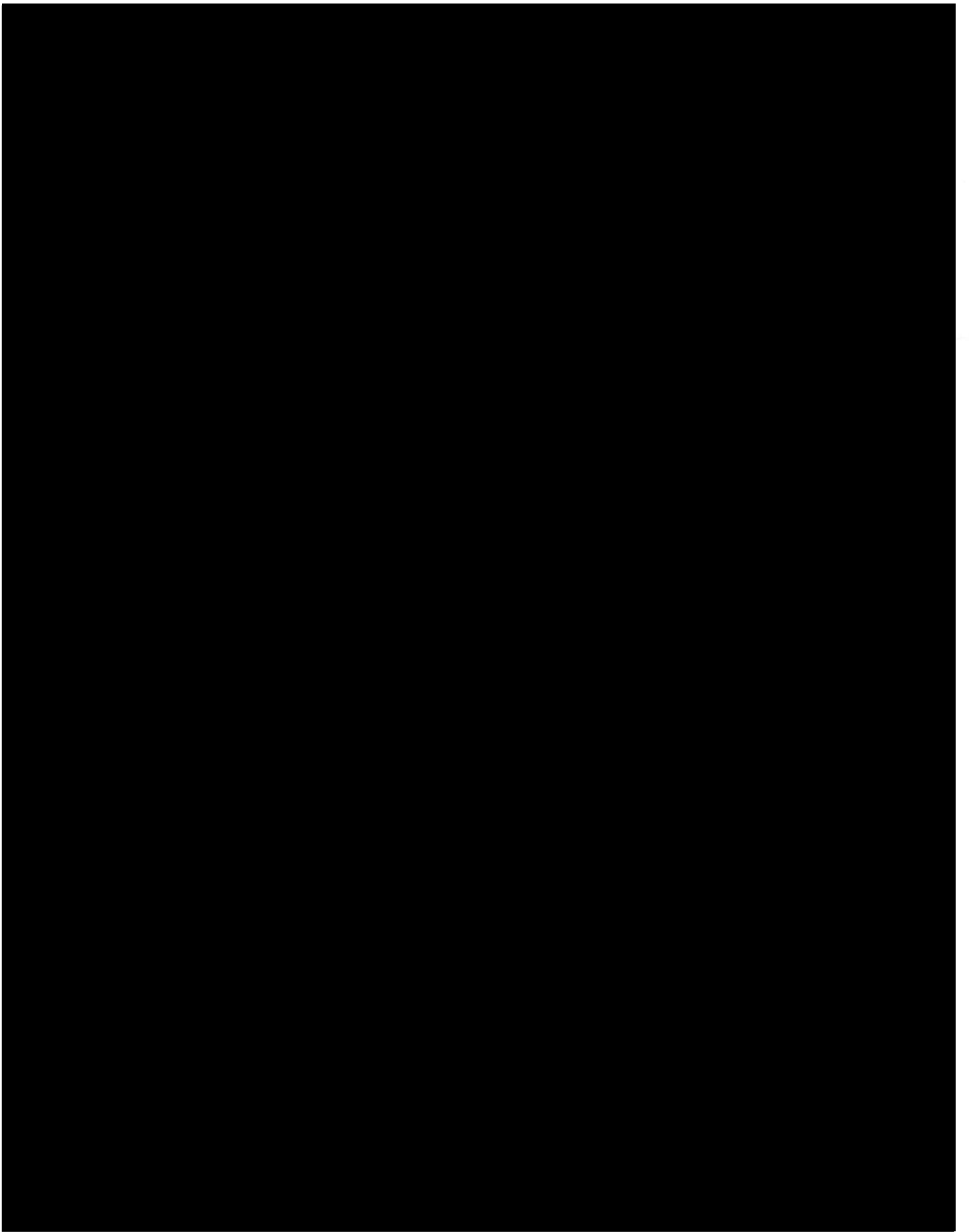




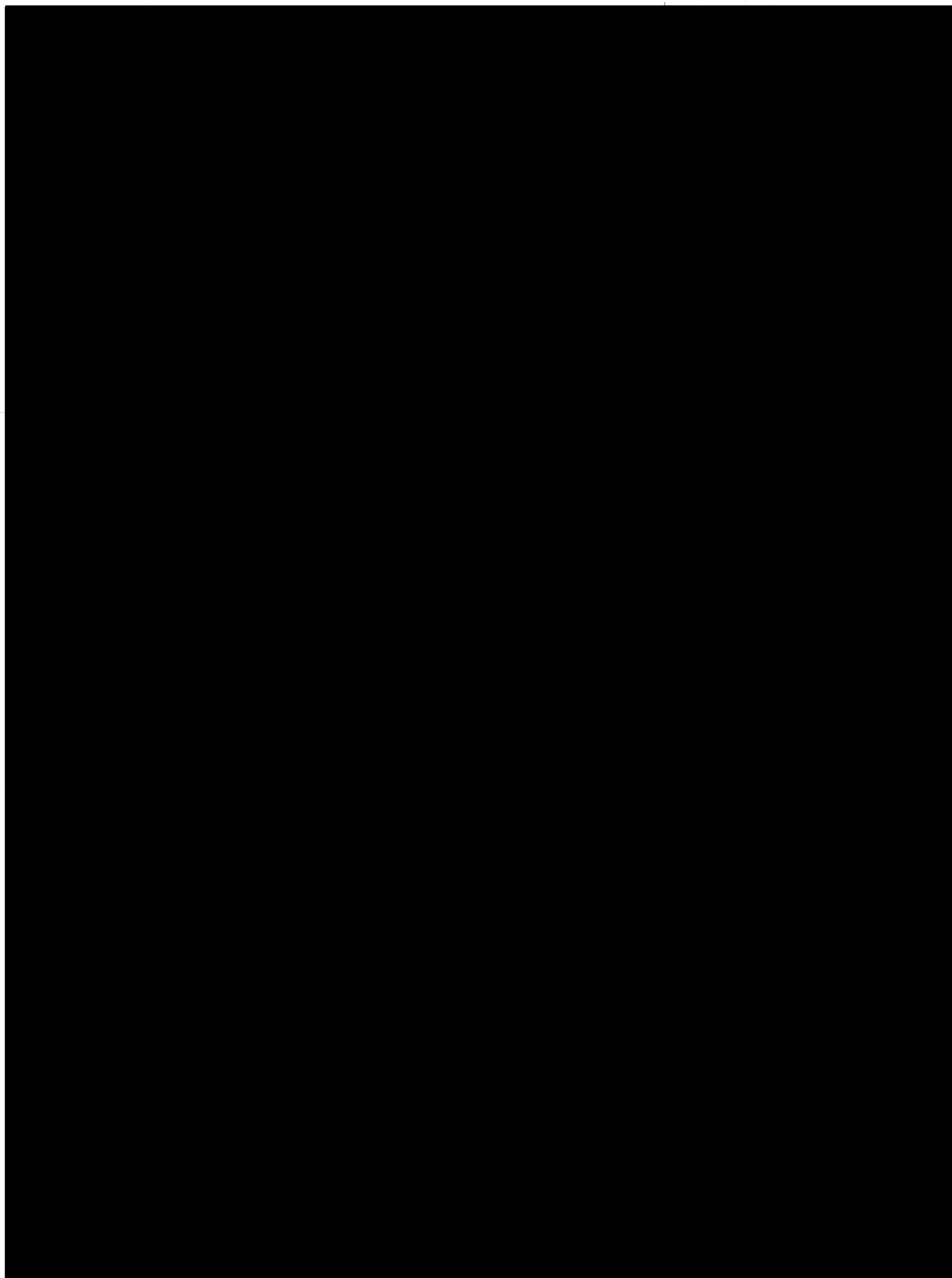


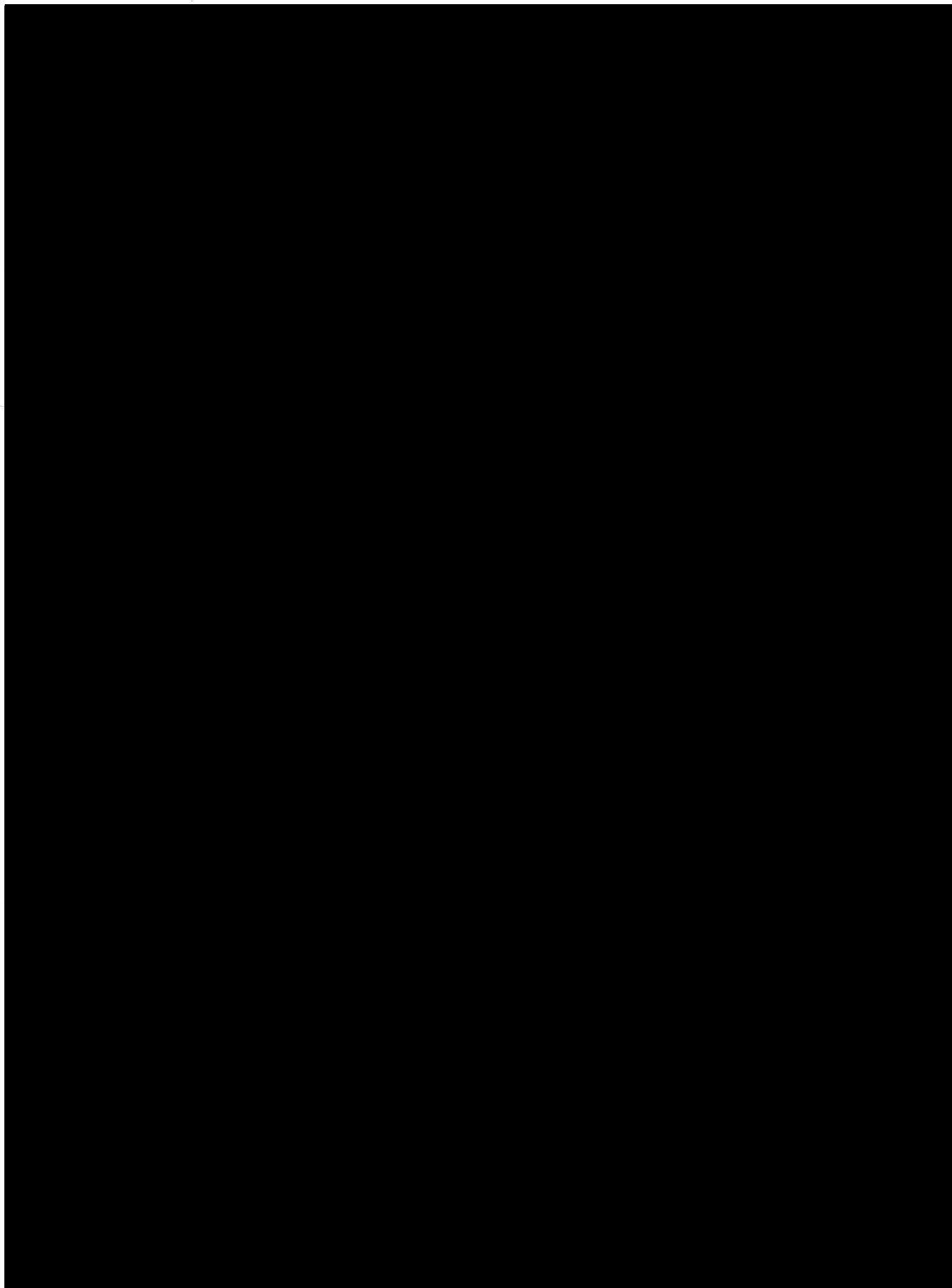


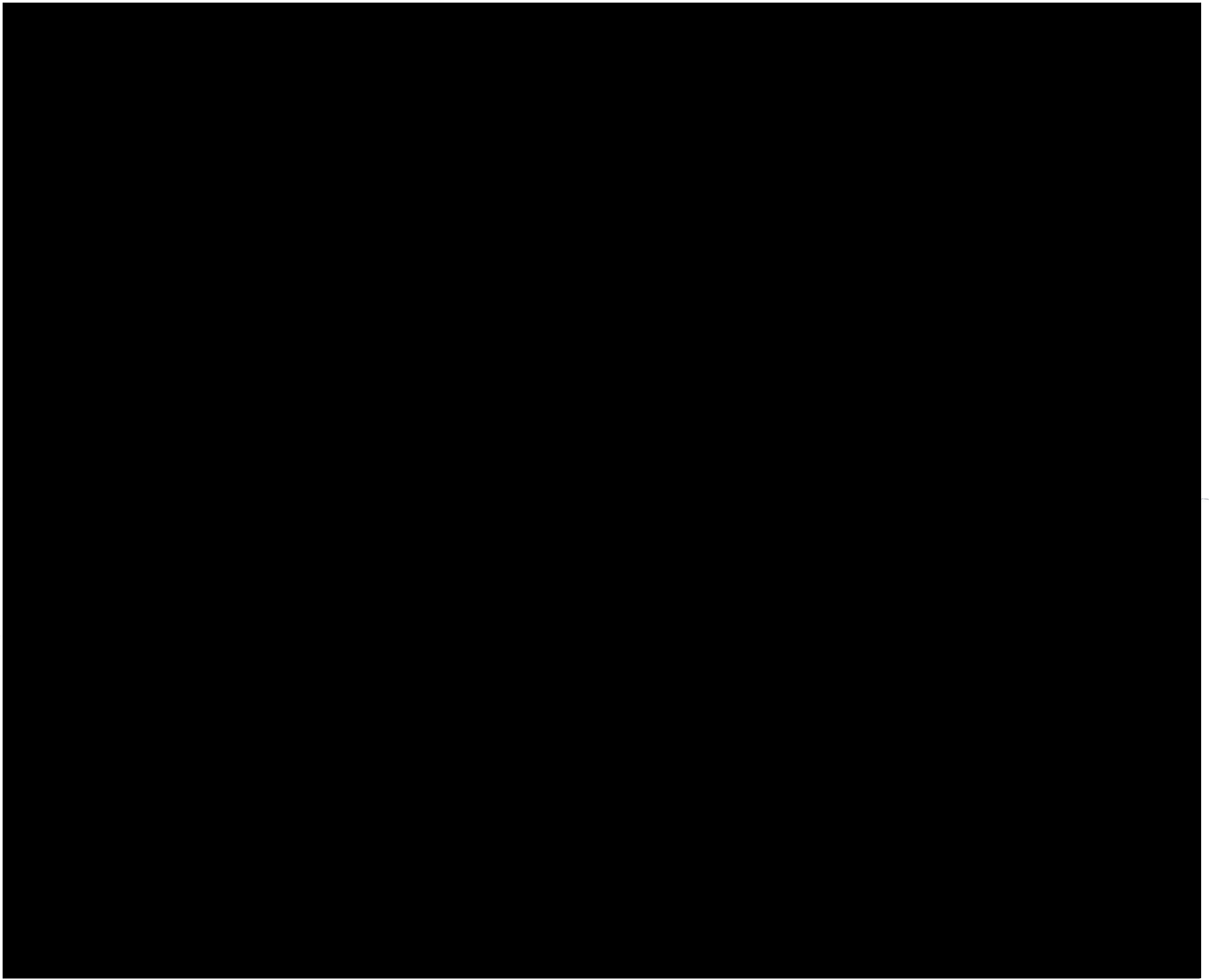




ATTACHMENT 2







ATTACHMENT 3



Todd Hill <toddryangregoryhill@gmail.com>

See attached for your review.

1 message

Todd Hill <toddryangregoryhill@gmail.com>
To: Kevin Clinton <ira@spirolawcorp.com>

Fri, May 5, 2023 at 4:33 AM

Ira,

Here is the latest....

Todd



SUPPLEMENTAL FAC MASTER HILL 88 PRVY 05052023 .pdf
713K

ATTACHMENT 4

Todd R. G. Hill,
toddryangregoryhill@gmail.com
pro se plaintiff
41459 Almond Avenue
Quartz Hill, Ca 93551
+1 [626] 232-7608

**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**TODD R. G. HILL , individually,
and as attorney-in-fact *guardian ad litem*
to ROES 1-888,**

Plaintiff,

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES**

Case No: 2:23-CV-01298-JLS-PD

Judge Assigned: Honorable Josephine L. Staton

DEMAND FOR JURY TRIAL

**PLAINTIFF TODD R. G. HILL'S
SUPPLEMENTAL FIRST AMENDED
COMPLAINT FOR DAMAGES,
DECLARATORY & INJUNCTIVE RELIEF
FOR DAMAGES, CIVIL PENALTIES, AN**

COLLEGE OF LAW:) ACCOUNTING, LIS PENDENS, PERMANENT
INJUNCTION, INVOLUNTARY
DISSOLUTION AND DECLARATORY RELIEF

THE GUILD LAW SCHOOL DBA INCLUDING CONSTITUTIONAL
PEOPLE'S COLLEGE OF LAW; HECTOR CHALLENGE TO A STATUTE PER FED.
C. PEÑA; CHRISTINA MARIN RULE 5.1 AND OTHER RELIEF ARISING
GONZALEZ, ESQ.; ROBERT IRA SPIRO, FROM:

ESQ.; JUAN MANUEL SARIÑANA, ESQ.;
PREM SARIN ; DAVID TYLER
BOUFFARD; JOSHUA GILLENS, ESQ.;
CLEMENTE FRANCO, ESQ.; HECTOR
SANCHEZ, ESQ.; PASCUAL TORRES,
ESQ.; CAROL DUPREE, ESQ., GARY
SILBIGER, ESQ.; EDITH POMPOSO;
ADRIANA ZUNIGA NUÑEZ
1) BREACH OF CONTRACT
2) COMMON LAW BREACH OF FIDUCIARY
DUTY – INDIVIDUAL & DERIVATIVE
3) BREACH OF FIDUCIARY DUTY
RELATED TO VIOLATION OF FEDERAL
AND STATE ADMINISTRATIVE LAW
AND BUSINESS PRACTICES

AND,

THE STATE BAR OF CALIFORNIA AS
WELL AS THESE PERSONS AS
INDIVIDUAL EMPLOYEES ACTING IN
OFFICIAL CAPACITY OR AS
INDIVIDUALS:
4) BREACH OF FIDUCIARY DUTY
RELATED TO SOLICITATIONS IN
VIOLATION OF BUSINESS AND
PROFESSIONS CODE SECTION 17510.8
5) UNTRUE OR MISLEADING STATEMENTS
IN VIOLATION OF BUSINESS &

LEAH WILSON, ESQ.; SUZANNE CELIA
 GRANDT, ESQ., ;VANESSA HOLTON,
 ESQ.; ELLIN DAVYTYAN, ESQ; LOUISA
 AYRAPETYAN; ALFREDO HERNANDEZ;
 JUAN DE LA CRUZ; NATALIE LEONARD,
 ESQ., DONNA HERSHKOWITZ, ESQ.;
 CARMEN NUNEZ; ELIZABETH HOM; JAY
 FRYKBERG; GINA CRAWFORD; LARRY
 KAPLAN; DAVID LAWRENCE; HON.
 JAMES HERMAN; PAUL A. KRAMER;
 CAROLINE HOLMES; IMELDA
 SANTIAGO; NATALIE HOPE; STEVE
 MAZER; YUN XIANG; JOAN RANDOLPH;
 JEAN KRISILNIKOFF; ENRIQUE ZUNIGA,
 ROBERT S. BRODY;

PROFESSIONS CODE § 17500
 6) CIVIL RIGHTS VIOLATIONS AND
 REMEDY UNDER 28 U.S.C. § 1654
 7) CIVIL RIGHTS VIOLATIONS UNDER 42
 U.S.C. § 1981 AND CA CIVIL CODE § 52.1
 (The Bane Act)
 8) NEGLIGENCE
 9) RICO
 10) CONSPIRACY
 11) COMMON LAW EXTORTION
 12) CIVIL RIGHTS VIOLATIONS AND
 REMEDY UNDER CA CIVIL CODE § 52.1
 (THE BANE ACT)

**THE OFFICE OF CHIEF TRIAL
 COUNSEL, THE STATE BAR OF
 CALIFORNIA AS AGENTS AND
 INDIVIDUALS:**

Unlimited Civil Case

GEORGE S. CARDONA, CHIEF TRIAL
 COUNSEL; MELANIE J. LAWRENCE,

1 INTERIM CHIEF TRIAL COUNSEL;
2 ANTHONY J. GARCIA, ASSISTANT
3 CHIEF TRIAL COUNSEL SHATAKA
4 SHORES-BROOKS, SUPERVISING
5 ATTORNEY ELI D. MORGENSTERN,
6 SENIOR TRIAL COUNSEL
7

8 and DOES 1-88.
9

10 **THE BOARD OF TRUSTEES, THE**
11 **STATE BAR OF CALIFORNIA AS**
12 **AGENTS AND INDIVIDUALS:**
13

14 RUBEN DURAN, Assembly Appointee,
15 Attorney Member, Chair (“DURAN”);
16 BRANDON N. STALLINGS, Supreme Court
17 Appointee, Attorney Member Vice-Chair;
18 MARK BROUGHTON, Supreme Court
19 Appointee, Attorney Member; HAILYN
20 CHEN, Supreme Court Appointee, Attorney
21 Member; JOSÉ CISNEROS, Governor
22 Appointee, Public Member; JUAN DE LA
23 CRUZ, Assembly Appointee, Public Member;
24 GREGORY E. KNOLL, Senate Appointee,
25
26
27
28

1 Attorney Member; MELANIE M. SHELBY,
2 Governor Appointee, Public Member;
3 ARNOLD SOWELL JR., Senate Appointee,
4 Public Member; MARK W. TONEY, PH.D.,
5 Governor Appointee, Public Member.
6

7 **THE OFFICE OF ADMISSIONS, THE**
8 **STATE BAR OF CALIFORNIA AS STAFF,**
9

10 **AGENTS AND INDIVIDUALS:**

11 AMY NUNEZ, Director III; AUDREY
12 CHING, Director I; NATALIE LEONARD,
13 Principal Program Analyst, Law School
14 Regulation; LISA CUMMINS, Principal
15 Program Analyst, Examinations; TAMMY
16 CAMPBELL, Program Manager II, Operations
17 & Management; KIM WONG, Admissions;
18
19 DEVAN MCFARLAND, Admissions.
20
21

22 Defendants
23
24
25

26 **ATTORNEY GENERAL**
27

OF THE UNITED STATES

As Nominal Defendant per 42 U.S.C. § 1956
and for notice per Rule 5.1

**THE SOVEREIGN STATE OF
CALIFORNIA**

Nominal Defendant

For purposes of Tort Liability and

Judgment Guarantor

PARTIES

PLAINTIFF

1. Plaintiff Todd Hill ("Plaintiff") is a United States citizen who resides in and holds his principal place of business in the city of Palmdale, County of Los Angeles, California. Plaintiff is employed and works in the business of specialty chemical services. Plaintiff is a member of the public, never admitted to the Bar nor entered on any attorney roll. Plaintiff is African American and a native of the State of California. Plaintiff suffers from at least one diagnosed physical or mental qualifying disability under the Americans with Disabilities Act. Plaintiff was a student at People's College of Law ("PCL") and believes he remains the rightful Secretary of the Corporation. At time of contract signing, .

DEFENDANT - THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLE COLLEGE OF LAW:

2. PEOPLE'S COLLEGE OF LAW ("PCL") is a nonprofit corporation incorporated 1974 to provide legal education services for preparation for admission to the STATE BAR. The school operates at 660 S. Bonnie Brae, Los Angeles, California 90057.
3. ENTERPRISE P ("Enterprise P") is distinct from PCL.
4. CHRISTINA MARIN GONZALEZ, ESQ. ("GONZALEZ") is an individual licensee associated with PCL. GONZALEZ served as PCL's President from January 17 to November 14, 2021. GONZALEZ is a PCL Alumnus, Class of 2012.

5. HECTOR CANDELARIO PEÑA RAMIREZ aka HECTOR P. RAMIREZ, aka HECTOR C. PEÑA, (“PEÑA”) is an individual residing in Los Angeles County, California. PEÑA is a PCL graduate and has served as the President and the Board Treasurer. PENA is a PCL Alumnus, believed class of 2017.
6. ROBERT IRA SPIRO, ESQ. ("SPIRO") is an individual associated with PCL. SPIRO has been involved with PCL from at least 2017 to present. SPIRO has connections to the STATE BAR and has served on various committees, including an ethics committee. SPIRO was the Dean of the law school until his retirement in 2021.
7. JUAN MANUEL SARIÑANA, ESQ. ("SARIÑANA") is an individual associated with PCL. SARIÑANA served as an adjunct professor from March 2020 to 2022 and as Dean of the law school.
8. PREM SARIN ("SARIN") is an individual and PCL graduate who has served as a PCL Board Member from November 2021 to the present.
9. DAVID TYLER BOUFFARD ("BOUFFARD") is an individual who has served as a PCL Board Member from November 2021 to the present.
10. JOSHUA GILLENS, ESQ. ("GILLINS") is an individual and PCL graduate who has served as a PCL Board Member from November 2021 to the present.
11. CLEMENTE FRANCO, ESQ. (“FRANCO”) is a PCL student who has served as a PCL Board Member from November 2021 to the present.
12. HECTOR SANCHEZ ("SANCHEZ") is an individual who has served as a PCL Board Member from November 2021 to the present.
13. PASCUAL TORRES, ESQ. ("TORRES") is an individual associated with PCL. TORRES has served as Dean of the law school for a brief tenure.

1 14. CAROL DUPREE, ESQ. ("DUPREE") is an individual who has served as a PCL Board Member
2 from November 2021 to the present.

3 15. GARY SILBIGER, ESQ. ("SILBERGER") is an individual who has served as a PCL Board
4 Member at various times from 2018 to the present.

5 16. JESSICA "CHUYITA" VIRAMONTES, ESQ. ("VIRAMONTES") is an individual associated with
6 PCL at various times from 2018 to the present.

7 17. EDITH POMPOSO, ("POMPOSO") is an individual associated with PCL. POMPOSO has served
8 as Dean of the law school since February 2022.

9 18. ADRIANA ZUÑIGA NUÑEZ is an individual associated with PCL in her capacity as PCL's paid
10 Registrar.

11
12
13 **STATE BAR DEFENDANTS**

14 19. The State Bar of California ("STATE BAR") is a separate entity from Enterprise S. The State Bar is
15 involved in the regulation of law schools and includes members serving on the Committee of State
16 Bar Accredited and Registered Schools ("CSBARS") or on the Board of Trustees, or as licensees.

17 20. A. Defendant State of California ("STATE") is a sovereign public entity among the United States of
18 America ("U.S." or "United States"). Plaintiff submitted a Government Claims Act notice to the
19 State on September 22, 2022, via web portal and certified mail.

20 21. B. The Committee of Bar Examiners ("CBE") is authorized under Rule 4.2 to register, oversee and
21 regulate unaccredited law schools.

22 22. C. The Committee of State Bar Accredited and Registered Schools (CSBARS) advises the State Bar
23 of California's Committee of Bar Examiners (CBE) on matters related to legal education, including
24 the development of rules and guidelines for accredited and unaccredited law schools. CSBARS is
25 responsible for ensuring law school compliance.

23. The Office of General Counsel ensures State Bar staff and agents comply with the law and antitrust rules.

24. The Office of Chief Trial Counsel is responsible for handling attorney discipline cases.

25. The Office of Admissions operates under separate funding and reporting principles, managing student records and testing evaluation. A current organizational chart ("Org Chart") dated April 17, 2023, obtained from the STATE BAR's website, reflects a change in departmental effective April 2023, with CHING's promotion to Director and NUNEZ's transition to Assistant Director.

1. A true and accurate copy of the STATE BAR's Org Chart for the Department of Admissions, can be found on the State Bar's website here: (<https://www.calbar.ca.gov/About-Us/Who-We-Are/Organizational-Chart>.)

2. A copy of the latest reported "Office of Admissions Organizational Chart", ("Org Chart") can be found on the State Bar's web site here:
(<https://board.calbar.ca.gov/Agenda.aspx?id=16951&tid=0&show=100035387>)

26. Enterprise S is a separate entity from the State Bar, with no shared legitimate interests. The plaintiff provides an example of the alleged functioning of Enterprise S but does not claim to understand its motives or methods below.

27. ALFREDO HERNANDEZ ("HERNANDEZ") is an individual and State Bar involved in the recording and distribution of State Bar public meetings under the Brown Act.

28. JOAN RANDOLPH ("RANDOLPH") is an individual employed as a court official secretary in the Office of the General Counsel. Randolph is involved in the business of providing legal services.

29. RUBEN DURAN, ESQ. ("DURAN") is an active licensee and market participant in the legal services trade. DURAN also provides legal services to the State Bar as a corporate officer and Chairman of the Board of Trustees.

30. LEAH WILSON, ESQ. ("WILSON") is an individual employed as the Executive Director of the State Bar.

31. SUZANNE CELIA GRANDT, ESQ. ("GRANDT") is an individual who serves in an official capacity as Assistant General Counsel of STATE BAR.

32. VANESSA HOLTON, ESQ. ("HOLTON") is an individual who served as General Counsel for the STATE BAR's internal Office of General Counsel ("OGC") from at least the initiation of 2018 until her retirement effective July 8, 2022.

33. BRANDON N. STALLINGS ("STALLINGS") is a Supreme Court Appointee and Attorney Member Vice-Chair of the STATE BAR Board of Trustees.

34. MARK BROUGHTON ("BROUGHTON") is a Supreme Court Appointee and Attorney Member of the STATE BAR Board of Trustees.

35. ELI D. MORGENSTERN ("MORGENSTERN") serves as Senior Trial Counsel of the STATE BAR.

36. GREGORY E. KNOLL ("KNOLL") is a Senate Appointee and Attorney Member of the STATE BAR Board of Trustees.

37. ELLIN DAVYTYAN ("DAVYTYAN") is an individual and current General Counsel of the State Bar of California.

38. HAILYN CHEN ("CHEN") is a Supreme Court Appointee and Attorney Member of the STATE BAR Board of Trustees.

39. JOSÉ CISNEROS ("CISNEROS") is a Governor Appointee and Public Member of the STATE BAR Board of Trustees.

40. LOUISA AYRAPETYAN ("AYRAPETYAN") is the Secretary for the Executive Director and Board of Trustees of STATE BAR.

41. JUAN DE LA CRUZ ("DE LA CRUZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

42. DONNA HERSHKOWITZ, ESQ. ("HERSHKOWITZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

43. AMY NUNEZ ("NUNEZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

44. ELIZABETH HOM ("HOM") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

45. JAY FRYKBERG ("FRYKBERG") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

46. GINA CRAWFORD ("CRAWFORD") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

47. MELANIE M. SHELBY ("SHELBY") is a Governor Appointee and Public Member of the STATE BAR.

48. TAMMY CAMPBELL ("CAMPBELL") serves as a Program Manager II for Operations & Management at STATE BAR.

49. LISA CUMMINS ("CUMMINS") is the Principal Program Analyst for Examinations at STATE BAR.

50. LARRY KAPLAN ("KAPLAN") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

51. DEVAN MCFARLAND ("MCFARLAND"), Admissions, is an individual providing legal services as an employee, agent, and authority of STATE BAR.

52. KIM WONG ("WONG"), Admissions, is an individual providing legal services as an employee, agent, and authority of STATE BAR.

53. DAVID LAWRENCE ("LAWRENCE") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

54. ARNOLD SOWELL, JR. ("SOWELL") is a Senate Appointee and Public Member of the STATE BAR.

55. MARK W. TONEY, PH.D. ("TONEY") is a Governor Appointee and Public Member of the STATE BAR.

56. HON. JAMES HERMAN ("HERMAN") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

57. PAUL A. KRAMER ("KRAMER") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

58. CAROLINE HOLMES ("HOLMES") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

59. IMELDA SANTIAGO ("SANTIAGO") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

60. NATALIE HOPE ("HOPE") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

61. ENRIQUE ZUNIGA ("ZUNIGA2") is an individual and newly designate Public Trust Liaison providing legal services as an employee, agent, and authority of STATE BAR.

62. ROBERT S. BRODY ("BRODY") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

63. STEVE MAZER ("MAZER") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

64. GEORGE S. CARDONA ("CARDONA") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

65. RACHEL R. ROSSI ("ROSSI") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

66. ANTHONY J. GARCIA ("GARCIA") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

67. SHATAKA SHORES-BROOKS ("SHORES-BROOKS") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

68. YUN XIANG ("XIANG") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

69. Plaintiff is informed and believes and based thereon alleges that certain of the Defendants and Doe Defendants 1-1 00 have improperly attempted to utilize various corporate and trust entity forms in an attempt to shield their personal or ultra vires corporate actions behind this veil of protection and avoid personal or other corporate liability. These Defendants have managed, supervised or worked for these entities as officers, directors, shareholders, employees and failed to respect the formalities and requirements in such a manner that these entity forms may be disregarded and pierced to reach these Defendants' personal or other corporate assets. Fur'.her, a fraud or injustice would occur if these Defendants were allowed to escape personal or other corporate liability. 9. Plaintiff is informed

and believes and thereon alleges that at all times material to this complaint, each of the Defendants and each of the Defendants fictitiously named in this Complaint, in addition to acting for himself, herself, or itself and on his, her, or its own behalf individually, is and was acting as the agent, servant, employee and representative of, and with the knowledge, consent and permission of, and in conspiracy with, each and all of the Defendants and within the course, scope and authority of that agency, service, employment, representation, and conspiracy. Plaintiff further alleges on information and belief that the acts of each of the Defendants were fully ratified by each and all of the Defendants. Specifically, and without limitation, Plaintiff alleges on information and belief that the actions, failures to act, breaches, conspiracy, and misrepresentations alleged and attributed to one or more of the specific defendants were approved, ratified, and done with the cooperation and knowledge of each and all of the Defendants.

I. JURISDICTION and VENUE

70. Jurisdiction rests with the Court under provisions of 18 U.S.C. §1961; 18 U.S.C. §1962; 18 U.S.C. § 1964, et sequentia, of the civil RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO); and Article III, Section 2, to the Constitution of the United States codified under 28 U.S.C. § 1331.

71. This Court has supplemental jurisdiction where state claims may become federal question under 28 U.S.C. § 1331.

72. **Constitutional Challenge:** Plaintiff contends the State Bar Act's mandatory membership provision is unconscionable and unenforceable due to the organization's unfair practices under the color of law and the detrimental and permanent harm suffered by the Plaintiff. The government's insistence on

1 compelling association in these circumstances fails to meet the standards of scrutiny required to
2 justify the infringement of the Plaintiff's constitutional rights.

3 73. Alternatively, Plaintiff asserts challenge on the theory that mandatory membership provisions of the
4 State Bar Act should be considered unconstitutional as the reasonable person in the Plaintiff's
5 circumstance would not willingly join an organization marred by such widespread misconduct.
6 Given the State Bar's tarnished reputation and failure to address its internal issues, the requirement
7 for mandatory membership constitutes an unfair infringement upon the Plaintiff's First Amendment
8 and other constitutional rights.
9

10 11 **III. FACTS AND COMMON ALLEGATIONS FOR ALL COUNTS**

12 74. Plaintiff incorporates paragraphs 1 through 73.
13

14 75. Plaintiff understands that he does not possess all the facts and thus seeks leave for discovery. If it is
15 determined by the finder of fact, Plaintiff asserts that all the Defendants share responsibility for the
16 harm and its remedy.
17

18 76. The State Bar Act of 1927 instantiates the STATE BAR's and is believed to define the scope of its'
19 regulatory authority.

20 77. Plaintiff believes based on credible report that the STATE BAR rules and guidelines are regulations
21 for purposes of Government Code section 11342.600.
22

23 78. The "Unaccredited Law School Rules" are adopted or amended by the Board of Trustees. These
24 rules in part define the scope of authority of the Committee of Bar Examiners ("CBE") the which
25 also controls law school registration, status, and degree-grant authority.
26
27

79. Plaintiff is informed and believes the STATE BAR Guidelines for Unaccredited Law School Rules (“GULSR”) include the rules for operation of fixed-facility institutions like PCL.

80. STATE BAR’s Guidelines for Unaccredited Law School Rules (“GULSR”) are adopted or amended under the authority of the Committee of Bar Examiners (“CBE”).

81. GULSR Rule 1.6 communicates the STATE BAR’s policy in handling “Student Complaints”. It reads:

Neither the Committee nor any office of the State Bar of California will intervene in disputes between students and their law schools. Student complaints are reviewed to determine if they raise compliance issues under the Unaccredited Law School Rules and, with the permission of the student, may be forwarded to the law school.

82. GULSR Rule 2.2 (B) requires “Honesty in Financial Dealings with Prospective Students, Applicants, and Students”. It reads:

A law school must deal with prospective students, applicants, and students in an honest and forthright manner in all financial dealings. A law school must adopt a written refund policy that is fair and reasonable.

83. The bases of plaintiff’s claims to rights violations lie in various breaches; of fiduciary duty; contract; the “implied covenant of good faith and fair dealing”, and trust.

84. Plaintiff will demonstrate pre-planned and intentional misrepresentations of the facts, willful concealment, retaliation, “unfair business practices” including debt collection under §17200 and false claims under §17500 and solicitation.

85. The various violations, appear objectively in the aggregate a combination of willful negligence, and a RICO-like anticompetitive combinations that remove student consumer protections.

86. At the time of PLAINTIFF’s matriculation in 2019 and election to the Board of Directors, (“Community Board”), PCL was subject to the “BYLAWS OF PEOPLES COLLEGE OF LAW”; a

true and correct copy of the relevant document as ratified May 22, 2017 was obtained by PLAINTIFF during his activities on PCL's Board of Directors ("Community Board") and can be found on the Court's web site prior marked as Exhibit D here:

87. Plaintiff served on PCL's Executive Committee (EC) concomitant with his attendance as a student.

Initially under the impression that it was a traditional and appropriate role as the Secretary of the Corporation, Plaintiff later discovered that the EC was not legitimized by PCL's Bylaws or the proper voting process. The EC, formed through an improper vote, was assigned various inappropriate roles that lacked the resources and intention to address substantively.

88. During Plaintiff's tenure on the Community Board and as Secretary, he attempted to restore compliance related to student unit reporting and other formalities but was consistently obstructed by Defendants GONZALEZ, PENA, or SPIRO.

89. PCL's Bylaws provide for egalitarian decision-making and delegation, including a framework that empowers student participation.

90. PCL's Bylaws also outline a process for elections and election disputes, including the establishment of a framework for appointing a third-party trustee to resolve election conflicts.

91. PCL's 2021 Student Handbook states that payment plans for tuition arrearage must be approved by the EC, which also reviews changes to student transcripts, academic appeals, ADA requests, Academic Disqualification, and Student Grievances. The Handbook claims that the Community Board may delegate some or all of its functions to the EC.

92. Despite the Student Handbook's assertion that EC members are specified in the PCL Bylaws, the Bylaws themselves make no mention of the EC, its role, duties, members, or functions. During the time relevant to this case, no official approach or mechanism was established for students to contact EC members.

93. PCL DEFENDANTS have failed to respond to a qualified demand for the production of documents under California Business and Professions Code (“CBPC”) Section § 8330.

94. STATE BAR is alleged to have allowed PCL to operate in grossly negligent and overtly predatory fashion in its student recruitment and retention efforts.

95. STATE BAR is alleged to have implemented, promulgated, and enforced public policies or regulatory rules in effect made law, that the organization’s staff and leadership are reasonably believed based on information and personal experience were improper to enforce in these, or any, circumstances.

96. PCL failed to make proper and timely mandatory disclosures to PLAINTIFF during academic years 2019, 2020, and 2021, as well as at the time of matriculation contract signing and each year of attendance. Such failures include the provision of inaccurate or misleading information, resulting in non-compliance with the law and Rule 2.3(D), as well as the non-standard award of units and non-compliance with Rule 9.1 (oversight of recordkeeping processes).

97. PCL failed to maintain accurate records and provide timely access to students. PLAINTIFF sought a transfer and evaluation of his records by STATE BAR staff for admissions suitability review but faced obstacles in obtaining an accurate transcript from PCL.

98. From 2019 through April 27, 2023, PLAINTIFF remains without a true and accurate transcript, the one presented for exhibit missing at least 2 of the classes taken in Summer 2020. A true and accurate copy of the last non-conforming transcript is lodged with the Court as Document #8 and marked by PLAINTIFF as “EXHIBIT GRDS-1 TRANSCRIPT” and can be found on this Courts website here: (<https://ecf.cacd.uscourts.gov/doc1/031139584481>).

99. PCL DEFENDANTS had a duty to maintain accurate records and produce them upon lawful demand or to fulfill institutional obligations, such as ordinary business documents, notices of program nonconformance and transcripts.

100. PCL failed to adhere to appropriate student solicitation, recruitment and matriculation standards.

101. PCL DEFENDANTS failed to produce records until it was necessary for the PLAINTIFF to lodge a formal demand for the documents. PCL DEFENDANTS failed to produce the documents or respond to the request.

102. PCL DEFENDANTS failed to provide PLAINTIFF with access to board meeting minutes, zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer, as required. No other PCL DEFENDANT acted in accord with duty after receipt of multiple demands for the production of documents per CBPC §8330.

103. SPIRO, PENA, GONZALEZ, and ALL PCL DEFENDANTS solicited student election and Board participation without adequately informing them, including PLAINTIFF, of PCL's non-compliant status and their plans not to conform. They demanded and collected funds in bad faith, entering contracts while withholding material facts or failing to disclose, and using these funds for purposes of retaliation, intimidation, and suppression.

104. PCL Defendants engaged in various violations of fair business and debt collection practices through deceit, misrepresentation, or negligence in documenting, facilitating, and collecting property, including charitable solicitations.

105. PENA, GONZALEZ, SILBERGER, GILLINS, ZUNIGA1, SARIN, DUPREE, FRANCO, SARINANA, TORRES, and SANCHEZ have continued to hold meetings and act as a Board in protracted conflict with the Bylaws.

106. Plaintiff repeatedly notified the State Bar of potential violations of California law by PCL's agents, Directors & Officers. STATE BAR failed to take substantive action to address these violations or enforce established procedures for investigating complaints, neglecting to implement internal policies related to employee discipline.

107. On July 14, 2021 SPIRO issues resignation as Dean effective August 13, 2021, stating that the resignation is "irreversible", then indicating doubts as to whether or not he could resign from the Executive Committee.

108. On July 17, 2021 PLAINTIFF emails LEONARD in his capacity as corporate Secretary, with questions to LEONARD regarding the ongoing search for a replacement Dean. Her response of July 20, 2021 answered the immediate questions and noticed that she was unaware of the "departure."

109. Defendants violated various fair business and debt collection practices as well by documenting, facilitating, and collecting property through deceit, misrepresentation, or negligence.

110. PCL DEFENDANTS are required but failed to provide PLAINTIFF with the minutes of their board meetings, the zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer.

111. PCL DEFENDANTS are required to provide PLAINTIFF with an accounting upon request for the funds they claim owed; DEFENDANTS never provided the accounting.

112. The events surrounding the STATE BAR's handling of PCL's noncompliance establish a pattern of intentional avoidance of procedural law. As early as 2017, the STATE BAR knew expressly or constructively that PCL was out of compliance with state and federal regulations because it receives executed copies of every student's transcript. Despite this knowledge, the STATE BAR failed to intervene timely or substantively or procedurally. Repeatedly.

113. The STATE BAR engaged in denial of duty and gaslighting of PLAINTIFF, including specific actions by LEONARD, CHING, HOLTON, and WILSON.

114. The State Bar's handling of PCL's noncompliance demonstrates a pattern of intentional avoidance of procedural law since at least 2017, despite PCL's known and actual non-compliance with state and federal regulations.

115. LEONARD facilitated SPIRO, GONZALEZ, and PENA's unfair practice of unit issuance under the "color of law" by using official transcripts as a form of "currency" for administrative purposes. These defendants misrepresented or failed to correct STATE BAR rules in electronic communications, suggesting a conspiracy to frustrate the appropriate application of administrative procedure.

116. Generally, a law school accepting transfer has both a set maximum number of units it will accept for transfer as well as minimum time in attendance requirements precluding 100% equivalence in program progress after transfer. PCL's approach was an even greater burden on students who made the decision to transfer.

117. April 21, 2021, SPIRO issues an email with an "essay" identified as a "State of the School" report. It purportedly shows "greatly improved" FYLSX and Bar Exam passage rates. The report fails to indicate the actual number of students enrolled in the cohort for each year.

118. The reported pass rates are detailed below First Year Law Students Exam (FYLSX) Pass Rates:

1. 2016-2017 Academic Year: 8 students took the FYLSX, with 4 passing (50% pass rate).
2. 2017-2018 Academic Year: 3 students took the FYLSX, with 2 passing (67% pass rate).
3. 2018-2019 Academic Year: 7 students took the FYLSX, with 4 passing (57% pass rate).

119. The reported pass rates are detailed below Pass Rates for California Bar Exam Pass Rates:

1. 2017 Graduates: 8 students graduated, with 4 passing the Bar Exam (50% pass rate).

2. 2018 Graduates: 7 students graduated, with 3 passing the Bar Exam (42.9% pass rate).

3. 2019 Graduates: 3 students graduated, with 2 taking the Bar Exam but not passing (0% pass rate).

4. 2020 Graduates: 2 students graduated, with 1 passing the Bar Exam on the first attempt (50% pass rate).

120. PLAINTIFF believes based on experience and credible report that his Fall 2019 cohort began with 22 students; 2 passed “timely” in 2020. No additional passers from this cohort have been reported as of 2023.

121. On May 7, 2021, Defendants SPIRO, SILBERGER, PENA, GONZALEZ, met with Sarah Wild, a fundraising coordinator, to discuss a fundraiser held earlier in the week yielding \$29,100 in donations.

122. The meeting was held via Zoom. In that meeting the DEFENDANTS authorized a “Thank You” note to donors stating that, “100% of proceeds from this event will help PCL to advance the rights of those underserved by the legal profession --such as of people of color, people of low and modest income, LGBTQIA+, immigrants, the disabled, the unhoused, rank and file workers, tenants and victims of police abuse -- by turning out lawyers from similar demographic and economic backgrounds.”

123. The letters were to be signed and were signed by either and only PENA, GONZALEZ, or SPIRO.

124. Plaintiff has no evidence nor reason to believe that a single penny of these funds was used towards the stated purpose and his initial requests and final demands for an accounting have gone unanswered.

125. On August 2, 2021, at 10:57 am SPIRO sends email to Nancy Popp stating, “ Nancy, I had to change your transcript by hand”, further explaining that “I couldn’t change it in Populi because I would have to change the units for all first year students, and PCL hasn’t decided to do that.”

1. Important to note are the host of other metrics on the PCL transcript changed by the units adjustment including: “earned credits” per course per quarter, total earned credits per course per quarter, “points” per course per quarter, total points per quarter, total earned credits for the academic year (at the bottom), total points for the academic year (also at the bottom)

126. On August 3, 2021, PLAINTIFF sends LEONARD request for clarification regarding the unit issuance and transcript correction requirements.

127. On August 3, 2021, LEONARD sends in response “In addition to this email, you also sent a prior email discussing clarification. Could you resend a copy? We are having a technical issue with the first email.” The email she is referring to is believed one sent in 2020.

128. On August 3, 2021, at 5:13 pm, SPIRO sends to group including GONZALEZ and PLAINTIFF an email from SPIRO to LEONARD, sent earlier with the subject “RE: explanation to another law school of units on Peoples College of Law's transcripts”. There does not appear to be a confirmation from LEONARD, but in what he states sent SPIRO writes to her:

“I explained that I have been requested to send to another law school, along with students’ transcripts, a notation or attachment explaining PCLs designation of quarter courses as 2 units, not three. I said I was thinking of a letter from me that would accompany the transcript rather than something attached to the transcript or written on it. I noted that our quarter courses are 10 weeks, with 3 hours of instruction per week. To use the words of the request I received, it was that the notation or attachment should state “the inconsistent listing of Semester Units for

Quarter Classes and clarifying the correct Quarter Units (3.0) for each 1L Course.” (Note that I disagree with that quoted characterization.)

You explained that I, and Peoples College of Law should not send such a communication, because it could be interpreted as an improper solicitation, by PCL or me, of the other law school to credit the students with more units for the students’ classes at PCL than the other law school would otherwise credit. You explained that for the other law school to do that would be a violation of State Bar rules.

You also explained that the communication could be considered an improper alteration of the transcript.

129. The only part of the statement made in this communication by SPIRO believed true is the STATE BAR’s prohibition on an institution accepting a transfer student and granting units in excess of those awarded at the student’s original school.

1. PLAINTIFF believes the use of the potential for “improper solicitation” as excuse to avoid correction of the issues as telling of the “bad faith” and resistance to comply with the law of the PCL DEFENDANTS since no actual correction would occur on behalf of the PLAINTIFF for another year, roughly June 2022.

2. PLAINTIFF submits this as additional evidence of his specific targeting, as other students had their issues, at least in this regard, remedied.

130. On August 3, 2021, Scott Bell and Kevin Clinton, student volunteers acting in their delegated capacity as PCL’s Election Committee sent out a notice of elections to be held August 30, 2021.

131. PCL’s Bylaws Section 4.14 informs that during a "Members" term of service on the “Community Board”, the member is deemed an officer of the corporation.

132. August 31, 2021, SPIRO sends email to group including SARINANA, TORRES, GONZALES, VIRAMONTES, and PENA explaining PCL's academic scheduling and potential student issues: "If they don't enroll as 3Ls this fall, i.e. now, and they want to continue their law school studies at PCL, there's a problem with them skipping only one year, i.e. skipping this academic year. The 2Ls and 3Ls take the same courses every year, so the courses for them rotate every other year. Thus, if they don't enroll this year but resume the year after, the 3L courses would be the same ones they took this past academic year, i.e., in 2020-2021. A student can't get credit for the same course twice, i.e. can't get credit for repeating a course. Thus, either they would have to skip two years, OR they PCL might be able to accommodate them in the following way: They could take 4L courses next academic year, and then take the 3L courses in their final year. One problem with that is that the 4L courses include one that is Bar Exam prep for the full year. But PCL might be able to replace that with an elective or two."

1. PLAINTIFF believes the 4L curriculum was not necessarily a "rigid offering" and that the school would ordinarily offer a 4L curriculum with electives and had a duty to do so in this case or attempt cure in "good faith".
2. PLAINTIFF believes that this also demonstrates the PCL DEFENDANTS constructive and express knowledge of the risks to the student in "missing classes" and the power disparity in the relative positions of the PLAINTIFF and PCL.

133. On September 6, 2021, Robert Skeels, Esq., a volunteer Professor, and PCL graduate emails a brief report to the Board "*Regarding Peoples College of Law Awarding of Course Units and Students Transferring Out*" ultimately recommending change to the longstanding practice.

134. September 7, 2021, GONZALEZ issues an email stating “This has already been researched” and “would require” an application for "major change". PLAINTIFF after diligent search was unable to locate and is unaware of any evidence corroborating this policy claim.

135. September 8, 2021 PENA sends an email to the group, indicating that in an “extensive email chain” between SPIRO and LEONARD she “stated that “we must not unilaterally change the unit allocations since it would constitute a major change.” PLAINTIFF has found no evidence that this is the case of statute or interpretive guideline. In the same email, PENA asks if PLAINTIFF has received any response from his inquiry to LEONARD.

136. October 15, 2021, Election results, confirming PLAINTIFF’s win, are published by the Committee’s volunteer Chair Scott Bell.

137. On October 17, 2021, PLAINTIFF based on personal experience and communications, GONZALEZ, without prior warning and with prior vote taken prohibiting such activity, records video of meeting for the fourth time as GONZALEZ and PENA attempt to legitimize invalidation of PLAINTIFF’s election to the Community Board.

138. October 19, 2021, PLAINTIFF sends demand for video recordings and documents and alleges the violation of PC 632, believed to be a recording privacy violation to SPIRO, PENA, and GONZALEZ.

139. October 25, 2021, PLAINTIFF sends email to SPIRO after discovering that SPIRO, at that time thought to have “retired” is constructing a Director’s and Officer’s (“D&O”) insurance policy application without any input or knowledge beyond that of the “EC”, including PENA and GONZALEZ.

140. October 25, 2021, GILLINS in response to the email chain of the same date states “I would like to clarify, I am not a member of the executive committee, or any other committee. If the election

1 results are being questioned, or contended, I am not clear that I am even a member of the board until
2 the election committee submits it's formal determination and report in writing.” No report was ever
3 produced, and PLAINTIFF understands GILLENS has served and continues to serve presently.

4
5 141. October 27, 2021, in response to a request for progress, LEONARD informs PLAINTIFF

6 142. October 31, 2021 PLAINTIFF send email to GONZALEZ, SARINANA, and SPIRO to facilitate
7 greater responses related to the student complaints he was fielding separate from his own concerns.
8 GONZALEZ states in the email “I don’t know what “complaints” you are referring to...” and refers
9 me back to the use of the “proper channels” the students are all complaining about. At this stage the
10 transcript issues were an open and public topic for discussion.

11
12 143. November 19, 2021 GONZALEZ issues a “letter of resignation” dated November 14 and
13 effective November 20, 2021 to the PCL Membership. In the same letter she gaslights and maligns
14 the PLAINTIFF, stating she suffered from “repeated abusive and oppressive behavior” causing her
15 “severe emotional distress” as the result of “abhorrent behavior” and encouraging the Board to take
16 “decisive action against” the PLAINTIFF. GONZALEZ and PLAINTIFF have never been in the
17 same room, as all interactions were remote via email or Zoom between the parties during this time.
18 PLAINTIFF was the only party mentioned and the President of the school issued what was
19 essentially a targeted command to “attack”. GONZALEZ completed the letter adding the tagline
20 before her signature, “in solidarity”.

21
22 144. The letter was distributed to the entire membership, more than 100 individuals including a
23 substantial number of attorneys and his classmates, attached along with minutes and the meeting
24 packet. The letter was not removed from the portal as of Plaintiff’s last access believed June 2022. It
25 is believed this letter violated the school’s own disclosure and privacy policies.
26
27

145. November 19, 2021, GONZALEZ, PENA, SPIRO, SARIN and BOUFFARD and ALL PCL DEFENDANTS issue or cause to be issued notice of a BOARD MEETING to occur 11:00 am November 21, 2021.

1. Included are draft Board Meeting minutes with an erroneous account of the election events and results likely designed to legitimize the improper conduct of the elections.

146. On November 21, 2021, ALL PCL DEFENDANTS are believed to have met while blocking PLAINTIFF's participation as a rightfully elected incumbent and without appropriately obtaining his resignation or curing the issues with the election. This meeting took place remotely, over Zoom, and thus is believed to

147. On November 23, 2021, Plaintiff received an email from Kevin Clinton containing newly proposed "retroactive rules" that effectively discouraged complaining to the STATE BAR and mandated routing student complaints through "proper channels."

148. PCL DEFENDANTS devised a series of rules to punish and expel PLAINTIFF from the educational institution in retaliation for his compliance activities. .

1. New PCL Student Handbook Rules 1.1.13 & 1.1.14 were improperly created and then claimed ratified by the Community Board November 21, 2021.
2. Improper because 1.by Board composition was constructively and expressly known contested; the rules clearly support retaliatory conduct to intimidate and create "plausible" grounds for other acts against the Plaintiff to discourage further engagement or escalation with the STATE BAR or others about his unfortunate treatment.
3. This would likely "chill" any other student disagreements.

4. When PLAINTIFF sends note to the PCL DEFENDANTS on the same day regarding the possible appearance of the rules as retaliatory, SPIRO responds.

5. PCL DEFENDANTS are expressly aware of GULSR 5.1 and the STATE BAR's promise, as policy, to not intervene in cases of student disagreements with their institutions. This policy was steadfastly maintained by STATE BAR DEFENDANTS as it related to the student, for even when the student complained of abuse or criminal conduct by the school administration.

149. PLAINTIFF is informed and believes on credible report that the "proper channels" in the rules language refers to the EC, at this time including PENA and SARIN and BOUFFARD. These rules likely violated STATE BAR rules and laws as they facilitated the punishment of reporting misconduct.

150. PCL's conduct with LEONARD and the "formal dismissal" of PLAINTIFF's initial complaint to the STATE BAR by SPIRO and GONZALEZ suggests that PCL DEFENDANTS were acting to "silence" PLAINTIFF and avoid accountability for shared misconduct.

151. November 24, 2021, PLAINTIFF send email to SPIRO, CHING, and the general address of OGC which PLAINTIFF purposed to alert and make STATE BAR aware of the perceived problems with this new policy. Here the policy threatened ad hoc discretionary expulsion by the EC for its violation, i.e., failing to make complaints or inquiries through the "proper channels", including inquiries or complaints to law enforcement! The offender was summarily accountable to the EC and any violation was subject RETROACTIVELY to the rule.

152. The policy also appears to violate Section 16 of PCL's Bylaws governing Disciplinary Procedures which requires an investigation by an Ad Hoc Committee of any conduct by an individual that "endangers" or actualizes loss to PCL the entity.

153. On November 28, 2021, PLAINTIFF issues request for removal of GONZALEZ's derogatory letter distributed to the membership along with non-spoliation notice attached to the email to PCL DEFENDANTS SPIRO, PENA, GILLENS, GONZALEZ, DUPREE, SILBERGER, and the other PCL defendants asking the letter to be taken down from the website. The letter was issued during heightened angst and outrage over misogynistic misconduct associated with and eventually confirmed in court attached to public figures like Harvey Weinstein and Bill Cosby.

154. Classes were still held remotely at the time, with schedules, assignments, and whatever grades made available being posted in the same portal likely accessed daily by the majority of active students.

155. STATE BAR's non-interference policy and LEONARD's delayed response inform that LEONARD was following a clearly stated policy in her official capacity. The problem here is that for this to be the case it means that STATE BAR policy can allow for private institutions to take open advantage of students without any fear of regulatory accountability because the institution knows that it can do whatever it desires in wanton fashion and the STATE BAR will refuse to offer aid or protection.

156. On December 10, 2021, CHING acting in her official capacity as Assistant Director, Admissions and LEONARD's immediate supervisor sent a letter via email indicating that ULSR 4.206 (the Committee does not intervene in disputes between students and their law schools) and ULSG 1.6 (Neither the Committee nor any office of the State Bar of California will intervene in disputes between students and their law schools) "require that the State Bar refrain from involving itself in any dispute you may have with PCL. Thus, the State Bar is unable to provide you any further response."

157. LEONARD'S "change in position" after communication from GONZALEZ believed by PLAINTIFF sent in email on November 14, 2021, supports the claim of PCL's improper conduct, because LEONARD had communicated her near completion of a response to PLAINTIFF. The STATE BAR DEFENDANTS concerted action is further bolstered when CHING presents the same suspect policy statements.

158. LEONARD's disclosure of confidential information to PCL indicates that the State Bar assisted PCL in avoiding accountability for its misconduct, violating Plaintiff's constitutional rights.

159. PCL's conduct with LEONARD supports the argument that both PCL and the State Bar are accountable for violating Plaintiff's constitutional rights under the state action doctrine.

160. . "Rule 1.6 governs "student complaints".

161. The STATE BAR's intentional avoidance of procedural law and its failure to manage complaints and enforce regulations support Plaintiff's claims of breach of fiduciary duty and violation of legal rights.

162. Fall 2020 PCL accepted at least one out of state student, based on personal experience and credible report, to be a student from Arizona.

163. Rule 4.246 (F) governs the requirements for fixed facility law schools like PCL must meet prior to providing law study credit for a fixed-facility law school program or class offered more than ten miles from the site of the law school, outside California, or in multiple locations; viewed under that is a "major change" because it is INTERSTATE COMMERCE.

164. The State Bar's conduct allowed conflict of interest to occur unchecked, which failed to protect the plaintiff and the public, and prolonged harmful misconduct.

165. The State Bar's use of “appeals of authority” to obscure questions or the appearance of regulator misconduct can be seen as substantial factors in potentially violating the plaintiff's First and Fourth Amendment privileges.

166. PLAINTIFF asserts that the STATE BAR’s non-intervention policy conflicts with the intended statutory protections of the California legislature, and it exemplifies a group agreement or a coordinated mindset. Here, LEONARD, CHING, WILSON, DAVYTYAN, HOLTON, KRASILNIKOFF, SOWELL, TONEY, KRAMER, CHEN and others assert AND enforce the policy as valid while PCL and STATE BAR fail to fulfill the statutory obligations ALL DEFENDANTS are believed to knowingly assumed.

167. Plaintiff believes that public officials owe duties to the public as “public servants” even if those duties were assumed as unpaid volunteer, under employment or by appointment.

168. Plaintiff’s allegations cover a span of time and involve many defendants, but the claims do not presume that all defendants were uniformly became aware or capable at the same time.

169. Plaintiff’s allegations cover a span of time and involve many defendants. Claims made here do not presume that ALL DEFENDANTS were uniformly aware or capable of equal substantive response during this period. Plaintiff will show that ALL DEFENDANTS were adequately noticed or otherwise were aware of PLAINTIFF’s circumstance and the issues, and that even when this was achieved the parties in the aggregate “doubled-down” on additional harmful conduct or failed to comport conduct reasonably to the circumstances.

170. The STATE BAR is a regulatory agency responsible for overseeing the practice of law in California. Operating under the authority of the California Supreme Court, its responsibilities

1 include rulemaking and regulation of attorney admission, discipline, and supervision processes in the
2 state.

3 171. As per statute and credible sources, the State Bar's mission is to protect the public as its highest
4 priority, regardless of conflicts of interest, and to promote access to justice through the regulation of
5 the legal profession (BPC §6001.1). However, the plaintiff's personal experience has not aligned
6 with this information.
7

8 172. The State Bar requires students attending registered fixed-facility schools to take an exam, the
9 FYLSX, to verify adequate preparation. Pass rates for the FYLSX and the Bar Exam have been
10 notably low, with students' perceptions of their chances likely influenced by their law school grades.
11

12 173. The State Bar's use of a single test after a program requiring three additional years of study
13 creates an environment that allows schools like PCL to act in predatory ways. Students may be
14 improperly admitted and blamed for their failure, never realizing they should not have been accepted
15 in the first place.

16 174. PCL defendants, including SPIRO, SARIN, BOUFFARD, GILBERGER, DUPREE,
17 SARINANA, GILLINS, FRANCO, ZUNIGA1 POMPOSO, and TORRES, are believed to have had
18 board meetings and continued their "pattern" of operation, driving the perception of improved long-
19 term compliance when the Board itself is not.
20

21 175. The STATE BAR ACT prioritizes the protection of the public as the highest priority no matter
22 the conflict of interest per CBPC §6001.1
23

24 176. . The State Bar has a duty to exercise good faith and make use of reasonable business
25 judgment in its regulatory and administrative operations.

26 177. The State Bar has a duty to exercise good faith and make use of reasonable business judgment in
27 its operations related to students. However, the evidence suggests that the State Bar's use of a single
28

test after completing a program requiring three years of additional study may provide cover for negligent or intentional administrative failures by organizations like PCL.

178. PCL is a mandatory active market participant in the legal services marketplace, operating under the regulatory umbrella of the State Bar as a law school.

179. BPC 6060.7 mandates that the State Bar is responsible for the approval of all law study degree programs, whether registered with the State Bar or not. However, the State Bar appears unaware of and does not enforce this provision for programs at larger private institutions.

180. PCL conducted fundraising events promising that “100% of the funds would be used towards the production of attorneys”; there is no evidence ever provided to the PLAINTIFF, even after he demanded production of the documents, that a single penny went toward the promised purpose .

181. PCL is subject to mandatory fee-based regulation, including registration and annual licensing, by co-defendant and statutory regulator, THE STATE BAR OF CALIFORNIA. The State Bar of California is responsible for regulating PCL's provision of postsecondary legal education services, ensuring academic program and Juris Doctorate as a registered, non-accredited fixed facility law school.

1. Along with PCL paying mandatory registration fees to the STATE BAR, students are also required to register and pay a fee within 90 days of starting law school.
2. Plaintiff argues that the fee for purposes of registration and the ongoing maintenance of records maintained by the STATE BAR is a service contract; although there is no “negotiation”, market participation for admissions requires the payment of initial fee. In addition, given the nature of the governmental organization charging the fee, the inability for

1 students to negotiate, and the Plaintiff's "reasonable" lack of expectation that either one of
2 the Defendants would "breach" the terms under PCL's matriculation and education contract
3 or STATE BAR's collection of fees for the administration of student progress and fitness for
4 admissions. Plaintiff argues an "implied warranty" as the administration system should be
5 adequate to "uncover "foreseeable issues of clerical nonconformance to prevent students
6 from suffering from reporting errors when the available remedies for failures are difficult to
7 obtain.
8

9
10 182. Plaintiff's information regarding the mandatory duties and priorities of all STATE BAR
11 agents, employees, appointees, and trustees is sourced from the California Business and Professions
12 Code (BPC) and the STATE BAR's web portal.
13

14 183. The STATE BAR's mission, as stated on its website, is to protect the public and
15 includes licensing, regulation, and discipline of attorneys; advancing ethical and competent law
16 practice; and supporting efforts for greater access to and inclusion in the legal system. Plaintiff
17 reasonably expected the STATE BAR to uphold its mission and protect the public interest.
18

19 184. Upon learning of misconduct within the STATE BAR, Plaintiff expected public
20 officials to report the misconduct to appropriate authorities and take steps to ensure the misconduct
21 was stopped and not repeated.
22

23 185. The STATE BAR has a mandate to protect the public interest, even if it requires
24 disciplinary action against its own attorneys or employees. Directors or officers who fail to fulfill
25 this duty may be subject to legal action.
26

27 186. Prior to 2018, the STATE BAR adopted a "non-interference" policy between students
28 and their academic institutions.

187. Plaintiff has been unable to identify any source of authority granting the STATE BAR the power to define or elect individuals or groups as ex publica for policy establishment or performance of its obligations. Additionally, Plaintiff questions the authority of the STATE BAR to charge administrative fees directly to student members of the public.

188. Licensees, sworn attorneys meeting legislative or judicial criteria, are considered "Members of the Bar" and not "Members of the Public" when acting as officers of the court, as defined by statute.

189. Plaintiff's academic performance, with average grades ranging from A+ to B- in the first two years of law school, demonstrates his capability and commitment to his education. However, due to the coordinated harassment and retaliation by Defendants SPIRO, PENA, SARIN, GONZALES, and others, Plaintiff's grades suffered significantly in the final quarter of his 3L year, providing further evidence of foreseeable harm caused by the Defendants' misconduct.

The STATE BAR's adoption of a policy that conflicts with its statutory mandate and regulatory obligations to protect the public raises concerns about its compliance with 14th Amendment Equal Protection constitutional obligations. Plaintiff believes that any conduct in line with the "non-interference" policy is a willful neglect of the STATE BAR's protective duties.

Directors and officers of the California State Bar must ensure the organization operates in accordance with its mission and objectives, upholds the standards of the legal profession, and protects the public interest.

190. Public officials, when made aware of misconduct within their organization, are expected to report such misconduct to appropriate authorities, ensure it is investigated and addressed, and implement new policies or procedures to prevent similar misconduct from recurring.

1 Conduct that the public would disapprove of includes creating or supporting mechanisms that cause
2 harm to most participants, or intentionally delaying the discovery or resolution of such
3 circumstances.

4
5 191. The California State Bar, as a regulatory agency overseeing the practice of law, has a mandate
6 to protect the public interest, even if it requires disciplinary action against attorneys or employees
7 within the organization. Failure to fulfill this duty may result in legal action.

8
9
10 192. Plaintiff asserts that every instance of conduct implying a failure to act in good faith likely fails
11 to meet the “reasonable” standard expected to be applied by individuals in similar circumstance. IF
12 the conduct fails to “meet or exceed” the reasonable standard, then the conduct is likely arbitrary or
13 capricious consistent with those terms of legal art, thus serving as evidence to establish the mens rea
14 or scienter requirements attributable to the Defendants. This evidence, combined with other available
15 facts, is believed sufficient to establish a prima facie case for the violation of Plaintiff's rights.
16 Defendants' overt support for improper purposes and intentional disregard of their obligations create
17 a hostile environment that jeopardizes public protection and causes harm.

18
19 193. All Defendant schemes are substantively advanced through electronic transmission of meetings,
20 documents, or funds, often crossing state lines and involving email or cellular communication.
21 Plaintiff's knowledge of these actions comes from direct personal experience.

22
23 194. Plaintiff alleges that the named Defendants and DOES 1 through 88 were authorized or permitted
24 by each other to act as agents of one another. Actions taken by them were done in the capacity of
25 such agency or under the "color" of such agency, or as individual acts purported to be conducted.

195. Upon credible information, belief and personal experience, PLAINTIFF asserts all Defendants are directly responsible for these events and are liable to Plaintiff for the injuries inflicted and resulting injuries and damages incurred in good faith.

196. PLAINTIFF asserts that because these acts are reasonably and foreseeably likely to result in injury to similarly situated students and those demonstrably vulnerable with extreme barriers to pursuing legal remedy because most students in similar 1L circumstance do not pass the FYLSX and thus cannot continue in PCL's or ANY law schools Juris Doctorate program for purposes of bar admission and licensure.

197. PCL focuses recruitment on students from non-traditional academic backgrounds and pre-identified communities suffering from intractably limited access to legal services, which PLAINTIFF believes is an intentional tactic to avoid possible negative attention often drawn by lawsuits by selecting victims, for each student was destined to receive unfair unit awards, less likely to desire or "have the stomach" for a long and arduous legal fight.

198. On April 8, 2022, at 8:30 a.m. SPIRO appears in front of the Honorable Dean J. Kitchens for case 22AVRO00363, at hearing in Department A-10 of the Superior Court appearing as counsel for himself and PENA, who is present as well.

199. PCL, the Corporation although properly served fails to appear; strangely SPIRO has indicated he represents the corporation as counsel as well.

200. The Court found that it was “not the appropriate forum for what Petitioner is seeking” and ordered the case “dismissed without prejudice”.

201. Plaintiff upon credible information believes that California does not recognize “forum non conveniens” nor does it allow case dismissals solely for failure to satisfy the local rule.

202. SPIRO requests attorney’s fees and filing costs in the amount of \$27,000; he is granted. To be paid directly to him, \$5,435.00.

193. On June 8, 2022, SPIRO sends letter to lawschoolregulation@calbar.ca.gov on his professional letterhead in his capacity as PCL’s counsel. In that letter SPIRO states that PCL was “more than 90% in compliance” with the mandatory recommendations in the State Bar inspection reports.

194. SPIRO specifically states that PCL was complaint with Guideline 2.2(B), governing refunds in certain contexts, because it “had revised the policy accordingly.” A copy of the letter is available on the State Bar’s website here:
(<https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000029268.pdf>) .

195. June 17, 2022, STATE BAR DEFENDANTS including LEONARD, KRAMER, CHEN, and others review in recorded meeting during the “Educational Standards” agenda item “Attachment O-406. Action on Progress Report Related to Periodic Inspection and Notice of Noncompliance - Peoples College of Law”, a copy of which is available on the STATE BAR’S web site here: (<https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000029315.pdf>)

196. On June 21, 2022, the STATE BAR acknowledged in a published letter that they were aware of the programs' "non-compliance" and could have issued notice effective 2020.

1 197. On March 24, 2022, between 6:00 pm and 7:00 pm, DEFENDANT SARIN sent an email to
2 BOUFFARD and PEÑA in response to PLAINTIFF's earlier email requesting transcripts.

3 198. On March 24, 2022, at 12:32 pm, PLAINTIFF sent an email to BOUFFARD and PEÑA in
4 response to an earlier email requesting transcript.

5 199. On March 25, 2022, at 12:32 pm, SPIRO, acting as outside counsel for PCL, sent an email
6 response to PLAINTIFF's earlier email requesting transcripts.

7 200. On June 2, 2022, SPIRO, as counsel for PCL, sent an email to ALL PCL DEFENDANTS,
8 excluding GONZALEZ, requesting that PLAINTIFF direct all communications related to this matter
9 to him, implying the group's united front.

10 201. On July 8, 2022, PCL Defendants, through SPIRO and operators of Enterprise P, sent notice to
11 Plaintiff of their intent not to provide classes or curriculum for PLAINTIFF's 4L year.

12 202. On July 9, 2022, agents and operators of Enterprise P, believed to be SPIRO, PEÑA, and
13 ZUNIGA1, placed the notice in the USPS bailment for certified mail delivery to Plaintiff (id 7022
14 0410 0002 9113 6086).

15 203. PCL failed to submit accurate records timely to the STATE BAR on Plaintiff's behalf which
16 they relied upon to make determinations about the PLAINTIFF and his academic status when they
17 were the sole available source of transcript information.

18 204. In early August 2022, without accurate transcripts or viable transfer options, PLAINTIFF
19 requested PCL to apply for a "Special Circumstance Exemption" under GULSR Section 5.6,
20 allowing a maximum of 10% of 4L students to be exempted for "unusual circumstances." PEÑA sent
21 the letter on August 9, 2022, via email.

22 a) The guideline rules inform that applications are processed by the "Educational Standards
23 Department in the Office of Admissions."
24

b) August 5, 2022, PLAINTIFF receives coverage denial letter from ANV related to PCL's D&O insurance, a true and accurate copy, previously marked as EXHIBIT DNO-1 ANV can be located lodged on the Court's web site here: (<https://ecf.cacd.uscourts.gov/doc1/031139584650>)

205. On September 1, 2022, LEONARD sent an email with an attached letter denying the request, believed to be produced by HOPE under the direction of LEONARD, CHING, and NUNEZ, pending discovery. The denial indicated that PLAINTIFF could "use the attached form **to submit another Proposed Plan of Law Study** which complies with the Admission Rules for our review. **The additional one year of law study must be completed in a Juris Doctor degree program recognized by the Committee. You must also clearly indicate the beginning and ending dates, including month, day, and year for each year of study, and the total number of hours/credits of study for each course.**"

206. Here, PLAINTIFF believes based on personal experience and credible report that LEONARD, HOPE, and admissions staff, including MCFARLAND and WONG along with LEONARD's direct chain of supervisors, including CHING, NUNEZ, and WILSON either took no action or supported the continued misconduct. Expected oversight and intervention from the OGC, including HOLTON, DAVYTYAN, GRANDT was not apparent.

207. September 1, 2022, SPIRO sends email to PLAINTIFF with the subject "start right now contacting other law schools even though you might have done so earlier this year", further stating, "in view of the State Bar's letter..." it continues, "you should start right now contacting other law schools... to see if you can enroll in them for the 2022-2023 academic year."

208. September 1, 2022, PLAINTIFF sends to WILSON, CHING, LEONARD, HOM, SPIRO, PENA, and others an email as Notice of Violation, including separate attached non spoliation request

entitled “thillevidpresltr09012022.pdf” an accompanying legal justification document and a copy of his transcripts dated August 29, 2022. A copy of the email is available on the Courts website as Document 17 here (<https://ecf.cacd.uscourts.gov/doc1/031139584971>) .

209. The last lines of the letter terminate “Please understand, the initial issue that gave rise to this could have very easily been resolved by the parties. Instead, they were wrong, they knew they were wrong, and they consistently doubled-down on unlawful conduct for a protracted (>4 years) period of time. Please provide confirmation of compliance with the preservation request at your convenience but no later than 9/9/2022, as time is known to be of the essence by all parties.” The STATE BAR never confirms compliance with the preservation request.

210. Over 300 days had passed without any denials or curative conduct from any of the DEFENDANTS related to PLAINTIFF’s notices and requests for assistance.

211. Plaintiff also notes the many Executive JD or non-licensure programs in the field that require 2 or 3 years of study.

212. STATE BAR conduct played a role in PLAINTIFF’s dire circumstance, yet the defendants attempt to avoid sensible recusal or conflict management, leaving PLAINTIFF to rely on the “good faith and fair dealing” of those they knew or should have known were compromised.

213. PLAINTIFF communicates with HOPE in the interim, who is believed to perform this review under LEONARD’s explicit authority. HOPE states she cannot assist and refers PLAINTIFF back to LEONARD.

214. September 3, 2022, SPIRO sends email with the subject “tuition agreement” as solicitation for PLAINTIFF’s execution and return of a payment agreement for his 4L year. PENA and ZUNIGA1

are carbon copied. It is clear PLAINTIFF is out of time with nowhere to go. Attached is an additional copy of a “new” Student Handbook”.

215. September 15, 2022, SPIRO began an email exchange to PLAINTIFF with cc: to PEÑA, ZUNIGA1 and LEONARD explaining that if he gave “consent, PCL is permitted right now to change your status in your previous Property and Remedies courses from credit to audit, which would enable you this academic year to take those same two courses for credit.”
- a) Plaintiff is informed and believes upon credible evidence that this to be in direct violation of STATE BAR guidelines, that expressly prohibit taking courses for credit twice.
 - b) Plaintiff believes this is evidence of conspiracy, in that the “offer” was presented uniformly and in concert.
 - c) PLAINTIFF believed this was an inappropriate solicitation because the rules for law schools seem to preclude encouraging misrepresentation or falsifying records and repudiated.
 - d) Plaintiff believes this reflects the intent to create or alter records or misrepresentation by SPIRO and LEONARD because both are acting in their “official capacity”, i.e., LEONARD as Principal Analyst left responsible for compliance oversight of PCL and SPIRO presumably as pro bono counsel.

216. September 26, 2022, PLAINTIFF issues request for antitrust determination via email to DAVYTYAN, WILSON, and others. The process and considerations for making such determination have been predetermined for STATE BAR in an administrative order dated September 20, 2017, prior marked as EXHIBIT AO-1, and identified as Document #13 on the docket. A true and correct copy of the document can be found on the Court’s web site: (<https://ecf.cacd.uscourts.gov/doc1/031139584790>).

217. October 18, 2022, PLAINTIFF sends email to HOPE with carbon copy to SPIRO, ZUNIGA1, PENA, FRANCO, GILLINS, CHING, LEONARD, requesting her outreach to the school that a proposed plan, where PLAINTIFF paid a fee to BARBRI and that curriculum successfully undertaken under PCL's supervision would satisfy the STATE BAR's claimed outstanding requirements for degree grant. SPIRO responded in an email of the same date that was sent at 4:37 p.m. asking "Nathalie" to clarify "what obligations and expenses there would be" for PCL.

218. November 7, 2022, PLAINTIFF sends email to SPIRO with carbon copy including HOPE, ZUNIGA1, PENA, FRANCO, GILLINS, CHING, LEONARD, SARINANA, WILSON, GONZALEZ and the OGC requesting status on the administrative oversight of the BARBRI course.

219. SPIRO responds November 8, 2022, denying that "the Bar requires submission of a proposed plan" from the school and citing the prior plan I submitted ; given the clear administrative context, that a law school would be required to supervise the student's participation because BARBRI is not registered as a law school and PCL was, by the design of the DEFENDANTS, the only "reasonably" available institution.

220. November 17, 2022, at 10:39 am, PLAINTIFF submits via Zoom to the STATE BAR Audit Committee meeting, chaired by SHELBY and attended by TONEY, DAVYTYAN, WILSON, BROUGHTON, CISNEROS, KNOLL, CHEN, SHELBY, SOWELL and staff member Justin Ewert. Plaintiff believes based on credible report and experience that other, currently unknown, STATE BAR staff or appointees were present as well, and seeks leave for further discovery. PLAINTIFF used the allotted time to inform the Board of Trustees of the likely issues with STATE BAR policy related to audits and the records-selection process used by the STATE BAR that is believed to facilitate misconduct or its concealment in a manner that raises antitrust and transparency concerns.

A true and accurate copy of the relevant meeting video can be found here, published by the STATE

1 BAR for purposes of compliance with the Brown Act on YouTube's web site here:

2 <https://youtu.be/ON4tx5ODdGA?t=234>.

3 221. November 17, 2022, at 12:49 am, PLAINTIFF submits public comment via Zoom at the STATE
4 BAR Board of Trustees meeting where AYREPETYAN, HERNANDEZ, TONEY, DAVYTYAN,
5 DURAN, WILSON, BROUGHTON, CISNEROS, KNOLL, CHEN, SHELBY, SOWELL and
6 currently unknown STATE BAR staff members. PLAINTIFF uses the allotted time to inform the
7 Board of Trustees of the likely issues with PCL and how STATE BAR policy is believed to facilitate
8 the misconduct in a manner that raises antitrust concerns in the entire marketplace. A true and
9 accurate copy of the relevant meeting section can be found here, published by the STATE BAR for
10 purposes of compliance with the Brown Act on YouTube's web site here:
11

12 https://youtu.be/dcBeUhm_f8Y?t=1967.

14 222. December 21, 2022, at 8:30 am, PLAINTIFF sends email with the subject line of "Public
15 Comment; Notice of Violation and Imminent Filing; Request for Antitrust Determination;
16 Supporting Documents" to DAVYTYAN, DURAN, WILSON, HOLTON, LEONARD,
17 RANDOLPH, HERSHKOWITZ, CARDONA, HOM, MAZER, CRAWFORD, XIANG, HOPE,
18 CHING, and the general emails of the OGC, OCTC, CPO, CFO, CAO, KNOWELS, HERMAN,
19 KRAMER, CARDONA, STALLINGS, CISNEROS, SHELBY, TONEY, AYRAPETYAN, CHEN
20 and other DEFENDANTS as well as the designated email for antitrust inquiries, including State Bar
21 employees Teresa Ruano and Joy Nunley. Attached to the email are the following documents: a
22 "Request for Antitrust Determination" accompanied by "corroborating" documents identified as: (1.)
23 DRAFT PLEADER 12212022; (2.) A copy of the preservation letter was noticed and sent to both
24 PCL and STATE BAR; assurances have been requested from both parties to no avail.; (3.) A copy of
25 the legal basis and justification for such letters, as the duty to preserve evidence was fairly believed
26

1 by the plaintiff to attach when the unlawful act was committed but definitively when it was known
2 likely to end up going through litigation. (4.) Timeline of events (5.) Election Timeline (6.) Nancy
3 Popp's, draft Election Committee Report presenting evidence of conspiracy; (7.) Various email
4 chains PLAINTIFF asserted demonstrative of wanton and clearly culpable conduct, with awareness
5 and knowledge of misconduct for over a year at the "highest levels" of the organization; (8.) A
6 statement of determination and a D7O insurance denial of claim provided to support Plaintiff's status
7 as officer of the Corporation and unlawful ouster.; (9.) A document entitled "Opposition #1",
8 submitted by SPIRO and PENA on behalf of PCL to the court that included erroneous information to
9 the court that the relevant PCL Defendants failed to correct when timely noticed.

10
11 223. December 21, 2022, at 10:30 am, PLAINTIFF sends a duplicate email with the same subject line
12 of "Public Comment; Notice of Violation and Imminent Filing; Request for Antitrust Determination;
13 Supporting Documents" to SPIRO, DURAN, HOPE, CHING, and the OGC's designated email for
14 antitrust inquiries, again including State Bar employees Teresa Ruano and Joy Nunley as well as the
15 earlier attachments.
16

17 224. December 22, 2022 at 8:56 am, AYRAPETYAN confirms receipt and plans to share "the
18 attachments and email" with the Board of Trustees after completing Day 2 of the meeting.
19

20 225. On January 20, 2023, RANDOLPH, in her capacity as secretary for the Office of General
21 Counsel, sent the first unsigned antitrust determination to plaintiff with OGC masthead, dated
22 January 20, 2022 and identified as "ANTITRUST DETERMINATION 2023-0001" from unsigned
23 author.
24

25 226. On January 24, 2023, SOWELL, SHELBY, WILSON, CHEN, DAVYTYAN, and
26 AYRAPETYAN attended a recorded "Ad Hoc Committee Meeting" via Zoom with PLAINTIFF in
27

attendance. SOWELL appears clearly familiar with PLAINTIFF's issues, announcing shortly before PLAINTIFF's speaks something akin to "Ok, Mr. Hill, You know the drill!" in affable tone.

227. February 3, 2023 PLAINTIFF sends request to AYRAPETYAN and SOWELL, including the general OGC email and DAVYTYAN's individual, with a request for the meeting minutes of that occurred the prior January 24th, 2023, as they were not placed online for review.

228. On February 4, 2023, PLAINTIFF sent an email subject "NOV - Ongoing violations of CBPC 17200 and 17500" to DURAN, NUNEZ, WILSON, BROUGHTON, TONEY, SHELBY, CHEN and MAZER; the addresses for the CTC and Admissions were also included. This "NOV" was one of several sent in attempt to resolve these issues. The notice informed the parties PLAINTIFF's theories related to his injuries, why he reasonably believed the issues were valid and likely Constitutional and attempted to give examples of a few of the inherent issues in the essentially "separate but equal" operation of the law school market.

229. On February 8, 2023, KRASILNIKOFF in her capacity as counsel, with RANDOLPH, sent a second noncompliant response to the antitrust determination request, despite being expressly aware of her professional and fiduciary duties. The document is asserted as noncompliant because the OGC did not follow proper procedures to affect its production or its contents misrepresent the facts.

230. Plaintiff learned on credible report that on February 13, 2023, unidentified STATE BAR staff believed to be LEONARD and CHING and possibly others, met with unknown PCL DEFENDANTS, believed SPIRO, POMPOSIO, and PENA to discuss compliance and ongoing issues.

231. On March 22, 2023 POMPOSIO sends to LEONARD, PENA and others a response to outstanding CBE questions, a copy of which can be found on the STATE Bar website here: <https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000030537.pdf>.

a) The 3rd page of the document lists an item identified as "7. The State Bar provided the citation of authority for fee assessment.", continuing to state in paragraph infra, "In addition to ensuring the creating of a 4L program for all students, a key purpose of the meeting was to provide the law school with an opportunity to demonstrate its compliance status with Rule 4.241 in a clear and transparent manner, and to ensure that the law school provides refunds to all students for whom it does not return a copy of a signed and complete disclosure. The law school asked for a request in writing, set forth here, and advised that this week the law school is preparing for finals."

b) Plaintiff here asserts that ALL PCL DEFENDANTS were expressly and constructively on notice, as were LEONARD, CHING, NUNEZ, WILSON, MCFARLAND, WONG, DURAN, SOWELL, KRAMER, and SHELBY.

232. On or around March 24, 2023, STATE BAR DEFENDANTS released a probationary progress report penned to CBE members by LEONARD.

233. As of May 4, 2023, PLAINTIFF still awaits complete and accurate transcripts; an accounting; disgorgement and return of funds; issuance of his degree or the fulfillment of other obligations.

FIRST CAUSE OF ACTION

BREACH OF CONTRACT

(SPIRO, GONZALEZ, POMPOSO, TORRES, SARINANA, BOUFFARD)

234. Plaintiff realleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 233.

235. Here, PCL DEFENDANTS refers to those named and appearing immediately below the cause caption.

236. That PLAINTIFF and PCL DEFENDANTS entered into a contract FOR LEGAL EDUCATION SERVICES August 2019 for a four year program contingent in part upon PLAINTIFF's passage for the First Year Law School Exam;

237. That PLAINTIFF substantially or fully performed the contract requirements, including attending classes, completing assignments, performance of service hours, and paying tuition.

238. SPIRO and PENA and BOUFFARD, and SARINANA, and TORRES and GONZALES as officers and directors had a duty to comport there conduct to the standards required by the implied covenant of "good faith and fair dealing."

239. TORRES, SARINANA, and POMPOSO were all Deans that failed to timely correct, intervene or offer any relevant services or response to PLAINTIFF's outreach and requests for aid when all were constructively and expressly aware of PLAINTIFF's circumstance and their duties.

240. BOUFFARD promised to perform an accounting and return funds collected improperly. He failed to do so.

241. SPIRO, BOUFFARD, and PENA reneged and made PLAINTIFF repay wages lawfully earned.

242. That PCL DEFENDANTS failed in:

- a) making proper and timely mandatory disclosures to PLAINTIFF during academic years 2019, 2020, and 2021, as well as at the time of matriculation contract signing and each year of attendance.
- b) maintaining accurate records and providing timely access to students; c. submitting accurate records timely to the STATE BAR on Plaintiff's behalf.
- c) failed to exercise good business judgment or the appropriate duty of care.
- d) providing PLAINTIFF with access to board meeting minutes, zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer.
- e) producing records in response to a formal demand for documents.

243. That PCL DEFENDANTS:

- a) engaged in violations of fair business and debt collection practices through deceit, misrepresentation, or negligence in documenting, facilitating, and collecting property, including charitable solicitations.
- b) Planned and acted in concert to retaliate against PLAINTIFF by the above and as exemplar created new PCL Student Handbook Rules 1.1.13 & 1.1.14 in November 2021;
- c) continuing to hold meetings and act as a Board in protracted conflict with the Bylaws;
- d) PCL DEFENDANTS planned to repudiate and in fact did fail to comply with the obligation, believed based on the plain language of STATE BAR rules, to provide the student with "4 years" of education consisting of a minimum of "270 hours" each year.

e) STATE BAR DEFENDANTS, including WILSON, DURAN, SOWELL, TONEY, STALLINGS, LEONARD, CHING, HOLTON, DAVYTYAN, CARDONA,

244. That PLAINTIFF was harmed, such as:

- a) facing obstacles in obtaining an accurate transcript from PCL timely.
- b) suffering retaliation, intimidation, and suppression.
- c) being unable to access the necessary documents for his case.

245. That PCL DEFENDANTS' breach of contract was a substantial factor in causing PLAINTIFF's harm, such as: a. hindering his engagement with the STATE BAR or others regarding PCL's non-compliance; b. negatively impacting his academic status due to PCL DEFENDANTS' failure to submit accurate records timely to the STATE BAR.

246. Plaintiff believes it is likely demonstrated why he reasonably believes that the Defendants breached their duties to the Plaintiff in his capacity as a student and in his capacity as Secretary of the Corporation.

247. The DEFENDANTS breached the fiduciary duties of loyalty they had with the PLAINTIFF for educational services by failing to provide the quality of education or administrative oversight they promised when they assumed their roles. The plaintiff was recruited by defendants SPIRO and PENA, who signed a contract in their official capacity to enroll the Plaintiff in their law school programs subject to regulatory oversight by the State Bar promising compliance or "good faith" efforts at maintaining compliance. Here, the plaintiff paid for this education with the expectation that it would be of a certain quality and value. Yet the defendants failed to provide adequate instruction, resources, and support, and then failed to act

1 or intervene when made expressly aware of their duties and that the conduct being engaged in
2 flouted the rules applicable to the regulation of unaccredited fixed facility law schools.

3
4 248. The defendants acting in individual and concerted fashion as the “Board”, when Plaintiff
5 presented demands for the production of documents for inspection to any Board Member as a
6 matter of law, failed to provide them.

7
8 249. That PCL DEFENDANTS' failure to provide the requested documents violated the
9 Plaintiff's rights as a student and as a member of the Corporation, impeding his ability to
10 address concerns related to the quality of education, administrative oversight, and regulatory
11 compliance at the institution.

12
13 250. The PCL DEFENDANTS, by breaching their fiduciary duties and failing to provide the
14 expected quality of education and support, caused the PLAINTIFF to suffer both financial and
15 emotional harm, as well as to experience a loss of opportunity and potential damage to his
16 future professional prospects.

17
18 251. That the PLAINTIFF, by demonstrating the numerous ways in which the DEFENDANTS
19 breached their duties and obligations towards him, has provided a reasonable basis for believing
20 that the DEFENDANTS are liable for the harms caused to him as a result of their actions and
21 inactions.

22
23 252. That the PLAINTIFF requests the Court to hold the PCL DEFENDANTS accountable for
24 their breaches of duty and failures, in order to ensure that future students are not similarly
25 harmed and to promote transparency, accountability, and compliance with applicable
26 regulations and standards in the field of legal education. When Defendants were informed,
27

expressly of the issues related to the management of elections, they chose to maintain “ultra vires” circumstance and made additional “ultra vires” policies.

253. The Defendants failed to exercise duties of due care by failing to properly adhere to the mandates of the Bylaws;

254. The Defendants failed to exercise duties of due care in addressing compliance issues, including the adequate recordkeeping and provision of notice.

255. The Defendants breached the duty of loyalty because when provided with the opportunity to cure without likely negative consequence, they intentionally failed to do so and retaliated against students and the stated mission of the Bylaws.

256. The defendants engaged in a pattern of conduct, including failure to properly apply, use, and enforce administrative procedures, and conspired to engage in illegal racketeering activities, including arbitrary and exclusionary policy enforcement to the detriment of a specific targeted market or speech and the plaintiff. These activities breach the contract for educational services, as the defendants willfully failed to provide an environment that was conducive to learning and the advancement of the plaintiff's legal education.

257. As a result of the defendants' breach of contract, the plaintiff suffered financial harm with long term consequences, deprivation of fundamental business and student protections, and other injuries. The plaintiff seeks declaratory, injunctive, and monetary relief from the defendants for their breach of duty and failure to act in the “good faith” required.

258. That the PLAINTIFF seeks relief for the damages suffered as a result of the DEFENDANTS' breach of fiduciary duties, failure to provide the quality of education and

support promised, and their refusal to provide necessary documentation for the PLAINTIFF to pursue his claims.

259. That the PLAINTIFF requests the Court to grant appropriate remedies to redress the harms suffered, including but not limited to, compensatory damages, injunctive relief requiring the DEFENDANTS to provide the necessary documentation, and any other relief the Court deems just and proper.

SECOND CAUSE OF ACTION

COMMON LAW BREACH OF FIDUCIARY DUTY

(KRAMER, STALLINGS, DURAN, WILSON, CHEN, CISNEROS, HOM, HOLMES,
GRANDT, WONG, SHELBY, TONEY, HERMAN, KNOWLES, HERSHKOWITZ)

260. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 259.

261. Here, STATE BAR DEFENDANTS refers to those named and appearing immediately below the cause caption.

262. This action alleges negligence, fraud, or corruption in violation of a general duty, affirmative duty, statutory duty, special duty to protect, and/or mandatory duty that has caused or was a reasonably foreseeable substantial factor in Plaintiff's severe injury and CTCA Claim, and the operation of a knowingly dangerous premises by State Bar which causes an unacceptable, unreasonable, sufficiently noticed risk of severe injury to members of public.

263. Plaintiff will seek summary judgment for violations of mandatory duties and negligence based on the allegedly clear and convincing evidence from California Auditor for all times relevant: <https://www.bsa.ca.gov/reports/agency/8>, for which Plaintiff will seek judicial notice.

264. Here, Plaintiff will demonstrate that STATE BAR, its directors, officers, employees, and licensees, and appointees after the 2018 divestment of trade association functions and adoption of its clear primary role as law school regulator knew or should have known students, who are members of the public and put at heightened risk by non-interference policies promulgated and enforced by the STATE BAR.

265. Here, STATE BAR employees and appointees repeatedly violated their respective duties to protect or act reasonably, a likely violation of both public trust and CBPC 6001.1.

266. Examples here include the December 2, 2022 CSBAR's meeting where STATE BAR's LEONARD re-iterated to the public the longstanding (in excess of 2 years by the admission) express and constructive knowledge of PCL's operators failure to maintain compliance, reiterated in the "progress report" discussed by LEONARD with defendants KRAMER, WILSON, HERSHKOWITZ, and CHEN.

267. Additionally, the conduct appears to conflict with the California Rules of Professional Conduct's ("CRPC") conformance mandate, BPC § 6077.

268. The Americans with Disabilities Act ("ADA") states that "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity."

269. Generally, to comply with public entities must reasonably modify their policies, procedures or practices when necessary to avoid discrimination unless the entity demonstrates that the requested modifications “fundamentally alter” its service system.

270. The STATE BAR, its agents and appointees had a duty of reasonable care in the conduction of their operations and to follow the law.

271. The STATE BAR as the monopoly regulator operates a “segregated” law school market because it allows large market participants like UCLA to categorically deny application of “tested” students attending other recognized law schools the opportunity to transfer. In essence, students cannot transfer from California’s non-ABA private law schools to “public” postsecondary institutions.

272. UCLA produces a standard 509 report detailing the basic costs and demographics of its JD program. Last year’s report, entitled “ABA_Standard_509_Report_2022_updated.pdf” can be found at UCLA’s web site at:

https://law.ucla.edu/sites/default/files/PDFs/Admissions/ABA_Standard_509_Report_2022_updated.pdf

a) The report demonstrates that UCLA only accepted transfers from ABA schools in the 2022 academic year, including a total of 8 students from California ABA-accredited schools.

b) This is consistent with its policy prohibiting application from “only” State-accredited or registered fixed-facility schools.

273. Plaintiff is informed and believes and thereon alleges that Defendants violated Business and Professions Code section 17500 by:

a. failing disseminating, or causing to be disseminated, to the public, untrue and/ or

misleading statements, including the statements set forth above, regarding the quality standard or compliance of services offered by PCL and statements connected with PCL's fundraising and operating costs, statements which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made;

b. misrepresentation of matters of law or the obligations of PLAINTIFF and students which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made;

c. representations to PLAINTIFF, students and the public that PCL offered a compliant education or failing to notice when Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made.

274. STATE BAR DEFENDANTS conduct resulted in the deprivation fundamental student protections, inclusive of “due process”, that students have a right to expect of a regulator, one whose rhetoric expressly promises “careful” performance of its public protection role and was a substantial factor in causing PLAINTIFF’s injuries.

275. STATE BAR representations to fixed facility schools, promulgated through its rulemaking authority, made it clear that the “system” was rigged against the individual student. Here, LEONARD, WILSON, CHING, HOLTON, and others restated the policies to PLAINTIFF even as they were aware he was being harassed and PCL had repudiated its obligations.

276. STATE BAR DEFENDANTS conduct resulted in various breaches of core principles of “good faith” in contracting, fiduciary relationships as a Board Member and Officer, and

1 numerous violations of rule or law around business practices and the submission of official
2 records improperly created and filed with State agencies.

3 277. For the reasons stated, STATE BAR DEFENDANTS conduct appears to demonstrate a
4 longstanding pattern of abrogative dereliction of public duty.
5

6
7
8 **THIRD CAUSE OF ACTION**

9 **BREACH OF FIDUCIARY DUTY RELATED TO**

10 **VIOLATION OF FEDERAL AND STATE ADMINISTRATIVE LAW**

11
12 **AND BUSINESS PRACTICES**

13
14 **(WILSON, NUNEZ, CHING, LEONARD)**
15

16
17 278. Plaintiff realleges and incorporates by reference each and every allegation contained in
18 Paragraphs 1 through 277.
19

20 279. The California STATE BAR has violated federal and state administrative law and business
21 practices by implementing underground rules, and consistently failing to follow mandated
22 administrative procedures to establish “due process” compliance under the APA and CAPA or
23 other statutes for student-related regulatory issues. STATE BAR’s failure to adopt or
24 appropriately reconcile the Federal Unit Hours as defined in the Higher Education Act and the
25 states own Private Postsecondary Education Act is not simply a singular example in this context
26 due to the number of individuals impacted and the duration of the misconduct.
27

280. PLAINTIFF contends that the process used for determination of his exception request under law school Rule 5.6 not only bolsters but demonstrates the STATE BAR defendants' failure to follow appropriate procedures, as it is an "unusual" circumstance and HOPE's referral back to LEONARD for resolution infers a "unified" approach, at least for her "on notice" direct management, including CHING, NUNEZ, WILSON, and DURAN. The process used to make the determination is unclear, and as a student, PLAINTIFF deserved protection and had not waived that expectation. In addition, LEONARD had not recused herself nor been directed to recuse given clear allegations had been made.

281. Plaintiff asserts that this failure to notice, given STATE BAR's non-interference policy, was a foreseeable cause of Plaintiff's harm, as the policy so stated allows schools to operate with "carte blanche", laissez faire, or wanton behavior because the "bad actor" has been told in advance that no matter the issue, a student will not receive assistance.

282. This likely represents a breach in the duty of due or reasonable care, as the regulator would not ordinarily inform the regulated that it can act wantonly in areas of regulation without concern of reprisal.

283. The State Bar operates to unfairly restrict law school transfers, restraining public liberty and trade while sustaining increased costs and risks to the Federal Government for legal education. The State Bar's exclusionary rule gives public institutions permission to exclude state citizens and taxpayers based on origin without any demonstration of their basis or authority to permit any institutions adoption of such restraint. It seems a truly unfair burden for any consumer, and to reconcile . Moreover, the State Bar administers a test to students in this category as an objective assessment and measure of student fitness, which is unlawful and discriminatory.

284. This exclusionary rule as substantive to PLAINTIFF's harm is admitted difficult to ascertain given the speculative nature of valuating the proximately impossible; but the condition of the marketplace falls under the statutory authority of a monopoly STATE BAR, and from that and procedural failures arises a negligence cause.

285. The State Bar's failure to adhere to federal and state administrative procedure acts, inadequate constitutional review of statutes, rules, or procedures, and implementation and enforcement of underground rules and procedures reveal a pattern of systemic dysfunction that undermines the organization's legitimacy. These violations of California Business and Professions Code sections § 17200 and § 17500 demonstrate a profound disregard for the rule of law and warrant further investigation to determine the full extent of the State Bar's unlawful, unfair, or fraudulent business practices.

286. The State Bar's failure to adhere to federal and state administrative procedure acts, inadequate constitutional review of statutes, rules, or procedures, and implementation and enforcement of underground rules and procedures reveal a pattern of systemic dysfunction that undermines the organization's legitimacy. These violations of California Business and Professions Code sections § 17200 and § 17500 demonstrate a profound disregard for the rule of law and warrant further investigation to determine the full extent of the State Bar's unlawful, unfair, or fraudulent business practices.

287. Here events like RANDOLPH's send of a nonconforming or noncompliant documents to PLAINTIFF on January 21, 2023, despite being constructively aware of her professional and fiduciary duties. The document is asserted as noncompliant because the OGC did not follow proper procedure, or the contents misrepresent the facts.

288. The State Bar's negligence in regulating unaccredited fixed facility law schools and the numerous allegations of unethical practices, including unfair collection practices, extortion, conversion, harassment, defamation, interference with business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment protections, constitute an alarming failure of oversight. This failure not only violates California Business and Professions Code sections § 17200 and § 17500 but also erodes public trust in the State Bar and the legal profession as a whole.

289. **Constitutional Challenge:** The State Bar Act's mandatory membership provision is unconscionable and unenforceable due to the organization's unfair practices under the color of law and the detrimental and permanent harm suffered by the Plaintiff. The government's insistence on compelling association in these circumstances fails to meet the standards of scrutiny required to justify the infringement of the Plaintiff's constitutional rights.

a) Alternatively, the mandatory membership provision of the State Bar Act should be considered unconstitutional as the reasonable person in the Plaintiff's circumstance would not willingly join an organization marred by such widespread misconduct. Given the State Bar's tarnished reputation and failure to address its internal issues, the requirement for mandatory membership constitutes an unfair infringement upon the Plaintiff's First Amendment and other constitutional rights.

290. The State Bar's failure to follow established procedures and other misconduct also breaches their statutorily assigned and sworn duties under California Code, Business and Professions Code (BPC) § 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member Defendants failed to support the Constitution and the Rule of Law, to respect the courts of

1 justice and judicial officers, to maintain actions, proceedings, or defenses that are legal or just,
2 candor and truth in statements of law or legal proceedings, to advance no fact prejudicial to the
3 honor or reputation of a party for unjust cause, not to encourage either the commencement or
4 the continuance of an action or proceeding from any corrupt motive of passion or interest, to
5 never reject, for any consideration personal to himself or herself, the cause of the defenseless or
6 the oppressed, and to cooperate with the tribunal.
7

8 291. As a result of the State Bar's violations, Plaintiff has suffered damages in the form of
9 financial harm, deprivation of fundamental student protections, and other injuries. Thus,
10 Plaintiff seeks declaratory, injunctive, and monetary relief from Defendants for their violations
11 of federal and state administrative law and business practices.
12

13 **FOURTH CAUSE OF ACTION**
14

15 **BREACH OF FIDUCIARY DUTY RELATED TO SOLICITATIONS IN**
16 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17510.8**
17

18 **(SPIRO, PENA, GONZALEZ, DUPREE, SILBERGER)**
19

20 292. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
21 Paragraphs 1 through 291.

22 293. Defendants have a fiduciary relationship with students because they solicit:
23

- 24 a) fees for administrative or legal education services. This fiduciary relationship is established
25 by statute, common law, and agreement.
26
27 b) ALL DEFENDANTS voluntarily participate in a regulated marketplace.
28

294. PCL solicited and received tuition and other services from a targeted subset of the public. The acceptance of these fees established a charitable trust and a fiduciary duty on the part of the Defendants to ensure that the tuition was used for the purposes stated during the solicitation under an implied promise that the services offered would meet the standards set for professional licensure.

295. PCL also made promises and received charitable donations but has failed to provide PLAINTIFF with an accounting to audit, even when presented lawful demand for documents.

296. PCL actively applies for and regularly receives grant awards, but to PLAINTIFF's direct knowledge and personal experience as an officer of the corporation, no accounting was ever produced, even after demand.

297. Plaintiff is informed and believes and alleges that Defendants breached their duty by failing to inform students of the intended use or purpose or failure as to ensure that tuition paid and collected by PCL were used for the purposes for which they were solicited. Students were told in advertisements, on the PCL website, or orally that their tuition would was required in exchange for the delivery of a compliant education using the appropriate administrative procedures and application of policy.

298. Plaintiff is informed and believes and thereon alleges that only a nominal amount of the funds collected as student tuition were used for the stated purpose by PCL DEFENDANTS. Instead, nearly all the funds solicited were used to pay fundraising or other "operating expenses" or benefiting others.

299. DEFENDANTS misled the PLAINTIFF and students to believe that they were in fact receiving

the regulatory value and assurance accompanied by proper records administration of the institution performed by its vertical regulator, the STATE BAR.

300. When STATE BAR DEFENDANTS were expressly informed of failures to properly review, correct, or act in accordance with duty, they failed to follow law or policy or rules of professional responsibility and used email and other forms of electronic communication to spread disinformation related to matters of law, their duties or conduct.

301. DEFENDANTS retaliated or failed to timely intervene on behalf of students and the PLAINTIFF. When PLAINTIFF requested assistance or fair resolution, the requests were denied.

302. DEFENDANTS solicited PLAINTIFF to “lie” to validate their own improper conduct for “official” administrative purposes, as the conduct of September 26, 2022 and the email exchange between LEONARD, SPIRO and other DEFENDANTS likely demonstrate the STATE BAR’s wanton and reckless disregard of the conduct of its market participants. to maintain

FIFTH CAUSE OF ACTION

UNTRUE OR MISLEADING STATEMENTS IN

VIOLATION OF

BUSINESS & PROFESSIONS CODE § 17500.

(SPIRO, GONZALEZ, PENA, DAVYTYAN, HOLTON, BOUFFARD,)

303. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 303.

304. Plaintiff is informed and believes and thereon alleges that Defendants violated Business and Professions Code section 17500 by:

- a) disseminating, or causing to be disseminated, to the public, untrue or
 - i) misleading statements, including the statements set forth above, regarding services offered by PCL and statements connected with PCL's fundraising and operating costs, statements which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made;
- b) misrepresentation of matters of law or the obligations of PLAINTIFF and students which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made, including unfair business collection activity;
- c) representations to PLAINTIFF, students and the public that PCL offered a compliant education or failing to notice when Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made.
- d) That law students were not members of the “public” for protection purposes.

305. STATE BAR DEFENDANTS conduct resulted in the deprivation fundamental student protections, inclusive of “due process”, that students have a right to expect of a regulator, one whose rhetoric expressly promises “careful” performance of its public protection role and was a substantial factor in causing PLAINTIFF’s injuries.

- a) PLAINTIFF sought grant of degree under various strategies after PCL was in breach of duty and contract;

b) STATE BAR requires registered schools to offer 4-year programs, except for PCL in the case of PLAINTIFF, which as an institution has been allowed to offer only 3 of the 4 years required.

c) STATE BAR does not require schools offering Juris Doctorates not marketed as leading to professional licensure to register in many cases at all. For example,

d) Even after STATE BAR

306. PCL DEFENDANTS conduct resulted in various breaches of core principles of “good faith” in contracting, fiduciary relationships as a Board Member and Officer, and several violations of rule or law around business practices and the submission of official records improperly created and filed with State agencies.

307. The defendants' actions were willful, wanton, and oppressive, justifying the imposition of punitive and exemplary damages.

308. The plaintiff is entitled to injunctive relief enjoining the defendants from making further untrue or misleading statements about their services.

309. The plaintiff is entitled to an award of attorney's fees or court costs, under applicable law.

310. The Plaintiff seeks judgment against defendants, jointly and severally, for general, special, and punitive damages, as well as injunctive relief, attorney's fees, and costs, and any further relief the court deems just and proper.

311. Plaintiff alleges that each and every Defendant sent emails and text messages in furtherance of the extortion scheme, a scheme that was for Defendants' direct pecuniary benefit, and therefore each such email and text message constitutes a separate violation of 18 U.S.C. § 1343, which prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

312. Defendants, in engaging in and participating in the acts of unfair competition as alleged in paragraphs 23 THROUGH 29, will additionally be shown to have violated these statutes:

- a) Section 6001.1 of the State Bar Act
- b) Penal Code 132 PC - offering false evidence
- c) Penal Code 134 PC - preparing false evidence
- d) Penal Code 135 PC - destroying evidence
- e) Penal Code 136.1 PC - tampering or intimidating witnesses
- f) Penal Code 632(a) – unauthorized recording (privacy)

SIXTH CAUSE OF ACTION

CIVIL RIGHTS VIOLATIONS

UNDER 42 U.S.C. § 1981 PROVISION OF FEDERAL BAR LICENSURE

(PLAINTIFF REQUEST FOR LICENSURE)

313. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 312.

314. The petitioner seeks relief under 42 U.S.C. § 1981 for Federal Bar licensure as an equitable remedy to address the harm suffered and to establish normative criteria that would level the playing

1 field for other members of the public, enhance public protection, and provide just and necessary
2 mitigation to Plaintiff's injuries and foreseeable damages. This remedy is requested in part because it
3 is appropriate under 28 U.S.C. § 1654.
4

5
6 315. In support of the request for Federal Bar licensure under 42 U.S.C. § 1981, the plaintiff argues
7 that the provision of such licensure would further the purposes of the statute, which is to prohibit
8 discrimination on the basis of race or origin in the making and enforcement of contracts.
9

10 316. In other claims associated with this cause, the Plaintiff contends that the State Bar's regulations
11 and requirements for professional licensure end up discriminating against a certain subset or class of
12 market participants, specifically students who may face historical financial, demographic, or access
13 barriers. By allowing state "public" law schools to exclude certain students and residents from the
14 possibility of transfer to any UC law school, the State Bar is perpetuating systemic inequalities and
15 hindering the ability of these students to compete on an equal playing field.
16
17
18
19

20 317. STATE BAR DEFENDANTS through its regulated entity PCL and directly through its agents
21 caused or were substantial factors in the harm.
22

23 318. The STATE BAR policies are constructed or designed to allow harm to the PLAINTIFF, and any
24 other in similar circumstance, repeatedly by a regulated entity like PCL without any substantive
25 recourse and no incentive for its protective undertaking by STATE BAR staff or appointees.
26
27

1
2 319. The STATE BAR knew or should have known that its policies would result in student injuries
3 and that they had a duty to perform Constitutional review; they failed to do so and knowingly
4 continued enforcement of the policies.
5

6
7 320. The STATE BAR allowed unequal treatment of students knowingly, as SPIRO corrected unit
8 counts and provided a complete transcript in 2021 to other students, but PCL DEFENDANTS
9 refused to make correction to PLAINTIFF's transcript until August 2022, and then have still
10 provided a transcript that shows two fewer classes (clinical) than taken.
11

12
13 321. Given entry into the marketplace of any predatory operator, even one unlike PCL and its
14 longstanding connection between operators PENA, SPIRO, GONZALEZ and analyst LEONARD
15

16
17 322. As a potential normative remedy, by providing Federal Bar licensure as an alternative option, the
18 Court would be promoting greater access to the legal profession and increasing opportunities for
19 underrepresented groups to overcome systemic barriers in extraordinary cases. This would track the
20 remedial purpose of 42 U.S.C. § 1981 and would mitigate the plaintiff's injuries and foreseeable
21 damages while enhancing public protection. Alternatively, specific performance or the cost of two
22 additional years at a "safe" school because of the loss of credit hours and the minimum time in
23 attendance requirements of similar schools.
24

25
26 323. Therefore, the plaintiff respectfully requests that the Court grant the request for Federal Bar
27

1 licensure as both an equitable remedy for harm and to establish normative criteria to "even the
2 playing field" for other members of the public.

3
4 **SEVENTH CAUSE OF ACTION**

5
6 **CIVIL RIGHTS VIOLATIONS**

7
8 **UNDER 42 U.S.C. § 1981 AND CIVIL CODE § 52.1 (The Bane Act)**

9 **(LEONARD, SPIRO, GONZALEZ, PENA, SARINANA, CHING, DUPREE, SILBERGER,**
10 **and GILLENS)**

11
12
13 324. Plaintiff re-alleges and incorporates by reference each allegation contained in Paragraphs 1
14 through 323.

15
16 325. PLAINTIFF claims that the defendants, including LEONARD, SPIRO, GONZALEZ, PENA,
17 SARINANA, CHING, DUPREE, SILBERGER, and GILLENS, intentionally interfered with or
18 attempted to interfere with his civil rights by coercion based on a nonviolent threat with severe
19 consequences. Specifically, the defendants engaged in a conspiracy to frustrate the appropriate
20 application of administrative procedure at PCL, and misrepresented or failed to correct STATE BAR
21 or other rules in electronic communications. They used official transcripts as a form of "currency"
22 for administrative purposes, and engaged in unfair practices of unit issuance under the "color of
23 law."
24

25 326. To establish this claim, PLAINTIFF must prove all of the following:
26
27

327. That the defendants, including LEONARD, SPIRO, GONZALEZ, PENA, SARINANA, CHING, DUPREE, SILBERGER, and GILLENS, caused PLAINTIFF to reasonably believe that if he exercised his right to report misconduct, the defendants would interfere with his rights by engaging in retaliation, ostracism, and slander.

328. That the defendants acted with the constructive knowledge and intent to violate this plaintiff's protected rights because Enterprise P, including SPIRO, changed the unit awards prior to recruitment and matriculation. PCL and Enterprise P operators submitted via mail or more likely wire, transcripts and various other executed documents that would necessarily include the reported changes to STATE BAR staff who expressly or constructively knew of the violations at time of review.

329. That PLAINTIFF was harmed as a result of the defendants' interference with his rights.

330. Under the Bane Act, damages may be recovered under Civil Code section 52(a) and (b), including up to three times actual damages but a minimum of \$4,000 for violations of Civil Code sections 51 (Unruh Act), 51.5, 51.6, 51.7 (Ralph Act), and 51.9.

331. PLAINTIFF alleges that the defendants interfered with his rights secured by the Constitution and laws of the United States, and of the rights secured by the Constitution and laws of the State of California, including the right to due process, the right to free speech, and the right to be free from retaliation for reporting misconduct. These rights were interfered with through coercion based on nonviolent threats with severe consequences, including intimidation, retaliation, ostracism, and slander.

332. PCL's conduct with the State Bar employee LEONARD suggests applying the state action doctrine is appropriate. LEONARD is a government actor because she works for the STATE BAR as the Principal Program Analyst and her role is law school regulation. In performance of her role she acted as the principal compliance officer and point of contact for SPIRO and others at PCL.

333. Other “high-level” areas of the STATE BAR participated or abrogated intervention, including the Office of the OGC, including RANDOLPH, KRASILNIKOFF, and DAVYTYAN in failing to follow the required internal process removed the possibility of PLAINTIFF receiving due process, just consideration, or equal protection under the 14th Amendments promise.

334. The essence of a Bane Act claim is that the defendants, by improper means, tried to or did prevent PLAINTIFF from doing something he had the right to do under the law or to force PLAINTIFF to do something that he was not required to do under the law. The defendants' actions, including their use of official transcripts as currency for administrative purposes, their misrepresentation of State Bar rules, and their unfair practices of unit issuance under the "color of law," all aimed at frustrating PLAINTIFF's attempts to hold the defendants accountable for their misconduct.

335. Therefore, if the finder of fact concurs that PLAINTIFF is a member of a minority protected class and the Defendants, including PCL and the State Bar, engaged in conduct intentionally or otherwise discriminated to the detriment of Plaintiff in fashion likely to yield disparate and similar injuries to students like the plaintiff.

336. For making false representations about the quality of PCL's law program and the State Bar's enforcement of rules and regulations related to unaccredited fixed facility law schools, upon which for all matter PLAINTIFF relied on. As previously argued, Defendants engaged in a pattern of illegal conduct, including false advertising and unfair competition. Defendants violated 42 U.S.C. § 1981 by discriminating against Plaintiff in the making and enforcement of contracts.

337. Plaintiff may be entitled to declaratory, injunctive, and monetary relief from the defendants for their violation of 42 U.S.C. § 1981.

EIGHTH CAUSE OF ACTION

NEGLIGENCE

(SPIRO, GONZALEZ, FRANCO, DURAN, LEONARD, CHING, NUNEZ, WILSON,
SOWELL, KRAMER, CHEN, WONG, SHORES-BROOKS, LAWRENCE, XIANG,
HERMAN, CISNEROS)

338. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 337.

339. LEONARD: As a STATE BAR administrator, LEONARD owed a duty of care to ensure that PCL was operating in compliance with state bar rules and regulations. By facilitating the unfair practice of unit issuance under the "color of law" and misrepresenting or failing to correct state bar rules in electronic communications, LEONARD breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.

340. SPIRO: As a member of PCL's Executive Committee and purportedly the school's "Chairman," SPIRO had a duty to ensure that PCL was operating in compliance with STATE BAR rules and regulations. By constructing a D&O insurance policy application without any input or knowledge beyond that of the EC, PENA and GONZALEZ, SPIRO breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.

341. GONZALEZ: As a member of PCL's Executive Committee, GONZALEZ had a duty to ensure that PCL was operating in compliance with state bar rules and regulations. By issuing a letter of resignation that gaslit and maligned PLAINTIFF and encouraging the Board to take "decisive action" against him, GONZALEZ breached that duty. This breach of duty caused PLAINTIFF to

suffer damages, including emotional distress and reputational harm. In addition, as PCL's President, GONZALEZ had a duty to actively manage SPIRO, SARINANA, GONZALEZ and others in the performance of their duties and compliance with schools rules and the law.

342. FRANCO: As a member of Community Board, FRANCO had a duty to ensure that PCL was operating in compliance with the Bylaws, STATE BAR rules and regulations. By facilitating the unfair practice of unit issuance under the "color of law" and stating that "we must not unilaterally change the unit allocations since it would constitute a major change" without any legal basis, FRANCO breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.

343. KRAMER: As CHAIR of CSBARS, KRAMER is an appointee and accountable for oversight of law school compliance or registration. KRAMER is entrusted to take reasonable measures or prevent misconduct from STATE BAR agents like LEONARD. As Chair and Appointee and individual, KRAMER is alleged to have negligently or willfully failed to perform when he owed a duty of care to ensure that both PCL and LEONARD were operating in compliance with the rules and regulations or that the STATE BAR ensured PCL was publicly noticed otherwise and suffered appropriate sanctions.

344. KRAMER likely has a fiduciary or other protective duty to report the misconduct of licensees that he knows to have occurred within his sphere of service on CSBARS because he is an active market participant appointed to and acting in the capacity of regulatory authority and the misconduct is directly related to the successful performance of his role.

345. In addition, as Committee Chair and public appointee, KRAMER had a duty to actively manage or oversee either LEONARD, WILSON, NUNEZ, HERSHKOWITZ, KRASILNIKOFF and others in the performance of their duties and compliance with schools rules and the law, or the work

product of these individuals and possibly others in furtherance of the reasonable performance of their duties pursuant to the State Bar Act and other statutes.

346. By facilitating the unfair practice of unit issuance by PCL under the "color of law" or misrepresenting or failing to correct state bar rules in electronic communications, LEONARD breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm and a violation of his rights and interest as they are likely protected under the 14th Amendment.

347. SARINANA: As a PCL Dean, SARINANA had a duty to ensure that PCL was operating in compliance with STATE BAR rules and regulations. Through lack of adequate oversight or participation and allowing mandatory routing of student complaints through "proper channels" and potentially violating state bar rules and laws, SARINANA breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm. SARINANA had an affirmative duty to act to correct the unit's issuance issue; he failed to do so.

348. GILLENS: As a member of PCL's Executive Committee, GILLENS had a duty to ensure that PCL was operating in compliance with state bar rules and regulations. By failing to produce a report related to the election results and denying membership on the board, GILLENS breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.

NINTH CAUSE OF ACTION

RICO

DAMAGES PURSUANT TO RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT [RICO] AS AGAINST ALL DEFENDANTS - VIOLATION OF 18 U.S.C § 1962 to (CIVIL RICO) and (d) (RICO CONSPIRACY)

(AGAINST CARDONA, DAVYTYAN, AREPYTYAN, WILSON, DURAN, HERNANDEZ, POMPOSO, SPIRO, LEONARD, GONZALEZ, PENA, BOUFFARD, SOWELL, TONEY, SHELBY, HERNANDEZ, MCFARLAND, WONG, NUNEZ, CUMMINS, CAMPBELL, GARCIA, BROOKS, CHEN, MORGENSTERN, KRISILNIKOFF, ZUNIGA1, and DOES 1-88)

349. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 348.

350. Plaintiff alleges damages pursuant to the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C, sections 1961 et seq. Federal Courts have jurisdiction over cases arising under federal laws unless Congress has made express provision to the contrary. The RICO statute does not state or suggest that jurisdiction is to be exclusive and therefore concurrent jurisdiction is applicable for the claims herein.

351. Here, DEFENDANTS refers to ALL DEFENDANTS named and appearing immediately below the caption for the Ninth cause of action.

352. Here, PCL DEFENDANTS refers to all previously associated named directors and officers of either PCL or Enterprise P, named and appearing immediately below the caption for this Ninth cause of action.

353. STATE BAR DEFENDANTS refers to all previously associated named directors and officers of either STATE BAR or Enterprise S, named and appearing immediately below the caption for this Ninth cause of action.

354. At least since May 2018, supported by the written explanation by Robert Skeels, Esq., PCL and STATE BAR Defendants have been engaged in or facilitated the noncompliant operation of PCL as a scheme to take unfair business advantage or defraud students and donors, as alleged herein.

355. The STATE BAR is the statutory and monopoly regulator in the field of postsecondary legal education leading to licensure, tasked with interpretation, rulemaking and enforcement in all areas pursuant to §6000 - §6243, et seq.

356. PCL is an active market participant and vertical downward “competitor” as a “regulated” entity of the STATE BAR.

357. UCLA is an active market part and vertical downward “competitor” as a “regulated” entity of the STATE BAR.

358. PCL and UCLA are active market participants and horizontal competitors for purposes of RICO or antitrust analysis because they both operate postsecondary law schools; the difference in accreditation is not believed substantive for purposes of establishing whether or not an organization is a prima facie competitor.

359. Therefore, were a group of persons associated together for a common purpose of engaging in a course of conduct. This association-in-fact was an "enterprise" within the meaning of RICO, 18 U.S.C. § 1961(4). At all relevant times, Defendants enterprise was used to carry out the illegal and fraudulent activities set forth herein.

360. At all relevant times, Defendants' enterprise was engaged in activities that affected interstate commerce within the meaning of RICO, 18 U.S.C. § 1962(c).

361. 18 U.S.C. § 1343, prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

362. As described herein, perpetrated their fraudulent Extortion Scheme through the use of wire affecting interstate and foreign commerce.

363. Plaintiff alleges that each Defendant sent emails and text messages in furtherance of the various acts or schemes, all conducted for Defendants' direct pecuniary benefit, and therefore each such email and text message constitute a separate violation of 18 U.S.C. § 1343, which prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

364. Plaintiff seeks declaratory determinations for any and all violations sufficient to meet the criteria for "predicate acts", as determined by the finder of fact under 18 U.S.C. § 1343, be so counted whether or not the acts themselves avail themselves to a damages or legal remedy.

365. Defendants' acts in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 2315 constitute a pattern of racketeering activity" within the meaning of RICO, 18U.S.C. § 1961(5).

366. Such racketeering activity included, but is not limited to, the extortion of money, misrepresentations of law, misrepresentations of fact, conversion, defamation, interference with business relationships, breaches of duty, privacy and civil rights violations or other injuries to Plaintiff.

367. PCL DEFENDANTS, and each of them, committed mail and wire fraud by the continuous use of the mail, the internet, emails and texts to accomplish their purpose of extorting money from Plaintiff.

As a result of Defendants' violation of RICO, 18 U.S.C. § 1962(c) and (d), Plaintiff has suffered damages in an amount to be determined at trial, including, but not limited to, out of pocket costs and tuition payments, interference with business relationships, loss of future earnings, Plaintiffs monetary payment to Defendants and the damages resulting from the failure to offer him classes or his degree, defamatory publications intended to damage Plaintiff's name, goodwill and reputation in the marketplace irrevocably.

- A. Gonzalez letter written November 2021, believed published to Populi by PENA, BOUFFARD, or SARIN, is an example of a "predicate act", as the effort here was to discredit the PLAINTIFF and end the pursuit of resolution AND not to correct the compliance issues.
- B. SPIRO and LEONARD's September 2022 solicitation letter, just one month after PCL provides an almost complete and "units corrected" transcript but has essentially blocked and prevented the PLAINTIFF's transfer.
- C. CHING, HOLTON and WILSON's letters on various dates supporting the STATE BAR's non-intervention or inability to assist in the matter, counter to the public protection mandate and their roles as public agents.
- D. CARDONA failed to intervene or otherwise facilitated intentional avoidance of proper procedure or due consideration when he was expressly or constructively aware.
- E. AYRAPETYAN proposed and published misleading statements in meeting minutes and otherwise facilitated and assisted STATE BAR DEFENDANTS in her capacity as Secretary.
- F. WILSON, NUNEZ, CHING, DURAN, SOWELL, SHELBY, TONEY, CHEN, WONG, and POMPOSO failed to intervene or facilitated the targeting of PLAINTIFF for retaliation by PCL

DEFENDANTS and LEONARD when all were expressly or constructively aware of duty as well as imminent or already realized harms to the Plaintiff.

368. At all relevant times, CARDONA was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

369. At all relevant times, DAVYTYAN was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

370. At all relevant times, AREPYTYAN was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

371. At all relevant times, WILSON was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

372. At all relevant times, DURAN was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

373. At all relevant times, HERNANDEZ was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

374. At all relevant times, POMPOSO was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

375. At all relevant times, SPIRO was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

376. At all relevant times, LEONARD was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

377. At all relevant times, GONZALEZ was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

378. At all relevant times, PENA was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

379. At all relevant times, BOUFFARD was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

380. At all relevant times, SOWELL was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

381. At all relevant times, TONEY was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

382. At all relevant times, SHELBY was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

383. At all relevant times, HERNANDEZ was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

384. At all relevant times, MCFARLAND was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

385. Defendants' actions violate the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. §§ 1961 -1968, and specifically, 18 U.S.C. § 1962(c) and (d) (RICO Conspiracy).

386. At all relevant times, WONG was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

387. At all relevant times, NUNEZ was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

388. At all relevant times, CUMMINS was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

389. At all relevant times, CAMPBELL was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

390. At all relevant times, GARCIA was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

391. At all relevant times, BROOKS was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

392. At all relevant times, CHEN was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

393. At all relevant times, MORGENSTERN was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d)."

394. At all relevant times, ZUNIGA was and is a "person" within the meaning of RICO, 18 U.S.C. §1961 (3) and §1 962 (c)-(d).

395. Defendant natural persons held responsibility for implementing and ensuring compliance with antitrust and competition policy within the defendant organization or other relevant capacity.

396. For purposes of RICO or predicate acts, LEONARD is believed based on the evidence to operate as a "nexus" and point of interoperation or is otherwise engaged or entangled or entwined in

unfortunate combination or conspiracy, demonstrated by her sheer resiliency to stay in the same position, and the April 2023 promotion of her supervisor CHING to Director by WILSON, signaling to the public entrenched support by STATE BAR DEFENDANTS for Enterprise S agents and operators.

397. Defendant Peoples College of Law (PCL) and all PCL Defendants either participated in or failed to intervene in unfair business practices related to PCL's advertising, recruitment, administration, misrepresentations, extortion, conversion, conspiracy, constructive fraud, and other conduct that likely violates RICO and Antitrust statutes, operating an enterprise for unlawful purposes.

398. Plaintiff believes, based on information, personal experience, and Defendant reporting, that the lack of principled compliance enforcement by agents and responsible parties at the STATE BAR is a significant factor in Plaintiff's harms. The system's stated purpose is to protect the public by ensuring that market participants provide timely notice.

399. The California STATE BAR implemented underground rules and charged arbitrary and “capricious” fees while consistently failing to follow mandated administrative procedures to establish “due process” compliance under the APA and CAPA or other statutes.

400. When made expressly aware of conduct or rule with attached requirement for review under the APA, the STATE BAR continued the unlawful conduct in multiple areas of its daily operations, in violation of mandate and breach of duty clearly outside the threshold of “good faith and fair dealing”.

401. The State Bar operated to unfairly restrict law school transfers, restraining public liberty and trade while sustaining increased costs and risks to the Federal Government for legal education. By

1 allowing schools in its system to not provide “full faith and credit” by use of exclusionary rule that
2 gives the public institution permission to exclude for meritorious review state citizens and taxpayers
3 based on origin; here, the STATE BAR administers a test to students in this category as objective
4 assessment and measure of student fitness.
5

6 402. The State Bar's violation of the Federal Administrative Procedure Act and State CAPA statutes,
7 failure to perform Constitutional review of statutes, rules, or procedures, implementation and
8 enforcement of underground rules and procedures, and capricious and arbitrary use and application
9 of determination or decision-making authority all constitute unlawful, unfair, or fraudulent business
10 practices under California Business and Professions Code sections § 17200 and § 17500.
11

12 403. The State Bar's failure to follow established procedures may also be considered a violation of
13 California Business and Professions Code section § 17200 and § 17500, which prohibit any
14 unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules
15 and regulations related to the regulation of unaccredited fixed facility law schools, including credible
16 reports of unfair collection practices, extortion, conversion, harassment, defamation, interference
17 with business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment
18 privilege and Fourth Amendment protections; all aforementioned acts likely fall under the category
19 of unlawful, unfair, or fraudulent business practice. Professions Code section 17200;
20
21

22 404. Causing or allowing PCL to violate its duties of care and failing to warn the public when the
23 parties were aware of noncompliance or had unlawful operation for a protracted period when it had
24 credible records and auditor documentation sufficient to trigger its statutory duties.
25

26 405. Failing to observe corporate formalities as required by law and by PCL's bylaws.
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1 406. At all times relevant, the Officer/Director Defendants failed to act in good faith, in the best
2 interests of PCL, and with such care as an ordinarily prudent person in a like position would use
3 under similar circumstances.
4

5 407. The State Bar's failure to follow established procedures and other misconduct breached their
6 statutorily assigned and sworn duties under California Code, Business and Professions Code (BPC) §
7 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member Defendants failed
8 to support the Constitution and the Rule of Law, to respect the courts of justice and judicial officers,
9 to maintain actions, proceedings, or defenses that are legal or just, candor and truth in statements of
10 law or legal proceedings, to advance no fact prejudicial to the honor or reputation of a party for
11 unjust cause, not to encourage either the commencement or the continuance of an action or
12 proceeding from any corrupt motive of passion or interest, to never reject, for any consideration
13 personal to himself or herself, the cause of the defenseless or the oppressed, and to cooperate with
14 the tribunal.
15
16

17 408. Defendants engaged in a pattern of illegal conduct including failure to properly apply, use, and
18 enforce the antitrust policy more than once.
19

20 409. Office of General Counsel failed to recuse on multiple occasions; Office of Chief Trial Counsel
21 failed to intervene on multiple occasions. Board of Trustees failed to intervene. All at varying times
22 had constructive or express knowledge of the circumstance.
23

24 410. No one at STATE BAR has substantively responded to PLAINTIFF's complaints or conducted
25 any investigations related to my complaints, although the school was put on probation and
26 PLAINTIFF's reports are credible with supporting evidence.
27

411. Failure to treat PLAINTIFF's complaints with the gravamen deserved by any member of the public is likely a violation of equal protection in other contexts, but here it is the purest form of intimidation tactic applied to isolate and demonstrate to the victim that there is no one to help them so their best chance is to be quiet.

412. STATE BAR DEFENDANTS likely invested the proceeds of their illegal activities into Enterprise S, as alter ego of the STATE BAR, to continue the "illusion" of proper regulatory function in law school regulation. They charged arbitrary and "capricious" fees because they failed to follow mandated administrative procedures to establish due process compliance under the APA and CAPA or other statutes required to pass evaluation prior to implementation. Plaintiff here asserts an established violation of 18 U.S.C. § 1962.

413. California STATE BAR implemented underground rules while by failing to follow mandated administrative procedure to establish "due process" compliance under the APA and CAPA or other statutes.

414. When made expressly aware of conduct or rule with attached requirement for review under the APA, STATE BAR continued in the unlawful conduct in multiple areas of its daily operations, in violation of mandate and breach of duty clearly outside the threshold of "good faith and fair dealing".

415. State Bar operated to unfairly restrict law school transfers restraining public liberty and trade while sustaining increased costs and risks to the Federal Government for legal education by allowing schools in its system to not provide "full faith and credit" by use of exclusionary rule that gives the public institution permission to exclude for meritorious review state citizens and taxpayers based on

origin; here, the STATE BAR administers a test to students in this category as objective assessment and measure of student fitness.

416. Violation of the Federal Administrative Procedure Act and State CAPA statutes; failure to perform Constitutional review of statutes, rules, or procedures; implementation and enforcement of underground rules and procedures; capricious and arbitrary use and application of determination or decision-making authority.

417. STATE BAR DEFENDANTS allowed or facilitated PCL's violation of Rule 4.246 (F) providing law study credit for a fixed-facility law school program or class offered more than ten miles from the site of the law school, outside California, or in multiple locations required a "major change" approval from the STATE BAR.

418. PCL matriculated at least one student from Arizona and other states in August 2020; that is a "major change" because it is INTERSTATE COMMERCE. PCL performed its standard "operations" here, including the award of fewer units than required, paid headhunter to bolster recruitment, contracting and payments. 18 U.S.C. § 1343, prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

419. Similarly, "in-state" students, Nancy Popp and the Plaintiff, receive the same erroneous unit awards, indicating that the scheme is universally applied.

420. Violation of California Business and Professions Code sections § 17200 and § 17500 violations: The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules

1 and regulations related to the regulation of unaccredited fixed facility law schools, including credible
2 report of unfair collection practices, extortion, conversion, harassment, defamation, interference with
3 business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment
4 privilege and Fourth Amendment protections. Because the acts likely fall under the category of
5 unlawful, unfair, or fraudulent business practice. These violations are particularly suggestive and
6 lend themselves to being declared predicate acts for qualification purposes.
7

8 421. Violation of California Code, Business and Professions Code (BPC) § 6068 (a), (b), (c), (d), (f),
9 (g) (a), (b),;; The State Bar and PCL licensee or member Defendants failure to follow established
10 procedures and other misconduct breached their statutorily assigned and sworn duties to support the
11 Constitution and the Rule of Law; to respect the courts of justice and judicial officers; to maintain
12 actions, proceedings, or defenses that are legal or just, candor and truth in statements of law or legal
13 proceedings; to advance no fact prejudicial to the honor or reputation of a party for unjust cause; Not
14 to encourage either the commencement or the continuance of an action or proceeding from any
15 corrupt motive of passion or interest; Never to reject, for any consideration personal to himself or
16 herself, the cause of the defenseless or the oppressed; and cooperation with the tribunal. These
17 violations are likely considered predicate acts for qualification purposes.
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21 422. Violations of 18 U.S.C. § 1962(c) RICO Acts in Furtherance of Enterprise; by engaging in a
22 pattern of illegal conduct including failure to properly apply, use, and enforce the antitrust policy
23 more than once. Office of General Counsel failed to recuse; Office of Chief Trial Counsel failed to
24 intervene. Board of Trustees failed to intervene. All at varying times had constructive or express
25 knowledge of the circumstance.
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423. Violations of 18 U.S.C. § 1962(a) RICO Investing Proceeds of Racketeering; by investing the proceeds of their illegal activities into the enterprise. Plaintiff here asserts an established violation of 18 U.S.C. § 1962(a) under RICO, based on credible report and personal experience that the defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the STATE BAR, to continue the “illusion” of proper regulatory function in law school regulation.

424. PLAINTIFF believes the Court will likely find they charged “arbitrary and capricious” fees while failing to follow mandated administrative procedures to establish due process compliance under the APA and CAPA or other statutes. Here, PLAINTIFF must pay a mandatory student registration fee and testing fees for the FYLSX. Fees paid here, as part of the ADMISSIONS pogrom, are not considered included in the general fund and are re-utilized to perpetuate the pogrom.

425. Violations of 18 U.S.C. § 1962(b) in that PCL DEFENDANTS PEÑA and SPIRO maintain control of the People’s College of Law through a pattern of conduct and racketeering activity, where PEÑA maintains formal control as President and SPIRO as “arms-length” muckraker.

a) Plaintiff based on personal experience and credible information, believes the control of PCL was illegitimately obtained and maintained by SPIRO, GONZALEZ, PENA and others Enterprise P operators through specific conduct of the defendants, including, but not limited to intimidation, harassment, gaslighting, unfair business and debt collection practices, deceit and misrepresentation.

a. SPIRO’S letter of resignation letter of July 14, 2021 [asserts this as evidence of PCL’s operation as an alter ego for the DEFENDANTS, as what would ordinarily be a “substantive” change and release of control is “hobbled” for dubious cause with the effect of THE status quo preservation of actual control.

b) PEÑA or SPIRO directed or aided BOUFFARD to issue invoice and collect moneys, totaling \$7,934 under unfair terms, retaliatory intent and extortionary threat, because the PLAINTIFF did not owe the sum AND PENA, SPIRO and BOUFFARD express and constructive knowledge of this fact.

i) had prior requested accounting, the amount claimed owed did so based on the renege of an earlier employment contract and service hours already performed under PLAINTIFF's contract. PLAINTIFF was specifically targeted and threatened in intimidating with, and

c) BOUFFARD, when asked to produce proof of debt and an accounting promised that one would be forthcoming after the money was paid and review was made. No evidence of legitimate review has ever been offered by PCL or the defendants

426. PCL for its own benefit and contrary to law offered fewer units – credit hours - as a practice designed to “trap” the student after matriculation and passage of the First Year Law School Exam to strengthen the perception of its operation as a legitimate enterprise and reduce reporting and inspection burden related to STATE BAR compliance as well as attract more student prospects.

TENTH CAUSE OF ACTION

CONSPIRACY

(DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GONZALEZ, LEONARD, CHING, NUNEZ, HOPE, WILSON, DURAN, SHELBY, TONEY, STALLINGS, MCFARLAND, SOWELL, ZUNIGA1, KRASILNIKOFF, MAZER)

1 427. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
2 Paragraphs 1 through 426.

3
4 428. Conspiracy is an agreement by two or more persons to commit a wrongful act. The conspiracy
5 need not be secret and may be implied by the conduct of the parties.

6
7 429. California requires an overt act by at least one of the parties.

8 430. From the evidence presented, it appears likely that DEFENDANTS SARIN, BOUFFARD,
9 PEÑA, SPIRO, GONZALEZ, LEONARD, CHING, NUNEZ, HOPE, WILSON, DURAN,
10 SHELBY, TONEY, STALLINGS, MCFARLAND, SOWELL, ZUNIGA¹, and others participated
11 in a conspiracy to deny PLAINTIFF equal protection under the law. Specifically, by refusing to
12 provide PLAINTIFF with accurate transcripts or viable transfer options, failure to in good faith
13 compose or fairly process the request for a "Special Circumstance Exemption" under GULSR
14 Section 5.6 without adequate consideration, in addition to the other overt acts or steps concomitant
15 with the breach their contract and duty to him, the DEFENDANTS effectively prevented
16 PLAINTIFF from completing his legal education and obtaining his degree. DEFENDANTS planned,
17 announced and repudiated their obligations, including the statutory requirement to provide 270 hours
18 of legal education for 4 years, and thus failed to take reasonable steps to ensure its provision.
19 Additionally, DEFENDANTS violated STATE BAR guidelines and regulations, which resulted in
20 the denial of PLAINTIFF's rights to due process and equal protection under the law because the
21 defendants were aware of the required conduct at the time of negligent or intentional lapse.
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431. When made expressly aware of conduct or rule with attached requirement for review, the STATE BAR continued or allowed to continue as the sole regulator in the field, the improper conduct in multiple areas for protracted periods of time conducted by PCL.

- a. PCL was allowed to continue in its non-compliant unit awards for years;
- b. Lack of intervention by STATE BAR facilitated PCL DEFENDANTS misconduct, as the anti-protective policy was published and followed as Rule.

432. The defendant parties are assisted by the legitimate regulatory relationship that exists between the parties, but the nature and quantity of communications from the PLAINTIFF and DEFENDANTS “in their own words” adds additional support to an affirmative finding.

433. The parties operate separate and distinct qualifying enterprises because the STATE BAR and PCL both engaged in likely tortious conduct for a continuous period to accomplish

434. The State Bar IN EFFECT facilitated an unfair circumstance, where it fails to inform the public of the known risk and then, when the unwitting is trapped, works in concert with the predator to prevent both escape and accurate record of the incident.to unfairly restrict law school transfers, restraining public liberty and trade while sustaining increased costs and risks to the Federal Government for legal education.

435. There exists an acute threat to the public because the schemes to defraud students and consumer market participants like Plaintiff are ongoing; DURAN, LEONARD, WILSON, HOLTON, RANDOLPH, CHING, NUNEZ, STALLINGS, HERMAN, SHELBY, TONEY, MCFARLAND and SPIRO, HCP, GONZALEZ, BOUFFARD, ANTONIO, GILLENS, DUPREE, FRANCO,

SARINANA as well as other members of Enterprise P and Enterprise S, as actors in actual or proximate privity to the harms to Plaintiff or the concealment of the culpable conduct, conducted individually and under “vertical merger” under the auspices of state authorized regulatory activity.

436. Here, the conduct related to an issue that could be so easily and quietly resolved by correcting a few transcripts was egregious, so egregious that it is hard to imagine any reasonable person adopting baseless position and then defending it in writing in front of the regulator. Here, licensees asserted to law enforcement and the regulator that PLAINTIFF consented to multiple privacy violations under state statute, and by allowing SPIRO, GONZALEZ, and PENA to make direct and spurious statements, knowing the issue was a “criminal matter” and providing no clarification to PCL or assistance to PLAINTIFF, seems consistent with a consolidated conspiratorial cause.

437. The State Bar's violation of the Federal Administrative Procedure Act and State CAPA statutes, failure to perform Constitutional review of statutes, rules, or procedures, implementation and enforcement of underground rules and procedures, and capricious and arbitrary use and application of determination or decision-making authority all constitute unlawful, unfair, or fraudulent business practices under California Business and Professions Code sections § 17200 and § 17500, although separate as causes or acts, suggests the DEFENDANTS concerted action. All relevant and proven violations here Plaintiff will allege are also “predicate acts” for purposes of RICO determination.

438. The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice.

1 439. The State Bar's failure to enforce the rules and regulations related to the regulation of
2 unaccredited fixed facility law schools, including credible reports of unfair collection practices,
3 extortion, conversion, harassment, defamation, interference with business relationships, and
4 conspiracy to deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment
5 protections; all aforementioned acts likely fall under the category of unlawful, unfair, or fraudulent
6 business practice. Professions Code section 17200; all of the latter are acts compatible with
7 conspiracy or inchoate acts, and here the failings are systemic.

9
10 440. Failing to observe corporate formalities as required by law and by PCL's bylaws, including the
11 Community Boards continuous failure to hold legitimate elections, illegitimate and likely ultra vires
12 conduct, combined with the submission of false statements to the Secretary of State all likely qualify
13 as unfair business practice under BPC § 17200.

14
15 441. PCL DEFENDANTS did not request, nor did they receive written resignation from the
16 PLAINTIFF. Because the PCL DEFENDANTS are both expressly and constructively aware of these
17 issues yet act in clear disregard, it strongly suggests concerted action for singular purpose.

18
19 442. PLAINTIFF has demanded an accounting, where PCL has performed fundraising guaranteeing
20 the use of funds but refuses to demonstrate that it will comply with any non-judicial demand.
21 DEFENDANTS had a duty of reasonable care. Because the PCL DEFENDANTS are both expressly
22 and constructively aware of these issues yet act in clear disregard, it strongly suggests concerted
23 action for singular purpose.

1 443. At all times relevant, the PCL DEFENDANTS failed to act in good faith, in the best interests of
2 PCL, and with such care as an ordinarily prudent person in a like position would use under similar
3 circumstances.

4
5 444. The State Bar's failure to follow established procedures and other misconduct breached their
6 statutorily assigned and sworn duties under California Code, Business and Professions Code (BPC) §
7 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member Defendants failed
8 to support the Constitution and the Rule of Law, to respect the courts of justice and judicial officers,
9 to maintain actions, proceedings, or defenses that are legal or just, candor and truth in statements of
10 law or legal proceedings, to advance no fact prejudicial to the honor or reputation of a party for
11 unjust cause, not to encourage either the commencement or the continuance of an action or
12 proceeding from any corrupt motive of passion or interest, to never reject, for any consideration
13 personal to himself or herself, the cause of the defenseless or the oppressed, and to cooperate with
14 the tribunal.
15
16

17 445. Defendants engaged in a pattern of illegal conduct including failure to properly apply, use, and
18 enforce the antitrust policy more than once. Office of General Counsel failed to recuse; Office of
19 Chief Trial Counsel failed to intervene. Board of Trustees failed to intervene. All at varying times
20 had constructive or express knowledge of the circumstance. This also implies cooperation, as non-
21 conforming results are posted on the STATE BAR's public web site.
22

23 446. Defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the
24 STATE BAR, to continue the "illusion" of proper regulatory function in law school regulation. They
25 charged arbitrary and "capricious" fees while failing to follow mandated administrative procedures
26
27

1 to establish due process compliance under the APA and CAPA or other statutes. Plaintiff here asserts
2 an established violation of 18 U.S.C. § 1962.

3
4 447. California STATE BAR implemented underground rules while by failing to follow mandated
5 administrative procedure to establish “due process” compliance under the APA and CAPA or other
6 statutes.

7
8 448. When made expressly aware of conduct or rule with attached requirement for review under the
9 APA, STATE BAR continued in the unlawful conduct in multiple areas of its daily operations, in
10 violation of mandate and breach of duty clearly outside the threshold of “good faith and fair
11 dealing”.

12
13 449. State Bar operated to unfairly restrict law school transfers restraining public liberty and trade
14 while sustaining increased costs and risks to the Federal Government for legal education by allowing
15 schools in its system to not provide “full faith and credit” by use of exclusionary rule that gives the
16 public institution permission to exclude for meritorious review state citizens and taxpayers based on
17 origin; here, the STATE BAR administers a test to students in this category as objective assessment
18 and measure of student fitness.

19
20 450. Violation of the Federal Administrative Procedure Act and State CAPA statutes; failure to
21 perform Constitutional review of statutes, rules, or procedures; implementation and enforcement of
22 underground rules and procedures; capricious and arbitrary use and application of determination or
23 decision-making authority.

24
25 451. The January 20, 2023, and RANDOLPH, in her capacity as secretary for the Office of General
26 Counsel, sent the first unsigned antitrust determination to plaintiff with OGC masthead, dated
27

January 20, 2022 and identified as “ANTITRUST DETERMINATION 2023-0001” from unsigned author. The determination includes OGC selected excerpts of the original complaint that appear selected to obscure the actual issues and exacerbate the appearance of incoherence.

452. On or about September 26, 2022, and January 20, 2023, OGC fails to recuse or in other clear, apparent, and transparent fashion remove conflict of interest issues using its own conflict of interest policy, as earlier referenced in EXHIBIT AO-1. Here, KRISILINIKOF peers and immediate supervisors, including HOLTON, GRANDT, DAVYTYAN, RANDOLPH and WILSON

453. OCTC fails to do the intervene upon OGC’s failures.

454. PLAINTIFF alleges that the STATE BAR and DEFENDANTS to this cause, were constructively and expressly aware of the circumstances, yet continued to operate in virtually “unchanged” and violative fashion to the present day.

455. Violation of California Business and Professions Code sections § 17200 and § 17500 violations: The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules and regulations related to the regulation of unaccredited fixed facility law schools, including credible report of unfair collection practices, extortion, conversion, harassment, defamation, interference with business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment protections. Because the acts likely fall under the category of unlawful, unfair, or fraudulent business practice. These violations are particularly suggestive and lend themselves to being declared predicate acts for qualification purposes.

1 456. Violation of California Code, Business and Professions Code (BPC) § 6068 (a), (b), (c), (d), (f),
2 (g) (a), (b),;; The State Bar and PCL licensee or member Defendants failure to follow established
3 procedures and other misconduct breached their statutorily assigned and sworn duties to support the
4 Constitution and the Rule of Law; to respect the courts of justice and judicial officers; to maintain
5 actions, proceedings, or defenses that are legal or just, candor and truth in statements of law or legal
6 proceedings; to advance no fact prejudicial to the honor or reputation of a party for unjust cause; Not
7 to encourage either the commencement or the continuance of an action or proceeding from any
8 corrupt motive of passion or interest; Never to reject, for any consideration personal to himself or
9 herself, the cause of the defenseless or the oppressed; and cooperation with the tribunal. These
10 violations are likely considered predicate acts for qualification purposes.

13 457. Violations of 18 U.S.C. § 1962(c) RICO Acts in Furtherance of Enterprise; by engaging in a
14 pattern of illegal conduct including failure to properly apply, use, and enforce the antitrust policy
15 more than once. Office of General Counsel failed to recuse; Office of Chief Trial Counsel failed to
16 intervene. Board of Trustees failed to intervene. All at varying times had constructive or express
17 knowledge of the circumstance.

19 458. Violations of 18 U.S.C. § 1962(a) RICO Investing Proceeds of Racketeering; by investing the
20 proceeds of their illegal activities into the enterprise. Plaintiff here asserts an established violation of
21 18 U.S.C. § 1962(a) under RICO, based on credible report and personal experience that the
22 defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the
23 STATE BAR, to continue the “illusion” of proper regulatory function in law school regulation.
24 STATE BAR charged fees while failing to follow mandated administrative procedures to establish
25 due process compliance for its rulemaking and scope of authority under the APA and CAPA or other
26
27

statutes. Here as example, PLAINTIFF must pay mandatory fees for registration as a law school student and subsequent testing for the FYLSX. Fees paid here, as part of the ADMISSIONS pogrom, are not considered included in the “general fund” and are re-utilized to perpetuate the pogrom.

459. Violations of 18 U.S.C. § 1962(b) RICO Control of Interests in Enterprise by exerting control over the enterprise through illegal means or underground rule.

460. The September 15, 2022, email exchange to PLAINTIFF with SPIRO, PEÑA, ZUNIGA1 and LEONARD’s soliciting his “consent” change the status of classes he had already taken for credit or had retaken due to PCL’s failure to provide adequate resources for the successful operation of its programs.

461. Plaintiff is informed and believes upon credible evidence that this request was likely in direct violation of STATE BAR guidelines, that expressly prohibit taking courses for credit twice or market participant misrepresentations.

462. Plaintiff believes this is evidence of conspiracy, in that the “offer” was presented uniformly and in concert.

463. PLAINTIFF believes this was an inappropriate solicitation because the rules for law schools appear to preclude encouraging misrepresentation or falsifying records.

464. PLAINTIFF repudiated the scheme in a writing of the same day, September 15, 2022, communicated to WILSON, DAVYTYAN, LEONARD, CHING, NUNEZ, DURAN and others. Plaintiff asked specifically why the conflict of interest issues were not being addressed because he believed the continued “runaround” with the same parties acting in clear and coherent alliance abusive.

1 465. Plaintiff believes this reflects the intent to create or alter records or misrepresentation by SPIRO
2 and LEONARD because both are acting in their “official capacity”, i.e., LEONARD as Principal
3 Analyst left responsible for compliance oversight of PCL and SPIRO presumably as pro bono
4 counsel.

5
6 466. Violations of 18 U.S.C. § 1962(d) RICO Conspiracy under Subsections (a)-(d); by conspiring to
7 engage in illegal racketeering activities, including arbitrary and exclusionary policy enforcement to
8 the detriment of a specific targeted market speech.

9
10 467. Operation of RICO Enterprise: RICO Acts in Furtherance of Enterprise

11
12 468. Violations of the State Bar Act § 6001.1 - Protection of the Public by unlawfully awarding 2/3
13 rds. of the Federal and State Mandated unit hours—credits—for its regulated postsecondary legal
14 education services as defined for use under Higher Education Act Title IV requirements for
15 postsecondary institutions.

16
17 469. Tortious Breaches of the Implied Covenant of Good Faith & Fair Dealing

18 470. Contracts [Matriculation and Regulatory]

19
20 471. Performance of Fiduciary Obligations – Here, the State Bar has a duty to protect the public under
21 CBPC §6001.1 and has failed to comport its conduct or its regulatory system to the law.

22
23 472. Violations of 42 U.S.C. § 1981 Equal Protection 14th Amendment (U.S.) by violating or
24 discriminating against students based on their constitutional rights including:

- c. The UCLA is allowed to operate using exclusionary rules that prohibit merit-based application by **“Students from law schools that are only state-approved are not eligible for admission.”**
- d. PCL is allowed to violate various laws and regulatory rules with the express knowledge and facilitation of STATE BAR personnel.
- e. STATE BAR maintains policies as the sole regulator in the sphere that denies students substantive or procedural protection, in clearly stated policies communicated to every school in the marketplace.
- f. When STATE BAR receives complaints related to schools or licensees, it “fails” to address them. Michael S. Tilden, in his capacity as acting State Auditor, released a report dated April 14, 2022, that detailed that in “more than one-third of the cases we reviewed” the STATE BAR “allowed staff members to review and close complaints” when it was already known that someone in the organization had a “conflict of interest” with that attorney. A copy of the reports “Fact Sheet” can be found on the California State Auditors web site (<https://www.bsa.ca.gov/pdfs/factsheets/2022-030.pdf>).

1. Here alleged the above schools have been granted “superpowers” that have disparate negative impact in the vulnerable communities the state run unaccredited schools like PCL recruit students.

473. First Amendment - Free Speech Suppression by Conduct including violations of:

474. Penal Code 132 PC - offering false evidence.

475. Penal Code 134 PC - preparing false evidence.

1 476. Penal Code 135 PC - destroying evidence with "intent to deprive".

2 477. Penal Code 136.1 PC - tampering or intimidating witnesses.

3
4 478. Penal Code 148 PC - resisting arrest or obstructing a police officer (passive)

5 479. Penal Code 632.PC – violation of privacy by unlawful recording.

6
7 480. Violation Fourth Amendment – Takings Clause -By deprivation of actual constitutional rights
8 and privileges and by unlawful discrimination without rational basis or in direct conflict of protected
9 status.

10
11 481. Violations of 18 U.S.C. § 1962(b) in that PCL defendants PEÑA and SPIRO maintain control of
12 the People’s College of Law through a pattern of conduct and racketeering activity, where PEÑA
13 maintains formal control as President and SPIRO informal control.

14
15 d) Plaintiff based on personal experience and credible information, believes the control of PCL was
16 illegitimately obtained and maintained by SPIRO, GONZALEZ, PENA and others Enterprise P
17 operators through specific conduct of the defendants, including, but not limited to intimidation,
18 harassment, gaslighting, unfair business and debt collection practices, deceit and
19 misrepresentation.

20
21 482. For example, the November 28, 2021, publication of GONZALEZ’s letter, likely defamatory,
22 PLAINTIFF evidences both concerted effort to damage PLAINTIFF’s reputation and encourage
23 antagonistic-levels of ill will amongst his community peers, as the messages content was both
24 “gaslighting” and foreseeably incendiary.

e) PEÑA or SPIRO directed or aided BOUFFARD to issue invoice and collect moneys, totaling \$7,934 under unfair terms and retaliatory intent, since the plaintiff did not owe the sum, had prior requested accounting, the amount claimed owed did so based on the renege of an earlier employment contract and service hours already performed under PLAINTIFF's contract. PLAINTIFF was specifically targeted and threatened in intimidating with, and

f) BOUFFARD, when asked to produce proof of debt and an accounting promised that one would be forthcoming after the money was paid and review was made. No evidence of legitimate review has ever been offered by PCL or the defendants

483. PCL for its own benefit and contrary to law offered fewer units – credit hours - as a practice designed to “trap” the student after matriculation and passage of the First Year Law School Exam to strengthen the perception of its operation as a legitimate enterprise and reduce reporting and inspection burden related to STATE BAR compliance as well as attract more student prospects.

484. Although PCL DEFENDANTS conduct violated the law or breached its own regulatory rules, STATE BAR facilitated its continuance or concealment.

485. Pursuant to RICO, 18 U.S.C. § 1964(c)-(d), Plaintiff is entitled to recover treble damages plus costs and attorneys' fees from Defendants.

486. Plaintiff alleges that the Defendants acted willfully, maliciously and fraudulently in coercing Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving Plaintiff of not only the money paid to Defendants, but the right under due process to receive the award of his degree, thereby justifying an award of punitive damages.

ELEVENTH CAUSE OF ACTION

COMMON LAW EXTORTION

**(DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GILLENS, FRANCO, TORRES,
SANCHEZ, SILBERGER, DEUPREE and DOES 1-88)**

487. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 486.

488. Common law extortion is the obtaining of property from another induced by a wrongful use of force or fear, or under color of official right.

489. Here, DEFENDANTS refers to ALL DEFENDANTS named and appearing immediately below the caption for the Eleventh cause of action.

490. Here, PCL DEFENDANTS refers to all previously associated named directors and officers of either PCL or Enterprise P, named and appearing immediately below the caption for this Eleventh cause of action.

491. As alleged herein, DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GILLENS, FRANCO, TORRES, SANCHEZ, SILBERGER, DEUPREE and DOES 1-88, acting under color of official right from their positions of authority with PCL, demanded or abetted and received payment from Plaintiff.

492. The PLAINTIFF was in the midst of successfully completing his studies and had made all required payments when Defendants threatened to block and not allow Plaintiff to complete his

1 studies at PCL timely if the additional sum of \$7934 was not immediately paid; Defendants
2 eventually reneged on the provision of Plaintiff's 4L year of classes, carrying out the "threat" even
3 after he had paid the \$7934.

4
5 493. Notwithstanding the payment to Defendants to continue his studies "unmolested", Plaintiff's
6 harassment was ongoing; PCL reneged on its promise to allow him to pursue his studies without
7 further interference, its agents engaging instead in targeted conduct.

8 494. As alleged herein, it appears likely that DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO,
9 GILLENS, FRANCO, TORRES, SANCHEZ, SILBERGER, DEUPREE and DOES 1-88
10 participated in a conspiracy to deny PLAINTIFF equal protection under the law. Specifically, by
11 refusing to provide PLAINTIFF with accurate transcripts or viable transfer options, failure to in
12 good faith compose or fairly process the request for a "Special Circumstance Exemption" under
13 GULSR Section 5.6 without adequate consideration, in addition to the other overt acts or steps
14 concomitant with the breach their contract and duty to him, the DEFENDANTS effectively
15 prevented PLAINTIFF from completing his legal education and obtaining his degree.
16
17 DEFENDANTS planned, announced and repudiated their obligations, including the statutory
18 requirement to provide 270 hours of legal education for 4 years, and thus failed to take reasonable
19 steps to ensure its provision. Additionally, DEFENDANTS violated STATE BAR guidelines and
20 regulations, which resulted in the denial of PLAINTIFF's rights to due process and equal protection
21 under the law because the defendants were aware of the required conduct at the time of negligent or
22 intentional lapse.
23
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495. When made expressly aware of conduct or rule with attached requirement for review, the STATE BAR continued or allowed to continue as the sole regulator in the field, the improper conduct in multiple areas for protracted periods of time conducted by PCL.

496. Plaintiff alleges that the Defendants acted willfully, maliciously and fraudulently in coercing Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving Plaintiff of not only the money paid to Defendants, but the due process right to lawfully obtain his degree, thereby justifying an award of punitive damages.

TWELFTH CAUSE OF ACTION

VIOLATIONS OF CIV. CODE §52.1 – BANE ACT

(DEFENDANTS LEONARD, PEÑA, SPIRO, CHING, WILSON, BOUFFARD, SARIN)

497. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 496.

498. Plaintiff claims that DEFENDANTS LEONARD, PEÑA, SPIRO, CHING, WILSON, BOUFFARD, SARIN intentionally interfered with or attempted to interfere with his civil rights by threats, intimidation, or coercion. To establish this claim Plaintiff will show:

499. That by threats, intimidation or coercion based on a nonviolent threat with severe consequences, BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused HILL to reasonably believe that if he exercised his right to report misconduct, SARIN or PENA would block him from classes, causing the loss of at least one year of study.

500. Additionally, that by threats, intimidation or coercion based on a nonviolent threat with severe consequences, BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused HILL to reasonably believe that if he did not pay them moneys they knew or should have known were not owed in the amount of \$7934, SARIN or PENA would block him from classes, causing the loss of at least one year of study and interfering in the “fair and just” pursuit of his degree.

501. Additionally, that by threats, intimidation or coercion based on a nonviolent threat with severe consequences, BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused HILL to reasonably believe that if he did not pay them moneys they knew or should have known were not owed in the amount of \$7934, SARIN or PENA would block him from classes, causing the loss of at least one year of study and interfering in the “fair and just” pursuit of his degree.

502. Here, in fact, as demonstrated at various times SPIRO, LEONARD, PENA and SARIN did in fact act to interfere with Plaintiff’s pursuit of education.

503. Furthermore, that WILSON, CHING and LEONARD, under “color of law” by threats, intimidation or coercion based on a nonviolent threat with severe consequences, caused HILL to reasonably believe that if he did not pay them moneys ALL likely knew or should have known were not owed in the amount of \$7934, SARIN or PENA would be allowed to block him from classes, causing the loss of at least one year of study, as it was clear from their prior communications that they would enforce the “non-intervention” policy.

504. BOUFFARD, PENA and SARIN intended to deprive the Plaintiff of enjoyment of the interests protected by his contractual rights; here PENA and SARIN, as members of the “EC”, had the ability and controlled the means required to carry out the threats and did in fact carry out the threats even after payment, including blocking or expelling the student from his classes.

1 505. The Plaintiff was harmed and the harm continues as BOUFFARD, SPIRO, SARIN, and PENA
2 have failed to return moneys owed and have reneged on their contractual and statutory obligations.

3 506. Additionally, DEFENDANTS violated STATE BAR guidelines and regulations, which resulted
4 in the denial of PLAINTIFF's rights to due process and equal protection under the law because the
5 defendants were aware of the required conduct at the time of negligent or intentional lapse.
6

7 507. When made expressly aware of conduct or rule with attached requirement for review, the
8 STATE BAR continued or allowed to continue as the sole regulator in the field, the improper
9 conduct in multiple areas for protracted periods of time conducted by PCL.
10

11 508. Plaintiff alleges that the Defendants acted willfully, maliciously, and fraudulently in coercing
12 Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving
13 Plaintiff of not only the money paid to Defendants, but the due process right to lawfully obtain his
14 degree, thereby justifying an award of punitive damages.
15

16 509. Here, the coercion and deprivation of money was also enacted to “disincentivize” student
17 transfer and the exercise of consumer liberty.

18 510. Plaintiff alleges that WILSON, CHING, SPIRO, LEONARD, sent emails and text messages in
19 furtherance of the Extortion Scheme, a scheme that was for Defendants' direct pecuniary benefit, and
20 therefore each such email and text message constitutes a separate violation of 18 U.S.C. § 1343,
21 which prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to
22 defraud.
23

24
25 **IV. REMEDIES**
26

511. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 650.

512. Plaintiff prays for judgment as follows:

513. For a permanent injunction, enjoining PCL Defendants, their employees, agents, servants, representatives, successors, and assigns, any and all persons acting in concert or participation with them, and all other persons, corporations, or other entities acting under, by, through or on their behalf, from doing any of the following until they have first provided a full and complete accounting for all funds received by, and disbursed from; any and all financial accounts of PCL from its inception to the present: (1) expending, disbursing, transferring, encumbering, withdrawing or otherwise exercising control over any funds received by or on behalf of PCL or rightfully due PCL except as authorized by the Court; (2) conducting business of any kind on behalf of, or relating to PCL other than as necessary to assist with disgorgement, transfer or dissolution; and (3) controlling or directing the operations and affairs of any California nonprofit or public benefit corporation;

514. That an order issue directing that PCL Defendants and each of them, render to the Court and to the Plaintiff a full and complete accounting of the financial activities and condition of PCL from their inception to the present, to include the expenditure and disposition of all revenues and assets received by or on behalf of PCL. Upon the rendering of such accounting, that the Court determine the property, real or personal, or the proceeds thereof, to which PCL and other beneficiaries thereof are lawfully entitled, in whatsoever form in whosoever hands they may now be, and order and declare that all such property or the proceeds thereof is impressed with a trust for charitable purposes, that defendants are constructive trustees of all

such charitable funds and assets in their possession, custody or control, and that the same shall be deposited forthwith in Court by each and every defendant now holding or possessing the same or claiming any rights, title or interest therein. In addition, that these defendants be surcharged and held liable and judgment entered against each of them for any and all such assets for which they fail to properly account, together with interest thereon at the legal rate from the date of liability thereon; and that any and all expenses and fees incurred by Defendants in this action be borne by the individual defendants and each of them and not by PCL or any other public or charitable corporation or fund;

515. Plaintiff seeks grant of an earned Juris Doctorate and asks for the court to direct specific performance for its delivery to the State Bar as regulator and degree authority.

516. Plaintiff seeks admission to the Federal Bar and provides an initial attestation in specific support of that request.

517. Plaintiffs ask for Declaratory relief and for this Court to expressly affirm that Defendant STATE OF CALIFORNIA (“State”) through its monopoly regulatory entity THE STATE BAR has a self-executing, threshold duty to determine the “actual costs” needed to provide law students in all California districts with the opportunity to obtain a sound basic legal education in a manner correspondent with public safety and its statutory obligations, and then to operate in good faith seeking to fully fund its share of such costs and perform its regulatory responsibilities. The State Bar cannot possibly “ensure” its finance system can provide constitutionally sufficient funding until it adheres to this threshold duty, and it apparently will not without this Court’s express affirmation that it must as it has failed to follow the mandates of its own policies or state administrative orders.

1 518. For damages resulting from Defendants' violations of RICO and fiduciary duty, Plaintiff
2 seeks an amount to be determined following an accounting, but believed to be more than \$5
3 million, plus interest at the legal rate until the judgment is paid.
4

5 519. Plaintiff also seeks punitive and exemplary damages against Defendants according to proof.

6 520. Plaintiff seeks special damages.
7

8 521. Plaintiff requests that the Court assess civil penalties against all Defendants under California
9 Civil Code section 51 for violating the Unruh Civil Rights Act (Civ. Code§ 51 et seq.) of four
10 thousand dollars (\$4,000) against Defendants for each violation of Business and Professions
11 Code section 17200, as proved at trial, for at least \$100,000.
12

13 522. Under Business and Professions Code section 17206, Plaintiff requests that the Court assess
14 a civil penalty of two thousand five hundred dollars (\$2,500) against Defendants for each
15 violation of Business and Professions Code section 17200, as proved at trial, for at least
16 \$100,000.
17

18 523. By Business and Professions Code section 17536, Plaintiff requests that the Court assess a
19 civil penalty of two thousand five hundred dollars (\$2,500) against Defendants for each
20 violation of Business and Professions Code section 17500, as proved at trial, for at least
21 \$100,000.
22

23 524. Under Business and Professions Code section 17206.1, Defendants and each of them should
24 be ordered to pay a civil penalty of \$2,500 for each violation of Business and Professions Code
25 section 17200 that was perpetrated against a senior citizen or disabled person, as proved at trial,
26 for at least \$500,000.
27

1 525. Pursuant to Business and Professions Code section 17203, Plaintiff seeks a permanent
2 injunction enjoining Defendants, their successors, agents, representatives, employees, and all
3 persons who act in concert with, or on behalf of, defendants from engaging in unfair
4 competition as defined in Business and Professions Code section 17200, including, but not
5 limited to, those acts and omissions alleged in this Complaint.
6

7 526. Plaintiff also requests that the Court order the involuntary dissolution of PCL under
8 Corporations Code section 6518 and establish a procedure for determining the disposition of
9 PCL's assets in a manner consistent with their charitable purposes and consistent with any
10 lawful restrictions that have been placed upon any of their remaining assets or oversight of a
11 Trustee to oversee that appropriate elections are held.
12

13 527. Related to the above, Plaintiff requests that the Court order the permanent removal of the
14 defendants under Corporations Code section 5223 as the Court deems appropriate.
15

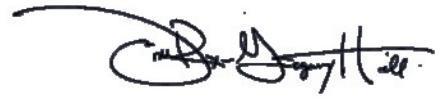
16 528. Plaintiff seeks declaration of his "good faith" indemnification, as such indemnity was
17 unfairly questioned and denied by PCL DEFENDANTS.
18

19 529. For Plaintiff's costs of suit and other costs under Government Code section 12598, and for
20 Plaintiff's attorney fees as provided in Government Code section 12598 and Code of Civil
21 Procedure section 1021.8, and for such other relief as the Court may order.
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1 **PLAINTIFF VERIFIES THE TRUTH AND BELIEF IN THE TRUTH OF THOSE MATTERS**
2 **DESCRIBED “UNDER PENALTY OF PERJURY” AND THEREFORE THIS COMPLAINT IS**
3 **DEEMED VERIFIED UNDER THE PROVISIONS OF CODE OF CIVIL PROCEDURE**
4 **SECTION 446.**

5
6 Dated: April 28, 2023

7
8 Respectfully submitted,

9
10 

11
12 TODD R. G. HILL

13
14 PRO SE LITIGANT

ATTACHMENT 5

Ira Spiro (sued as Robert Ira Spiro)
10573 West Pico Blvd. #865
Los Angeles, CA 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com

Defendant in Propria Persona

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. CV23-1298-JLS(PDx)

**DEFENDANT SPIRO'S
OPPOSITION TO PLAINTIFF'S
MOTION TO SUPPLEMENT FIRST
AMENDED COMPLAINT (Dkt. No.
40)**

**MEMORANDUM OF POINTS AND
AUTHORITIES;**

DECLARATION OF IRA SPIRO

Date and Time of Hearing:

Date: Friday, July 7, 2023

Time: 10:30 a.m.

Before Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **A. PROCEDURAL BACKGROUND, BRIEFLY**

3 On April 5, 2023, the Court issued an order (Dkt. No. 37) dismissing
4 Plaintiff's initial Complaint with leave to amend. The Order detailed the deficiencies
5 in the Complaint. On April 18, Plaintiff filed his First Amended Complaint (Dkt.
6 No. 38). The First Amended Complaint repeats nearly all the deficiencies of the
7 initial Complaint. On May 5, Plaintiff filed a document titled "A Motion for Leave
8 to Supplement Todd R. G. Hill's First Amended Complaint" (Dkt. No. 40),
9 attaching a proposed "Supplemental First Amended Complaint" ((Dkt. No. 40-1).
10 This is Defendant Spiro's opposition to that motion.

11 **B. THE MOTION IS GROSSLY IMPROPER IN FORM, AND**
12 **SHOULD BE DENIED ON THOSE GROUNDS AT LEAST.**

13 Plaintiff's motion (Dkt. No. 40) violates the large majority of rules governing
14 motions in general and motions to amend pleadings in particular. Following are only
15 some of the violations:

- 16 1. The motion is not signed, not by Plaintiff or by anyone else.
- 17 2. The motion was not served at all, not on Defendant Spiro or anyone
18 else. (Defendant Spiro learned of the motion only because he viewed the Court's
19 docket after it was filed. (Spiro Decl., ¶ 1.)) There is no proof of service. Service
20 outside the Court's automatic electronic service feature is required, and thus a proof
21 of service is required, because the Court's order of April 5, 2023 prohibited Plaintiff
22 from using the ECF system. The order did notify Plaintiff that he could use the
23 EDSS system, but the Court's website for assistance with the EDSS system includes
24 this question and answer:

25 "Do I still have to serve copies of my documents on people?"
26
27
28

1 “Yes. EDSS will not send copies of your documents to anyone but the Court.
 2 You must serve copies of your documents on other parties to the case
 3 yourself.”

4 (The quotation is at <https://apps.cacd.uscourts.gov/edss>.)

5 3. The motion completely fails to supply the required means to determine
 6 the additions and deletions to the First Amended Complaint that would be made by
 7 the proposed “Supplemental First Amended Complaint” and completely fails to
 8 identify the page and line numbers and wording of the proposed changes and
 9 additions of material.

10 4. The motion completely fails to comply with Local Rule 7-3. Plaintiff
 11 did not have a conference before making the motion, did not even attempt to have
 12 one, and does not claim to have had one. Plaintiff filed the motion on the very day
 13 Plaintiff and Defendant Spiro were meeting face-to-face *on motions contemplated*
 14 *by Defendant Spiro*, but Plaintiff said nothing about any motion to file a
 15 supplemental or amended complaint or any motion by him, and Defendant Spiro did
 16 not even know about the “Motion to Supplement First Amended Complaint”
 17 motion. These facts and Plaintiff’s deceitful conduct surrounding them are detailed
 18 in the declaration of Defendant Spiro, paragraph 2.

19 5. The motion submits no evidence for the supposed facts stated in it.

20 6. On the first page of the motion, in the required naming of the Judge,
 21 Plaintiff even gets the name of Judge Staton wrong.

22
 23 **C. THE PROPOSED “SUPPLEMENTAL FIRST AMENDED**
 24 **COMPLAINT” VIOLATES THE ORDER OF APRIL 5, 2023 (Dkt. No. 37)**

25 Without reading the entire 114 pages of Plaintiff’s proposed “Supplemental
 26 First Amended Complaint,” a glance at some of its features shows that it is yet
 27 another violation of the order of April 5, 2023 dismissing the initial Complaint with
 28 leave to amend. (It is *another* violation, because the First Amended Complaint (Dkt.

No. 38) violates the Order in the same ways.) Following are some examples of how the “Supplemental First Amended Complaint” violates the Order:

a. The Order condemns complaints in which “each count incorporates every antecedent allegation by reference”. (Page 3, quotation paragraph.) Yet that is precisely what the Plaintiff’s proposed “Supplemental First Amended Complaint” does – each “cause of action” incorporates all or nearly all paragraphs that precede it. (The First Amended Complaint does the same thing.)

b. The April 5th Order also condemns complaints “where the plaintiff uses the omnibus term ‘Defendants’ throughout a complaint by grouping defendants together without identifying what the particular defendants specifically did wrong.” (Page 3, quotation paragraph.) One need only read a few paragraphs into the “First Cause of Action” to find an egregious example, paragraph 242, which is also in the First Amended Complaint as paragraph 189. It reads (with emphasis added in the first line):

“242. That **PCL DEFENDANTS failed** in:

“a) making proper and timely mandatory disclosures to PLAINTIFF during academic years 2019, 2020, and 2021, as well as at the time of matriculation contract signing and each year of attendance.

“b) maintaining accurate records and providing timely access to students; c. submitting accurate records timely to the STATE BAR on Plaintiff’s behalf.

“c) failed to exercise good business judgment or the appropriate duty of care.

“d) providing PLAINTIFF with access to board meeting minutes, zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer.

“e) producing records in response to a formal demand for documents.”

1 c. The April 5th Order criticizes the initial Complaint as exceedingly
2 long. It was 402 pages. The First Amended Complaint is also far too long, at 75
3 pages. But the point here is that the proposed “Supplemental First Amended
4 Complaint” compounds the offense by increasing the number of pages by 52%,
5 from the 75-page First Amended Complaint to the 114-page “Supplemental First
6 Amended Complaint.”

7 **D. SANCTIONS**

8 This is most appropriate situation for the Court to use its inherent powers to
9 sanction recalcitrant parties. Sanctions are the only way to protect the Court and the
10 defendants, approximately 70 in number. Plaintiff has already committed a host of
11 violations of court rules, and he was not deterred by the Court's April 5 order. He
12 files what he wants to file, regardless of whether it complies with rules and laws or
13 not, and he has a history of doing that before this case. Plaintiff is nearing or crossed
14 the line into vexatious litigation.

15 This is not the first lawsuit against Peoples College of Law, and those
16 associated with it, in which Plaintiff has persisted in violations of rules and statutes.
17 In 2022, he filed a Los Angeles Superior Court lawsuit, Case No. 22AVRO000363,
18 against Peoples College of Law and its leadership, including Defendant Spiro,
19 making most of the same allegations he makes here. He filed the suit as a Petition
20 for Civil Harassment Restraining Orders, a special proceeding in which damages are
21 not recoverable, yet he sought “compensatory damages ... in the amount \$750,000”
22 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
23 awarded in that type of proceeding. He filed a motion for a temporary restraining
24 order, which was denied. He then filed a “Motion for Clarification and
25 Reconsideration” of the denial, which the Court refused to hear.

26 At the only hearing in the case, Plaintiff refused to stipulate to allow the
27 Commissioner who normally handles Civil Harassment Petitions to hear his case.
28 That caused a Judge from another Department to come to the Commissioner’s

1 Department to hear the case. The Judge dismissed the case, stating in his order of
2 April 8, 2022, “The Court finds that this court is not the appropriate forum for what
3 Petitioner is seeking and orders the case dismissed without prejudice.” The Court
4 also awarded against Plaintiff “\$5,435.00 for attorney’s fees and filing cost payable
5 within 30 days of this date.” Plaintiff has not paid a penny of that award (Spiro
6 Decl., ¶ 3.)

7 Defendant Spiro does not wish money sanctions in favor of himself, but rather
8 a money sanction payable to the Court and, more importantly, sanctions aimed at
9 staunching Plaintiff’s apparently inexorable misconduct, perhaps an order that
10 Plaintiff may not file any further papers without first obtaining written permission
11 from the Court, or even an order dismissing this lawsuit.

12 Respectfully submitted,

13 Dated: May 21 2023

14 _____/s/_____
15 Ira Spiro (sued as Robert Ira Spiro)
16 Defendant in Propria Persona
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DECLARATION OF IRA SPIRO

Ira Spiro declares:

1. I was not served in any way with Plaintiff's Motion to Supplement First Amended Complaint. I did not receive it by mail, by electronic service, or any other means of service. I discovered it only when I viewed the Court's docket after the motion had been filed.

2. The docket and the file stamp on Plaintiff's motion show it was filed on Friday, May 5, 2023. On that very day, I met with Plaintiff face-to-face in West Los Angeles from 12:36 p.m. until approximately 2:30 p.m. We met pursuant to my request under Local Rule 7-3 to confer about *my contemplated motions* against the First Amended Complaint. We did not discuss any motion by Plaintiff. I did not even know the Motion to Supplement First Amended Complaint had been filed. Although we met for two hours or more, Plaintiff said nothing about making a motion to file a supplemental or amended complaint, or about him making any motion at all. At 4:34 a.m. that morning he had emailed me a version of his "Supplemental First Amended Complaint" with no docket number on it and without any motion or indication of one. The text of his email was only "Here is the latest..." and the subject line was "See attached for your review." I saw the email about 10 a.m., but I spent only a few minutes looking over the "Supplemental First Amended Complaint." Plaintiff brought a hard copy of the "Supplemental First Amended Complaint" to the meeting. Twice he started to refer to it, but I stopped any discussion of it, telling him we were not there to talk about it, rather we were there to talk about his First Amended Complaint and my planned motions against it.

3. In 2022, Plaintiff filed a Los Angeles Superior Court lawsuit, Case No. 22AVRO000363, against Peoples College of Law and its leadership, including me, alleging most of the same allegations he makes here. He filed the suit as a Petition for Civil Harassment Restraining Orders, a special proceeding in which damages are not recoverable, yet he sought "compensatory damages ... in the amount \$750,000"

1 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
2 awarded in that type of proceeding. He filed a motion for a temporary restraining
3 order, which was denied. He then filed a “Motion for Clarification and
4 Reconsideration” of the denial, which the Court refused to hear. At the only hearing
5 in the case, Plaintiff refused to stipulate to allow the Commissioner who normally
6 handles Civil Harassment Petitions to hear his case. That caused a Judge from
7 another Department to come to the Commissioner’s Department to hear the case.
8 The Judge dismissed the case, stating in his order of April 8, 2022, “The Court finds
9 that this court is not the appropriate forum for what Petitioner is seeking and orders
10 the case dismissed without prejudice.” The Court also awarded against Plaintiff
11 “\$5,435.00 for attorney’s fees and filing cost payable within 30 days of this date.”
12 Plaintiff has not paid a penny of that award. Attached hereto as Exhibit A is a copy
13 of the order.

14 I declare under penalty of perjury that the foregoing is true and correct and
15 was executed at Los Angeles, California on May 21, 2023.

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17 _____
Ira Spiro
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1 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
2 awarded in that type of proceeding. He filed a motion for a temporary restraining
3 order, which was denied. He then filed a “Motion for Clarification and
4 Reconsideration” of the denial, which the Court refused to hear. At the only hearing
5 in the case, Plaintiff refused to stipulate to allow the Commissioner who normally
6 handles Civil Harassment Petitions to hear his case. That caused a Judge from
7 another Department to come to the Commissioner’s Department to hear the case.
8 The Judge dismissed the case, stating in his order of April 8, 2022, “The Court finds
9 that this court is not the appropriate forum for what Petitioner is seeking and orders
10 the case dismissed without prejudice.” The Court also awarded against Plaintiff
11 “\$5,435.00 for attorney’s fees and filing cost payable within 30 days of this date.”
12 Plaintiff has not paid a penny of that award. Attached hereto as Exhibit A is a copy
13 of the order.

14 I declare under penalty of perjury that the foregoing is true and correct and
15 was executed at Los Angeles, California on May 21, 2023.

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Ira Spiro

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Michael D. Antonovich Antelope Valley Dept. - A10

22AVRO00363

Hill, Todd

vs

Pena, Hector

April 8, 2022

8:30 AM

Honorable Dean J. Kitchens, Judge

Jocelyn Keating, Judicial Assistant

Tiana Harrelson, Court Reporter

NATURE OF PROCEEDINGS: Motion for Clarification and Reconsideration; New Evidence; List of Case to Whip Motion Applies filed by Petitioner on March 25, 2022

The following parties are present for the aforementioned proceeding:

Todd Hill, Petitioner
Hector Pena, Respondent
Robert Ira Spiro, Attorney for Respondent

The Court finds the Petitioner does not stipulate to the Commissioner Valerie L. Skeba hearing the above-captioned matter.

By order of the Supervising Judge of Family Law, the above-captioned matter is reassigned to the Honorable Dean J. Kitchens, Judge presiding, in Department A12 for all purposes. If any appearing party has not yet exercised a peremptory challenge under Section 170.6, Code of Civil Procedure, the peremptory challenge to the Honorable Dean Kitchens, Judge must be filed within the 15-day period specified in Section 170.6, Code of Civil Procedure, with extensions of time pursuant to Section 1013, Code of Civil Procedure, if service is by mail. Non-appearing parties, if any, have a 15-day period from first appearance to file a peremptory challenge as specified in Section 170.6, Code of Civil Procedure.

The matter is called for hearing in Department A-10 with the Honorable Dean J. Kitchens, Judge presiding.

The parties are sworn.

The Court finds that this court is not the appropriate forum for what Petitioner is seeking and orders the case dismissed without prejudice.

Respondent's attorney's request for Attorney fees and filing cost is granted. The Court orders that the Petitioner shall pay directly to Respondent's attorney of record the sum of \$5,435.00 for attorney's fees and filing cost payable within 30 days of this date.

Clerk shall give notice.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Michael D. Antonovich Antelope Valley Dept. - A10

22AVRO00363

Hill, Todd

vs

Pena, Hector

April 8, 2022

8:30 AM

**CLERK'S CERTIFICATE OF MAILING/
NOTICE OF ENTRY OF ORDER**

I, Sherri R. Carter, Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of the above minute order of April 8, 2022 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States Mail at the courthouse in Lancaster, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Dated: April 8, 2022

By: /s/ Jocelyn Keating

Jocelyn Keating, Deputy Clerk

Todd Hill
41459 Almond Avenue
Palmdale, CA 93551

Ira Spiro, Esq.
10573 W. Pico Blvd., No. 865
Los Angeles, CA 90064

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the May 21, 2023, I served the document described as DEFENDANT SPIRO'S OPPOSITION TO PLAINTIFF'S MOTION TO FILE SUPPLEMENTAL COMPLAINT on the interested parties in this action by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
 41459 Almond Avenue
 Quartz Hill, Ca 93551

☒ **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

☐ **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 21, 2023 at Los Angeles, California.

Ira Spiro

Type or Print Name

Signature

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the May 21, 2023, I served the document described as DEFENDANT SPIRO'S OPPOSITION TO PLAINTIFF'S MOTION TO FILE SUPPLEMENTAL COMPLAINT on the interested parties in this action by placing: [] the original [xx] true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
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 Quartz Hill, Ca 93551

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☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 21, 2023 at Los Angeles, California.

Ira Spiro
 Type or Print Name

Signature

ATTACHMENT 6

STUDENT NAME: TODD HILL

NAME of COURSE: Criminal Defense Clinical

Hours Total: **117.8**

Date:	Hours:	Task
05/24/20	1.0	Conversation wit D. Kapelovitz re: class structure and initial case. (ESP - knife fight)
06/04/20	0.8	Conversation wit D. Kapelovitz re: class structure and initial case. (ESP - knife fight)
06/04/20	1.5	Initial document review. Preliminary question set
06/05/20	0.5	Conversation wit R. Wymms re: work approach. (ESP - knife fight)
06/05/20	7.5	Body cam footage review. Question
06/08/20	2.0	Case questions starter completion and submission
06/08/20	2.0	First Class via Zoom
06/15/20	2.0	Class via Zoom
06/27/20	0.8	Conversation with D. Kapelovitz, Case #2 (Sexual Assault)
06/28/20	1.0	Initial case file review
06/29/20	2.0	Case file review and initial questions documentation
06/29/20	3.0	Class via Zoom
07/06/20	3.0	Class via Zoom
07/07/20	3.5	Review of Cunningham v. California; People v. Black
07/08/20	2.0	Blakely v. Washington; Apprendi v. New Jersey
07/11/20	2.0	Meeting with Nicole R. re Case Assignment via Zoom
07/13/20	3.0	Class via Zoom - Issues with Witness Identification
07/14/20	3.0	Strickler v. Greene
07/16/20	2.0	Evans v. Superior Court
07/20/20	3.3	Class via Zoom
07/22/20	2.0	People v. Rodriguez
07/25/20	2.0	Assigned Case Review
07/26/20	0.5	Case review call with Dan
07/26/20	1.0	4th Amendment
07/26/20	4.0	Strickland v. Washington; Lee v. United States
07/27/20	2.0	Class via Zoom - Immigration Implications
07/28/20	3.0	Gilbert v. Municipal Court
07/29/30	6.0	Brady v. Maryland; Riley v. California
07/31/20	4.0	McQuiggin v. Perkins
08/01/20	5.0	Motions review
08/02/20	3.0	Kimmelman v. Morrison
08/03/20	3.0	Class via Zoom - Prosecutors
08/04/20	7.0	People v. Howard; Case review
08/04/20	1.0	Case review call with Dan
08/10/20	3.0	Class
08/13/20	6.0	Commonwealth v. Redline;
08/17/20	3.0	Class; Jim Allard guest speaker.
08/18/20	4.0	995 Motion reviews
08/18/20	3.0	Garabedian v. Superior Court of San Francisco; People v. Kuhn; People v. Leutholtz
08/19/20	2.0	People v. McKee; People v. McMurchy
08/21/20	4.0	Lemus (waiting for BWC footage)
08/22/20	3.5	United States v. Robinson; Riley v. California; Brightline rules.

ATTACHMENT 7

STUDENT NAME: Todd Hill

NAME of COURSE: Eviction Defense Clinical Course

Total Hours: 69.0

Date:	Hours:	Task
07/08/20	4.0	Review of C. Sanabria UD action
07/08/20	1.0	C. Sanabria UD Appeal Client call
07/09/20	2.0	JRPC v. Ramos Oppo Review/ Comments
07/10/20	1.8	Daily Zoom Meeting/ Case status briefings
07/13/20	1.0	Daily Zoom Meeting/ Case status briefings
07/15/20	2.3	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/15/20	1.0	Client inquiry response
07/17/20	1.0	Client interview and onboarding/update activity
07/15/20	1.0	EDN Staffing Pattern Proposal Funding Spreadsheet Review
07/20/20	2.5	Eviction process video assignment (per Ira)
07/20/20	1.5	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/21/20	2.0	Daily Zoom Meeting/ Case status briefings / ACT and Slack training
07/22/20	1.0	Daily Zoom Meeting / Case status briefings
07/23/20	1.5	Daily Zoom Meeting / Case status briefings
07/24/20	1.5	Daily Zoom Meeting/ Case Status briefings
7/27/2020	0.5	R. Ortiz; emails and communications.
07/27/20	1.5	Daily Zoom Meeting / Case status briefings
07/28/20	0.3	Client call; appointment setting.
07/28/20	1.5	Client call and email response.
07/28/20	1.5	Daily Zoom Call / Case status briefings
07/28/20	2.0	Call and prep with client (DR)
07/28/20	1.8	Call, intial response to Elena's questions (RO)
07/29/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/29/20	1.5	Daily Zoom Call
07/30/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/30/20	1.0	Daily Zoom Call
07/30/20	0.5	Hurley inquiry call
07/30/20	0.8	Mia inquiry call
07/31/20	0.8	Communications related to case 20STUD0617
07/31/20	1.0	ACT! AND Slack review
07/31/20	1.5	Daily Zoom Call / Case status briefings
08/03/20	1.8	Daily Zoom Call / Case status briefings
08/04/20	8.0	Call log, referrals, admin, etc.
08/04/20	0.5	Daily Zoom Call / Case status briefings
08/05/20	1.0	Daily Zoom Call / Case status briefings
08/07/20	1.3	Ask An Attorney - Ramon Ortiz, Rocio Castellano
08/07/20	1.5	Daily Zoom Call / Case status briefings
08/10/20	1.0	RC / RO client calls
08/10/20	1.0	Daily Zoom Call / Case status briefings

STUDENT NAME: Todd Hill

NAME of COURSE: Eviction Defense Clinical Course

Total Hours: 120.5

Date:	Hours:	Task
06/29/20	4.0	Initial Class Meeting and AB 1486 Presentation
06/29/20	1.0	Daily Zoom Meeting/ Case status briefings
07/01/20	1.5	Daily Zoom Meeting/ Case status briefings
07/01/20	1.0	AB 1436 review and credit reporting language suggestions..
07/02/20	0.5	Daily Zoom Meeting/ Case status briefings
07/02/20	3.0	Arrieta v. Mahon; Drouet v. Superior Court
07/06/20	2.0	Dennis Block interview and summary document production
07/06/20	1.0	Daily Zoom Meeting/ Case status briefings
07/06/20	2.0	Ellis Act Tenant Eviction Document research and Document Production
07/07/20	2.3	Ellis Act Tenant Eviction Document research and Document Production
07/07/20	0.5	Conversation with Q. Fisher re Ellis Act Info Sheet
07/07/20	1.0	Ellis Act Tenant Eviction Document research and Document Production
07/08/20	4.0	Review of C. Sanabria UD action
07/08/20	1.0	Daily Zoom Meeting/ Case status briefings
07/08/20	1.0	C. Sanabria UD Appeal Client call
07/09/20	2.0	JRPC v. Ramos Oppo Review/ Comments
07/09/20	1.0	Daily Zoom Meeting/ Case status briefings
07/10/20	1.8	Daily Zoom Meeting/ Case status briefings
07/13/20	1.0	Daily Zoom Meeting/ Case status briefings
07/13/20	2.0	Completion of Ellis Act document.
07/14/20	3.0	Training for Eviction Process via Zoom and client response.
07/15/20	2.3	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/15/20	1.0	Client inquiry response
07/17/20	1.0	Client interview and onboarding/update activity
07/15/20	1.0	EDN Staffing Pattern Proposal Funding Spreadsheet Review
07/20/20	2.5	Eviction process video assignment (per Ira)
07/20/20	1.5	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/21/20	2.0	Implied Warranty of Habitability Rules Coverage
07/21/20	3.0	Green v. Superior Court
07/21/20	2.0	Daily Zoom Meeting/ Case status briefings / ACT and Slack training
07/22/20	2.0	Zoom Class with Dean Ira Spiro
07/22/20	1.0	Daily Zoom Meeting
07/23/20	1.5	Daily Zoom Meeting
07/23/20	3.5	Hinson v. Delis; Knight v. Hallsthammar
07/24/20	1.5	Daily Zoom Meeting
7/27/2020	0.5	R. Ortiz; emails and communications.
07/27/20	2.5	UD Discovery with Ira Spiro
07/27/20	1.5	Daily Zoom Meeting
07/28/20	2.3	Class via Zoom; S. Chandra guest speaker
07/28/20	0.3	Client call; appointment setting.
07/28/20	1.5	Client call and email response.
07/28/20	1.5	Daily Zoom Call
07/28/20	2.0	Call and prep with client (DR)
07/28/20	1.8	Call, intial response to Elena's questions (RO)

07/29/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/29/20	1.5	Daily Zoom Call
07/30/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/30/20	1.0	Daily Zoom Call
07/30/20	4.0	Orozco v. Casimiro; Beasley v. Wells Fargo Bank; Hitz v. First Interstate Bank
07/30/20	0.5	Hurley inquiry call
07/30/20	0.8	Mia inquiry call
07/31/20	0.8	Communications related to case 20STUD0617
07/31/20	1.0	ACT! AND Slack review
07/31/20	1.5	Daily Zoom Call
08/03/20	3.0	Ex parte motion review; Industrial Indemnity Co. v. Levine
08/03/20	1.8	Daily Zoom Call
08/04/20	2.0	Class via Zoom;
08/04/20	8.0	Call log, referrals, admin, etc.
08/04/20	0.5	Daily Zoom Call
08/05/20	1.0	Daily Zoom Call
08/07/20	1.3	Ask An Attorney - Ramon Ortiz, Rocio Castellano
08/07/20	1.5	Daily Zoom Call
08/10/20	1.0	RC / RO Calls
08/10/20	1.5	Daily Zoom Call
08/11/20		

ATTACHMENT 8



People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:

213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

August 29, 2022

Sent via Certified Mail

Todd Hill
41459 Almond Avenue
Palmdale, CA 93551

RE: Incomplete Transcript/Updated Transcript

Dear Mr. Hill,

I received an email from Professor Cyrus Whittaker regarding your incorrect transcript. Enclosed herein please find an updated official transcript. I apologize for the delay and inconvenience this may have caused. Should you have any objections with the grades reflected on your transcript, please follow the procedures in the Student Handbook.

Sincerely,

Adriana Zuniga Nunez, JD
Administrator/Registrar
People's College of Law

Peoples College of Law

Official Transcript

660 S. Bonnie Brae, Los Angeles, CA 90057

Phone: (213)483-0083, Fax:

RECIPIENT:

STUDENT:

Hill, Todd

Student ID: 007-2019

SSN (Last 4):

Enrollment Date: Sep 3, 2019

Previous Degree(s): BA

Degrees/Certificates

Juris Doctorate

Pursuing as of 9/3/2019

Transcript

2019-2020: Fall Quarter - 09/03/2019 - 11/15/2019

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT I	Contracts I	30.00	3.00	A	12.00
LEGAL WRTG I	Legal Writing I	30.00	3.00	A-	11.10
TORT I	Torts I	30.00	3.00	A-	11.10
Totals		90.00	9.00	Term GPA: 3.80	Cum. GPA: 3.80

2019-2020: Winter Quarter - 11/18/2019 - 02/21/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT II	Contracts II	30.00	3.00	A	12.00
CRIM L I	Criminal Law I	30.00	3.00	C-	5.10
LEGAL WRTG II	Legal Writing II	30.00	3.00	B+	9.90
TORT II	Torts II	30.00	3.00	B-	8.10
Totals		120.00	12.00	Term GPA: 2.93	Cum. GPA: 3.30

2019-2020: Spring Quarter - 03/02/2020 - 05/15/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT III	Contracts III	30.00	3.00	A	12.00
CRIM L II	Criminal Law II*	30.00	3.00	A-	11.10
LEGAL WRTG III	Legal Writing III	30.00	3.00	A	12.00
TORT III	Torts III*	30.00	3.00	A-	11.10
Totals		120.00	12.00	Term GPA: 3.85	Cum. GPA: 3.50

2020-2021: Fall Quarter - 08/31/2020 - 11/13/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L I	Constitutional Law I*	30.00	3.00	A-	11.10
CRIM PROC I	Criminal Procedure I*	30.00	3.00	A-	11.10
TRIAL ADVOC	Trial Advocacy	30.00	3.00	P	--
Totals		90.00	9.00	Term GPA: 3.70	Cum. GPA: 3.53

2020-2021: Winter Quarter - 11/14/2020 - 02/26/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L II	Constitutional Law II*	30.00	3.00	A	12.00
CRIM PROC II	Criminal Procedure II*	30.00	3.00	A+	12.90
REM I	Remedies I*	30.00	3.00	C	6.00
WILLS/TR I	Wills & Trusts*	30.00	3.00	B-	8.10
Totals		120.00	12.00	Term GPA: 3.25	Cum. GPA: 3.46

2020-2021: Spring Quarter - 03/01/2021 - 05/14/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L III	Constitutional Law III*	30.00	3.00	A	12.00

LEGAL RES	Legal Research	30.00	3.00	P	--
REM II	Remedies II*	30.00	3.00	D+	3.90
WILLS/TR II	Wills & Trusts II*	30.00	3.00	B	9.00
Totals		120.00	12.00	Term GPA: 2.77	Cum. GPA: 3.36

2021-2022: Fall Quarter - 08/30/2021 - 11/13/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
BUSN	Business Transactions Clinical Course	30.00	3.00	B+	9.90
TRANS					
CLINIC					
CIV PROC I	Civil Procedure I*	30.00	3.00	A+	12.90
EVID I	Evidence I*	30.00	3.00	A-	11.10
REAL PROP I	Real Property I*	30.00	3.00	B+	9.90
Totals		120.00	12.00	Term GPA: 3.65	Cum. GPA: 3.41

2021-2022: Winter Quarter - 11/15/2021 - 02/19/2022

Course #	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC II	Civil Procedure II*	30.00	3.00	A+	12.90
CORP & BUS ASSOC	Corporations & Business Associations*	30.00	3.00	B	9.00
EVID II	Evidence II*	30.00	3.00	A-	11.10
REAL PROP II	Real Property II*	30.00	3.00	C	6.00
Totals		120.00	12.00	Term GPA: 3.25	Cum. GPA: 3.39

2021-2022: Spring Quarter - 02/28/2022 - 05/14/2022

Course #	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC III	Civil Procedure III*	30.00	3.00	C-	5.10
CMTY PROP	Community Property*	30.00	3.00	C-	5.10
PROFL RESP	Professional Responsibility*	30.00	3.00	D	3.00
REAL PROP III	Real Property III*	30.00	3.00	C+	6.90
REM II	Remedies II*	--	--	AUD	--
Totals		120.00	12.00	Term GPA: 1.68	Cum. GPA: 3.17

Cumulative

	Earned Hours	Earned Units	Points	GPA
Resident	1,020.00	102.00	304.50	3.17
Transfer	0.00	0.00	0.00	0.00
Overall	1,020.00	102.00	304.50	3.17


(1) One semester unit is defined as fifteen (15) hours of classroom instruction. Generally, one hour of instruction per week for fifteen (15) weeks equals one semester unit of credit.

(2) One quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per week for ten (10) weeks equals one quarter unit of credit.

AUD = Audit
 FN = Failure for non-attendance
 I = Incomplete
 IP = In Progress
 R = Retake
 W = Withdraw

FYLS Information
 Date(s) Taken: --
 Date Passed: --

CBE Information
 Date(s) Taken: --
 Date Passed: --


 Adriana Zúñiga Núñez - Registrar



From: [Todd Hill](#)
To: [Doherty, Erika](#)
Cc: [Brandon.Krueger@calbar.ca.gov](#); [Stallings, Brandon](#); [Wilson, Leah](#); [Duran, Ruben](#); [Kramer, Paul](#); [Hunter.Starr@calbar.ca.gov](#); [Justin.Fields@calbar.ca.gov](#); [De La Cruz, Juan](#); [GC](#); [CTC](#); [AntitrustRequest](#); [Toney, Mark](#); [Joel.Mark@calbar.ca.gov](#); [Linda Keller](#); [Krasilnikoff, Jean](#); [RE: CASE 2:23-cv-01298-JLS-PDx TODD HILL, STATE BAR, PEOPLES COLLEGE](#); [Shelby, Melanie](#); [RE: CASE 2:23-cv-01298-JLS-PDx TODD HILL, STATE BAR, PEOPLES COLLEGE](#); [RE: CASE 2:23-cv-01298-JLS-PDx TODD HILL, STATE BAR, PEOPLES COLLEGE](#); [scott.wilk@sen.ca.gov](#); [Antitrust@calawyers.org](#); [judicialcouncil@jud.ca.gov](#); [Navarrete, Jorge](#); [Todd Hill](#)
Subject: Public Comment: Strengthening the Integrity of Our Legal Profession through Vigilant Conduct Oversight
Date: Thursday, July 27, 2023 1:18:31 PM
Attachments: [image.png](#)
[Attorney Misconduct Monitoring and Reporting 07272023.pdf](#)
[THILL - Antitrust Determination Request and Conduct Evidence 072723 -Public Comment.pdf](#)
[TRANSCRIPT 08-29-22 with full Civ Pro Grades & cover letter \(3\).pdf](#)
[Response Letter to Justin Beck 6-16-2023.pdf](#)
[Proposed Plan of Law Study-Legal Evaluation - Todd Hill - 9-2-22 - adding quarter info 9-15-22.pdf](#)
[Enrollment-Agreement \(2\).pdf](#)
[SUPPLEMENTAL FAC MASTER HILL 88 PRVY 05052023 edit.pdf](#)
[Response to Peoples College Request for Exception Under Guideline 5dot6.pdf](#)
[email to spiro with SFAC 05052023.pdf](#)
[SPIRO MOTION IN OPPOSITION TO SUPPLEMENTED FAC 05212023.pdf](#)
[\[REDACTED\]](#)
[Todd Hill Criminal Defense Timesheet - Clinical Course v7 \(1\).xls](#)
[Todd Hill Eviction Defense Timesheet - Clinical Course v6 \(1\).xls](#)
[\[REDACTED\]](#)
[230203 Letter to Todd Hill.pdf](#)
[Comment Graphic on Filing-Complaint-Against-Attorney Problems.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find attached and accompanying my public comment related to the State Bar's ability to maintain and foster compliance under Rule 8.3:

My name is Todd Hill. I matriculated into People's College of Law in 2019. I completed all available coursework, sufficient for a degree award in units, but was blocked from graduating or transferring.

I hope this letter finds you well. As dedicated leaders of the legal profession, you bear the tremendous responsibility of upholding the highest standards of ethical conduct and integrity within our ranks. It is with a sense of unwavering commitment to these principles that I write to you today.

As of today, after more than four (4) years of legal study I have never been in possession of an accurate transcript. The reason for this I believe is due in large part to the misconduct of State Bar agents and operatives.

Recent events have highlighted certain patterns of misconduct within your organization that demand your utmost attention. As custodians of justice, it is incumbent upon you to identify, weed out, and prevent any behavior that undermines the trust placed in us by the public served. The adherence to ethical norms is not only a legal obligation but a moral imperative to protect the reputation and credibility of the profession itself.

In this letter, I intend to address the types of conduct that should be readily identifiable and methods to preemptively eradicate them from your organization. By fortifying your vigilance, we, the State Bar and the public it is sworn to protect, can foster an environment where the values of honesty, accountability, and transparency flourish, and where the pursuit of justice

remains untainted by misconduct.

It is my firm belief that together, we can institute measures that bolster our commitment to ethical conduct and further cement our role as guardians of justice. By proactively addressing these issues, we can reaffirm our dedication to the public and ensure that the legal profession remains a beacon of trust and integrity for generations to come.

I kindly request your attention to the matters outlined herein, and I am eager to engage in a constructive dialogue to address these concerns effectively. Our collective efforts can cultivate an even stronger foundation upon which the State Bar thrives.

Thank you for your time and consideration. I eagerly anticipate our collaboration to uphold the values that define your noble profession which I have chosen to undertake.

With utmost respect,
Todd Hill
Law Student

Potential State Bar Anticompetitive Conduct

1. Succession - The “Two Letters” Strategy - as employed by culpable attorneys, involves the tactic of blaming a predecessor or a prior legal representative for any present-day issues or challenges faced by current obligee stakeholders. In this strategy, the current attorney(s) may send “two letters” to the opposing party, wherein they shift the responsibility for any alleged misconduct, errors, or shortcomings to the previous legal counsel or representation and if that fails, they will ultimately “take the blame” to allow their designated successor to assume control under the illusion of compliance.

By employing this deceptive tactic, the culpable attorneys aim to create a narrative that distances themselves or other operatives from any wrongdoing while portraying themselves as new representatives who are not responsible for the past actions or decisions. This strategy seeks to sow confusion and cast doubt on the opposing party's claims, using the pretext of a change in “legal” representation to deflect blame and undermine the credibility of the opposing party's case.

Moreover, the Two Letters Strategy also enables the culpable attorneys to stall the legal process by placing the onus on the opposing party to address or refute the alleged misconduct of the previous legal representatives. This tactic aims to create a perception of innocence and plausible deniability while strategically delaying the resolution of the matter.

Overall, the Two Letters Strategy serves as a duplicitous means for culpable attorneys to manipulate the legal landscape, evade accountability, and obscure the truth behind their client's actions. By shifting blame and responsibility to predecessors, they seek to gain an advantage in the legal proceedings and diminish the impact of any legal claims against their clients.

2. Two Letters and Latches: The Two Letters and Latches tactic is a deceptive strategy employed by culpable attorneys to exploit delays in the legal process by sending two letters to the opposing party. In these letters, the attorneys raise minor or frivolous objections, often unrelated to the substantive issues of the case. By doing so, they create the appearance of engaging in legitimate legal dialogue while intentionally stalling or hindering progress. This strategy aims to exhaust the opposing party's resources, patience, and time, ultimately leading to the expiration of relevant statutes of limitations or procedural timeframes. Through this tactic, the culpable attorneys seek to invoke the doctrine of laches, arguing that the opposing party's delay in responding to the initial letters constitutes a waiver of their rights or claims. (Dunn, Girardi)

3. Musical Chairs: The Musical Chairs tactic involves a calculated pattern of attorney substitutions by the culpable party. This strategy is designed to disrupt the continuity of legal representation for the opposing party, creating confusion and hindering the flow of information. By frequently changing legal counsel, the culpable party aims to complicate the case, delay proceedings, and impede the opposing party's ability to build a cohesive case. This tactic may also be employed strategically to distance the culpable party from any prior legal advice or decisions, shifting blame to previous attorneys and evading accountability for their actions.

4. Musical Chairs - Plausible Denial: In the variant of Musical Chairs - Plausible Denial, the culpable party deliberately switches legal representation in a manner that allows them to claim ignorance or lack of knowledge regarding the previous legal counsel's actions or conduct. By feigning lack of awareness about prior legal advice or strategies, the culpable party seeks to create plausible deniability and distance themselves from any potential wrongdoing. This tactic aims to obscure the chain of responsibility and evade accountability for their actions while creating doubt and confusion for the opposing party and the court. New Committee formations, appointments, etc.

5. Musical Chairs - No Duty Owed: In the Musical Chairs - No Duty Owed tactic, the culpable party intentionally hires attorneys on a limited or ad-hoc basis without granting them the full authority or capacity to represent their interests fully. This strategy allows the culpable party to claim that the attorneys had no fiduciary duty or agency relationship with them, despite their involvement in the case. By disavowing any duty owed to the attorneys involved, the culpable party aims to shield themselves from potential liability and legal consequences. This tactic seeks to exploit the lack of a formal attorney-client relationship to escape accountability and undermine the opposing party's case. Ad-hoc Committees are functional areas where this strategy is quite successful.

6. Sacrificial Lamb(s) – Use of Attorney State Bar Court process, prosecution or releases of newsworthy information timed to preempt or otherwise whitewash reporting of other issues. (LA Times and Girardi Investigation)

Rule 8.3:

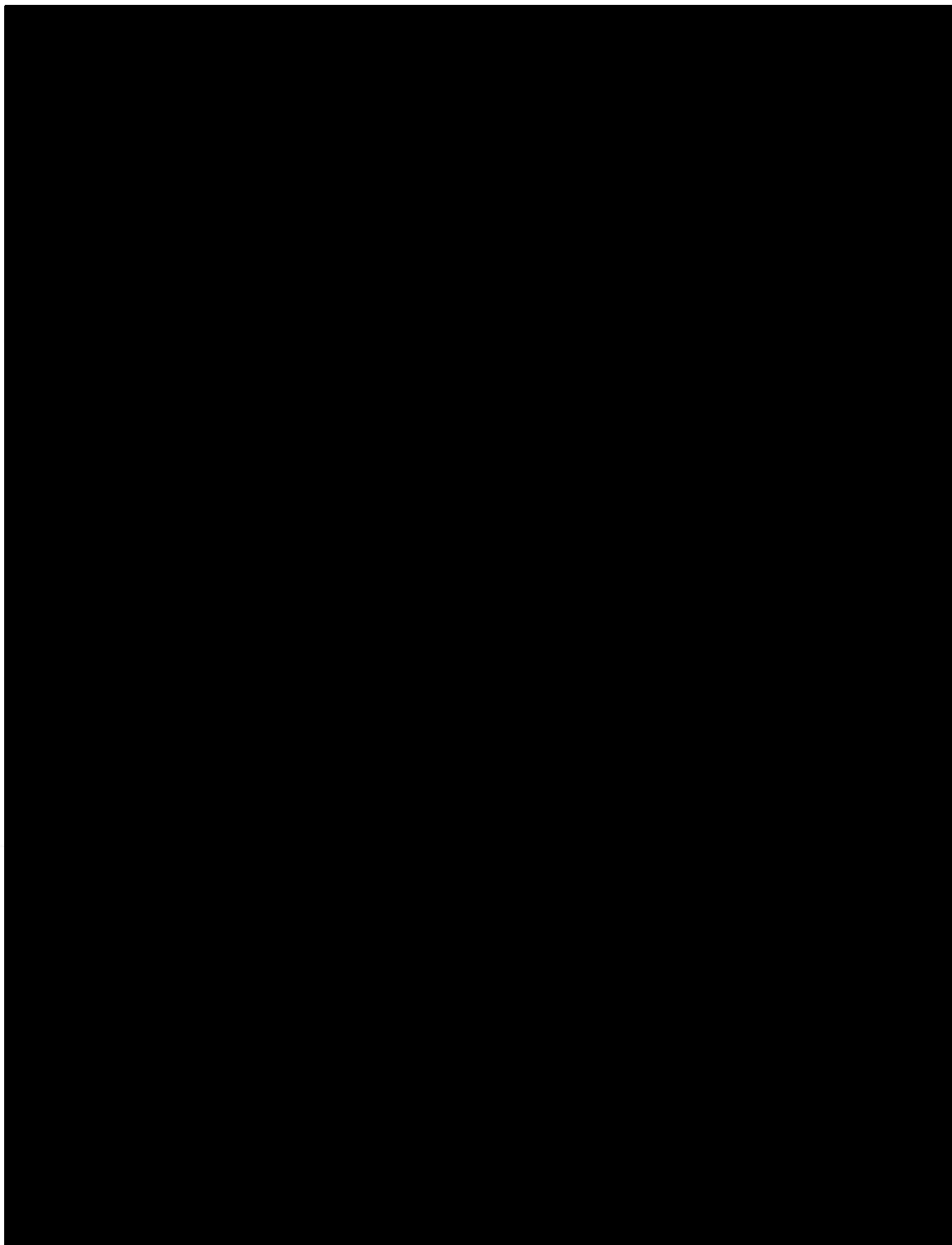
A lawyer shall, without undue delay, inform the State Bar, or a tribunal* with jurisdiction to investigate or act upon such misconduct, when the lawyer knows* of credible evidence that another lawyer has committed a criminal act or has engaged in conduct involving dishonesty, fraud,* deceit, or reckless or intentional misrepresentation or misappropriation of funds or property that raises a substantial* question as to that lawyer's honesty, trustworthiness, or

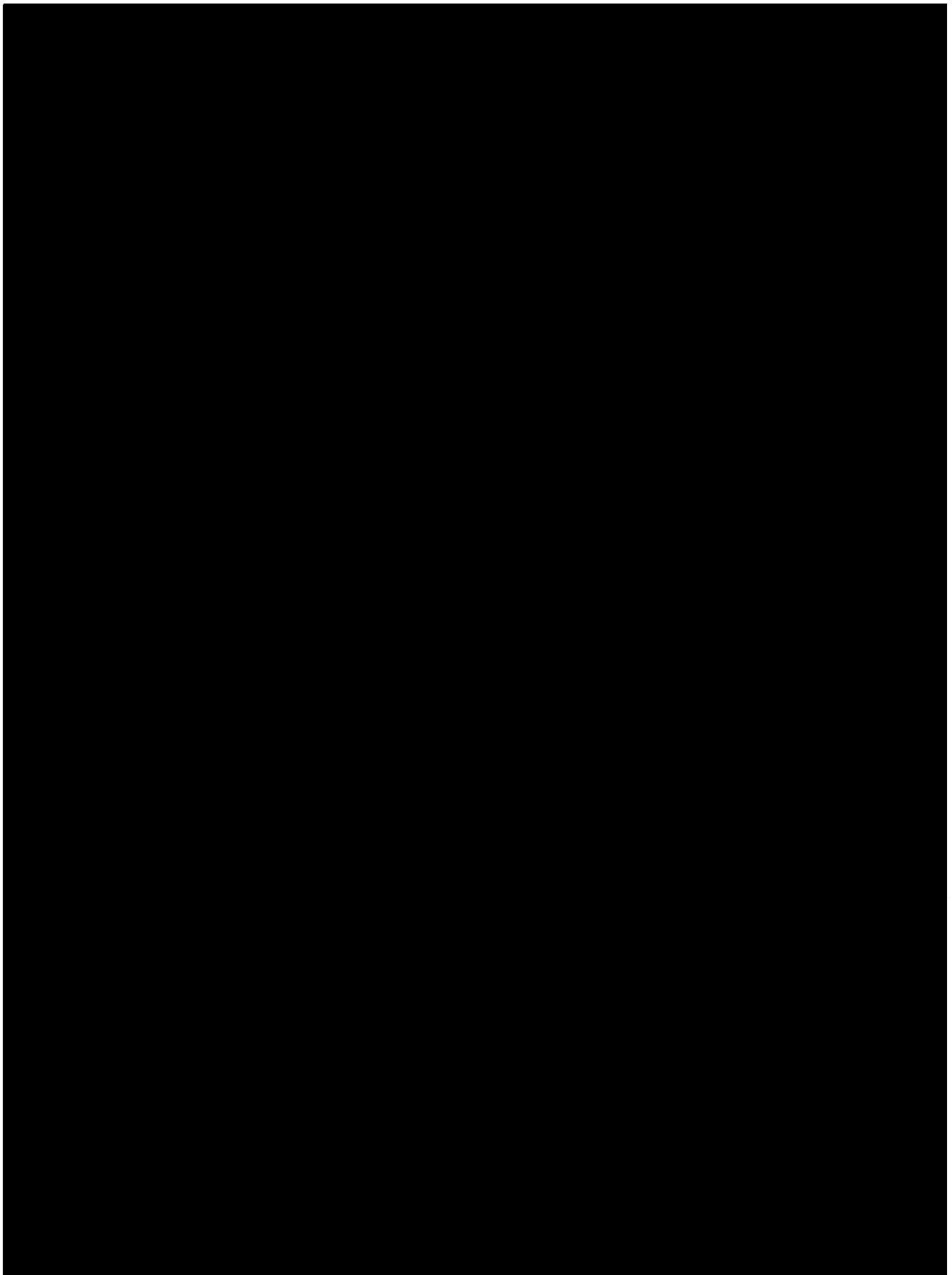
fitness as a lawyer in other respects. (b) Except as required by paragraph (a), a lawyer may, but is not required to, report to the State Bar a violation of these Rules or the State Bar Act.

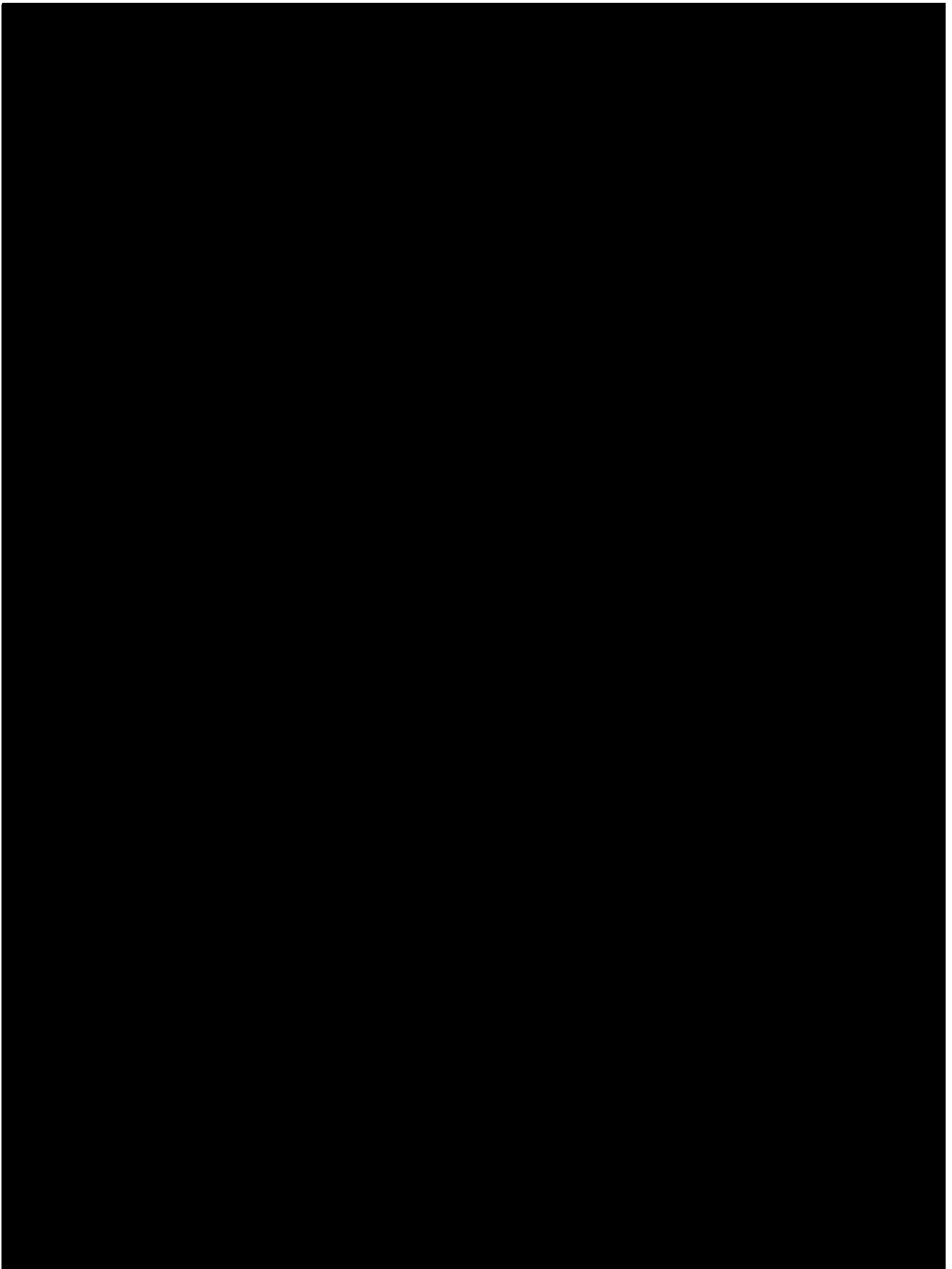
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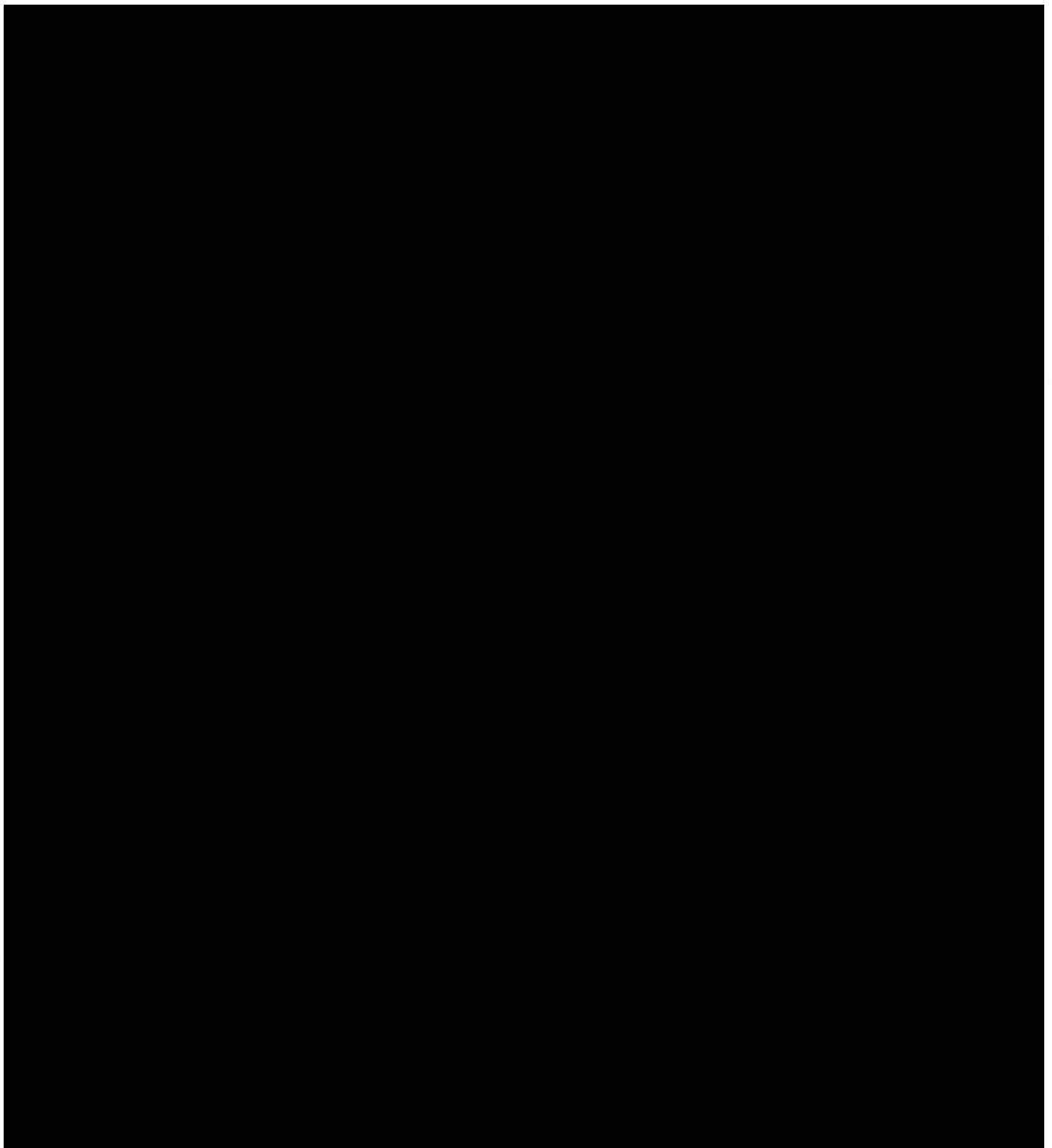


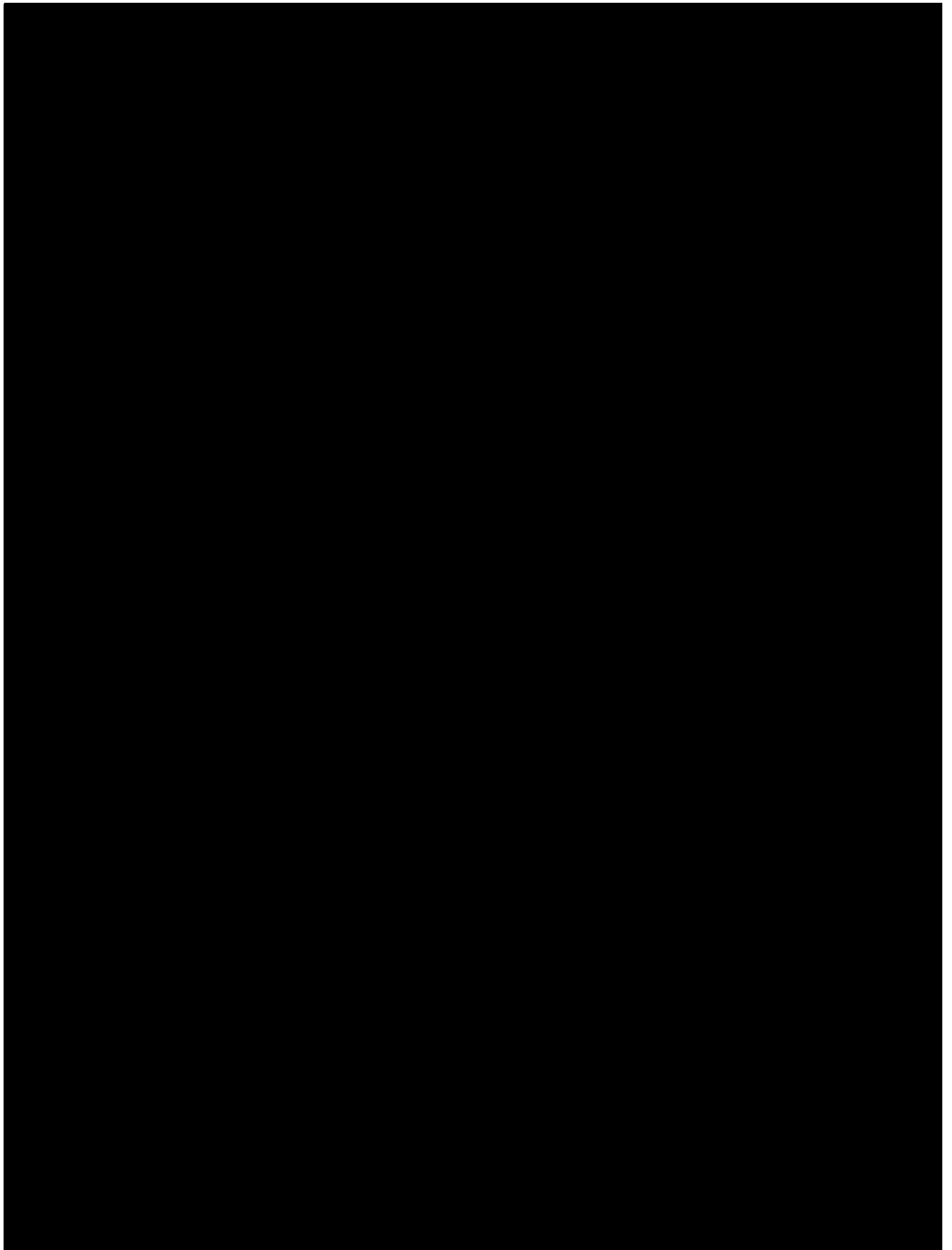
ATTACHMENT 1

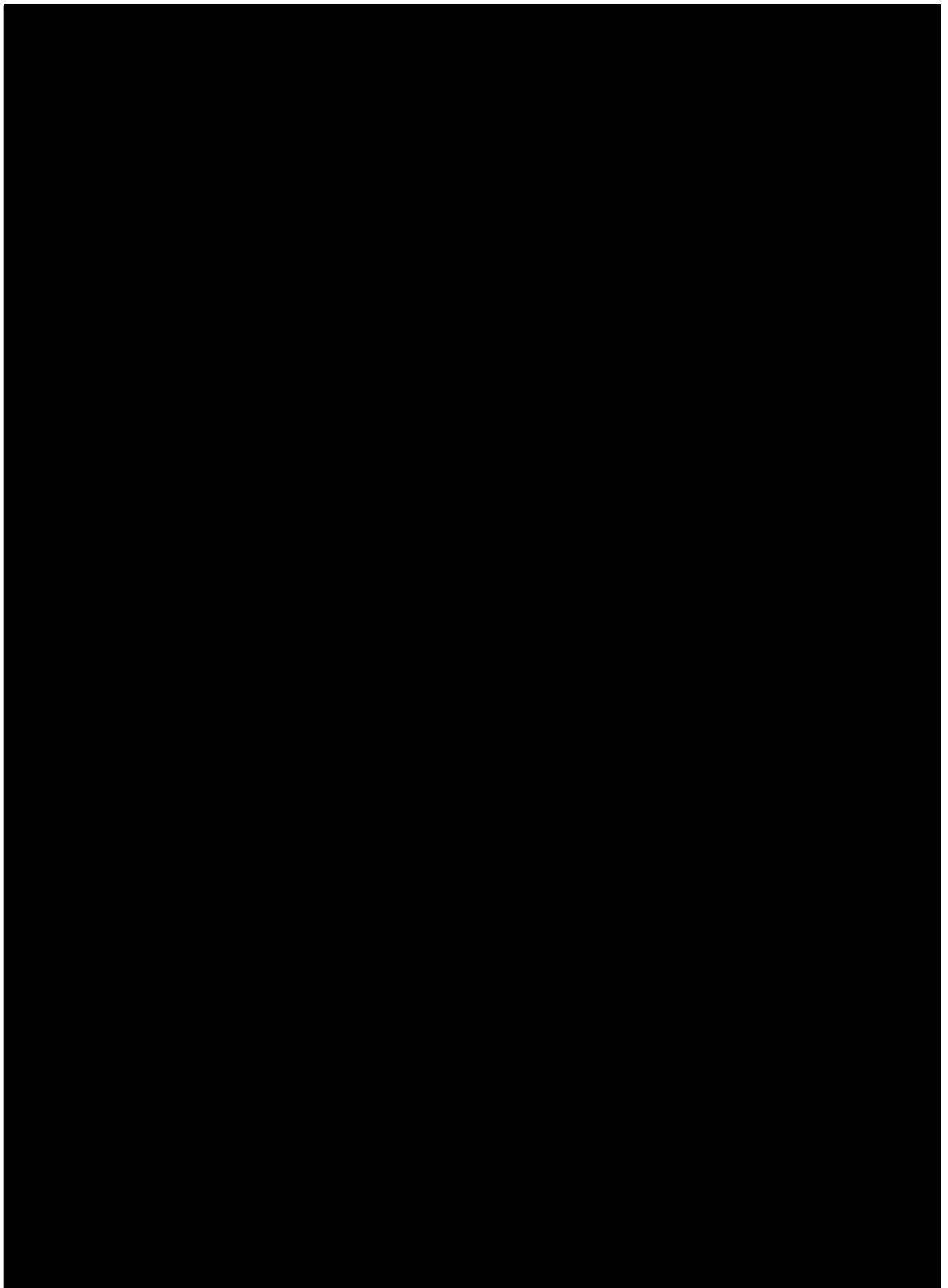


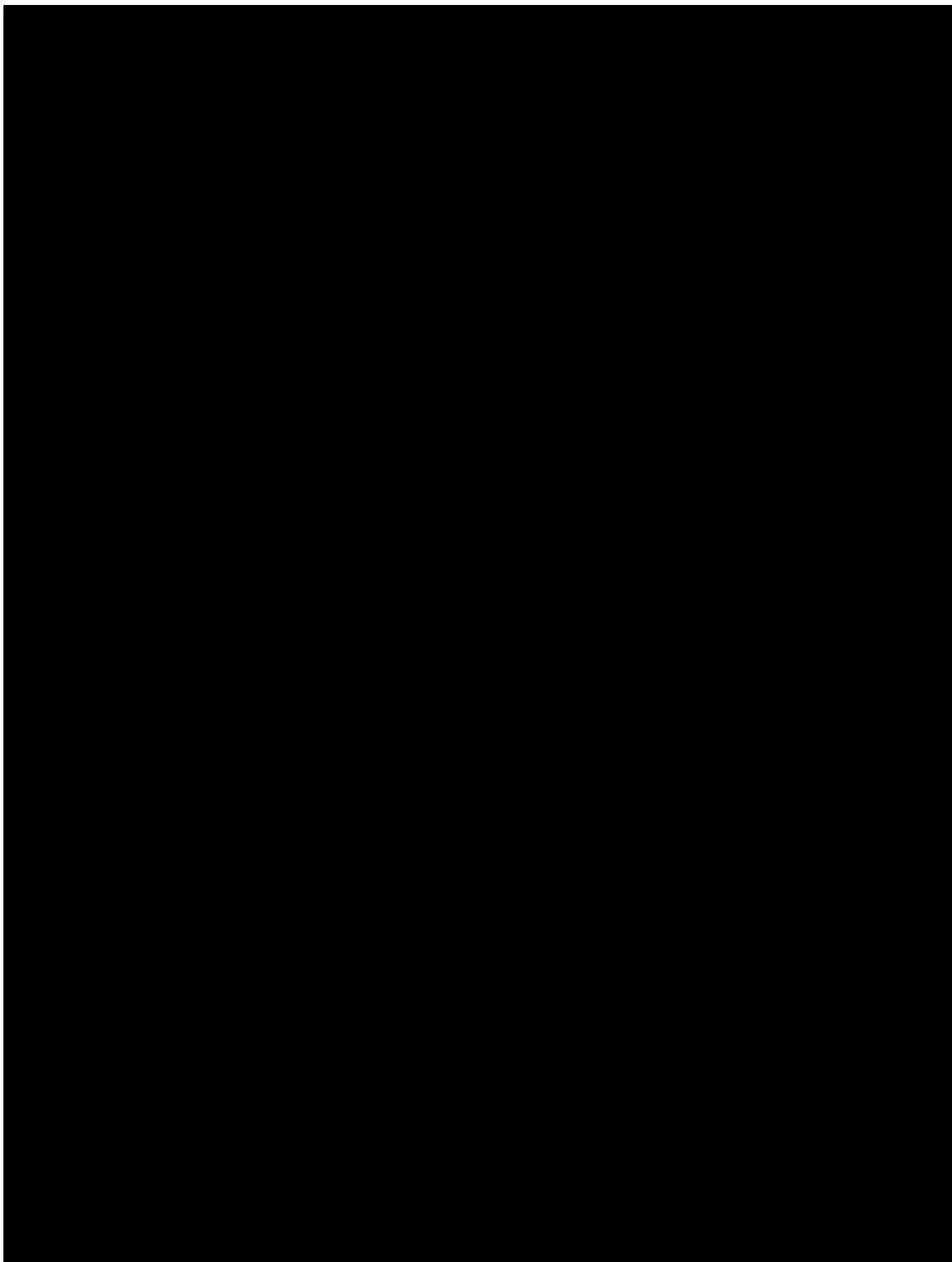


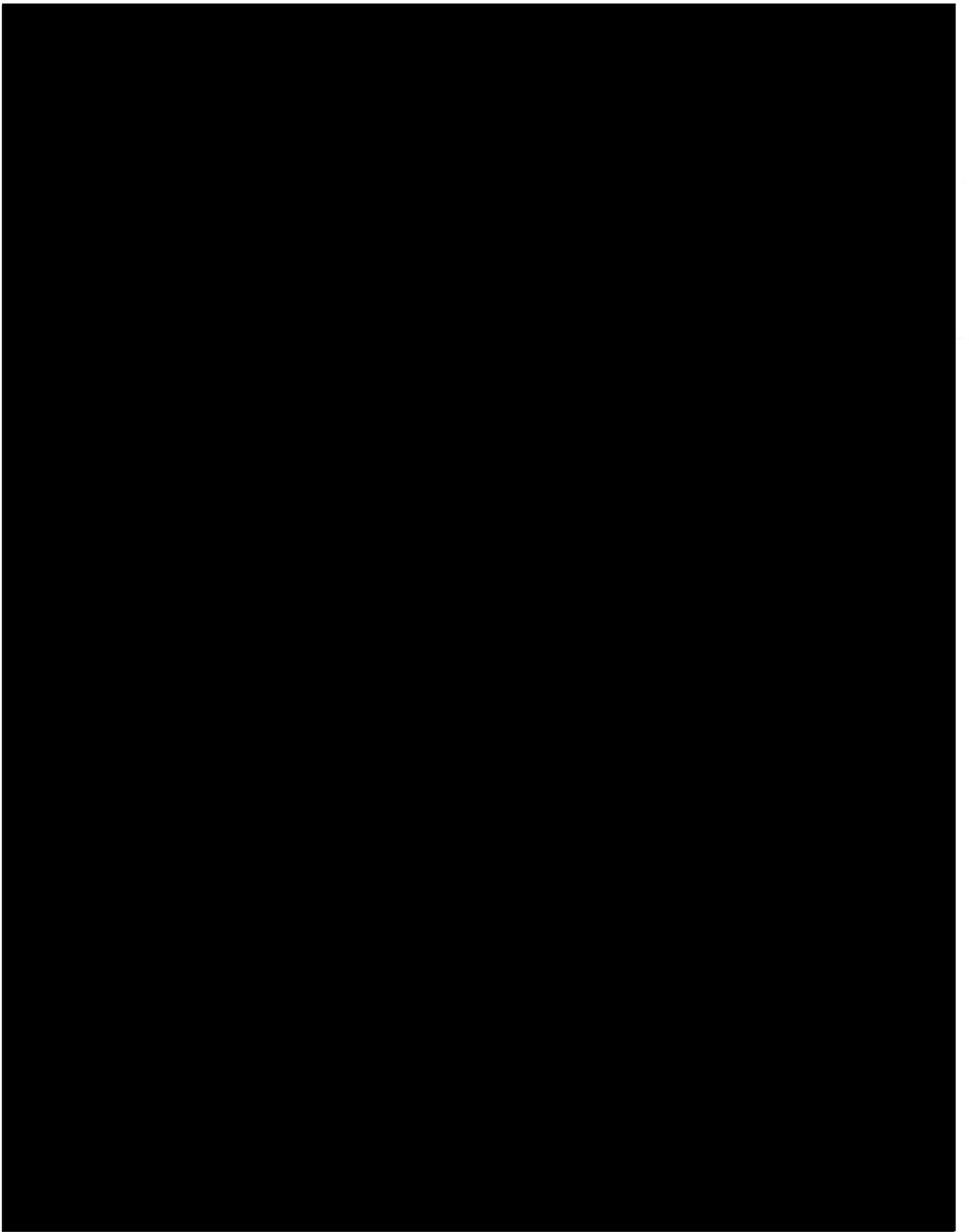




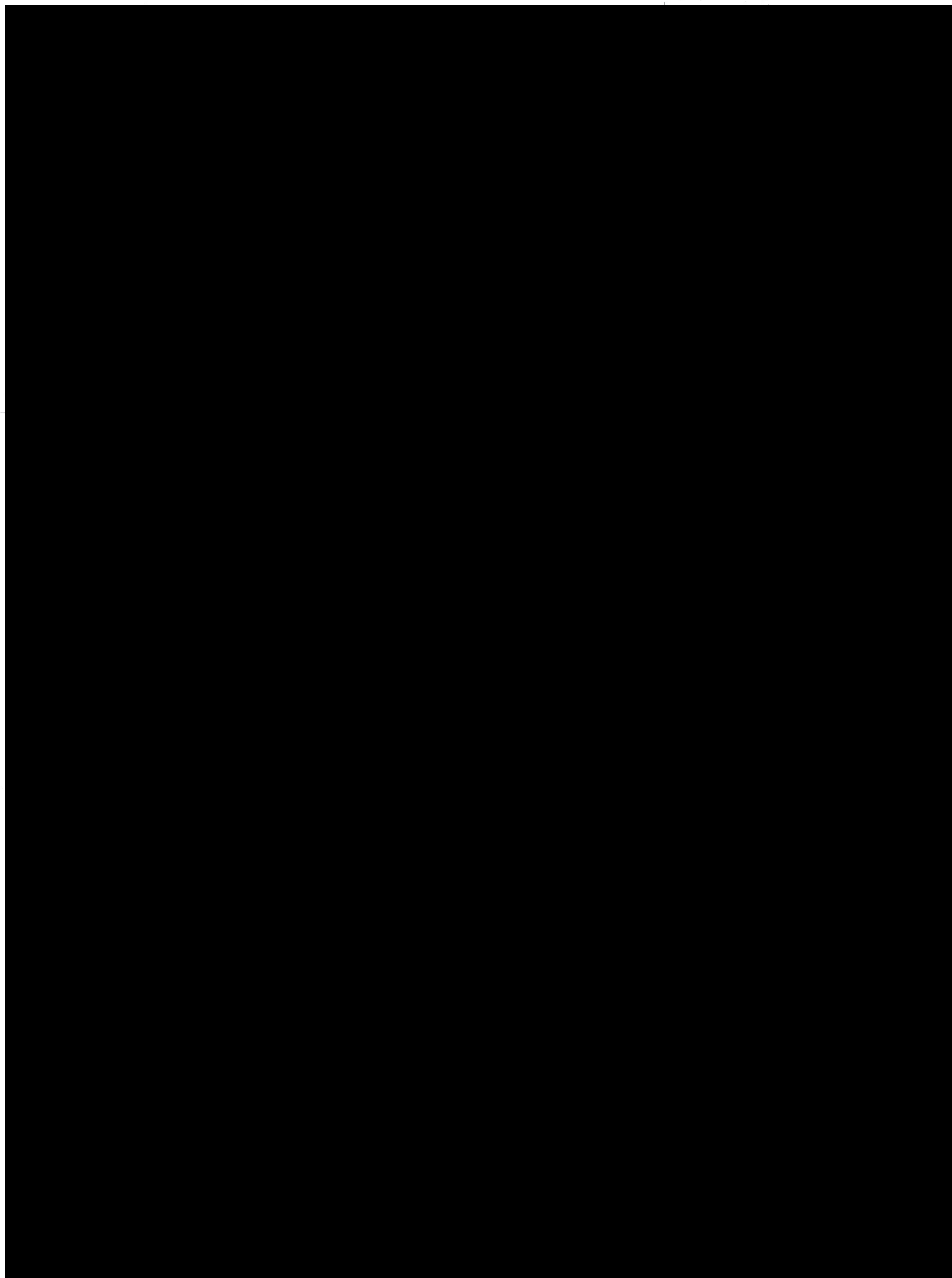


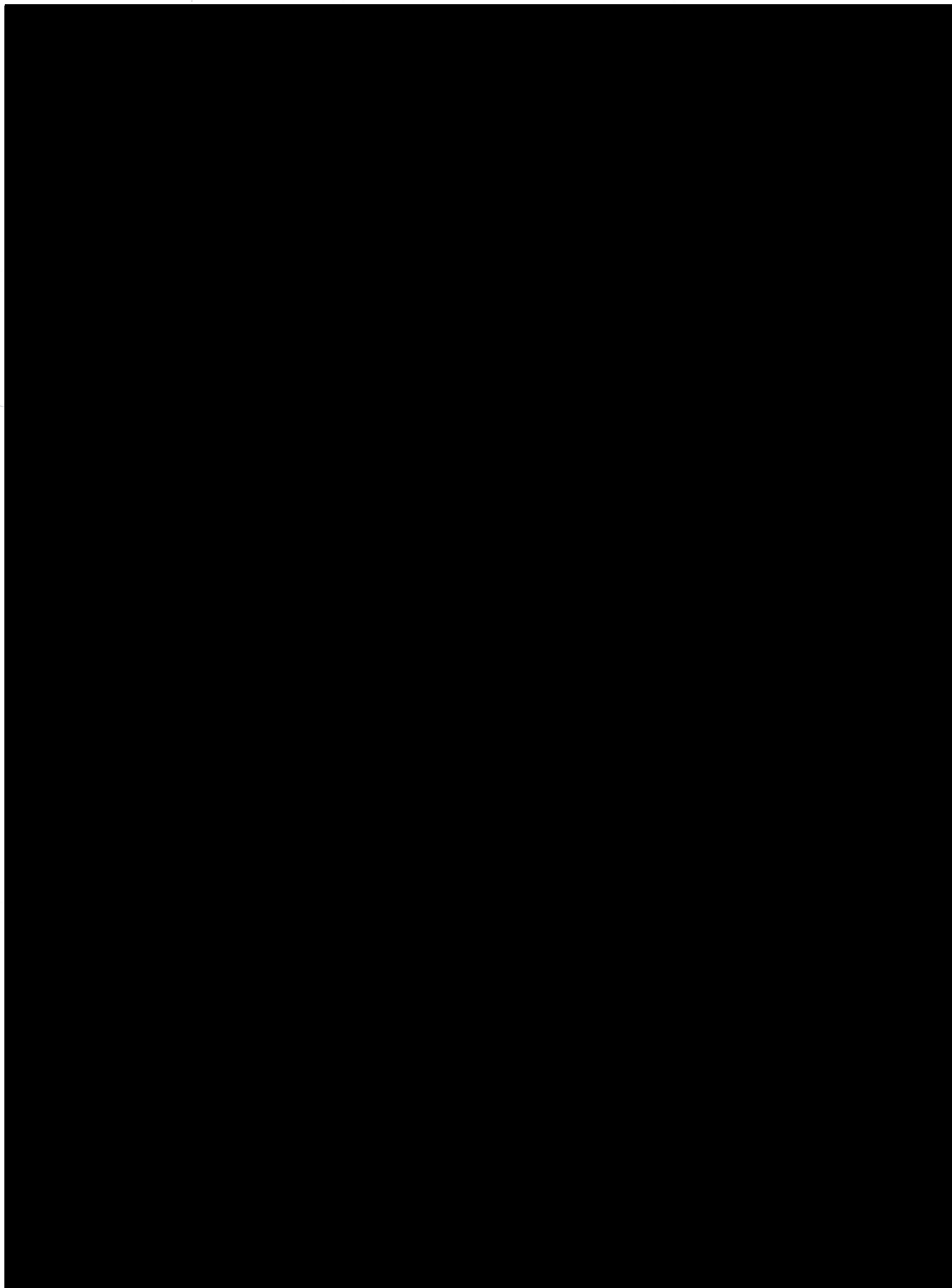






ATTACHMENT 2







ATTACHMENT 3



U.S. Department of Justice

Antitrust Division

San Francisco Field Office

450 Golden Gate Avenue
Room 10-0101
San Francisco, CA 94102-3478

415/934-5300
FAX 415/934-5399

February 3, 2023

Via EMAIL

Todd Hill
toddryangregoryhill@gmail.com

Re: Notice of Antitrust Determination and Issues Review Request

Dear Mr. Hill:

Thank you for contacting the Antitrust Division of the U.S. Department of Justice. We have carefully reviewed your complaint and recognize your concerns. We have determined, however, that the information provided does not raise federal antitrust issues that warrant further review by the Division. We have your information on file and should the legal staff need further information, they may contact you in the future.

The Antitrust Division website contains primers on antitrust laws and explains what constitutes an antitrust violation (<http://www.justice.gov/atr/public/guidelines/209114.htm>).

We wish you the best in resolving your concerns.

Sincerely,

/S/

Aaron Sheanin
Trial Attorney

ATTACHMENT 4

Todd Hill
41459 Almond Avenue
Quartz Hill, CA 93551
+1 (661) 899-8899

July 27, 2023

Subject: Strengthening the Integrity of Our Legal Profession through Vigilant Conduct Oversight

Dear Members of the State Bar and the Committee on

My name is Todd Hill.

I hope this letter finds you well. As dedicated leaders of the legal profession, you bear the tremendous responsibility of upholding the highest standards of ethical conduct and integrity within our ranks. It is with a sense of unwavering commitment to these principles that I write to you today.

As of today, after more than four (4) years of legal study I have never been in possession of an accurate transcript. The reason for this I believe is due in large part to the misconduct of State Bar agents and operatives.

What is the ACTUAL State Bar attorney complaint protocol? Is it the same for 2201 cases? How is the Administrator contract awarded?

Recent events have highlighted certain patterns of misconduct within your organization that demand your utmost attention. As custodians of justice, it is incumbent upon you to identify, weed out, and prevent any behavior that undermines the trust placed in us by the public served. The adherence to ethical norms is not only a legal obligation but a moral imperative to protect the reputation and credibility of the profession itself.

In this letter, I intend to address the types of conduct that should be readily identifiable and methods to preemptively eradicate them from your organization. By fortifying your vigilance, we, the State Bar and the public it is sworn to protect, can foster an environment where the values of honesty, accountability, and transparency flourish, and where the pursuit of justice remains untainted by misconduct.

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Todd Hill
41459 Almond Avenue
Quartz Hill, CA 93551
+1 (661) 899-8899

I kindly request your attention to the matters outlined herein, and I am eager to engage in a constructive dialogue to address these concerns effectively. Our collective efforts can cultivate an even stronger foundation upon which the State Bar thrives.

Thank you for your time and consideration. I eagerly anticipate our collaboration to uphold the values that define your noble profession which I have chosen to undertake.

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Todd Hill

Law Student

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Overall, the Two Letters Strategy serves as a duplicitous means for culpable attorneys to manipulate the legal landscape, evade accountability, and obscure the truth behind their client's actions. By shifting blame and responsibility to predecessors, they seek to gain an advantage in the legal proceedings and diminish the impact of any legal claims against their clients.

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shield themselves from potential liability and legal consequences. This tactic seeks to exploit the lack of a formal attorney-client relationship to escape accountability and undermine the opposing party's case. Ad-hoc Committees are functional areas where this strategy is quite successful.

6. Sacrificial Lamb(s) – Use of Attorney State Bar Court process, prosecution or releases of newsworthy information timed to preempt or otherwise whitewash reporting of other issues. (LA Times and Girardi Investigation)

ATTACHMENT 5

Filing a Complaint against an Attorney

If you feel your attorney has engaged in misconduct, please file a complaint with the State Bar. Filing a complaint helps the State Bar stop attorney misconduct and may prevent others from becoming victims of it. You do not have to be a U.S. citizen, and there is no charge to file a complaint.



FILING

You can file your complaint online or by regular mail. Forms and instructions are available on our website.



REVIEW

*Time required:
At least three weeks;
up to 60 days.*

A State Bar attorney will review your complaint to determine if it warrants investigation. The State Bar may contact you for additional information.

In limited situations, if your complaint indicates misconduct, the State Bar may direct the attorney to take certain action to resolve the matter without investigation.

NO

If your complaint **DOES NOT** indicate misconduct, the State Bar will close your complaint and send you a letter explaining why the complaint was closed.

You may request a review of this decision by writing to the Complaint Review Unit, which may reopen your complaint if it determines that it was closed inappropriately or that you have new information to support your complaint. The letter notifying you that the complaint was closed will contain instructions for requesting a review. You must submit your request within 90 days of the closing letter's date.

YES



INVESTIGATION

If your complaint **DOES** indicate misconduct, the State Bar will investigate the allegations. You will be notified about the attorney and investigator assigned to your complaint.

NO

If the investigation **DOES NOT** confirm misconduct, the State Bar will close your complaint and send you a letter explaining why it was closed.

Even if your complaint **DOES NOT** indicate misconduct, the State Bar may write to the attorney to suggest resources to address the conduct that led to a complaint.

YES

See Page 2

Questions? Call our multilingual intake line at 800-843-9053



If the Investigation Confirms Misconduct:



NOTICE & SETTLEMENT PROPOSAL

If the investigation **CONFIRMS misconduct**, the State Bar will either resolve the case with an alternative to discipline or send a notice to the attorney of its intent to file charges in an attempt to settle the case.

YES

If the case is **SETTLED**, the State Bar Court will review the settlement agreement, which describes the discipline to be imposed. If the discipline includes suspension or disbarment, the agreement must be reviewed and approved by the California Supreme Court. If not, the State Bar Court can order the discipline.

NO



TRIAL & DISCIPLINE

If the case is **NOT SETTLED**, the State Bar will file charges against the attorney in the State Bar Court and make the case public.⁽¹⁾

The State Bar Court will schedule proceedings.

NO

After trial, if the State Bar Court judge determines that the attorney **SHOULD NOT be disciplined**, the State Bar Court will close the case with no discipline imposed.

YES

If the State Bar Court judge determines that the attorney **SHOULD BE suspended or disbarred**, the decision must be reviewed and approved by the California Supreme Court. The State Bar Court can order less severe forms of discipline.⁽¹⁾

Either the attorney or the State Bar can request a review of the State Bar Court decision.

⁽¹⁾ All public discipline information is noted on the attorney's online profile and summarized on the State Bar website Discipline section. Documents are posted in the State Bar Court online case dockets.

PLEASE NOTE

If criminal conduct is suspected, the State Bar may refer complaints to a law enforcement agency for investigation and potential prosecution.

If you have lost money due to a licensed attorney's dishonest conduct, you should also apply for reimbursement from the State Bar's Client Security Fund.

If you have questions about the complaint process, or want to know the status of a complaint you have filed, call the State Bar at 800-843-9053.



The State Bar
of California

[More information on attorney misconduct](#)

ATTACHMENT 6



Todd Hill <toddryangregoryhill@gmail.com>

See attached for your review.

1 message

Todd Hill <toddryangregoryhill@gmail.com>
To: Kevin Clinton <ira@spirolawcorp.com>

Fri, May 5, 2023 at 4:33 AM

Ira,

Here is the latest....

Todd



SUPPLEMENTAL FAC MASTER HILL 88 PRVY 05052023 .pdf
713K

ATTACHMENT 7



Concord Law School at Purdue Global Enrollment Agreement

To complete this form, input all required information and electronically initial and sign where required. When the form is complete, click Finish to submit it to the University. Please fill out the form completely and accurately to avoid potential delays in processing.

Personal Information

NAME: TODD HILL PRIOR/MAIDEN NAME (IF APPLICABLE): _____
STREET: 41459 ALMOND AVE
CITY: Palmdale STATE: California ZIP: 93551
LAST FOUR DIGITS OF SSN: ██████ CVUE STUDENT NUMBER: 38152123
DATE OF BIRTH: 05/09/1971 EMAIL ADDRESS: toddryangregoryhill@gmail.com
HOME TELEPHONE: _____ WORK TELEPHONE: 626-232-7608 CELL PHONE: _____
ARE YOU HISPANIC/LATINO? [] YES [X] NO
PLEASE SELECT ONE OR MORE OF THE FOLLOWING RACES: [] AMERICAN INDIAN OR ALASKA NATIVE [] ASIAN
[X] BLACK OR AFRICAN AMERICAN [] NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER [] WHITE
U.S. MILITARY AFFILIATION: Non Military BRANCH: _____
RANK: _____ DATE OF SEPARATION: _____

Educational Background

A BACHELOR'S DEGREE IS REQUIRED FOR ADMISSION TO CONCORD LAW SCHOOL AT PURDUE GLOBAL.

POSTSECONDARY EDUCATION

Please list all postsecondary degrees obtained.

LAST EDUCATIONAL INSTITUTION: University Of California, Los Angeles DATES ATTENDED: 09/2004 - 08/2008
MAJOR OR SPECIALIZATION: PHILOSOPHY DEGREE OBTAINED: Bachelor's
CITY: Los Angeles STATE: CA ZIP: _____
EDUCATIONAL INSTITUTION: People's College of Law DATES ATTENDED: 08/2019 - 06/2022
MAJOR OR SPECIALIZATION: Juris Doctorate DEGREE OBTAINED: Some credits but no degree
CITY: Los Angeles STATE: California ZIP: _____
EDUCATIONAL INSTITUTION: Quantic School of Business DATES ATTENDED: 04/2023 - 05/2023
MAJOR OR SPECIALIZATION: Executive MBA DEGREE OBTAINED: Some coursework but no credits
CITY: Los Angeles STATE: California ZIP: _____
YOUR LAST NAME AT THE TIME OF PREVIOUS DEGREE COMPLETION IF DIFFERENT FROM ABOVE: _____

Program

PROGRAM OF STUDY: Juris Doctor CONCENTRATION*: _____
I AM APPLYING FOR THE TERM STARTING IN: 08/30/2023 LENGTH IN CREDIT HOURS: 92

* If not indicated, to be determined by the end of the first term.

Financial

TUITION AND FEES: The tuition and fees for your program are included in the Concord Law School at Purdue Global Tuition and Fees Supplement located at <https://www.concordlawschool.edu/admissions/tuition/>. Students who take courses offered by other schools within the University may be charged a different tuition rate than that for their program of study. Tuition and fees are subject to change after 30 days' advance notice. This amount does not include costs incurred due to program changes or repeated classes, fundamental courses, or multiple concentrations. Students outside the United States or U.S. Territories will be responsible for the cost and the shipment of instructional materials including returns and payment of customs duties or fees.

PURDUE GLOBAL PAYMENT PLAN: The Purdue Global Payment Plan requires monthly payments. The terms and conditions of your Purdue Global Payment Plan are contained in your Purdue Global Payment Plan Promissory Note. The Purdue Global Payment Plan Promissory Note will be provided by the Financial Aid Office. The amount financed may change depending on the amount of federal financial assistance you actually receive. If the actual amount is less than expected, we will increase the amount financed to cover the gap and provide you with a revised Truth in Lending Disclosure Statement. You agree to pay the actual amount financed pursuant to the terms of the Purdue Global Payment Plan Agreement and revised Truth in Lending Disclosure.

BILLING STATEMENTS: Students receive monthly billing statements in hard copy and/or electronic format.

Proof of Prior Degree

Concord Law School must receive and verify your official transcript showing completion of a bachelor's degree from a college or university accredited by a regional or national accrediting agency recognized by the U.S. Department of Education no later than 2 days prior to the start of the first term. If by the deadline you are unable to provide an official college transcript showing your prior degree completion, Purdue Global will attempt to use an unofficial transcript you provided during enrollment, and compare it to other official record sources, to confirm that the degree completion requirements for your program have been met. If the degree cannot be verified by 2 days prior to your scheduled start date, you will need to defer your start date.

Graduation Requirements

The candidate for graduation must:

1. Complete all requirements for his or her program of study within the maximum time frame permitted and attain a cumulative grade point average (CGPA) for the program as defined in the Purdue Global Catalog,
2. Attend career services and financial aid exit interviews, if applicable.

Additional Technology Requirements for Courses

Along with the Technology Requirements listed in the Catalog, all students should review and be aware of any additional software and hardware requirements for their classes prior to enrollment.

Refund Policy

If your application is not accepted by Concord, all monies paid will be promptly refunded. Applicants who are dismissed as a result of failing to provide proof of required prior degree completion or meet any other condition of enrollment will be charged applicable tuition and instructional material fees including book vouchers. Additional monies received will be refunded.

CHANGES TO ADMISSIONS POLICIES: CANCELLATION OF ENROLLMENT AGREEMENT—Purdue Global reserves the right to amend its admissions policies at any time, and to seek your acknowledgement and agreement to such amended policies and/or to cancel this Agreement if you do not acknowledge and agree to such policy amendment prior to your expected start date.

Three-Day Cancellation: An applicant who provides notice of cancellation within 3 days (excluding Saturday, Sunday and federal and state holidays) of signing an Enrollment Agreement is entitled to a refund of all monies paid. No later than 30 days of receiving the notice of cancellation, the School shall provide the 100% refund.

NOTICE TO STUDENTS

If you withdraw or are dismissed from the School up through the 60 percent point in any payment period and received federal financial aid in the form of grants or loan funds, federal law requires that the School, and in some cases you, the student, return funds you did not earn to the U.S. Department of Education. In these situations, please refer to the Purdue Global Financial Aid Information Guide. All refunds due will be made within 30 days of your effective withdrawal date. The last date of attendance is used in calculating any refund amount.

TUITION REFUND CHART

If you begin a term, you are subject to the Purdue Global Refund Policy and the Tuition Refund Chart.

The institutional refund (tuition) is based on the same formula as the Title IV (R2T4) formula, which is based upon the actual daily percentage of the term attended: days completed (LDA) divided by the length (days) of the term.

STUDENTS WITHDRAWING	REFUND
Prior to the first day of the term	100% Tuition
During the first 7 calendar days of each term	100% Tuition
With attendance posted during the term	Tuition will be prorated/refunded based upon the number of calendar days attended in the term/total days in the term. Attendance greater than 60% is considered fully earned tuition for that term, and no refund will be given.

Additional Conditions

1. To maintain the academic integrity of its law programs, Concord Law School at Purdue Global has installed protections into its website to prevent students from using the curriculum inappropriately or submitting assignments or examinations fraudulently. Any student who has been found to be involved in the false submission of assignments or material on the website or otherwise in furtherance of their degree will be subject to discipline, including possible expulsion from the School. In addition, for Juris Doctor candidates, any information of unethical or fraudulent use of the site by a student which is confirmed after thorough investigation by Concord Law School at Purdue Global will be forwarded to the Committee of Bar Examiners of the State Bar of California and may affect the student's future application for admission to the Bar.
2. While Concord Law School has links to resources that allow students to investigate career opportunities open to those with a legal education, they are primarily for third- and fourth-year students. Students may contact the Career Services Director for individual assistance with their career development. Concord does not guarantee that graduates will be placed in any particular job or employed at all. Career services offered by Concord are not an obligation or guarantee of employment.
3. Concord Law School at Purdue Global will not deny admission because of race, color, religion, ancestry, national origin, age, nondisqualifying disability, gender, sexual orientation, marital status, or veteran status.
4. This agreement, its addenda, and its attachments constitute the complete agreement between Concord Law School at Purdue Global and the student, and no verbal statements or promises will be recognized or enforced. Concord Law School at Purdue Global does not imply, promise, or guarantee transferability of earned credits to any other institution.
5. Concord Law School at Purdue Global has the right, at its discretion, to make reasonable changes in program content, materials, schedules, and sequence of courses in programs, in the interest of improving the student's education, or where deemed necessary due to industry changes, academic scheduling, or professional requirements. Concord Law School at Purdue Global is required to make changes in programs or policies when ongoing federal, state, or accrediting changes affect students currently in attendance.
6. Concord Law School at Purdue Global does not provide health services for students.
7. Any controversy or claim arising out of or relating to this Agreement, no matter how pleaded or styled, shall be resolved by arbitration in accordance with the Commercial Rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction.
8. Students may address grievances or complaints not covered under any other specific school code or policy to the Associate Dean by requesting a reporting form as set forth in the Petition and Report and Complaint Procedures.
9. All Admissions Requirements specified in the institutional Catalog must be met for the student to be permitted to start classes and prior to any Title IV aid being originated or paid.

All States: In addition to state-specific grievance procedures, all students may file a complaint with the **Indiana Commission for Higher Education**: 101 West Ohio Street, #300, Indianapolis, IN 46204. Tel: 317-464-4400.

JD Program

The method of instruction at this law school for the Juris Doctor (JD) degree program is principally by technological means including interactive classes.

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.

EJD Program

The method of instruction at this law school for professional law degree programs other than the Juris Doctor degree is principally by technological means including interactive classes.

Completion of a professional law degree program at this law school, other than the Juris Doctor degree, does not qualify a student to take the California Bar Examination or satisfy the requirements for admission to practice law in California. It may not qualify a student to take the bar examination or satisfy the requirements for admission to the practice of law in any other jurisdiction. A student seeking admission to practice law should contact the admitting authority in the jurisdiction where the student intends to sit for the bar examination or intends to practice law for information regarding the legal education requirements in that jurisdiction for admission to practice.

Holder In Due Course Statement

Any holder of this consumer credit contract is subject to all claims and defenses which the debtor could assert against the seller of goods or services obtained pursuant hereto or with the proceeds, hereof Recovery hereunder by the debtor shall not exceed amounts paid by the debtor (FTC Rule effective 5-14-76).

Signatures

I hereby apply for admission to Concord Law School at Purdue Global. This Enrollment Agreement is conditional upon Concord's review of my application with supporting documentation and its admission decision. This Agreement is a legally binding instrument when signed by me and accepted by the School.

My signature below certifies that I have read all the pages of this Enrollment Agreement; I understand and agree to my rights and responsibilities; and that the Concord Law School at Purdue Global's cancellation and refund policies have been clearly explained to me. I understand that this Agreement is a legally binding agreement, and with my signature certify that I have received and read an exact signed copy of this Agreement and Purdue Global's Catalog and its Addenda and understand that I am responsible for completing any program-specific requirements (e.g., admissions, GPA, and progression requirements) and abiding by academic policies (e.g., Student Code of Conduct,). Further, my signature on this Agreement acknowledges that the Catalog dated August, 3, 2022, and all subsequent Catalog Addenda are incorporated as part of this Enrollment Agreement. I further acknowledge that no oral statements have been made to me contrary to what is contained in this Enrollment Agreement.

APPLICANT'S ACKNOWLEDGMENTS:

X TODD HILL
Please Initial

I acknowledge and understand that I will be held responsible for the terms and conditions in this Agreement.

X TODD HILL
Please Initial

I acknowledge that I have received and read the Concord Law School at Purdue Global Tuition and Fees Supplement located at <https://www.concordlawschool.edu/admissions/tuition/>.

X TODD HILL
Please Initial

I acknowledge and understand that I will be held responsible for the requirements and policies in the An electronic copy of the Purdue Global Catalog which is available at <http://www.catalog.purdueglobal.edu>.

X TODD HILL
Please Initial

I acknowledge and understand that I have a continuing obligation to update my student file with any new or pending criminal charges.

X TODD HILL
Please Initial

I acknowledge that should I relocate from the primary address noted at the time of enrollment I must update my address via the Concord student portal within the first 30 days of moving to have my primary address updated. I acknowledge and understand I must review my program page in the University Catalog to determine any applicable professional licensure requirements for my new primary address and that certain programs that are designed to meet professional licensure requirements in one state may have different requirements in another state.

X TODD HILL
Please Initial

I acknowledge that while traveling or relocating outside of the U.S., I may be unable to access the Purdue Global campus, services, and courses from countries or regions subject to economic and/or trade sanctions by the Office of Foreign Assets Control (OFAC) or other authorities.

X TODD HILL
Please Initial

I authorize Purdue Global or a third-party employment verification agency, upon or after my graduation, to contact my place of employment for the purpose of verifying my employment.

X TODD HILL
Please Initial

I acknowledge that if I am an employee, eligible family member, or member of a preselected organization or postsecondary institution with which Purdue Global has an educational relationship I may be required to provide proof of eligibility to obtain a tuition reduction before or during my enrollment at Purdue Global.

X TODD HILL
Please Initial

I understand that I must provide a copy of a valid, government-issued identification and the name in my student record must match my legal first and last name from my ID.

Indiana Residents: X TODD HILL
Please Initial

I understand that to receive a residency-based tuition discount I must provide a copy of official documentation that includes my name and current address.

SIGNATURE OF APPLICANT:

TODD HILL

DATE: 07 / 05 / 2023

Enrollment Eligibility Certification Statement.....

Applicant Name: TODD HILL **CVUE Student ID Number:** 38152123

As an authorized representative of Purdue Global, I certify that I have made no verbal statements or promises to the applicant contrary to the terms set forth in this Agreement.

Purdue University Global Authorized Representative Signature: _____ **Date:** _____

Purdue University Global Authorized Representative Name: _____



JD STUDENT DISCLOSURE STATEMENT

This disclosure statement is required by Business and Professions Code section 6061.7 and Guideline 2.3 (D) of the Guidelines to Accredited Law School Rules, adopted by the Committee of Bar Examiners and approved by the Board of Governors of the State Bar of California.

1. Study at, or graduation from, this law school may not qualify a student to take the bar examination or 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 for admission to the practice of law.

There will be additional eligibility requirements to be admitted to the California bar. For more information, visit <http://www.calbar.ca.gov/Admissions>.

2. Concord Law School of Purdue University Global is accredited by the Committee of Bar Examiners of the State Bar of California. It is not an American Bar Association approved school. Concord Law School has not applied for accreditation to the American Bar Association.
3. If you were enrolled in Concord Law School prior to the attainment of accreditation by the State Bar of California, you may petition the Dean of Students to transfer into the accredited program if you have passed the FYLSE exam. Petitions will be considered at the discretion of the school.
4. Concord Law School cannot guarantee the transferability of any credits to other institutions, including other law schools.

I acknowledge receipt of a copy of this disclosure statement on the date listed below.

Residents of states other than California further acknowledge that the Juris Doctorate degree program from this law school does not satisfy the legal education requirements for admission to practice law in states other than California.

Student Signature: TODD HILL **Date:** 07 / 05 / 2023

Print Name: TODD HILL **Student Number:** 38152123



Educational Funding Plan

At Concord Law School at Purdue University Global, we understand that earning your degree is a significant investment, and we offer many ways for you to fund your education.

Below is a breakdown of funding options that you can choose from. Select your primary, secondary, and/or additional funding sources. Please note that these options are not a guarantee or confirmation of eligibility.

STUDENT NAME: TODD HILL **CVUE STUDENT NUMBER:** 38152123

PROGRAM OF STUDY: Juris Doctor

Primary Funding Options

- ☐ **100% Out of Pocket**—Students wanting to utilize their own funds to pay for their education are encouraged to select this option.
- ☒ **Federal Financial Aid**—Federal financial aid is a combination of grants and loans. Federal Stafford loans are fixed-rate educational loans sponsored by the federal government. Two types of federal Stafford loans are available to undergraduate students: subsidized and unsubsidized. Purdue University Global also offers Pell Grants and the Federal Supplemental Educational Opportunity Grant (FSEOG) to those who qualify.
- ☐ **Military Benefits**—Servicemembers, veterans, and dependents of servicemembers may fund their education using military educational benefits.
- ☐ **Employer Tuition Assistance**—Many employers offer tuition reimbursement for employees seeking to increase skills and knowledge. Please check with your human resources department to see what options are available.
- ☐ **Other**

Secondary Funding Options

- ☒ **Partial Out of Pocket**—In the case that other finance options do not cover the entire cost of tuition, books, and fees, or if you've elected to reduce the amount of debt you accrue during the course of your education, select this option.
- ☐ **Employer Tuition Assistance**—Many employers offer tuition reimbursement for employees seeking to increase skills and knowledge. Please check with your human resources department to see what options are available.
- ☐ **Scholarships**—Unlike student loans, scholarship funds do not have to be repaid. All of the funds you receive apply directly toward paying your tuition.
- ☐ **Federal Financial Aid**—Federal financial aid is a combination of grants and loans. Federal Stafford loans are fixed-rate educational loans sponsored by the federal government. Two types of federal Stafford loans are available to undergraduate students: subsidized and unsubsidized. Purdue University Global also offers Pell Grants and the Federal Supplemental Educational Opportunity Grant (FSEOG) to those who qualify.
- ☐ **Military Benefits**—Servicemembers, veterans, and dependents of servicemembers may fund their education using military educational benefits.
- ☐ **Other**

Alternative Funding Options

- ☐ **Partial Out of Pocket**—In the case that other finance options do not cover the entire cost of tuition, books, and fees, or if you've elected to reduce the amount of debt you accrue during the course of your education, select this option.
- ☐ **Employer Tuition Assistance**—Many employers offer tuition reimbursement for employees seeking to increase skills and knowledge. Please check with your human resources department to see what options are available.
- ☐ **Scholarships**—Unlike student loans, scholarship funds do not have to be repaid. All of the funds you receive apply directly toward paying your tuition.
- ☐ **Financial Aid**—Federal financial aid is a combination of grants and loans. Federal Stafford loans are fixed-rate educational loans sponsored by the federal government. Two types of federal Stafford loans are available to undergraduate students: subsidized and unsubsidized. Purdue University Global also offers Pell Grants and the Federal Supplemental Educational Opportunity Grant (FSEOG) to those who qualify.
- ☐ **Military Benefits**—Servicemembers, veterans, and dependents of servicemembers may fund their education using military educational benefits.
- ☐ **Other**

Signature of Applicant: TODD HILL **Date:** 07 / 05 / 2023

ATTACHMENT 8

Proposed Plan of Law Study

As Part of a Request for Legal Evaluation

Student's Name: Todd Ryan Gregory Hill

Student's File Number: 498729

Name of Law School: Peoples College of Law

Start Date ¹	End Date ¹	Course Name	Units (or Hours ²)
		NEXT 3 LINES FALL QUARTER 2019-2020	
9/3/19	11/5/19	Contracts I	3
9/3/19	11/5/19	Legal Writing I	3
9/3/19	11/5/19	Torts I	3
		NEXT 4 LINES WINTER QUARTER 2019-2020	
11/18/19	2/21/20	Contracts II	3
11/18/19	2/21/20	Criminal Law I	3
11/18/19	2/21/20	Legal Writing II	3
11/18/19	2/21/20	Torts II	3
		NEXT 4 LINES SPRING QUARTER 2019-2020	
3/2/20	5/15/20	Contracts III	3
3/2/20	5/15/20	Criminal Law II	3
3/2/20	5/15/20	Legal Writing III	3
3/2/20	5/15/20	Torts III	3
		NEXT 3 LINES FALL QUARTER 2020-2021	
8/3/20	11/13/20	Constitutional Law I	3
8/3/20	11/13/20	Criminal Procedure I	3
8/3/20	11/13/20	Trial Advocacy	3
		NEXT 4 LINES WINTER QUARTER 2020-2021	
11/14/20	2/20/21	Constitutional Law II	3
11/14/20	2/20/21	Criminal Procedure II	3
11/14/20	2/20/21	Remedies I	0 – audit, no credit
11/14/20	2/20/21	Wills & Trusts	3
		NEXT 4 LINES SPRING QUARTER 2020-2021	
3/1/20	5/14/21	Constitutional Law III	3
3/1/20	5/14/21	Criminal Procedure III	3
3/1/20	5/14/21	Remedies I	0 – audit, no credit
3/1/20	5/14/21	Wills & Trusts	3
		NEXT 4 LINES FALL QUARTER 2021-2022	
8/30/21	11/13/21	Business Transactions Clinical Course	3
8/30/21	11/13/21	Civil Procedure I	3
8/30/21	11/13/21	Evidence I	3
8/30/21	11/13/21	Real Property I	0 – audit, no credit

		NEXT 4 LINES WINTER QUARTER 2021-2022	
11/15/21	2/19/22	Civil Procedure II	3
11/15/21	2/19/22	Evidence II	3
11/15/21	2/19/22	Real Property II	0 – audit, no credit
11/15/21	2/19/22	Corporations & Business Associations	3
		NEXT 4 LINES SPRING QUARTER 2021-2022	
2/28/22	5/14/22	Civil Procedure III	3
2/28/22	5/14/22	Community Property	3
2/28/22	5/14/22	Real Property III	0 – audit, no credit
2/28/22	5/14/22	Remedies II	0 – audit, no credit
2/28/22	5/14/22	Professional Responsibility	3
		NEXT 3 LINES FALL QUARTER 2022-2023	
9/6/22	11/18/22	Civil Rights	3
9/6/22	11/18/22	Property I	3
9/6/22	11/18/22	Legal Principles and Elements for MBE	3
		NEXT 3 LINES WINTER QUARTER 2022-2023	
11/28/22	2/24/23	Remedies I	3
11/28/22	2/24/23	Property II	3
11/28/22	2/24/23	Advanced Essay Writing	3
		NEXT 3 LINES SPRING QUARTER 2022-2023	
2/20/23	5/19/23	Remedies II	3
2/20/23	5/19/23	Property III	3
2/20/23	5/19/23	Competency and Performance	3

¹ This date must align to that of either the semester, quarter, or year.

² For correspondence law schools only: provide start date and end date, including month and day for each year of study. Also provide the total hours of preparation and study for each course.

ATTACHMENT 9



The State Bar of California

845 South Figueroa Street, Los Angeles, CA 90017

pra@calbar.ca.gov

June 16, 2023

VIA EMAIL

Justin Beck
3501 Roselle St.
Oceanside, CA 92056

Dear Justin Beck:

I am writing on behalf of the State Bar of California in further response to your May 19, 2023, California Public Records Act (CPRA) request. On May 20, 2023, the State Bar responded to request number one. You were advised that additional time was needed to respond to requests number two and three, and that a response would be provided on or before June 16, 2023. The State Bar responds to requests number two and three as follows:

Request No. 2

Please produce all records of individual attorney names who have served in this “Special Deputy Trial Counsel” capacity from 2010 to 2023.

Response to Request No. 2

The attached PDF titled “SDTC 2010-2022” contains the State Bar’s records responsive to this Request. The 2023 list of attorneys who served as Special Deputy Trial Counsel is included in Response No. 3.

Request No. 3

Please produce all records of individual attorney names who serve in this “Special Deputy Trial Counsel” capacity currently.

Response to Request No. 3

The attached PDF titled “SDTC Roster June 2023” contains the State Bar’s records responsive to this Request.

This completes the State Bar’s response to your CPRA request.

Sincerely,

Public Records Coordinator
State Bar of California

ATTACHMENT 10



The State Bar of California

OFFICE OF ADMISSIONS

180 Howard Street, San Francisco, CA 94105

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

September 1, 2022

Board President Hector Peña
Peoples College of Law
660 S Bonnie Brae
Los Angeles, CA 90057

RE: Application for Exemption Under Guideline 5.6

Dear President Peña:

On August 11, 2022, the State Bar of California received your letter sent on behalf of Peoples College of Law seeking an exemption under Guideline 5.6 to “exempt a student from the unit or hourly requirement if a student demonstrates that illness, disability, or other unusual circumstance warrants such special consideration.”

This exception was sought for one particular student, and this is the first such exception request that the law school has filed.

After careful consideration of the request, it has been determined that the request does not fit within the exception of Guideline 5.6, and the request is denied for the reasons described below.

The law school seeks an exception to offer a program of 120 hours to that law student for the fourth year of study, after which the law school would award the student a JD degree.

The law school seeks this permission because it asserts that there is a special circumstance. Specifically, the law school is not able to fulfill its obligation to provide a law program offering a minimum of 270 classroom attendance hours per year for this student. While Peoples College of Law generally does so, it currently cannot do so in this case, because the law school permitted this student to take some of the classes that are a part of the normal fourth year course load during his second and third years of study.

While the law school asserts that the student is suffering from a disability, without describing more, this is not identified as the cause of the request for the exemption. In fact, the student has demonstrated that they are able to meet and exceed the hours requirement over an extended period of time. Further, this exception is designed for consideration when a situation requires that the student take more time to graduate due to an unforeseen circumstance, rather than less.

Staff counseled both the law school and the student prior to the student’s third year, advising that California Business and Professions Code 6060 requires law schools to offer a program of study of at least 270 hours per year for four years before a JD can be awarded. Both the student and the law school

were advised to schedule accordingly. At that time, the law school advised the State Bar that it would not allow the student to further modify their program, and that it understood that four full years of study of at least 270 hours would be necessary. It appears that this is not the course of action that was taken.

Looking ahead to the law student's fourth year of study, the law school is strongly urged to act immediately to fulfill its obligations to the law student by taking the steps needed to provide a fourth-year JD program to the law student that offers 270 classroom hours. For example, the law school may create an internship under the rules and guidelines that may represent up to 40 percent of the coursework for the year and may allow the student to visit at another law school for one or more courses if the law school is not able to provide the required hours. If it cannot do so, the law school should assist the law student in assessing their transfer options.

The law student may also consider other ways to fulfill the legal education requirement without earning a JD, including participating in the Law Office Study program if the law school is not able to offer sufficient coursework to allow the student to complete their fourth year of study. We understand that the law student is also looking into this option.

Finally, either the law school or the student can submit the student's transcript and proposed plan of study for review, in order to be sure that any proposed program will be a compliant program that will meet the legal education requirement toward establishing eligibility to take the bar exam.

Please affirmatively communicate this result to the student as soon as possible and confirm at lawschoolregulation@calbar.ca.gov that you have done so. Please also provide all necessary counseling to allow the student to complete their education in accordance with the applicable statutes, rules and guidelines. Once a solution has been determined, please provide written confirmation of the plan and evidence that the plan is in compliance, such as a review of the proposed plan by eligibility. Time is of the essence and your prompt action is required.

Should you have any further questions, please do not hesitate to contact me. Should the student have any further questions, they may speak with the eligibility unit of the Office of Admissions in our Los Angeles office.

The invoice for this matter is attached and due within 30 days.

Sincerely,

Natalie Leonard

Natalie Leonard
Principal Program Analyst

cc:
Dean Pascual Torres
Administrator Adriana Zuniga Nuñez



The State Bar of California

180 Howard Street, San Francisco, CA 94105

OFFICE OF ADMISSIONS

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

Name of Law School: Peoples College of Law

RE: Request for Evaluation of Exemption Pursuant to Guideline 5.6 - DENIED

Date: September 1, 2022

Invoice Number: 2022-154

INVOICE

Description	Amount
Review of request for exemption pursuant to guideline 5.6, 5.25 Staff Hours	\$1,473.75
Total Deposit:	
Total due if paying by check:	\$1,473.75
<i>Add 2.5% to the total if paying by credit card</i>	
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 for 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:

ATTACHMENT 11

Ira Spiro (sued as Robert Ira Spiro)
10573 West Pico Blvd. #865
Los Angeles, CA 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com

Defendant in Propria Persona

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. CV23-1298-JLS(PDx)

**DEFENDANT SPIRO'S
OPPOSITION TO PLAINTIFF'S
MOTION TO SUPPLEMENT FIRST
AMENDED COMPLAINT (Dkt. No.
40)**

**MEMORANDUM OF POINTS AND
AUTHORITIES;**

DECLARATION OF IRA SPIRO

Date and Time of Hearing:

Date: Friday, July 7, 2023

Time: 10:30 a.m.

Before Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **A. PROCEDURAL BACKGROUND, BRIEFLY**

3 On April 5, 2023, the Court issued an order (Dkt. No. 37) dismissing
4 Plaintiff's initial Complaint with leave to amend. The Order detailed the deficiencies
5 in the Complaint. On April 18, Plaintiff filed his First Amended Complaint (Dkt.
6 No. 38). The First Amended Complaint repeats nearly all the deficiencies of the
7 initial Complaint. On May 5, Plaintiff filed a document titled "A Motion for Leave
8 to Supplement Todd R. G. Hill's First Amended Complaint" (Dkt. No. 40),
9 attaching a proposed "Supplemental First Amended Complaint" ((Dkt. No. 40-1).
10 This is Defendant Spiro's opposition to that motion.

11 **B. THE MOTION IS GROSSLY IMPROPER IN FORM, AND**
12 **SHOULD BE DENIED ON THOSE GROUNDS AT LEAST.**

13 Plaintiff's motion (Dkt. No. 40) violates the large majority of rules governing
14 motions in general and motions to amend pleadings in particular. Following are only
15 some of the violations:

- 16 1. The motion is not signed, not by Plaintiff or by anyone else.
- 17 2. The motion was not served at all, not on Defendant Spiro or anyone
18 else. (Defendant Spiro learned of the motion only because he viewed the Court's
19 docket after it was filed. (Spiro Decl., ¶ 1.)) There is no proof of service. Service
20 outside the Court's automatic electronic service feature is required, and thus a proof
21 of service is required, because the Court's order of April 5, 2023 prohibited Plaintiff
22 from using the ECF system. The order did notify Plaintiff that he could use the
23 EDSS system, but the Court's website for assistance with the EDSS system includes
24 this question and answer:

25 "Do I still have to serve copies of my documents on people?"
26
27
28

1 “Yes. EDSS will not send copies of your documents to anyone but the Court.
 2 You must serve copies of your documents on other parties to the case
 3 yourself.”

4 (The quotation is at <https://apps.cacd.uscourts.gov/edss>.)

5 3. The motion completely fails to supply the required means to determine
 6 the additions and deletions to the First Amended Complaint that would be made by
 7 the proposed “Supplemental First Amended Complaint” and completely fails to
 8 identify the page and line numbers and wording of the proposed changes and
 9 additions of material.

10 4. The motion completely fails to comply with Local Rule 7-3. Plaintiff
 11 did not have a conference before making the motion, did not even attempt to have
 12 one, and does not claim to have had one. Plaintiff filed the motion on the very day
 13 Plaintiff and Defendant Spiro were meeting face-to-face *on motions contemplated*
 14 *by Defendant Spiro*, but Plaintiff said nothing about any motion to file a
 15 supplemental or amended complaint or any motion by him, and Defendant Spiro did
 16 not even know about the “Motion to Supplement First Amended Complaint”
 17 motion. These facts and Plaintiff’s deceitful conduct surrounding them are detailed
 18 in the declaration of Defendant Spiro, paragraph 2.

19 5. The motion submits no evidence for the supposed facts stated in it.

20 6. On the first page of the motion, in the required naming of the Judge,
 21 Plaintiff even gets the name of Judge Staton wrong.

22
 23 **C. THE PROPOSED “SUPPLEMENTAL FIRST AMENDED**
 24 **COMPLAINT” VIOLATES THE ORDER OF APRIL 5, 2023 (Dkt. No. 37)**

25 Without reading the entire 114 pages of Plaintiff’s proposed “Supplemental
 26 First Amended Complaint,” a glance at some of its features shows that it is yet
 27 another violation of the order of April 5, 2023 dismissing the initial Complaint with
 28 leave to amend. (It is *another* violation, because the First Amended Complaint (Dkt.

1 No. 38) violates the Order in the same ways.) Following are some examples of how
 2 the “Supplemental First Amended Complaint” violates the Order:

3 a. The Order condemns complaints in which “each count incorporates
 4 every antecedent allegation by reference”. (Page 3, quotation paragraph.) Yet that is
 5 precisely what the Plaintiff’s proposed “Supplemental First Amended Complaint”
 6 does – each “cause of action” incorporates all or nearly all paragraphs that precede
 7 it. (The First Amended Complaint does the same thing.)

8 b. The April 5th Order also condemns complaints “where the plaintiff
 9 uses the omnibus term ‘Defendants’ throughout a complaint by grouping defendants
 10 together without identifying what the particular defendants specifically did wrong.”
 11 (Page 3, quotation paragraph.) One need only read a few paragraphs into the “First
 12 Cause of Action” to find an egregious example, paragraph 242, which is also in the
 13 First Amended Complaint as paragraph 189. It reads (with emphasis added in the
 14 first line):

15 “242. That **PCL DEFENDANTS failed** in:

16 “a) making proper and timely mandatory disclosures to PLAINTIFF
 17 during academic years 2019, 2020, and 2021, as well as at the
 18 time of matriculation contract signing and each year of
 19 attendance.

20 “b) maintaining accurate records and providing timely access to
 21 students; c. submitting accurate records timely to the STATE
 22 BAR on Plaintiff’s behalf.

23 “c) failed to exercise good business judgment or the appropriate duty of
 24 care.

25 “d) providing PLAINTIFF with access to board meeting minutes, zoom
 26 recordings by former President GONZALEZ, and the accounting
 27 and books held by PENA and BOUFFARD as Treasurer.

28 “e) producing records in response to a formal demand for documents.”

1 c. The April 5th Order criticizes the initial Complaint as exceedingly
2 long. It was 402 pages. The First Amended Complaint is also far too long, at 75
3 pages. But the point here is that the proposed “Supplemental First Amended
4 Complaint” compounds the offense by increasing the number of pages by 52%,
5 from the 75-page First Amended Complaint to the 114-page “Supplemental First
6 Amended Complaint.”

7 **D. SANCTIONS**

8 This is most appropriate situation for the Court to use its inherent powers to
9 sanction recalcitrant parties. Sanctions are the only way to protect the Court and the
10 defendants, approximately 70 in number. Plaintiff has already committed a host of
11 violations of court rules, and he was not deterred by the Court's April 5 order. He
12 files what he wants to file, regardless of whether it complies with rules and laws or
13 not, and he has a history of doing that before this case. Plaintiff is nearing or crossed
14 the line into vexatious litigation.

15 This is not the first lawsuit against Peoples College of Law, and those
16 associated with it, in which Plaintiff has persisted in violations of rules and statutes.
17 In 2022, he filed a Los Angeles Superior Court lawsuit, Case No. 22AVRO000363,
18 against Peoples College of Law and its leadership, including Defendant Spiro,
19 making most of the same allegations he makes here. He filed the suit as a Petition
20 for Civil Harassment Restraining Orders, a special proceeding in which damages are
21 not recoverable, yet he sought “compensatory damages ... in the amount \$750,000”
22 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
23 awarded in that type of proceeding. He filed a motion for a temporary restraining
24 order, which was denied. He then filed a “Motion for Clarification and
25 Reconsideration” of the denial, which the Court refused to hear.

26 At the only hearing in the case, Plaintiff refused to stipulate to allow the
27 Commissioner who normally handles Civil Harassment Petitions to hear his case.
28 That caused a Judge from another Department to come to the Commissioner’s

1 Department to hear the case. The Judge dismissed the case, stating in his order of
2 April 8, 2022, “The Court finds that this court is not the appropriate forum for what
3 Petitioner is seeking and orders the case dismissed without prejudice.” The Court
4 also awarded against Plaintiff “\$5,435.00 for attorney’s fees and filing cost payable
5 within 30 days of this date.” Plaintiff has not paid a penny of that award (Spiro
6 Decl., ¶ 3.)

7 Defendant Spiro does not wish money sanctions in favor of himself, but rather
8 a money sanction payable to the Court and, more importantly, sanctions aimed at
9 staunching Plaintiff’s apparently inexorable misconduct, perhaps an order that
10 Plaintiff may not file any further papers without first obtaining written permission
11 from the Court, or even an order dismissing this lawsuit.

12 Respectfully submitted,

13 Dated: May 21 2023

14 _____/s/_____
15 Ira Spiro (sued as Robert Ira Spiro)
16 Defendant in Propria Persona
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DECLARATION OF IRA SPIRO

Ira Spiro declares:

1. I was not served in any way with Plaintiff's Motion to Supplement First Amended Complaint. I did not receive it by mail, by electronic service, or any other means of service. I discovered it only when I viewed the Court's docket after the motion had been filed.

2. The docket and the file stamp on Plaintiff's motion show it was filed on Friday, May 5, 2023. On that very day, I met with Plaintiff face-to-face in West Los Angeles from 12:36 p.m. until approximately 2:30 p.m. We met pursuant to my request under Local Rule 7-3 to confer about *my contemplated motions* against the First Amended Complaint. We did not discuss any motion by Plaintiff. I did not even know the Motion to Supplement First Amended Complaint had been filed. Although we met for two hours or more, Plaintiff said nothing about making a motion to file a supplemental or amended complaint, or about him making any motion at all. At 4:34 a.m. that morning he had emailed me a version of his "Supplemental First Amended Complaint" with no docket number on it and without any motion or indication of one. The text of his email was only "Here is the latest..." and the subject line was "See attached for your review." I saw the email about 10 a.m., but I spent only a few minutes looking over the "Supplemental First Amended Complaint." Plaintiff brought a hard copy of the "Supplemental First Amended Complaint" to the meeting. Twice he started to refer to it, but I stopped any discussion of it, telling him we were not there to talk about it, rather we were there to talk about his First Amended Complaint and my planned motions against it.

3. In 2022, Plaintiff filed a Los Angeles Superior Court lawsuit, Case No. 22AVRO000363, against Peoples College of Law and its leadership, including me, alleging most of the same allegations he makes here. He filed the suit as a Petition for Civil Harassment Restraining Orders, a special proceeding in which damages are not recoverable, yet he sought "compensatory damages ... in the amount \$750,000"

1 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
2 awarded in that type of proceeding. He filed a motion for a temporary restraining
3 order, which was denied. He then filed a “Motion for Clarification and
4 Reconsideration” of the denial, which the Court refused to hear. At the only hearing
5 in the case, Plaintiff refused to stipulate to allow the Commissioner who normally
6 handles Civil Harassment Petitions to hear his case. That caused a Judge from
7 another Department to come to the Commissioner’s Department to hear the case.
8 The Judge dismissed the case, stating in his order of April 8, 2022, “The Court finds
9 that this court is not the appropriate forum for what Petitioner is seeking and orders
10 the case dismissed without prejudice.” The Court also awarded against Plaintiff
11 “\$5,435.00 for attorney’s fees and filing cost payable within 30 days of this date.”
12 Plaintiff has not paid a penny of that award. Attached hereto as Exhibit A is a copy
13 of the order.

14 I declare under penalty of perjury that the foregoing is true and correct and
15 was executed at Los Angeles, California on May 21, 2023.

16
17 _____
Ira Spiro
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1 and “punitive damages ... of \$2.95 million” and seeking other relief that cannot be
2 awarded in that type of proceeding. He filed a motion for a temporary restraining
3 order, which was denied. He then filed a “Motion for Clarification and
4 Reconsideration” of the denial, which the Court refused to hear. At the only hearing
5 in the case, Plaintiff refused to stipulate to allow the Commissioner who normally
6 handles Civil Harassment Petitions to hear his case. That caused a Judge from
7 another Department to come to the Commissioner’s Department to hear the case.
8 The Judge dismissed the case, stating in his order of April 8, 2022, “The Court finds
9 that this court is not the appropriate forum for what Petitioner is seeking and orders
10 the case dismissed without prejudice.” The Court also awarded against Plaintiff
11 “\$5,435.00 for attorney’s fees and filing cost payable within 30 days of this date.”
12 Plaintiff has not paid a penny of that award. Attached hereto as Exhibit A is a copy
13 of the order.

14 I declare under penalty of perjury that the foregoing is true and correct and
15 was executed at Los Angeles, California on May 21, 2023.

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Ira Spiro

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Michael D. Antonovich Antelope Valley Dept. - A10

22AVRO00363

Hill, Todd

vs

Pena, Hector

April 8, 2022

8:30 AM

Honorable Dean J. Kitchens, Judge

Jocelyn Keating, Judicial Assistant

Tiana Harrelson, Court Reporter

NATURE OF PROCEEDINGS: Motion for Clarification and Reconsideration; New Evidence; List of Case to Whip Motion Applies filed by Petitioner on March 25, 2022

The following parties are present for the aforementioned proceeding:

Todd Hill, Petitioner
Hector Pena, Respondent
Robert Ira Spiro, Attorney for Respondent

The Court finds the Petitioner does not stipulate to the Commissioner Valerie L. Skeba hearing the above-captioned matter.

By order of the Supervising Judge of Family Law, the above-captioned matter is reassigned to the Honorable Dean J. Kitchens, Judge presiding, in Department A12 for all purposes. If any appearing party has not yet exercised a peremptory challenge under Section 170.6, Code of Civil Procedure, the peremptory challenge to the Honorable Dean Kitchens, Judge must be filed within the 15-day period specified in Section 170.6, Code of Civil Procedure, with extensions of time pursuant to Section 1013, Code of Civil Procedure, if service is by mail. Non-appearing parties, if any, have a 15-day period from first appearance to file a peremptory challenge as specified in Section 170.6, Code of Civil Procedure.

The matter is called for hearing in Department A-10 with the Honorable Dean J. Kitchens, Judge presiding.

The parties are sworn.

The Court finds that this court is not the appropriate forum for what Petitioner is seeking and orders the case dismissed without prejudice.

Respondent's attorney's request for Attorney fees and filing cost is granted. The Court orders that the Petitioner shall pay directly to Respondent's attorney of record the sum of \$5,435.00 for attorney's fees and filing cost payable within 30 days of this date.

Clerk shall give notice.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Michael D. Antonovich Antelope Valley Dept. - A10

22AVRO00363

Hill, Todd

vs

Pena, Hector

April 8, 2022

8:30 AM

**CLERK'S CERTIFICATE OF MAILING/
NOTICE OF ENTRY OF ORDER**

I, Sherri R. Carter, Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of the above minute order of April 8, 2022 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States Mail at the courthouse in Lancaster, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Dated: April 8, 2022

By: /s/ Jocelyn Keating

Jocelyn Keating, Deputy Clerk

Todd Hill
41459 Almond Avenue
Palmdale, CA 93551

Ira Spiro, Esq.
10573 W. Pico Blvd., No. 865
Los Angeles, CA 90064

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the May 21, 2023, I served the document described as DEFENDANT SPIRO'S OPPOSITION TO PLAINTIFF'S MOTION TO FILE SUPPLEMENTAL COMPLAINT on the interested parties in this action by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
 41459 Almond Avenue
 Quartz Hill, Ca 93551

☒ **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

☐ **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 21, 2023 at Los Angeles, California.

Ira Spiro

Type or Print Name

Signature

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the May 21, 2023, I served the document described as DEFENDANT SPIRO'S OPPOSITION TO PLAINTIFF'S MOTION TO FILE SUPPLEMENTAL COMPLAINT on the interested parties in this action by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 21, 2023 at Los Angeles, California.

Ira Spiro
 Type or Print Name

Signature

ATTACHMENT 12

Todd R. G. Hill,
toddryangregoryhill@gmail.com
pro se plaintiff
41459 Almond Avenue
Quartz Hill, Ca 93551
+1 [626] 232-7608

**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**TODD R. G. HILL , individually,
and as attorney-in-fact *guardian ad litem*
to ROES 1-888,**

Plaintiff,

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES**

Case No: 2:23-CV-01298-JLS-PD

Judge Assigned: Honorable Josephine L. Staton

DEMAND FOR JURY TRIAL

**PLAINTIFF TODD R. G. HILL'S
SUPPLEMENTAL FIRST AMENDED
COMPLAINT FOR DAMAGES,
DECLARATORY & INJUNCTIVE RELIEF
FOR DAMAGES, CIVIL PENALTIES, AN**

COLLEGE OF LAW:)

ACCOUNTING, LIS PENDENS, PERMANENT
INJUNCTION, INVOLUNTARY

DISSOLUTION AND DECLARATORY RELIEF

THE GUILD LAW SCHOOL DBA

INCLUDING CONSTITUTIONAL

PEOPLE’S COLLEGE OF LAW; HECTOR

CHALLENGE TO A STATUTE PER FED.

C. PEÑA; CHRISTINA MARIN

RULE 5.1 AND OTHER RELIEF ARISING

GONZALEZ, ESQ.; ROBERT IRA SPIRO,

FROM:

ESQ.; JUAN MANUEL SARIÑANA, ESQ.;

1) BREACH OF CONTRACT

PREM SARIN ; DAVID TYLER

BOUFFARD; JOSHUA GILLENS, ESQ.;

2) COMMON LAW BREACH OF FIDUCIARY

CLEMENTE FRANCO, ESQ.; HECTOR

DUTY – INDIVIDUAL & DERIVATIVE

SANCHEZ, ESQ.; PASCUAL TORRES,

3) BREACH OF FIDUCIARY DUTY

ESQ.; CAROL DUPREE, ESQ., GARY

RELATED TO VIOLATION OF FEDERAL

SILBIGER, ESQ.; EDITH POMPOSO;

AND STATE ADMINISTRATIVE LAW

ADRIANA ZUNIGA NUÑEZ

AND BUSINESS PRACTICES

AND,

4) BREACH OF FIDUCIARY DUTY

THE STATE BAR OF CALIFORNIA AS

RELATED TO SOLICITATIONS IN

WELL AS THESE PERSONS AS

VIOLATION OF BUSINESS AND

INDIVIDUAL EMPLOYEES ACTING IN

PROFESSIONS CODE SECTION 17510.8

OFFICIAL CAPACITY OR AS

5) UNTRUE OR MISLEADING STATEMENTS

INDIVIDUALS:

IN VIOLATION OF BUSINESS &

LEAH WILSON, ESQ.; SUZANNE CELIA
GRANDT, ESQ., ;VANESSA HOLTON,
ESQ.; ELLIN DAVYTYAN, ESQ; LOUISA
AYRAPETYAN; ALFREDO HERNANDEZ;
JUAN DE LA CRUZ; NATALIE LEONARD,
ESQ., DONNA HERSHKOWITZ, ESQ.;
CARMEN NUNEZ; ELIZABETH HOM; JAY
FRYKBERG; GINA CRAWFORD; LARRY
KAPLAN; DAVID LAWRENCE; HON.
JAMES HERMAN; PAUL A. KRAMER;
CAROLINE HOLMES; IMELDA
SANTIAGO; NATALIE HOPE; STEVE
MAZER; YUN XIANG; JOAN RANDOLPH;
JEAN KRISILNIKOFF; ENRIQUE ZUNIGA,
ROBERT S. BRODY;

**THE OFFICE OF CHIEF TRIAL
COUNSEL, THE STATE BAR OF
CALIFORNIA AS AGENTS AND
INDIVIDUALS:**

GEORGE S. CARDONA, CHIEF TRIAL
COUNSEL; MELANIE J. LAWRENCE,

PROFESSIONS CODE § 17500

6) CIVIL RIGHTS VIOLATIONS AND
REMEDY UNDER 28 U.S.C. § 1654

7) CIVIL RIGHTS VIOLATIONS UNDER 42
U.S.C. § 1981 AND CA CIVIL CODE § 52.1
(The Bane Act)

8) NEGLIGENCE

9) RICO

10) CONSPIRACY

11) COMMON LAW EXTORTION

12) CIVIL RIGHTS VIOLATIONS AND
REMEDY UNDER CA CIVIL CODE § 52.1
(THE BANE ACT)

Unlimited Civil Case

1 INTERIM CHIEF TRIAL COUNSEL;
2 ANTHONY J. GARCIA, ASSISTANT
3 CHIEF TRIAL COUNSEL SHATAKA
4 SHORES-BROOKS, SUPERVISING
5 ATTORNEY ELI D. MORGENSTERN,
6
7 SENIOR TRIAL COUNSEL

8
9 and DOES 1-88.

10 **THE BOARD OF TRUSTEES, THE**
11 **STATE BAR OF CALIFORNIA AS**
12 **AGENTS AND INDIVIDUALS:**
13

14 RUBEN DURAN, Assembly Appointee,
15 Attorney Member, Chair (“DURAN”);
16
17 BRANDON N. STALLINGS, Supreme Court
18 Appointee, Attorney Member Vice-Chair;
19 MARK BROUGHTON, Supreme Court
20 Appointee, Attorney Member; HAILYN
21 CHEN, Supreme Court Appointee, Attorney
22 Member; JOSÉ CISNEROS, Governor
23 Appointee, Public Member; JUAN DE LA
24 CRUZ, Assembly Appointee, Public Member;
25
26 GREGORY E. KNOLL, Senate Appointee,
27

1 Attorney Member; MELANIE M. SHELBY,
2 Governor Appointee, Public Member;
3 ARNOLD SOWELL JR., Senate Appointee,
4 Public Member; MARK W. TONEY, PH.D.,
5 Governor Appointee, Public Member.
6

7 **THE OFFICE OF ADMISSIONS, THE**
8 **STATE BAR OF CALIFORNIA AS STAFF,**
9

10 **AGENTS AND INDIVIDUALS:**

11 AMY NUNEZ, Director III; AUDREY
12 CHING, Director I; NATALIE LEONARD,
13 Principal Program Analyst, Law School
14 Regulation; LISA CUMMINS, Principal
15 Program Analyst, Examinations; TAMMY
16 CAMPBELL, Program Manager II, Operations
17 & Management; KIM WONG, Admissions;
18
19 DEVAN MCFARLAND, Admissions.
20
21

22 Defendants
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26 **ATTORNEY GENERAL**
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As Nominal Defendant per 42 U.S.C. § 1956
and for notice per Rule 5.1

**THE SOVEREIGN STATE OF
CALIFORNIA**

Nominal Defendant

For purposes of Tort Liability and

Judgment Guarantor

1 **PARTIES**

2
3 **PLAINTIFF**

- 4
5 1. Plaintiff Todd Hill ("Plaintiff") is a United States citizen who resides in and holds his principal place
6 of business in the city of Palmdale, County of Los Angeles, California. Plaintiff is employed and
7 works in the business of specialty chemical services. Plaintiff is a member of the public, never
8 admitted to the Bar nor entered on any attorney roll. Plaintiff is African American and a native of the
9 State of California. Plaintiff suffers from at least one diagnosed physical or mental qualifying
10 disability under the Americans with Disabilities Act. Plaintiff was a student at People's College of
11 Law ("PCL") and believes he remains the rightful Secretary of the Corporation. At time of contract
12 signing, .
13

14
15 DEFENDANT - THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND
16 INDIVIDUALS OF THE PEOPLE COLLEGE OF LAW:
17
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- 19 2. PEOPLE'S COLLEGE OF LAW ("PCL") is a nonprofit corporation incorporated 1974 to provide
20 legal education services for preparation for admission to the STATE BAR. The school operates at
21 660 S. Bonnie Brae, Los Angeles, California 90057.
22
23 3. ENTERPRISE P ("Enterprise P") is distinct from PCL.
24
25 4. CHRISTINA MARIN GONZALEZ, ESQ. ("GONZALEZ") is an individual licensee associated with
26 PCL. GONZALEZ served as PCL's President from January 17 to November 14, 2021. GONZALEZ
27 is a PCL Alumnus, Class of 2012.
28

5. HECTOR CANDELARIO PEÑA RAMIREZ aka HECTOR P. RAMIREZ, aka HECTOR C. PEÑA, (“PEÑA”) is an individual residing in Los Angeles County, California. PEÑA is a PCL graduate and has served as the President and the Board Treasurer. PENA is a PCL Alumnus, believed class of 2017.
6. ROBERT IRA SPIRO, ESQ. ("SPIRO") is an individual associated with PCL. SPIRO has been involved with PCL from at least 2017 to present. SPIRO has connections to the STATE BAR and has served on various committees, including an ethics committee. SPIRO was the Dean of the law school until his retirement in 2021.
7. JUAN MANUEL SARIÑANA, ESQ. ("SARIÑANA") is an individual associated with PCL. SARIÑANA served as an adjunct professor from March 2020 to 2022 and as Dean of the law school.
8. PREM SARIN ("SARIN") is an individual and PCL graduate who has served as a PCL Board Member from November 2021 to the present.
9. DAVID TYLER BOUFFARD ("BOUFFARD") is an individual who has served as a PCL Board Member from November 2021 to the present.
10. JOSHUA GILLENS, ESQ. ("GILLINS") is an individual and PCL graduate who has served as a PCL Board Member from November 2021 to the present.
11. CLEMENTE FRANCO, ESQ. (“FRANCO”) is a PCL student who has served as a PCL Board Member from November 2021 to the present.
12. HECTOR SANCHEZ ("SANCHEZ") is an individual who has served as a PCL Board Member from November 2021 to the present.
13. PASCUAL TORRES, ESQ. ("TORRES") is an individual associated with PCL. TORRES has served as Dean of the law school for a brief tenure.

1 14. CAROL DUPREE, ESQ. ("DUPREE") is an individual who has served as a PCL Board Member
2 from November 2021 to the present.

3 15. GARY SILBIGER, ESQ. ("SILBERGER") is an individual who has served as a PCL Board
4 Member at various times from 2018 to the present.

5 16. JESSICA "CHUYITA" VIRAMONTES, ESQ. ("VIRAMONTES") is an individual associated with
6 PCL at various times from 2018 to the present.

7 17. EDITH POMPOSO, ("POMPOSO") is an individual associated with PCL. POMPOSO has served
8 as Dean of the law school since February 2022.

9 18. ADRIANA ZUÑIGA NUÑEZ is an individual associated with PCL in her capacity as PCL's paid
10 Registrar.

11 **STATE BAR DEFENDANTS**

12 19. The State Bar of California ("STATE BAR") is a separate entity from Enterprise S. The State Bar is
13 involved in the regulation of law schools and includes members serving on the Committee of State
14 Bar Accredited and Registered Schools ("CSBARS") or on the Board of Trustees, or as licensees.

15 20. A. Defendant State of California ("STATE") is a sovereign public entity among the United States of
16 America ("U.S." or "United States"). Plaintiff submitted a Government Claims Act notice to the
17 State on September 22, 2022, via web portal and certified mail.

18 21. B. The Committee of Bar Examiners ("CBE") is authorized under Rule 4.2 to register, oversee and
19 regulate unaccredited law schools.

20 22. C. The Committee of State Bar Accredited and Registered Schools (CSBARS) advises the State Bar
21 of California's Committee of Bar Examiners (CBE) on matters related to legal education, including
22 the development of rules and guidelines for accredited and unaccredited law schools. CSBARS is
23 responsible for ensuring law school compliance.

23. The Office of General Counsel ensures State Bar staff and agents comply with the law and antitrust rules.

24. The Office of Chief Trial Counsel is responsible for handling attorney discipline cases.

25. The Office of Admissions operates under separate funding and reporting principles, managing student records and testing evaluation. A current organizational chart ("Org Chart") dated April 17, 2023, obtained from the STATE BAR's website, reflects a change in departmental effective April 2023, with CHING's promotion to Director and NUNEZ's transition to Assistant Director.

1. A true and accurate copy of the STATE BAR's Org Chart for the Department of Admissions, can be found on the State Bar's website here: (<https://www.calbar.ca.gov/About-Us/Who-We-Are/Organizational-Chart>.)

2. A copy of the latest reported "Office of Admissions Organizational Chart", ("Org Chart") can be found on the State Bar's web site here:
(<https://board.calbar.ca.gov/Agenda.aspx?id=16951&tid=0&show=100035387>)

26. Enterprise S is a separate entity from the State Bar, with no shared legitimate interests. The plaintiff provides an example of the alleged functioning of Enterprise S but does not claim to understand its motives or methods below.

27. ALFREDO HERNANDEZ ("HERNANDEZ") is an individual and State Bar involved in the recording and distribution of State Bar public meetings under the Brown Act.

28. JOAN RANDOLPH ("RANDOLPH") is an individual employed as a court official secretary in the Office of the General Counsel. Randolph is involved in the business of providing legal services.

29. RUBEN DURAN, ESQ. ("DURAN") is an active licensee and market participant in the legal services trade. DURAN also provides legal services to the State Bar as a corporate officer and Chairman of the Board of Trustees.

1 30. LEAH WILSON, ESQ. ("WILSON") is an individual employed as the Executive Director of the
2 State Bar.

3 31. SUZANNE CELIA GRANDT, ESQ. ("GRANDT") is an individual who serves in an official
4 capacity as Assistant General Counsel of STATE BAR.

5 32. VANESSA HOLTON, ESQ. ("HOLTON") is an individual who served as General Counsel for the
6 STATE BAR's internal Office of General Counsel ("OGC") from at least the initiation of 2018 until
7 her retirement effective July 8, 2022.

8 33. BRANDON N. STALLINGS ("STALLINGS") is a Supreme Court Appointee and Attorney
9 Member Vice-Chair of the STATE BAR Board of Trustees.

10 34. MARK BROUGHTON ("BROUGHTON") is a Supreme Court Appointee and Attorney Member of
11 the STATE BAR Board of Trustees.

12 35. ELI D. MORGENSTERN ("MORGENSTERN") serves as Senior Trial Counsel of the STATE
13 BAR.

14 36. GREGORY E. KNOLL ("KNOLL") is a Senate Appointee and Attorney Member of the STATE
15 BAR Board of Trustees.

16 37. ELLIN DAVYTYAN ("DAVYTYAN") is an individual and current General Counsel of the State
17 Bar of California.

18 38. HAILYN CHEN ("CHEN") is a Supreme Court Appointee and Attorney Member of the STATE
19 BAR Board of Trustees.

20 39. JOSÉ CISNEROS ("CISNEROS") is a Governor Appointee and Public Member of the STATE BAR
21 Board of Trustees.

22 40. LOUISA AYRAPETYAN ("AYRAPETYAN") is the Secretary for the Executive Director and
23 Board of Trustees of STATE BAR.

41. JUAN DE LA CRUZ ("DE LA CRUZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

42. DONNA HERSHKOWITZ, ESQ. ("HERSHKOWITZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

43. AMY NUNEZ ("NUNEZ") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

44. ELIZABETH HOM ("HOM") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

45. JAY FRYKBERG ("FRYKBERG") is an individual who provides legal services as an employee, agent, or authority of STATE BAR.

46. GINA CRAWFORD ("CRAWFORD") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

47. MELANIE M. SHELBY ("SHELBY") is a Governor Appointee and Public Member of the STATE BAR.

48. TAMMY CAMPBELL ("CAMPBELL") serves as a Program Manager II for Operations & Management at STATE BAR.

49. LISA CUMMINS ("CUMMINS") is the Principal Program Analyst for Examinations at STATE BAR.

50. LARRY KAPLAN ("KAPLAN") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

51. DEVAN MCFARLAND ("MCFARLAND"), Admissions, is an individual providing legal services as an employee, agent, and authority of STATE BAR.

52. KIM WONG ("WONG"), Admissions, is an individual providing legal services as an employee, agent, and authority of STATE BAR.

53. DAVID LAWRENCE ("LAWRENCE") is an individual providing legal services as an employee, agent, or authority of STATE BAR.

54. ARNOLD SOWELL, JR. ("SOWELL") is a Senate Appointee and Public Member of the STATE BAR.

55. MARK W. TONEY, PH.D. ("TONEY") is a Governor Appointee and Public Member of the STATE BAR.

56. HON. JAMES HERMAN ("HERMAN") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

57. PAUL A. KRAMER ("KRAMER") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

58. CAROLINE HOLMES ("HOLMES") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

59. IMELDA SANTIAGO ("SANTIAGO") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

60. NATALIE HOPE ("HOPE") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

61. ENRIQUE ZUNIGA ("ZUNIGA2") is an individual and newly designate Public Trust Liaison providing legal services as an employee, agent, and authority of STATE BAR.

62. ROBERT S. BRODY ("BRODY") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

63. STEVE MAZER ("MAZER") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

64. GEORGE S. CARDONA ("CARDONA") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

65. RACHEL R. ROSSI ("ROSSI") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

66. ANTHONY J. GARCIA ("GARCIA") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

67. SHATAKA SHORES-BROOKS ("SHORES-BROOKS") is an individual providing legal services as an employee, agent, and authority of THE OFFICE OF CHIEF TRIAL COUNSEL, THE STATE BAR OF CALIFORNIA.

68. YUN XIANG ("XIANG") is an individual providing legal services as an employee, agent, and authority of STATE BAR.

69. Plaintiff is informed and believes and based thereon alleges that certain of the Defendants and Doe Defendants 1-1 00 have improperly attempted to utilize various corporate and trust entity forms in an attempt to shield their personal or ultra vires corporate actions behind this veil of protection and avoid personal or other corporate liability. These Defendants have managed, supervised or worked for these entities as officers, directors, shareholders, employees and failed to respect the formalities and requirements in such a manner that these entity forms may be disregarded and pierced to reach these Defendants' personal or other corporate assets. Further, a fraud or injustice would occur if these Defendants were allowed to escape personal or other corporate liability. 9. Plaintiff is informed

1 and believes and thereon alleges that at all times material to this complaint, each of the Defendants
2 and each of the Defendants fictitiously named in this Complaint, in addition to acting for himself,
3 herself, or itself and on his, her, or its own behalf individually, is and was acting as the agent,
4 servant, employee and representative of, and with the knowledge, consent and permission of, and in
5 conspiracy with, each and all of the Defendants and within the course, scope and authority of that
6 agency, service, employment, representation, and conspiracy. Plaintiff further alleges on information
7 and belief that the acts of each of the Defendants were fully ratified by each and all of the
8 Defendants. Specifically, and without limitation, Plaintiff alleges on information and belief that the
9 actions, failures to act, breaches, conspiracy, and misrepresentations alleged and attributed to one or
10 more of the specific defendants were approved, ratified, and done with the cooperation and
11 knowledge of each and all of the Defendants.
12
13
14

15 **I. JURISDICTION and VENUE**

16
17 70. Jurisdiction rests with the Court under provisions of 18 U.S.C. §1961; 18 U.S.C. §1962; 18 U.S.C. §
18 1964, et sequentia, of the civil RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
19 ACT (RICO); and Article III, Section 2, to the Constitution of the United States codified under 28
20 U.S.C. § 1331.

21 71. This Court has supplemental jurisdiction where state claims may become federal question under 28
22 U.S.C. § 1331.
23

24 72. **Constitutional Challenge:** Plaintiff contends the State Bar Act's mandatory membership provision
25 is unconscionable and unenforceable due to the organization's unfair practices under the color of law
26 and the detrimental and permanent harm suffered by the Plaintiff. The government's insistence on
27

1 compelling association in these circumstances fails to meet the standards of scrutiny required to
2 justify the infringement of the Plaintiff's constitutional rights.

3 73. Alternatively, Plaintiff asserts challenge on the theory that mandatory membership provisions of the
4 State Bar Act should be considered unconstitutional as the reasonable person in the Plaintiff's
5 circumstance would not willingly join an organization marred by such widespread misconduct.
6 Given the State Bar's tarnished reputation and failure to address its internal issues, the requirement
7 for mandatory membership constitutes an unfair infringement upon the Plaintiff's First Amendment
8 and other constitutional rights.
9

10 11 **III. FACTS AND COMMON ALLEGATIONS FOR ALL COUNTS**

12 74. Plaintiff incorporates paragraphs 1 through 73.
13

14 75. Plaintiff understands that he does not possess all the facts and thus seeks leave for discovery. If it is
15 determined by the finder of fact, Plaintiff asserts that all the Defendants share responsibility for the
16 harm and its remedy.
17

18 76. The State Bar Act of 1927 instantiates the STATE BAR's and is believed to define the scope of its'
19 regulatory authority.
20

21 77. Plaintiff believes based on credible report that the STATE BAR rules and guidelines are regulations
22 for purposes of Government Code section 11342.600.

23 78. The "Unaccredited Law School Rules" are adopted or amended by the Board of Trustees. These
24 rules in part define the scope of authority of the Committee of Bar Examiners ("CBE") the which
25 also controls law school registration, status, and degree-grant authority.
26
27

1 79. Plaintiff is informed and believes the STATE BAR Guidelines for Unaccredited Law School Rules
2 (“GULSR”) include the rules for operation of fixed-facility institutions like PCL.

3 80. STATE BAR’s Guidelines for Unaccredited Law School Rules (“GULSR”) are adopted or amended
4 under the authority of the Committee of Bar Examiners (“CBE”).

5 81. GULSR Rule 1.6 communicates the STATE BAR’s policy in handling “Student Complaints”. It
6 reads:

7
8 Neither the Committee nor any office of the State Bar of California will intervene in
9 disputes between students and their law schools. Student complaints are reviewed to
10 determine if they raise compliance issues under the Unaccredited Law School Rules and,
11 with the permission of the student, may be forwarded to the law school.

12 82. GULSR Rule 2.2 (B) requires “Honesty in Financial Dealings with Prospective Students,
13 Applicants, and Students”. It reads:

14 A law school must deal with prospective students, applicants, and students in an
15 honest and forthright manner in all financial dealings. A law school must adopt a
16 written refund policy that is fair and reasonable.

17 83. The bases of plaintiff’s claims to rights violations lie in various breaches; of fiduciary duty; contract;
18 the “implied covenant of good faith and fair dealing”, and trust.

19 84. Plaintiff will demonstrate pre-planned and intentional misrepresentations of the facts, willful
20 concealment, retaliation, “unfair business practices” including debt collection under §17200 and
21 false claims under §17500 and solicitation.

22 85. The various violations, appear objectively in the aggregate a combination of willful negligence, and
23 a RICO-like anticompetitive combinations that remove student consumer protections.

24 86. At the time of PLAINTIFF’s matriculation in 2019 and election to the Board of Directors, (“
25 Community Board”), PCL was subject to the “BYLAWS OF PEOPLES COLLEGE OF LAW”; a
26

1 true and correct copy of the relevant document as ratified May 22, 2017 was obtained by
2 PLAINTIFF during his activities on PCL's Board of Directors ("Community Board") and can be
3 found on the Court's web site prior marked as Exhibit D here:

4 87. Plaintiff served on PCL's Executive Committee (EC) concomitant with his attendance as a student.

5 Initially under the impression that it was a traditional and appropriate role as the Secretary of the
6 Corporation, Plaintiff later discovered that the EC was not legitimized by PCL's Bylaws or the
7 proper voting process. The EC, formed through an improper vote, was assigned various
8 inappropriate roles that lacked the resources and intention to address substantively.
9

10 88. During Plaintiff's tenure on the Community Board and as Secretary, he attempted to restore
11 compliance related to student unit reporting and other formalities but was consistently obstructed by
12 Defendants GONZALEZ, PENA, or SPIRO.
13

14 89. PCL's Bylaws provide for egalitarian decision-making and delegation, including a framework that
15 empowers student participation.

16 90. PCL's Bylaws also outline a process for elections and election disputes, including the establishment
17 of a framework for appointing a third-party trustee to resolve election conflicts.
18

19 91. PCL's 2021 Student Handbook states that payment plans for tuition arrearage must be approved by
20 the EC, which also reviews changes to student transcripts, academic appeals, ADA requests,
21 Academic Disqualification, and Student Grievances. The Handbook claims that the Community
22 Board may delegate some or all of its functions to the EC.
23

24 92. Despite the Student Handbook's assertion that EC members are specified in the PCL Bylaws, the
25 Bylaws themselves make no mention of the EC, its role, duties, members, or functions. During the
26 time relevant to this case, no official approach or mechanism was established for students to contact
27 EC members.
28

93. PCL DEFENDANTS have failed to respond to a qualified demand for the production of documents under California Business and Professions Code (“CBPC”) Section § 8330.

94. STATE BAR is alleged to have allowed PCL to operate in grossly negligent and overtly predatory fashion in its student recruitment and retention efforts.

95. STATE BAR is alleged to have implemented, promulgated, and enforced public policies or regulatory rules in effect made law, that the organization’s staff and leadership are reasonably believed based on information and personal experience were improper to enforce in these, or any, circumstances.

96. PCL failed to make proper and timely mandatory disclosures to PLAINTIFF during academic years 2019, 2020, and 2021, as well as at the time of matriculation contract signing and each year of attendance. Such failures include the provision of inaccurate or misleading information, resulting in non-compliance with the law and Rule 2.3(D), as well as the non-standard award of units and non-compliance with Rule 9.1 (oversight of recordkeeping processes).

97. PCL failed to maintain accurate records and provide timely access to students. PLAINTIFF sought a transfer and evaluation of his records by STATE BAR staff for admissions suitability review but faced obstacles in obtaining an accurate transcript from PCL.

98. From 2019 through April 27, 2023, PLAINTIFF remains without a true and accurate transcript, the one presented for exhibit missing at least 2 of the classes taken in Summer 2020. A true and accurate copy of the last non-conforming transcript is lodged with the Court as Document #8 and marked by PLAINTIFF as “EXHIBIT GRDS-1 TRANSCRIPT” and can be found on this Courts website here: (<https://ecf.cacd.uscourts.gov/doc1/031139584481>).

99. PCL DEFENDANTS had a duty to maintain accurate records and produce them upon lawful demand or to fulfill institutional obligations, such as ordinary business documents, notices of program nonconformance and transcripts.

100. PCL failed to adhere to appropriate student solicitation, recruitment and matriculation standards.

101. PCL DEFENDANTS failed to produce records until it was necessary for the PLAINTIFF to lodge a formal demand for the documents. PCL DEFENDANTS failed to produce the documents or respond to the request.

102. PCL DEFENDANTS failed to provide PLAINTIFF with access to board meeting minutes, zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer, as required. No other PCL DEFENDANT acted in accord with duty after receipt of multiple demands for the production of documents per CBPC §8330.

103. SPIRO, PENA, GONZALEZ, and ALL PCL DEFENDANTS solicited student election and Board participation without adequately informing them, including PLAINTIFF, of PCL's non-compliant status and their plans not to conform. They demanded and collected funds in bad faith, entering contracts while withholding material facts or failing to disclose, and using these funds for purposes of retaliation, intimidation, and suppression.

104. PCL Defendants engaged in various violations of fair business and debt collection practices through deceit, misrepresentation, or negligence in documenting, facilitating, and collecting property, including charitable solicitations.

105. PENA, GONZALEZ, SILBERGER, GILLINS, ZUNIGA1, SARIN, DUPREE, FRANCO, SARINANA, TORRES, and SANCHEZ have continued to hold meetings and act as a Board in protracted conflict with the Bylaws.

1 106. Plaintiff repeatedly notified the State Bar of potential violations of California law by PCL's
2 agents, Directors & Officers. STATE BAR failed to take substantive action to address these
3 violations or enforce established procedures for investigating complaints, neglecting to implement
4 internal policies related to employee discipline.
5

6 107. On July 14, 2021 SPIRO issues resignation as Dean effective August 13, 2021, stating that the
7 resignation is "irreversible", then indicating doubts as to whether or not he could resign from the
8 Executive Committee.

9 108. On July 17, 2021 PLAINTIFF emails LEONARD in his capacity as corporate Secretary, with
10 questions to LEONARD regarding the ongoing search for a replacement Dean. Her response of July
11 20, 2021 answered the immediate questions and noticed that she was unaware of the "departure."
12

13 109. Defendants violated various fair business and debt collection practices as well by documenting,
14 facilitating, and collecting property through deceit, misrepresentation, or negligence.

15 110. PCL DEFENDANTS are required but failed to provide PLAINTIFF with the minutes of their
16 board meetings, the zoom recordings by former President GONZALEZ, and the accounting and
17 books held by PENA and BOUFFARD as Treasurer.
18

19 111. PCL DEFENDANTS are required to provide PLAINTIFF with an accounting upon request
20 for the funds they claim owed; DEFENDANTS never provided the accounting.

21 112. The events surrounding the STATE BAR's handling of PCL's noncompliance establish a pattern
22 of intentional avoidance of procedural law. As early as 2017, the STATE BAR knew expressly or
23 constructively that PCL was out of compliance with state and federal regulations because it receives
24 executed copies of every student's transcript . Despite this knowledge, the STATE BAR failed to
25 intervene timely or substantively or procedurally. Repeatedly.
26
27

113. The STATE BAR engaged in denial of duty and gaslighting of PLAINTIFF, including specific actions by LEONARD, CHING, HOLTON, and WILSON.

114. The State Bar's handling of PCL's noncompliance demonstrates a pattern of intentional avoidance of procedural law since at least 2017, despite PCL's known and actual non-compliance with state and federal regulations.

115. LEONARD facilitated SPIRO, GONZALEZ, and PENA's unfair practice of unit issuance under the "color of law" by using official transcripts as a form of "currency" for administrative purposes. These defendants misrepresented or failed to correct STATE BAR rules in electronic communications, suggesting a conspiracy to frustrate the appropriate application of administrative procedure.

116. Generally, a law school accepting transfer has both a set maximum number of units it will accept for transfer as well as minimum time in attendance requirements precluding 100% equivalence in program progress after transfer. PCL's approach was an even greater burden on students who made the decision to transfer.

117. April 21, 2021, SPIRO issues an email with an "essay" identified as a "State of the School" report. It purportedly shows "greatly improved" FYLSX and Bar Exam passage rates. The report fails to indicate the actual number of students enrolled in the cohort for each year.

118. The reported pass rates are detailed below First Year Law Students Exam (FYLSX) Pass Rates:

1. 2016-2017 Academic Year: 8 students took the FYLSX, with 4 passing (50% pass rate).
2. 2017-2018 Academic Year: 3 students took the FYLSX, with 2 passing (67% pass rate).
3. 2018-2019 Academic Year: 7 students took the FYLSX, with 4 passing (57% pass rate).

119. The reported pass rates are detailed below Pass Rates for California Bar Exam Pass Rates:

1. 2017 Graduates: 8 students graduated, with 4 passing the Bar Exam (50% pass rate).

2. 2018 Graduates: 7 students graduated, with 3 passing the Bar Exam (42.9% pass rate).

3. 2019 Graduates: 3 students graduated, with 2 taking the Bar Exam but not passing (0% pass rate).

4. 2020 Graduates: 2 students graduated, with 1 passing the Bar Exam on the first attempt (50% pass rate).

120. PLAINTIFF believes based on experience and credible report that his Fall 2019 cohort began with 22 students; 2 passed “timely” in 2020. No additional passers from this cohort have been reported as of 2023.

121. On May 7, 2021, Defendants SPIRO, SILBERGER, PENA, GONZALEZ, met with Sarah Wild, a fundraising coordinator, to discuss a fundraiser held earlier in the week yielding \$29,100 in donations.

122. The meeting was held via Zoom. In that meeting the DEFENDANTS authorized a “Thank You” note to donors stating that, “100% of proceeds from this event will help PCL to advance the rights of those underserved by the legal profession --such as of people of color, people of low and modest income, LGBTQIA+, immigrants, the disabled, the unhoused, rank and file workers, tenants and victims of police abuse -- by turning out lawyers from similar demographic and economic backgrounds.”

123. The letters were to be signed and were signed by either and only PENA, GONZALEZ, or SPIRO.

124. Plaintiff has no evidence nor reason to believe that a single penny of these funds was used towards the stated purpose and his initial requests and final demands for an accounting have gone unanswered.

1 125. On August 2, 2021, at 10:57 am SPIRO sends email to Nancy Popp stating, “ Nancy, I had to
2 change your transcript by hand”, further explaining that “I couldn’t change it in Populi because I
3 would have to change the units for all first year students, and PCL hasn’t decided to do that.”

- 4
5 1. Important to note are the host of other metrics on the PCL transcript changed by the units
6 adjustment including: “earned credits” per course per quarter, total earned credits per course
7 per quarter, “points” per course per quarter, total points per quarter, total earned credits for
8 the academic year (at the bottom), total points for the academic year (also at the bottom)

9 126. On August 3, 2021, PLAINTIFF sends LEONARD request for clarification regarding the unit
10 issuance and transcript correction requirements.

11
12 127. On August 3, 2021, LEONARD sends in response “In addition to this email, you also sent a prior
13 email discussing clarification. Could you resend a copy? We are having a technical issue with the
14 first email.” The email she is referring to is believed one sent in 2020.

15 128. On August 3, 2021, at 5:13 pm, SPIRO sends to group including GONZALEZ and PLAINTIFF
16 an email from SPIRO to LEONARD, sent earlier with the subject “RE: explanation to another law
17 school of units on Peoples College of Law's transcripts”. There does not appear to be a confirmation
18 from LEONARD, but in what he states sent SPIRO writes to her:

19
20 “I explained that I have been requested to send to another law school, along with students’
21 transcripts, a notation or attachment explaining PCLs designation of quarter courses as 2 units,
22 not three. I said I was thinking of a letter from me that would accompany the transcript rather
23 than something attached to the transcript or written on it. I noted that our quarter courses are 10
24 weeks, with 3 hours of instruction per week. To use the words of the request I received, it was
25 that the notation or attachment should state “the inconsistent listing of Semester Units for
26
27

Quarter Classes and clarifying the correct Quarter Units (3.0) for each 1L Course.” (Note that I disagree with that quoted characterization.)

You explained that I, and Peoples College of Law should not send such a communication, because it could be interpreted as an improper solicitation, by PCL or me, of the other law school to credit the students with more units for the students’ classes at PCL than the other law school would otherwise credit. You explained that for the other law school to do that would be a violation of State Bar rules.

You also explained that the communication could be considered an improper alteration of the transcript.

129. The only part of the statement made in this communication by SPIRO believed true is the STATE BAR’s prohibition on an institution accepting a transfer student and granting units in excess of those awarded at the student’s original school.

1. PLAINTIFF believes the use of the potential for “improper solicitation” as excuse to avoid correction of the issues as telling of the “bad faith” and resistance to comply with the law of the PCL DEFENDANTS since no actual correction would occur on behalf of the PLAINTIFF for another year, roughly June 2022.

2. PLAINTIFF submits this as additional evidence of his specific targeting, as other students had their issues, at least in this regard, remedied.

130. On August 3, 2021, Scott Bell and Kevin Clinton, student volunteers acting in their delegated capacity as PCL’s Election Committee sent out a notice of elections to be held August 30, 2021.

131. PCL’s Bylaws Section 4.14 informs that during a "Members” term of service on the “Community Board”, the member is deemed an officer of the corporation.

132. August 31, 2021, SPIRO sends email to group including SARINANA, TORRES, GONZALES, VIRAMONTES, and PENA explaining PCL’s academic scheduling and potential student issues: “If they don’t enroll as 3Ls this fall, i.e. now, and they want to continue their law school studies at PCL, there's a problem with them skipping only one year, i.e. skipping this academic year. The 2Ls and 3Ls take the same courses every year, so the courses for them rotate every other year. Thus, if they don’t enroll this year but resume the year after, the 3L courses would be the same ones they took this past academic year, i.e., in 2020-2021. A student can’t get credit for the same course twice, i.e. can’t get credit for repeating a course. Thus, either they would have to skip two years, OR they PCL might be able to accommodate them in the following way: They could take 4L courses next academic year, and then take the 3L courses in their final year. One problem with that is that the 4L courses include one that is Bar Exam prep for the full year. But PCL might be able to replace that with an elective or two.”

1. PLAINTIFF believes the 4L curriculum was not necessarily a “rigid offering” and that the school would ordinarily offer a 4L curriculum with electives and had a duty to do so in this case or attempt cure in “good faith”.
2. PLAINTIFF believes that this also demonstrates the PCL DEFENDANTS constructive and express knowledge of the risks to the student in “missing classes” and the power disparity in the relative positions of the PLANTIFF and PCL.

133. On September 6, 2021, Robert Skeels, Esq., a volunteer Professor, and PCL graduate emails a brief report to the Board “*Regarding Peoples College of Law Awarding of Course Units and Students Transferring Out*” ultimately recommending change to the longstanding practice.

1 134. September 7, 2021, GONZALEZ issues an email stating “This has already been researched” and
2 “would require” an application for "major change". PLAINTIFF after diligent search was unable to
3 locate and is unaware of any evidence corroborating this policy claim.

4 135. September 8, 2021 PENA sends an email to the group, indicating that in an “extensive email
5 chain” between SPIRO and LEONARD she “stated that “we must not unilaterally change the unit
6 allocations since it would constitute a major change.” PLAINTIFF has found no evidence that this is
7 the case of statute or interpretive guideline. In the same email, PENA asks if PLAINTIFF has
8 received any response from his inquiry to LEONARD.
9

10 136. October 15, 2021, Election results, confirming PLAINTIFF’s win, are published by the
11 Committee’s volunteer Chair Scott Bell.
12

13 137. On October 17, 2021, PLAINTIFF based on personal experience and communications,
14 GONZALEZ, without prior warning and with prior vote taken prohibiting such activity, records
15 video of meeting for the fourth time as GONZALEZ and PENA attempt to legitimize invalidation of
16 PLAINTIFF’s election to the Community Board.
17

18 138. October 19, 2021, PLAINTIFF sends demand for video recordings and documents and alleges
19 the violation of PC 632, believed to be a recording privacy violation to SPIRO, PENA, and
20 GONZALEZ.

21 139. October 25, 2021, PLAINTIFF sends email to SPIRO after discovering that SPIRO, at that time
22 thought to have “retired” is constructing a Director’s and Officer’s (“D&O”) insurance policy
23 application without any input or knowledge beyond that of the “EC”, including PENA and
24 GONZALEZ.
25

26 140. October 25, 2021, GILLINS in response to the email chain of the same date states “I would like
27 to clarify, I am not a member of the executive committee, or any other committee. If the election
28

1 results are being questioned, or contended, I am not clear that I am even a member of the board until
2 the election committee submits it's formal determination and report in writing.” No report was ever
3 produced, and PLAINTIFF understands GILLENS has served and continues to serve presently.

4
5 141. October 27, 2021, in response to a request for progress, LEONARD informs PLAINTIFF

6 142. October 31, 2021 PLAINTIFF send email to GONZALEZ, SARINANA, and SPIRO to facilitate
7 greater responses related to the student complaints he was fielding separate from his own concerns.
8 GONZALEZ states in the email “I don’t know what “complaints” you are referring to...” and refers
9 me back to the use of the “proper channels” the students are all complaining about. At this stage the
10 transcript issues were an open and public topic for discussion.

11
12 143. November 19, 2021 GONZALEZ issues a “letter of resignation” dated November 14 and
13 effective November 20, 2021 to the PCL Membership. In the same letter she gaslights and maligns
14 the PLAINTIFF, stating she suffered from “repeated abusive and oppressive behavior” causing her
15 “severe emotional distress” as the result of “abhorrent behavior” and encouraging the Board to take
16 “decisive action against” the PLAINTIFF. GONZALEZ and PLAINTIFF have never been in the
17 same room, as all interactions were remote via email or Zoom between the parties during this time.
18 PLAINTIFF was the only party mentioned and the President of the school issued what was
19 essentially a targeted command to “attack”. GONZALEZ completed the letter adding the tagline
20 before her signature, “in solidarity”.

21
22 144. The letter was distributed to the entire membership, more than 100 individuals including a
23 substantial number of attorneys and his classmates, attached along with minutes and the meeting
24 packet. The letter was not removed from the portal as of Plaintiff’s last access believed June 2022. It
25 is believed this letter violated the school’s own disclosure and privacy policies.
26
27

1 145. November 19, 2021, GONZALEZ, PENA, SPIRO, SARIN and BOUFFARD and ALL PCL
2 DEFENDANTS issue or cause to be issued notice of a BOARD MEETING to occur 11:00 am
3 November 21, 2021.

- 4 1. Included are draft Board Meeting minutes with an erroneous account of the election events
5 and results likely designed to legitimize the improper conduct of the elections.
6

7 146. On November 21, 2021, ALL PCL DEFENDANTS are believed to have met while blocking
8 PLAINTIFF's participation as a rightfully elected incumbent and without appropriately obtaining his
9 resignation or curing the issues with the election. This meeting took place remotely, over Zoom, and
10 thus is believed to
11

12 147. On November 23, 2021, Plaintiff received an email from Kevin Clinton containing newly
13 proposed "retroactive rules" that effectively discouraged complaining to the STATE BAR and
14 mandated routing student complaints through "proper channels."
15

16 148. PCL DEFENDANTS devised a series of rules to punish and expel PLAINTIFF from the
17 educational institution in retaliation for his compliance activities. .

- 18 1. New PCL Student Handbook Rules 1.1.13 & 1.1.14 were improperly created and then
19 claimed ratified by the Community Board November 21, 2021.
20
21 2. Improper because 1.by Board composition was constructively and expressly known
22 contested; the rules clearly support retaliatory conduct to intimidate and create "plausible"
23 grounds for other acts against the Plaintiff to discourage further engagement or escalation
24 with the STATE BAR or others about his unfortunate treatment.
25
26 3. This would likely "chill" any other student disagreements.
27

1 4. When PLAINTIFF sends note to the PCL DEFENDANTS on the same day regarding the
2 possible appearance of the rules as retaliatory, SPIRO responds.

3 5. PCL DEFENDANTS are expressly aware of GULSR 5.1 and the STATE BAR's promise, as
4 policy, to not intervene in cases of student disagreements with their institutions. This policy
5 was steadfastly maintained by STATE BAR DEFENDANTS as it related to the student, for
6 even when the student complained of abuse or criminal conduct by the school administration.
7

8 149. PLAINTIFF is informed and believes on credible report that the "proper channels" in the rules
9 language refers to the EC, at this time including PENA and SARIN and BOUFFARD. These rules
10 likely violated STATE BAR rules and laws as they facilitated the punishment of reporting
11 misconduct.
12

13 150. PCL's conduct with LEONARD and the "formal dismissal" of PLAINTIFF's initial complaint to
14 the STATE BAR by SPIRO and GONZALEZ suggests that PCL DEFENDANTS were acting to
15 "silence" PLAINTIFF and avoid accountability for shared misconduct.
16

17 151. November 24, 2021, PLAINTIFF send email to SPIRO, CHING, and the general address of
18 OGC which PLAINTIFF purposed to alert and make STATE BAR aware of the perceived problems
19 with this new policy. Here the policy threatened ad hoc discretionary expulsion by the EC for its
20 violation, i.e., failing to make complaints or inquiries through the "proper channels", including
21 inquiries or complaints to law enforcement! The offender was summarily accountable to the EC and
22 any violation was subject RETROACTIVELY to the rule.
23

24 152. The policy also appears to violate Section 16 of PCL's Bylaws governing Disciplinary
25 Procedures which requires an investigation by an Ad Hoc Committee of any conduct by an
26 individual that "endangers" or actualizes loss to PCL the entity.
27

1 153. On November 28, 2021, PLAINTIFF issues request for removal of GONZALEZ's derogatory
2 letter distributed to the membership along with non-spoliation notice attached to the email to PCL
3 DEFENDANTS SPIRO, PENA, GILLENS, GONZALEZ, DUPREE, SILBERGER, and the other
4 PCL defendants asking the letter to be taken down from the website. The letter was issued during
5 heightened angst and outrage over misogynistic misconduct associated with and eventually
6 confirmed in court attached to public figures like Harvey Weinstein and Bill Cosby.
7

8 154. Classes were still held remotely at the time, with schedules, assignments, and whatever grades
9 made available being posted in the same portal likely accessed daily by the majority of active
10 students.
11

12 155. STATE BAR's non-interference policy and LEONARD's delayed response inform that
13 LEONARD was following a clearly stated policy in her official capacity. The problem here is that
14 for this to be the case it means that STATE BAR policy can allow for private institutions to take
15 open advantage of students without any fear of regulatory accountability because the institution
16 knows that it can do whatever it desires in wanton fashion and the STATE BAR will refuse to offer
17 aid or protection.
18

19 156. On December 10, 2021, CHING acting in her official capacity as Assistant Director, Admissions
20 and LEONARD's immediate supervisor sent a letter via email indicating that ULSR 4.206 (the
21 Committee does not intervene in disputes between students and their law schools) and ULSG 1.6 (
22 Neither the Committee nor any office of the State Bar of California will intervene in disputes
23 between students and their law schools) "require that the State Bar refrain from involving itself in
24 any dispute you may have with PCL. Thus, the State Bar is unable to provide you any further
25 response."
26
27

1 157. LEONARD’S “change in position” after communication from GONZALEZ believed by
2 PLAINTIFF sent in email on November 14, 2021, supports the claim of PCL's improper conduct,
3 because LEONARD had communicated her near completion of a response to PLAINTIFF. The
4 STATE BAR DEFENDANTS concerted action is further bolstered when CHING presents the same
5 suspect policy statements.
6

7 158. LEONARD's disclosure of confidential information to PCL indicates that the State Bar assisted
8 PCL in avoiding accountability for its misconduct, violating Plaintiff's constitutional rights.

9 159. PCL's conduct with LEONARD supports the argument that both PCL and the State Bar are
10 accountable for violating Plaintiff's constitutional rights under the state action doctrine.
11

12 160. . “Rule 1.6 governs “student complaints”.

13 161. The STATE BAR's intentional avoidance of procedural law and its failure to manage complaints
14 and enforce regulations support Plaintiff's claims of breach of fiduciary duty and violation of legal
15 rights.
16

17 162. Fall 2020 PCL accepted at least one out of state student, based on personal experience and
18 credible report, to be a student from Arizona.

19 163. Rule 4.246 (F) governs the requirements for fixed facility law schools like PCL must meet prior
20 to providing law study credit for a fixed-facility law school program or class offered more than ten
21 miles from the site of the law school, outside California, or in multiple locations; viewed under that
22 is a "major change" because it is INTERSTATE COMMERCE.
23

24
25 164. The State Bar's conduct allowed conflict of interest to occur unchecked, which failed to protect
26 the plaintiff and the public, and prolonged harmful misconduct.
27

1 165. The State Bar's use of “appeals of authority” to obscure questions or the appearance of regulator
2 misconduct can be seen as substantial factors in potentially violating the plaintiff's First and Fourth
3 Amendment privileges.

4 166. PLAINTIFF asserts that the STATE BAR’s non-intervention policy conflicts with the intended
5 statutory protections of the California legislature, and it exemplifies a group agreement or a
6 coordinated mindset. Here, LEONARD, CHING, WILSON, DAVYTYAN, HOLTON,
7 KRASILNIKOFF, SOWELL, TONEY, KRAMER, CHEN and others assert AND enforce the policy
8 as valid while PCL and STATE BAR fail to fulfill the statutory obligations ALL DEFENDANTS
9 are believed to knowingly assumed.

10 167. Plaintiff believes that public officials owe duties to the public as “public servants” even if those
11 duties were assumed as unpaid volunteer, under employment or by appointment.

12 168. Plaintiff’s allegations cover a span of time and involve many defendants, but the claims do not
13 presume that all defendants were uniformly became aware or capable at the same time.

14 169. Plaintiff’s allegations cover a span of time and involve many defendants. Claims made here do
15 not presume that ALL DEFENDANTS were uniformly aware or capable of equal substantive
16 response during this period. Plaintiff will show that ALL DEFENDANTS were adequately noticed
17 or otherwise were aware of PLAINTIFF’s circumstance and the issues, and that even when this was
18 achieved the parties in the aggregate “doubled-down” on additional harmful conduct or failed to
19 comport conduct reasonably to the circumstances.

20 170. The STATE BAR is a regulatory agency responsible for overseeing the practice of law in
21 California. Operating under the authority of the California Supreme Court, its responsibilities
22

1 include rulemaking and regulation of attorney admission, discipline, and supervision processes in the
2 state.

3 171. As per statute and credible sources, the State Bar's mission is to protect the public as its highest
4 priority, regardless of conflicts of interest, and to promote access to justice through the regulation of
5 the legal profession (BPC §6001.1). However, the plaintiff's personal experience has not aligned
6 with this information.
7

8 172. The State Bar requires students attending registered fixed-facility schools to take an exam, the
9 FYLSX, to verify adequate preparation. Pass rates for the FYLSX and the Bar Exam have been
10 notably low, with students' perceptions of their chances likely influenced by their law school grades.
11

12 173. The State Bar's use of a single test after a program requiring three additional years of study
13 creates an environment that allows schools like PCL to act in predatory ways. Students may be
14 improperly admitted and blamed for their failure, never realizing they should not have been accepted
15 in the first place.

16 174. PCL defendants, including SPIRO, SARIN, BOUFFARD, GILBERGER, DUPREE,
17 SARINANA, GILLINS, FRANCO, ZUNIGA1 POMPOSO, and TORRES, are believed to have had
18 board meetings and continued their "pattern" of operation, driving the perception of improved long-
19 term compliance when the Board itself is not.
20

21 175. The STATE BAR ACT prioritizes the protection of the public as the highest priority no matter
22 the conflict of interest per CBPC §6001.1
23

24 176. . The State Bar has a duty to exercise good faith and make use of reasonable business
25 judgment in its regulatory and administrative operations.

26 177. The State Bar has a duty to exercise good faith and make use of reasonable business judgment in
27 its operations related to students. However, the evidence suggests that the State Bar's use of a single
28

test after completing a program requiring three years of additional study may provide cover for negligent or intentional administrative failures by organizations like PCL.

178. PCL is a mandatory active market participant in the legal services marketplace, operating under the regulatory umbrella of the State Bar as a law school.

179. BPC 6060.7 mandates that the State Bar is responsible for the approval of all law study degree programs, whether registered with the State Bar or not. However, the State Bar appears unaware of and does not enforce this provision for programs at larger private institutions.

180. PCL conducted fundraising events promising that “100% of the funds would be used towards the production of attorneys”; there is no evidence ever provided to the PLAINTIFF, even after he demanded production of the documents, that a single penny went toward the promised purpose .

181. PCL is subject to mandatory fee-based regulation, including registration and annual licensing, by co-defendant and statutory regulator, THE STATE BAR OF CALIFORNIA. The State Bar of California is responsible for regulating PCL's provision of postsecondary legal education services, ensuring academic program and Juris Doctorate as a registered, non-accredited fixed facility law school.

1. Along with PCL paying mandatory registration fees to the STATE BAR, students are also required to register and pay a fee within 90 days of starting law school.
2. Plaintiff argues that the fee for purposes of registration and the ongoing maintenance of records maintained by the STATE BAR is a service contract; although there is no “negotiation”, market participation for admissions requires the payment of initial fee. In addition, given the nature of the governmental organization charging the fee, the inability for

1 students to negotiate, and the Plaintiff's "reasonable" lack of expectation that either one of
2 the Defendants would "breach" the terms under PCL's matriculation and education contract
3 or STATE BAR's collection of fees for the administration of student progress and fitness for
4 admissions. Plaintiff argues an "implied warranty" as the administration system should be
5 adequate to "uncover "foreseeable issues of clerical nonconformance to prevent students
6 from suffering from reporting errors when the available remedies for failures are difficult to
7 obtain.
8

9
10 182. Plaintiff's information regarding the mandatory duties and priorities of all STATE BAR
11 agents, employees, appointees, and trustees is sourced from the California Business and Professions
12 Code (BPC) and the STATE BAR's web portal.
13

14 183. The STATE BAR's mission, as stated on its website, is to protect the public and
15 includes licensing, regulation, and discipline of attorneys; advancing ethical and competent law
16 practice; and supporting efforts for greater access to and inclusion in the legal system. Plaintiff
17 reasonably expected the STATE BAR to uphold its mission and protect the public interest.
18

19 184. Upon learning of misconduct within the STATE BAR, Plaintiff expected public
20 officials to report the misconduct to appropriate authorities and take steps to ensure the misconduct
21 was stopped and not repeated.
22

23 185. The STATE BAR has a mandate to protect the public interest, even if it requires
24 disciplinary action against its own attorneys or employees. Directors or officers who fail to fulfill
25 this duty may be subject to legal action.
26

27 186. Prior to 2018, the STATE BAR adopted a "non-interference" policy between students
28 and their academic institutions.

187. Plaintiff has been unable to identify any source of authority granting the STATE BAR the power to define or elect individuals or groups as ex publica for policy establishment or performance of its obligations. Additionally, Plaintiff questions the authority of the STATE BAR to charge administrative fees directly to student members of the public.

188. Licensees, sworn attorneys meeting legislative or judicial criteria, are considered "Members of the Bar" and not "Members of the Public" when acting as officers of the court, as defined by statute.

189. Plaintiff's academic performance, with average grades ranging from A+ to B- in the first two years of law school, demonstrates his capability and commitment to his education. However, due to the coordinated harassment and retaliation by Defendants SPIRO, PENA, SARIN, GONZALES, and others, Plaintiff's grades suffered significantly in the final quarter of his 3L year, providing further evidence of foreseeable harm caused by the Defendants' misconduct.

The STATE BAR's adoption of a policy that conflicts with its statutory mandate and regulatory obligations to protect the public raises concerns about its compliance with 14th Amendment Equal Protection constitutional obligations. Plaintiff believes that any conduct in line with the "non-interference" policy is a willful neglect of the STATE BAR's protective duties.

Directors and officers of the California State Bar must ensure the organization operates in accordance with its mission and objectives, upholds the standards of the legal profession, and protects the public interest.

190. Public officials, when made aware of misconduct within their organization, are expected to report such misconduct to appropriate authorities, ensure it is investigated and addressed, and implement new policies or procedures to prevent similar misconduct from recurring.

1 Conduct that the public would disapprove of includes creating or supporting mechanisms that cause
2 harm to most participants, or intentionally delaying the discovery or resolution of such
3 circumstances.

4
5 191. The California State Bar, as a regulatory agency overseeing the practice of law, has a mandate
6 to protect the public interest, even if it requires disciplinary action against attorneys or employees
7 within the organization. Failure to fulfill this duty may result in legal action.

8
9
10 192. Plaintiff asserts that every instance of conduct implying a failure to act in good faith likely fails
11 to meet the “reasonable” standard expected to be applied by individuals in similar circumstance. IF
12 the conduct fails to “meet or exceed” the reasonable standard, then the conduct is likely arbitrary or
13 capricious consistent with those terms of legal art, thus serving as evidence to establish the mens rea
14 or scienter requirements attributable to the Defendants. This evidence, combined with other available
15 facts, is believed sufficient to establish a prima facie case for the violation of Plaintiff's rights.
16 Defendants' overt support for improper purposes and intentional disregard of their obligations create
17 a hostile environment that jeopardizes public protection and causes harm.

18
19 193. All Defendant schemes are substantively advanced through electronic transmission of meetings,
20 documents, or funds, often crossing state lines and involving email or cellular communication.
21 Plaintiff's knowledge of these actions comes from direct personal experience.

22
23 194. Plaintiff alleges that the named Defendants and DOES 1 through 88 were authorized or permitted
24 by each other to act as agents of one another. Actions taken by them were done in the capacity of
25 such agency or under the "color" of such agency, or as individual acts purported to be conducted.

1 195. Upon credible information, belief and personal experience, PLAINTIFF asserts all
2 Defendants are directly responsible for these events and are liable to Plaintiff for the injuries
3 inflicted and resulting injuries and damages incurred in good faith.
4

5
6 196. PLAINTIFF asserts that because these acts are reasonably and foreseeably likely to
7 result in injury to similarly situated students and those demonstrably vulnerable with extreme
8 barriers to pursuing legal remedy because most students in similar 1L circumstance do not pass the
9 FYLSX and thus cannot continue in PCL's or ANY law schools Juris Doctorate program for
10 purposes of bar admission and licensure.
11

12 197. PCL focuses recruitment on students from non-traditional academic backgrounds and
13 pre-identified communities suffering from intractably limited access to legal services, which
14 PLAINTIFF believes is an intentional tactic to avoid possible negative attention often drawn by
15 lawsuits by selecting victims, for each student was destined to receive unfair unit awards, less
16 likely to desire or "have the stomach" for a long and arduous legal fight.
17

18
19 198. On April 8, 2022, at 8:30 a.m. SPIRO appears in front of the Honorable Dean J.
20 Kitchens for case 22AVRO00363, at hearing in Department A-10 of the Superior Court appearing
21 as counsel for himself and PENA, who is present as well.
22

23 199. PCL, the Corporation although properly served fails to appear; strangely SPIRO has
24 indicated he represents the corporation as counsel as well.
25
26
27

1 200. The Court found that it was “not the appropriate forum for what Petitioner is seeking”
2 and ordered the case “dismissed without prejudice”.
3

4 201. Plaintiff upon credible information believes that California does not recognize “forum
5 non conveniens” nor does it allow case dismissals solely for failure to satisfy the local rule.

6 202. SPIRO requests attorney’s fees and filing costs in the amount of \$27,000; he is granted.
7 To be paid directly to him, \$5,435.00.
8

9 193. On June 8, 2022, SPIRO sends letter to lawschoolregulation@calbar.ca.gov on his
10 professional letterhead in his capacity as PCL’s counsel. In that letter SPIRO states that PCL was
11 “more than 90% in compliance” with the mandatory recommendations in the State Bar inspection
12 reports.
13

14 194. SPIRO specifically states that PCL was complaint with Guideline 2.2(B), governing
15 refunds in certain contexts, because it “had revised the policy accordingly.” A copy of the letter is
16 available on the State Bar’s website here:
17 (<https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000029268.pdf>) .
18

19 195. June 17, 2022, STATE BAR DEFENDANTS including LEONARD, KRAMER,
20 CHEN, and others review in recorded meeting during the “Educational Standards” agenda item
21 “Attachment O-406. Action on Progress Report Related to Periodic Inspection and Notice of
22 Noncompliance - Peoples College of Law”, a copy of which is available on the STATE BAR’S
23 web site here: (<https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000029315.pdf>)
24

25 196. On June 21, 2022, the STATE BAR acknowledged in a published letter that they were
26 aware of the programs' "non-compliance" and could have issued notice effective 2020.
27

1 197. On March 24, 2022, between 6:00 pm and 7:00 pm, DEFENDANT SARIN sent an email to
2 BOUFFARD and PEÑA in response to PLAINTIFF's earlier email requesting transcripts.

3 198. On March 24, 2022, at 12:32 pm, PLAINTIFF sent an email to BOUFFARD and PEÑA in
4 response to an earlier email requesting transcript.

5 199. On March 25, 2022, at 12:32 pm, SPIRO, acting as outside counsel for PCL, sent an email
6 response to PLAINTIFF's earlier email requesting transcripts.

7 200. On June 2, 2022, SPIRO, as counsel for PCL, sent an email to ALL PCL DEFENDANTS,
8 excluding GONZALEZ, requesting that PLAINTIFF direct all communications related to this matter
9 to him, implying the group's united front.

10 201. On July 8, 2022, PCL Defendants, through SPIRO and operators of Enterprise P, sent notice to
11 Plaintiff of their intent not to provide classes or curriculum for PLAINTIFF's 4L year.

12 202. On July 9, 2022, agents and operators of Enterprise P, believed to be SPIRO, PEÑA, and
13 ZUNIGA1, placed the notice in the USPS bailment for certified mail delivery to Plaintiff (id 7022
14 0410 0002 9113 6086).

15 203. PCL failed to submit accurate records timely to the STATE BAR on Plaintiff's behalf which
16 they relied upon to make determinations about the PLAINTIFF and his academic status when they
17 were the sole available source of transcript information.

18 204. In early August 2022, without accurate transcripts or viable transfer options, PLAINTIFF
19 requested PCL to apply for a "Special Circumstance Exemption" under GULSR Section 5.6,
20 allowing a maximum of 10% of 4L students to be exempted for "unusual circumstances." PEÑA sent
21 the letter on August 9, 2022, via email.

22 a) The guideline rules inform that applications are processed by the "Educational Standards
23 Department in the Office of Admissions."
24

b) August 5, 2022, PLAINTIFF receives coverage denial letter from ANV related to PCL's D&O insurance, a true and accurate copy, previously marked as EXHIBIT DNO-1 ANV can be located lodged on the Court's web site here: (<https://ecf.cacd.uscourts.gov/doc1/031139584650>)

205. On September 1, 2022, LEONARD sent an email with an attached letter denying the request, believed to be produced by HOPE under the direction of LEONARD, CHING, and NUNEZ, pending discovery. The denial indicated that PLAINTIFF could "use the attached form **to submit another Proposed Plan of Law Study** which complies with the Admission Rules for our review. **The additional one year of law study must be completed in a Juris Doctor degree program recognized by the Committee. You must also clearly indicate the beginning and ending dates, including month, day, and year for each year of study, and the total number of hours/credits of study for each course.**"

206. Here, PLAINTIFF believes based on personal experience and credible report that LEONARD, HOPE, and admissions staff, including MCFARLAND and WONG along with LEONARD's direct chain of supervisors, including CHING, NUNEZ, and WILSON either took no action or supported the continued misconduct. Expected oversight and intervention from the OGC, including HOLTON, DAVYTYAN, GRANDT was not apparent.

207. September 1, 2022, SPIRO sends email to PLAINTIFF with the subject "start right now contacting other law schools even though you might have done so earlier this year", further stating, "in view of the State Bar's letter..." it continues, "you should start right now contacting other law schools... to see if you can enroll in them for the 2022-2023 academic year."

208. September 1, 2022, PLAINTIFF sends to WILSON, CHING, LEONARD, HOM, SPIRO, PENA, and others an email as Notice of Violation, including separate attached non spoliation request

entitled “thillevidpresltr09012022.pdf” an accompanying legal justification document and a copy of his transcripts dated August 29, 2022. A copy of the email is available on the Courts website as Document 17 here (<https://ecf.cacd.uscourts.gov/doc1/031139584971>) .

209. The last lines of the letter terminate “Please understand, the initial issue that gave rise to this could have very easily been resolved by the parties. Instead, they were wrong, they knew they were wrong, and they consistently doubled-down on unlawful conduct for a protracted (>4 years) period of time. Please provide confirmation of compliance with the preservation request at your convenience but no later than 9/9/2022, as time is known to be of the essence by all parties.” The STATE BAR never confirms compliance with the preservation request.

210. Over 300 days had passed without any denials or curative conduct from any of the DEFENDANTS related to PLAINTIFF’s notices and requests for assistance.

211. Plaintiff also notes the many Executive JD or non-licensure programs in the field that require 2 or 3 years of study.

212. STATE BAR conduct played a role in PLAINTIFF’s dire circumstance, yet the defendants attempt to avoid sensible recusal or conflict management, leaving PLAINTIFF to rely on the “good faith and fair dealing” of those they knew or should have known were compromised.

213. PLAINTIFF communicates with HOPE in the interim, who is believed to perform this review under LEONARD’s explicit authority. HOPE states she cannot assist and refers PLAINTIFF back to LEONARD.

214. September 3, 2022, SPIRO sends email with the subject “tuition agreement” as solicitation for PLAINTIFF’s execution and return of a payment agreement for his 4L year. PENA and ZUNIGA1

are carbon copied. It is clear PLAINTIFF is out of time with nowhere to go. Attached is an additional copy of a “new” Student Handbook”.

215. September 15, 2022, SPIRO began an email exchange to PLAINTIFF with cc: to PEÑA, ZUNIGA1 and LEONARD explaining that if he gave “consent, PCL is permitted right now to change your status in your previous Property and Remedies courses from credit to audit, which would enable you this academic year to take those same two courses for credit.”

- a) Plaintiff is informed and believes upon credible evidence that this to be in direct violation of STATE BAR guidelines, that expressly prohibit taking courses for credit twice.
- b) Plaintiff believes this is evidence of conspiracy, in that the “offer” was presented uniformly and in concert.
- c) PLAINTIFF believed this was an inappropriate solicitation because the rules for law schools seem to preclude encouraging misrepresentation or falsifying records and repudiated.
- d) Plaintiff believes this reflects the intent to create or alter records or misrepresentation by SPIRO and LEONARD because both are acting in their “official capacity”, i.e., LEONARD as Principal Analyst left responsible for compliance oversight of PCL and SPIRO presumably as pro bono counsel.

216. September 26, 2022, PLAINTIFF issues request for antitrust determination via email to DAVYTYAN, WILSON, and others. The process and considerations for making such determination have been predetermined for STATE BAR in an administrative order dated September 20, 2017, prior marked as EXHIBIT AO-1, and identified as Document #13 on the docket. A true and correct copy of the document can be found on the Court’s web site:
(<https://ecf.cacd.uscourts.gov/doc1/031139584790>).

1 217. October 18, 2022, PLAINTIFF sends email to HOPE with carbon copy to SPIRO, ZUNIGA1,
2 PENA, FRANCO, GILLINS, CHING, LEONARD, requesting her outreach to the school that a
3 proposed plan, where PLAINTIFF paid a fee to BARBRI and that curriculum successfully
4 undertaken under PCL's supervision would satisfy the STATE BAR's claimed outstanding
5 requirements for degree grant. SPIRO responded in an email of the same date that was sent at 4:37
6 p.m. asking "Nathalie" to clarify "what obligations and expenses there would be" for PCL.
7

8 218. November 7, 2022, PLAINTIFF sends email to SPIRO with carbon copy including HOPE,
9 ZUNIGA1, PENA, FRANCO, GILLINS, CHING, LEONARD, SARINANA, WILSON,
10 GONZALEZ and the OGC requesting status on the administrative oversight of the BARBRI course.
11

12 219. SPIRO responds November 8, 2022, denying that "the Bar requires submission of a proposed
13 plan" from the school and citing the prior plan I submitted ; given the clear administrative context,
14 that a law school would be required to supervise the student's participation because BARBRI is not
15 registered as a law school and PCL was, by the design of the DEFENDANTS, the only "reasonably"
16 available institution.
17

18 220. November 17, 2022, at 10:39 am, PLAINTIFF submits via Zoom to the STATE BAR Audit
19 Committee meeting, chaired by SHELBY and attended by TONEY, DAVYTYAN, WILSON,
20 BROUGHTON, CISNEROS, KNOLL, CHEN, SHELBY, SOWELL and staff member Justin Ewert.
21 Plaintiff believes based on credible report and experience that other, currently unknown, STATE
22 BAR staff or appointees were present as well, and seeks leave for further discovery. PLAINTIFF
23 used the allotted time to inform the Board of Trustees of the likely issues with STATE BAR policy
24 related to audits and the records-selection process used by the STATE BAR that is believed to
25 facilitate misconduct or its concealment in a manner that raises antitrust and transparency concerns.
26

27 A true and accurate copy of the relevant meeting video can be found here, published by the STATE
28

BAR for purposes of compliance with the Brown Act on YouTube's web site here:

<https://youtu.be/ON4tx5ODdGA?t=234>.

221. November 17, 2022, at 12:49 am, PLAINTIFF submits public comment via Zoom at the STATE BAR Board of Trustees meeting where AYREPETYAN, HERNANDEZ, TONEY, DAVYTYAN, DURAN, WILSON, BROUGHTON, CISNEROS, KNOLL, CHEN, SHELBY, SOWELL and currently unknown STATE BAR staff members. PLAINTIFF uses the allotted time to inform the Board of Trustees of the likely issues with PCL and how STATE BAR policy is believed to facilitate the misconduct in a manner that raises antitrust concerns in the entire marketplace. A true and accurate copy of the relevant meeting section can be found here, published by the STATE BAR for purposes of compliance with the Brown Act on YouTube's web site here:

https://youtu.be/dcBeUhm_f8Y?t=1967.

222. December 21, 2022, at 8:30 am, PLAINTIFF sends email with the subject line of "Public Comment; Notice of Violation and Imminent Filing; Request for Antitrust Determination; Supporting Documents" to DAVYTYAN, DURAN, WILSON, HOLTON, LEONARD, RANDOLPH, HERSHKOWITZ, CARDONA, HOM, MAZER, CRAWFORD, XIANG, HOPE, CHING, and the general emails of the OGC, OCTC, CPO, CFO, CAO, KNOWELS, HERMAN, KRAMER, CARDONA, STALLINGS, CISNEROS, SHELBY, TONEY, AYRAPETYAN, CHEN and other DEFENDANTS as well as the designated email for antitrust inquiries, including State Bar employees Teresa Ruano and Joy Nunley. Attached to the email are the following documents: a "Request for Antitrust Determination" accompanied by "corroborating" documents identified as: (1.) DRAFT PLEADER 12212022; (2.) A copy of the preservation letter was noticed and sent to both PCL and STATE BAR; assurances have been requested from both parties to no avail.; (3.) A copy of the legal basis and justification for such letters, as the duty to preserve evidence was fairly believed

1 by the plaintiff to attach when the unlawful act was committed but definitively when it was known
2 likely to end up going through litigation. (4.) Timeline of events (5.) Election Timeline (6.) Nancy
3 Popp's, draft Election Committee Report presenting evidence of conspiracy; (7.) Various email
4 chains PLAINTIFF asserted demonstrative of wanton and clearly culpable conduct, with awareness
5 and knowledge of misconduct for over a year at the "highest levels" of the organization; (8.) A
6 statement of determination and a D7O insurance denial of claim provided to support Plaintiff's status
7 as officer of the Corporation and unlawful ouster.; (9.) A document entitled "Opposition #1",
8 submitted by SPIRO and PENA on behalf of PCL to the court that included erroneous information to
9 the court that the relevant PCL Defendants failed to correct when timely noticed.

10
11 223. December 21, 2022, at 10:30 am, PLAINTIFF sends a duplicate email with the same subject line
12 of "Public Comment; Notice of Violation and Imminent Filing; Request for Antitrust Determination;
13 Supporting Documents" to SPIRO, DURAN, HOPE, CHING, and the OGC's designated email for
14 antitrust inquiries, again including State Bar employees Teresa Ruano and Joy Nunley as well as the
15 earlier attachments.
16

17 224. December 22, 2022 at 8:56 am, AYRAPETYAN confirms receipt and plans to share "the
18 attachments and email" with the Board of Trustees after completing Day 2 of the meeting.
19

20 225. On January 20, 2023, RANDOLPH, in her capacity as secretary for the Office of General
21 Counsel, sent the first unsigned antitrust determination to plaintiff with OGC masthead, dated
22 January 20, 2022 and identified as "ANTITRUST DETERMINATION 2023-0001" from unsigned
23 author.
24

25 226. On January 24, 2023, SOWELL, SHELBY, WILSON, CHEN, DAVYTYAN, and
26 AYRAPETYAN attended a recorded "Ad Hoc Committee Meeting" via Zoom with PLAINTIFF in
27

attendance. SOWELL appears clearly familiar with PLAINTIFF's issues, announcing shortly before PLAINTIFF's speaks something akin to "Ok, Mr. Hill, You know the drill!" in affable tone.

227. February 3, 2023 PLAINTIFF sends request to AYRAPETYAN and SOWELL, including the general OGC email and DAVYTYAN's individual, with a request for the meeting minutes of that occurred the prior January 24th, 2023, as they were not placed online for review.

228. On February 4, 2023, PLAINTIFF sent an email subject "NOV - Ongoing violations of CBPC 17200 and 17500" to DURAN, NUNEZ, WILSON, BROUGHTON, TONEY, SHELBY, CHEN and MAZER; the addresses for the CTC and Admissions were also included. This "NOV" was one of several sent in attempt to resolve these issues. The notice informed the parties PLAINTIFF's theories related to his injuries, why he reasonably believed the issues were valid and likely Constitutional and attempted to give examples of a few of the inherent issues in the essentially "separate but equal" operation of the law school market.

229. On February 8, 2023, KRASILNIKOFF in her capacity as counsel, with RANDOLPH, sent a second noncompliant response to the antitrust determination request, despite being expressly aware of her professional and fiduciary duties. The document is asserted as noncompliant because the OGC did not follow proper procedures to affect its production or its contents misrepresent the facts.

230. Plaintiff learned on credible report that on February 13, 2023, unidentified STATE BAR staff believed to be LEONARD and CHING and possibly others, met with unknown PCL DEFENDANTS, believed SPIRO, POMPOSIO, and PENA to discuss compliance and ongoing issues.

231. On March 22, 2023 POMPOSIO sends to LEONARD, PENA and others a response to outstanding CBE questions, a copy of which can be found on the STATE Bar website here: <https://board.calbar.ca.gov/docs/agendaItem/Public/agendaitem1000030537.pdf>.

1 a) The 3rd page of the document lists an item identified as ”7. The State Bar provided the citation of
2 authority for fee assessment.”, continuing to state in paragraph infra, “In addition to ensuring the
3 creating of a 4L program for all students, a key purpose of the meeting was to provide the law
4 school with an opportunity to demonstrate its compliance status with Rule 4.241 in a clear and
5 transparent manner, and to ensure that the law school provides refunds to all students for whom
6 it does not return a copy of a signed and complete disclosure. The law school asked for a request
7 in writing, set forth here, and advised that this week the law school is preparing for finals.”

8
9 b) Plaintiff here asserts that ALL PCL DEFENDANTS were expressly and constructively on
10 notice, as were LEONARD, CHING, NUNEZ, WILSON, MCFARLAND, WONG, DURAN,
11 SOWELL, KRAMER, and SHELBY.

12
13 232. On or around March 24, 2023, STATE BAR DEFENDANTS released a probationary progress
14 report penned to CBE members by LEONARD.

15 233. As of May 4, 2023, PLAINTIFF still awaits complete and accurate transcripts; an accounting;
16 disgorgement and return of funds; issuance of his degree or the fulfillment of other obligations.
17

18
19 **FIRST CAUSE OF ACTION**

20 **BREACH OF CONTRACT**

21
22 (SPIRO, GONZALEZ, POMPOSO, TORRES, SARINANA, BOUFFARD)

23 234. Plaintiff realleges and incorporates by reference each and every allegation contained in
24 Paragraphs 1 through 233.
25
26
27

1 235. Here, PCL DEFENDANTS refers to those named and appearing immediately below the
2 cause caption.

3
4 236. That PLAINTIFF and PCL DEFENDANTS entered into a contract FOR LEGAL
5 EDUCATION SERVICES August 2019 for a four year program contingent in part upon
6 PLAINTIFF's passage for the First Year Law School Exam;

7
8 237. That PLAINTIFF substantially or fully performed the contract requirements, including
9 attending classes, completing assignments, performance of service hours, and paying tuition.

10 238. SPIRO and PENA and BOUFFARD, and SARINANA, and TORRES and GONZALES as
11 officers and directors had a duty to comport there conduct to the standards required by the
12 implied covenant of "good faith and fair dealing."
13

14 239. TORRES, SARINANA, and POMPOSO were all Deans that failed to timely correct,
15 intervene or offer any relevant services or response to PLAINTIFF's outreach and requests for
16 aid when all were constructively and expressly aware of PLAINTIFF's circumstance and their
17 duties.
18

19 240. BOUFFARD promised to perform an accounting and return funds collected improperly. He
20 failed to do so.
21

22 241. SPIRO, BOUFFARD, and PENA reneged and made PLAINTIFF repay wages lawfully
23 earned.
24

25 242. That PCL DEFENDANTS failed in:
26
27

- a) making proper and timely mandatory disclosures to PLAINTIFF during academic years 2019, 2020, and 2021, as well as at the time of matriculation contract signing and each year of attendance.
- b) maintaining accurate records and providing timely access to students; c. submitting accurate records timely to the STATE BAR on Plaintiff's behalf.
- c) failed to exercise good business judgment or the appropriate duty of care.
- d) providing PLAINTIFF with access to board meeting minutes, zoom recordings by former President GONZALEZ, and the accounting and books held by PENA and BOUFFARD as Treasurer.
- e) producing records in response to a formal demand for documents.

243. That PCL DEFENDANTS:

- a) engaged in violations of fair business and debt collection practices through deceit, misrepresentation, or negligence in documenting, facilitating, and collecting property, including charitable solicitations.
- b) Planned and acted in concert to retaliate against PLAINTIFF by the above and as exemplar created new PCL Student Handbook Rules 1.1.13 & 1.1.14 in November 2021;
- c) continuing to hold meetings and act as a Board in protracted conflict with the Bylaws;
- d) PCL DEFENDANTS planned to repudiate and in fact did fail to comply with the obligation, believed based on the plain language of STATE BAR rules, to provide the student with "4 years" of education consisting of a minimum of "270 hours" each year.

e) STATE BAR DEFENDANTS, including WILSON, DURAN, SOWELL, TONEY, STALLINGS, LEONARD, CHING, HOLTON, DAVYTYAN, CARDONA,

244. That PLAINTIFF was harmed, such as:

- a) facing obstacles in obtaining an accurate transcript from PCL timely.
- b) suffering retaliation, intimidation, and suppression.
- c) being unable to access the necessary documents for his case.

245. That PCL DEFENDANTS' breach of contract was a substantial factor in causing PLAINTIFF's harm, such as: a. hindering his engagement with the STATE BAR or others regarding PCL's non-compliance; b. negatively impacting his academic status due to PCL DEFENDANTS' failure to submit accurate records timely to the STATE BAR.

246. Plaintiff believes it is likely demonstrated why he reasonably believes that the Defendants breached their duties to the Plaintiff in his capacity as a student and in his capacity as Secretary of the Corporation.

247. The DEFENDANTS breached the fiduciary duties of loyalty they had with the PLAINTIFF for educational services by failing to provide the quality of education or administrative oversight they promised when they assumed their roles. The plaintiff was recruited by defendants SPIRO and PENA, who signed a contract in their official capacity to enroll the Plaintiff in their law school programs subject to regulatory oversight by the State Bar promising compliance or "good faith" efforts at maintaining compliance. Here, the plaintiff paid for this education with the expectation that it would be of a certain quality and value. Yet the defendants failed to provide adequate instruction, resources, and support, and then failed to act

1 or intervene when made expressly aware of their duties and that the conduct being engaged in
2 flouted the rules applicable to the regulation of unaccredited fixed facility law schools.

3
4 248. The defendants acting in individual and concerted fashion as the “Board”, when Plaintiff
5 presented demands for the production of documents for inspection to any Board Member as a
6 matter of law, failed to provide them.

7
8 249. That PCL DEFENDANTS' failure to provide the requested documents violated the
9 Plaintiff's rights as a student and as a member of the Corporation, impeding his ability to
10 address concerns related to the quality of education, administrative oversight, and regulatory
11 compliance at the institution.

12
13 250. The PCL DEFENDANTS, by breaching their fiduciary duties and failing to provide the
14 expected quality of education and support, caused the PLAINTIFF to suffer both financial and
15 emotional harm, as well as to experience a loss of opportunity and potential damage to his
16 future professional prospects.

17
18 251. That the PLAINTIFF, by demonstrating the numerous ways in which the DEFENDANTS
19 breached their duties and obligations towards him, has provided a reasonable basis for believing
20 that the DEFENDANTS are liable for the harms caused to him as a result of their actions and
21 inactions.

22
23 252. That the PLAINTIFF requests the Court to hold the PCL DEFENDANTS accountable for
24 their breaches of duty and failures, in order to ensure that future students are not similarly
25 harmed and to promote transparency, accountability, and compliance with applicable
26 regulations and standards in the field of legal education. When Defendants were informed,
27

expressly of the issues related to the management of elections, they chose to maintain “ultra vires” circumstance and made additional “ultra vires” policies.

253. The Defendants failed to exercise duties of due care by failing to properly adhere to the mandates of the Bylaws;

254. The Defendants failed to exercise duties of due care in addressing compliance issues, including the adequate recordkeeping and provision of notice.

255. The Defendants breached the duty of loyalty because when provided with the opportunity to cure without likely negative consequence, they intentionally failed to do so and retaliated against students and the stated mission of the Bylaws.

256. The defendants engaged in a pattern of conduct, including failure to properly apply, use, and enforce administrative procedures, and conspired to engage in illegal racketeering activities, including arbitrary and exclusionary policy enforcement to the detriment of a specific targeted market or speech and the plaintiff. These activities breach the contract for educational services, as the defendants willfully failed to provide an environment that was conducive to learning and the advancement of the plaintiff's legal education.

257. As a result of the defendants' breach of contract, the plaintiff suffered financial harm with long term consequences, deprivation of fundamental business and student protections, and other injuries. The plaintiff seeks declaratory, injunctive, and monetary relief from the defendants for their breach of duty and failure to act in the “good faith” required.

258. That the PLAINTIFF seeks relief for the damages suffered as a result of the DEFENDANTS' breach of fiduciary duties, failure to provide the quality of education and

support promised, and their refusal to provide necessary documentation for the PLAINTIFF to pursue his claims.

259. That the PLAINTIFF requests the Court to grant appropriate remedies to redress the harms suffered, including but not limited to, compensatory damages, injunctive relief requiring the DEFENDANTS to provide the necessary documentation, and any other relief the Court deems just and proper.

SECOND CAUSE OF ACTION

COMMON LAW BREACH OF FIDUCIARY DUTY

**(KRAMER, STALLINGS, DURAN, WILSON, CHEN, CISNEROS, HOM, HOLMES,
GRANDT, WONG, SHELBY, TONEY, HERMAN, KNOWLES, HERSHKOWITZ)**

260. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 259.

261. Here, STATE BAR DEFENDANTS refers to those named and appearing immediately below the cause caption.

262. This action alleges negligence, fraud, or corruption in violation of a general duty, affirmative duty, statutory duty, special duty to protect, and/or mandatory duty that has caused or was a reasonably foreseeable substantial factor in Plaintiff's severe injury and CTCA Claim, and the operation of a knowingly dangerous premises by State Bar which causes an unacceptable, unreasonable, sufficiently noticed risk of severe injury to members of public.

1 263. Plaintiff will seek summary judgment for violations of mandatory duties and negligence
2 based on the allegedly clear and convincing evidence from California Auditor for all times
3 relevant: <https://www.bsa.ca.gov/reports/agency/8>, for which Plaintiff will seek judicial
4 notice.

5
6 264. Here, Plaintiff will demonstrate that STATE BAR, its directors, officers, employees, and
7 licensees, and appointees after the 2018 divestment of trade association functions and
8 adoption of its clear primary role as law school regulator knew or should have known
9 students, who are members of the public and put at heightened risk by non-interference
10 policies promulgated and enforced by the STATE BAR.

11
12 265. Here, STATE BAR employees and appointees repeatedly violated their respective duties
13 to protect or act reasonably, a likely violation of both public trust and CBPC 6001.1.

14 266. Examples here include the December 2, 2022 CSBAR's meeting where STATE BAR's
15 LEONARD re-iterated to the public the longstanding (in excess of 2 years by the admission)
16 express and constructive knowledge of PCL's operators failure to maintain compliance,
17 reiterated in the "progress report" discussed by LEONARD with defendants KRAMER,
18 WILSON, HERSHKOWITZ, and CHEN.

19
20 267. Additionally, the conduct appears to conflict with the California Rules of Professional
21 Conduct's ("CRPC") conformance mandate , BPC § 6077.

22 268. The Americans with Disabilities Act ("ADA") states that "no qualified individual with a
23 disability shall, by reason of such disability, be excluded from participation in or be denied the
24 benefits of the services, programs, or activities of a public entity, or be subjected to
25 discrimination by any such entity."
26
27

1 269. Generally, to comply with public entities must reasonably modify their policies, procedures
2 or practices when necessary to avoid discrimination unless the entity demonstrates that the
3 requested modifications “fundamentally alter” its service system.

4 270. The STATE BAR, its agents and appointees had a duty of reasonable care in the conduction
5 of their operations and to follow the law.

6 271. The STATE BAR as the monopoly regulator operates a “segregated” law school market
7 because it allows large market participants like UCLA to categorically deny application of
8 “tested” students attending other recognized law schools the opportunity to transfer. In essence,
9 students cannot transfer from California’s non-ABA private law schools to “public”
10 postsecondary institutions.

11 272. UCLA produces a standard 509 report detailing the basic costs and demographics of its JD
12 program. Last year’s report, entitled “ABA_Standard_509_Report_2022_updated.pdf” can be
13 found at UCLA’s web site at:

14 [15 \(https://law.ucla.edu/sites/default/files/PDFs/Admissions/ABA_Standard_509_Report_2022_upd](https://law.ucla.edu/sites/default/files/PDFs/Admissions/ABA_Standard_509_Report_2022_updated.pdf)
16 [17 ated.pdf\)](https://law.ucla.edu/sites/default/files/PDFs/Admissions/ABA_Standard_509_Report_2022_updated.pdf)

18 a) The report demonstrates that UCLA only accepted transfers from ABA schools in the 2022
19 academic year, including a total of 8 students from California ABA-accredited schools.

20 b) This is consistent with its policy prohibiting application from “only” State-accredited or
21 registered fixed-facility schools.

22 273. Plaintiff is informed and believes and thereon alleges that Defendants violated Business
23 and Professions Code section 17500 by:

24 a. failing disseminating, or causing to be disseminated, to the public, untrue and/ or
25

misleading statements, including the statements set forth above, regarding the quality standard or compliance of services offered by PCL and statements connected with PCL's fundraising and operating costs, statements which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made;

b. misrepresentation of matters of law or the obligations of PLAINTIFF and students which Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made;

c. representations to PLAINTIFF, students and the public that PCL offered a compliant education or failing to notice when Defendants and each of them knew, or reasonably should have known, were untrue or misleading at the time the statements were made.

274. STATE BAR DEFENDANTS conduct resulted in the deprivation fundamental student protections, inclusive of “due process”, that students have a right to expect of a regulator, one whose rhetoric expressly promises “careful” performance of its public protection role and was a substantial factor in causing PLAINTIFF’s injuries.

275. STATE BAR representations to fixed facility schools, promulgated through its rulemaking authority, made it clear that the “system” was rigged against the individual student. Here, LEONARD, WILSON, CHING, HOLTON, and others restated the policies to PLAINTIFF even as they were aware he was being harassed and PCL had repudiated its obligations.

276. STATE BAR DEFENDANTS conduct resulted in various breaches of core principles of “good faith” in contracting, fiduciary relationships as a Board Member and Officer, and

1 numerous violations of rule or law around business practices and the submission of official
2 records improperly created and filed with State agencies.

3 277. For the reasons stated, STATE BAR DEFENDANTS conduct appears to demonstrate a
4 longstanding pattern of abrogative dereliction of public duty.
5

6
7 **THIRD CAUSE OF ACTION**
8

9 **BREACH OF FIDUCIARY DUTY RELATED TO**

10 **VIOLATION OF FEDERAL AND STATE ADMINISTRATIVE LAW**

11 **AND BUSINESS PRACTICES**

12 **(WILSON, NUNEZ, CHING, LEONARD)**
13
14

15
16
17 278. Plaintiff realleges and incorporates by reference each and every allegation contained in
18 Paragraphs 1 through 277.

19
20 279. The California STATE BAR has violated federal and state administrative law and business
21 practices by implementing underground rules, and consistently failing to follow mandated
22 administrative procedures to establish “due process” compliance under the APA and CAPA or
23 other statutes for student-related regulatory issues. STATE BAR’s failure to adopt or
24 appropriately reconcile the Federal Unit Hours as defined in the Higher Education Act and the
25 states own Private Postsecondary Education Act is not simply a singular example in this context
26 due to the number of individuals impacted and the duration of the misconduct.
27

1 280. PLAINTIFF contends that the process used for determination of his exception request under
2 law school Rule 5.6 not only bolsters but demonstrates the STATE BAR defendants' failure to
3 follow appropriate procedures, as it is an "unusual" circumstance and HOPE's referral back to
4 LEONARD for resolution infers a "unified" approach, at least for her "on notice" direct
5 management, including CHING, NUNEZ, WILSON, and DURAN. The process used to make
6 the determination is unclear, and as a student, PLAINTIFF deserved protection and had not
7 waived that expectation. In addition, LEONARD had not recused herself nor been directed to
8 recuse given clear allegations had been made.
9

10
11 281. Plaintiff asserts that this failure to notice, given STATE BAR's non-interference policy, was
12 a foreseeable cause of Plaintiff's harm, as the policy so stated allows schools to operate with
13 "carte blanche", laissez faire, or wanton behavior because the "bad actor" has been told in
14 advance that no matter the issue, a student will not receive assistance.
15

16 282. This likely represents a breach in the duty of due or reasonable care, as the regulator would
17 not ordinarily inform the regulated that it can act wantonly in areas of regulation without
18 concern of reprisal.
19

20 283. The State Bar operates to unfairly restrict law school transfers, restraining public liberty and
21 trade while sustaining increased costs and risks to the Federal Government for legal education.
22 The State Bar's exclusionary rule gives public institutions permission to exclude state citizens
23 and taxpayers based on origin without any demonstration of their basis or authority to permit
24 any institutions adoption of such restraint. It seems a truly unfair burden for any consumer, and
25 to reconcile . Moreover, the State Bar administers a test to students in this category as an
26 objective assessment and measure of student fitness, which is unlawful and discriminatory.
27

1 284. This exclusionary rule as substantive to PLAINTIFF's harm is admitted difficult to ascertain
2 given the speculative nature of valuating the proximately impossible; but the condition of the
3 marketplace falls under the statutory authority of a monopoly STATE BAR, and from that and
4 procedural failures arises a negligence cause.
5

6 285. The State Bar's failure to adhere to federal and state administrative procedure acts,
7 inadequate constitutional review of statutes, rules, or procedures, and implementation and
8 enforcement of underground rules and procedures reveal a pattern of systemic dysfunction that
9 undermines the organization's legitimacy. These violations of California Business and
10 Professions Code sections § 17200 and § 17500 demonstrate a profound disregard for the rule
11 of law and warrant further investigation to determine the full extent of the State Bar's unlawful,
12 unfair, or fraudulent business practices.
13
14

15 286. The State Bar's failure to adhere to federal and state administrative procedure acts,
16 inadequate constitutional review of statutes, rules, or procedures, and implementation and
17 enforcement of underground rules and procedures reveal a pattern of systemic dysfunction that
18 undermines the organization's legitimacy. These violations of California Business and
19 Professions Code sections § 17200 and § 17500 demonstrate a profound disregard for the rule
20 of law and warrant further investigation to determine the full extent of the State Bar's unlawful,
21 unfair, or fraudulent business practices.
22

23 287. Here events like RANDOLPH's send of a nonconforming or noncompliant documents to
24 PLAINTIFF on January 21, 2023, despite being constructively aware of her professional and
25 fiduciary duties. The document is asserted as noncompliant because the OGC did not follow proper
26 procedure, or the contents misrepresent the facts.
27

1 288. The State Bar's negligence in regulating unaccredited fixed facility law schools and the
2 numerous allegations of unethical practices, including unfair collection practices, extortion,
3 conversion, harassment, defamation, interference with business relationships, and conspiracy to
4 deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment
5 protections, constitute an alarming failure of oversight. This failure not only violates California
6 Business and Professions Code sections § 17200 and § 17500 but also erodes public trust in the
7 State Bar and the legal profession as a whole.
8

9
10 289. **Constitutional Challenge:** The State Bar Act's mandatory membership provision is
11 unconscionable and unenforceable due to the organization's unfair practices under the color of
12 law and the detrimental and permanent harm suffered by the Plaintiff. The government's
13 insistence on compelling association in these circumstances fails to meet the standards of
14 scrutiny required to justify the infringement of the Plaintiff's constitutional rights.
15

16 a) Alternatively, the mandatory membership provision of the State Bar Act should be
17 considered unconstitutional as the reasonable person in the Plaintiff's circumstance would
18 not willingly join an organization marred by such widespread misconduct. Given the State
19 Bar's tarnished reputation and failure to address its internal issues, the requirement for
20 mandatory membership constitutes an unfair infringement upon the Plaintiff's First
21 Amendment and other constitutional rights.
22

23 290. The State Bar's failure to follow established procedures and other misconduct also breaches
24 their statutorily assigned and sworn duties under California Code, Business and Professions
25 Code (BPC) § 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member
26 Defendants failed to support the Constitution and the Rule of Law, to respect the courts of
27

1 justice and judicial officers, to maintain actions, proceedings, or defenses that are legal or just,
2 candor and truth in statements of law or legal proceedings, to advance no fact prejudicial to the
3 honor or reputation of a party for unjust cause, not to encourage either the commencement or
4 the continuance of an action or proceeding from any corrupt motive of passion or interest, to
5 never reject, for any consideration personal to himself or herself, the cause of the defenseless or
6 the oppressed, and to cooperate with the tribunal.
7

8 291. As a result of the State Bar's violations, Plaintiff has suffered damages in the form of
9 financial harm, deprivation of fundamental student protections, and other injuries. Thus,
10 Plaintiff seeks declaratory, injunctive, and monetary relief from Defendants for their violations
11 of federal and state administrative law and business practices.
12

13 **FOURTH CAUSE OF ACTION**

14 **BREACH OF FIDUCIARY DUTY RELATED TO SOLICITATIONS IN** 15 16 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17510.8**

17
18 **(SPIRO, PENA, GONZALEZ, DUPREE, SILBERGER)**

19 292. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
20 Paragraphs 1 through 291.
21

22 293. Defendants have a fiduciary relationship with students because they solicit:

- 23 a) fees for administrative or legal education services. This fiduciary relationship is established
24 by statute, common law, and agreement.
25
26 b) ALL DEFENDANTS voluntarily participate in a regulated marketplace.
27

1 294. PCL solicited and received tuition and other services from a targeted subset of the public. The
2 acceptance of these fees established a charitable trust and a fiduciary duty on the part of the
3 Defendants to ensure that the tuition was used for the purposes stated during the solicitation under
4 an implied promise that the services offered would meet the standards set for professional
5 licensure.
6

7 295. PCL also made promises and received charitable donations but has failed to provide PLAINTIFF
8 with an accounting to audit, even when presented lawful demand for documents.
9

10 296. PCL actively applies for and regularly receives grant awards, but to PLAINTIFF's direct
11 knowledge and personal experience as an officer of the corporation, no accounting was ever
12 produced, even after demand.
13

14 297. Plaintiff is informed and believes and alleges that Defendants breached their duty by failing to
15 inform students of the intended use or purpose or failure as to ensure that tuition paid and collected
16 by PCL were used for the purposes for which they were solicited. Students were told in
17 advertisements, on the PCL website, or orally that their tuition would was required in exchange for
18 the delivery of a compliant education using the appropriate administrative procedures and
19 application of policy.
20

21 298. Plaintiff is informed and believes and thereon alleges that only a nominal amount of the funds
22 collected as student tuition were used for the stated purpose by PCL DEFENDANTS. Instead,
23 nearly all the funds solicited were used to pay fundraising or other "operating expenses" or
24 benefiting others.
25

26 299. DEFENDANTS misled the PLAINTIFF and students to believe that they were in fact receiving
27
28

the regulatory value and assurance accompanied by proper records administration of the institution performed by its vertical regulator, the STATE BAR.

300. When STATE BAR DEFENDANTS were expressly informed of failures to properly review, correct, or act in accordance with duty, they failed to follow law or policy or rules of professional responsibility and used email and other forms of electronic communication to spread disinformation related to matters of law, their duties or conduct.

301. DEFENDANTS retaliated or failed to timely intervene on behalf of students and the PLAINTIFF. When PLAINTIFF requested assistance or fair resolution, the requests were denied.

302. DEFENDANTS solicited PLAINTIFF to “lie” to validate their own improper conduct for “official” administrative purposes, as the conduct of September 26, 2022 and the email exchange between LEONARD, SPIRO and other DEFENDANTS likely demonstrate the STATE BAR’s wanton and reckless disregard of the conduct of its market participants. to maintain

FIFTH CAUSE OF ACTION

UNTRUE OR MISLEADING STATEMENTS IN

VIOLATION OF

BUSINESS & PROFESSIONS CODE § 17500.

(SPIRO, GONZALEZ, PENA, DAVYTYAN, HOLTON, BOUFFARD,)

303. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 303.

1 304. Plaintiff is informed and believes and thereon alleges that Defendants violated Business and
2 Professions Code section 17500 by:

3 a) disseminating, or causing to be disseminated, to the public, untrue or
4

5 i) misleading statements, including the statements set forth above, regarding services offered
6 by PCL and statements connected with PCL's fundraising and operating costs, statements
7 which Defendants and each of them knew, or reasonably should have known, were untrue
8 or misleading at the time the statements were made;
9

10 b) misrepresentation of matters of law or the obligations of PLAINTIFF and students which
11 Defendants and each of them knew, or reasonably should have known, were untrue or
12 misleading at the time the statements were made, including unfair business collection activity;
13

14 c) representations to PLAINTIFF, students and the public that PCL offered a compliant
15 education or failing to notice when Defendants and each of them knew, or reasonably
16 should have known, were untrue or misleading at the time the statements were made.
17

18 d) That law students were not members of the “public” for protection purposes.
19

20 305. STATE BAR DEFENDANTS conduct resulted in the deprivation fundamental student
21 protections, inclusive of “due process”, that students have a right to expect of a regulator, one whose
22 rhetoric expressly promises “careful” performance of its public protection role and was a substantial
23 factor in causing PLAINTIFF’s injuries.

24 a) PLAINTIFF sought grant of degree under various strategies after PCL was in breach of duty and
25 contract;
26
27

- b) STATE BAR requires registered schools to offer 4-year programs, except for PCL in the case of PLAINTIFF, which as an institution has been allowed to offer only 3 of the 4 years required.
- c) STATE BAR does not require schools offering Juris Doctorates not marketed as leading to professional licensure to register in many cases at all. For example,
- d) Even after STATE BAR

306. PCL DEFENDANTS conduct resulted in various breaches of core principles of “good faith” in contracting, fiduciary relationships as a Board Member and Officer, and several violations of rule or law around business practices and the submission of official records improperly created and filed with State agencies.

307. The defendants' actions were willful, wanton, and oppressive, justifying the imposition of punitive and exemplary damages.

308. The plaintiff is entitled to injunctive relief enjoining the defendants from making further untrue or misleading statements about their services.

309. The plaintiff is entitled to an award of attorney's fees or court costs, under applicable law.

310. The Plaintiff seeks judgment against defendants, jointly and severally, for general, special, and punitive damages, as well as injunctive relief, attorney's fees, and costs, and any further relief the court deems just and proper.

311. Plaintiff alleges that each and every Defendant sent emails and text messages in furtherance of the extortion scheme, a scheme that was for Defendants' direct pecuniary benefit, and therefore each such email and text message constitutes a separate violation of 18 U.S.C. § 1343, which prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

312. Defendants, in engaging in and participating in the acts of unfair competition as alleged in paragraphs 23 THROUGH 29, will additionally be shown to have violated these statutes:

- a) Section 6001.1 of the State Bar Act
- b) Penal Code 132 PC - offering false evidence
- c) Penal Code 134 PC - preparing false evidence
- d) Penal Code 135 PC - destroying evidence
- e) Penal Code 136.1 PC - tampering or intimidating witnesses
- f) Penal Code 632(a) – unauthorized recording (privacy)

SIXTH CAUSE OF ACTION

CIVIL RIGHTS VIOLATIONS

UNDER 42 U.S.C. § 1981 PROVISION OF FEDERAL BAR LICENSURE

(PLAINTIFF REQUEST FOR LICENSURE)

313. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 312.

314. The petitioner seeks relief under 42 U.S.C. § 1981 for Federal Bar licensure as an equitable remedy to address the harm suffered and to establish normative criteria that would level the playing

1 field for other members of the public, enhance public protection, and provide just and necessary
2 mitigation to Plaintiff's injuries and foreseeable damages. This remedy is requested in part because it
3 is appropriate under 28 U.S.C. § 1654.
4

5
6 315. In support of the request for Federal Bar licensure under 42 U.S.C. § 1981, the plaintiff argues
7 that the provision of such licensure would further the purposes of the statute, which is to prohibit
8 discrimination on the basis of race or origin in the making and enforcement of contracts.
9

10 316. In other claims associated with this cause, the Plaintiff contends that the State Bar's regulations
11 and requirements for professional licensure end up discriminating against a certain subset or class of
12 market participants, specifically students who may face historical financial, demographic, or access
13 barriers. By allowing state "public" law schools to exclude certain students and residents from the
14 possibility of transfer to any UC law school, the State Bar is perpetuating systemic inequalities and
15 hindering the ability of these students to compete on an equal playing field.
16
17
18
19

20 317. STATE BAR DEFENDANTS through its regulated entity PCL and directly through its agents
21 caused or were substantial factors in the harm.
22

23 318. The STATE BAR policies are constructed or designed to allow harm to the PLAINTIFF, and any
24 other in similar circumstance, repeatedly by a regulated entity like PCL without any substantive
25 recourse and no incentive for its protective undertaking by STATE BAR staff or appointees.
26
27

1
2 319. The STATE BAR knew or should have known that its policies would result in student injuries
3 and that they had a duty to perform Constitutional review; they failed to do so and knowingly
4 continued enforcement of the policies.
5

6
7 320. The STATE BAR allowed unequal treatment of students knowingly, as SPIRO corrected unit
8 counts and provided a complete transcript in 2021 to other students, but PCL DEFENDANTS
9 refused to make correction to PLAINTIFF's transcript until August 2022, and then have still
10 provided a transcript that shows two fewer classes (clinicals) than taken.
11

12
13 321. Given entry into the marketplace of any predatory operator, even one unlike PCL and its
14 longstanding connection between operators PENA, SPIRO, GONZALEZ and analyst LEONARD
15

16
17 322. As a potential normative remedy, by providing Federal Bar licensure as an alternative option, the
18 Court would be promoting greater access to the legal profession and increasing opportunities for
19 underrepresented groups to overcome systemic barriers in extraordinary cases. This would track the
20 remedial purpose of 42 U.S.C. § 1981 and would mitigate the plaintiff's injuries and foreseeable
21 damages while enhancing public protection. Alternatively, specific performance or the cost of two
22 additional years at a "safe" school because of the loss of credit hours and the minimum time in
23 attendance requirements of similar schools.
24

25
26 323. Therefore, the plaintiff respectfully requests that the Court grant the request for Federal Bar
27

1 licensure as both an equitable remedy for harm and to establish normative criteria to "even the
2 playing field" for other members of the public.
3

4 **SEVENTH CAUSE OF ACTION**
5

6 **CIVIL RIGHTS VIOLATIONS**
7

8 UNDER 42 U.S.C. § 1981 AND CIVIL CODE § 52.1 (The Bane Act)

9 (LEONARD, SPIRO, GONZALEZ, PENA, SARINANA, CHING, DUPREE, SILBERGER,
10 and GILLENS)
11

12
13 324. Plaintiff re-alleges and incorporates by reference each allegation contained in Paragraphs 1
14 through 323.
15

16 325. PLAINTIFF claims that the defendants, including LEONARD, SPIRO, GONZALEZ, PENA,
17 SARINANA, CHING, DUPREE, SILBERGER, and GILLENS, intentionally interfered with or
18 attempted to interfere with his civil rights by coercion based on a nonviolent threat with severe
19 consequences. Specifically, the defendants engaged in a conspiracy to frustrate the appropriate
20 application of administrative procedure at PCL, and misrepresented or failed to correct STATE BAR
21 or other rules in electronic communications. They used official transcripts as a form of "currency"
22 for administrative purposes, and engaged in unfair practices of unit issuance under the "color of
23 law."
24

25 326. To establish this claim, PLAINTIFF must prove all of the following:
26
27

1 327. That the defendants, including LEONARD, SPIRO, GONZALEZ, PENA, SARINANA,
2 CHING, DUPREE, SILBERGER, and GILLENS, caused PLAINTIFF to reasonably believe that if
3 he exercised his right to report misconduct, the defendants would interfere with his rights by
4 engaging in retaliation, ostracism, and slander.

5
6 328. That the defendants acted with the constructive knowledge and intent to violate this plaintiff's
7 protected rights because Enterprise P, including SPIRO, changed the unit awards prior to recruitment
8 and matriculation. PCL and Enterprise P operators submitted via mail or more likely wire, transcripts
9 and various other executed documents that would necessarily include the reported changes to
10 STATE BAR staff who expressly or constructively knew of the violations at time of review.

11
12 329. That PLAINTIFF was harmed as a result of the defendants' interference with his rights.

13 330. Under the Bane Act, damages may be recovered under Civil Code section 52(a) and (b),
14 including up to three times actual damages but a minimum of \$4,000 for violations of Civil Code
15 sections 51 (Unruh Act), 51.5, 51.6, 51.7 (Ralph Act), and 51.9.

16 331. PLAINTIFF alleges that the defendants interfered with his rights secured by the Constitution and
17 laws of the United States, and of the rights secured by the Constitution and laws of the State of
18 California, including the right to due process, the right to free speech, and the right to be free from
19 retaliation for reporting misconduct. These rights were interfered with through coercion based on
20 nonviolent threats with severe consequences, including intimidation, retaliation, ostracism, and
21 slander.
22

23 332. PCL's conduct with the State Bar employee LEONARD suggests applying the state action
24 doctrine is appropriate. LEONARD is a government actor because she works for the STATE BAR as
25 the Principal Program Analyst and her role is law school regulation. In performance of her role she
26 acted as the principal compliance officer and point of contact for SPIRO and others at PCL.
27

1 333. Other “high-level” areas of the STATE BAR participated or abrogated intervention, including
2 the Office of the OGC, including RANDOLPH, KRASILNIKOFF, and DAVYTYAN in failing to
3 follow the required internal process removed the possibility of PLAINTIFF receiving due process,
4 just consideration, or equal protection under the 14th Amendments promise.
5

6 334. The essence of a Bane Act claim is that the defendants, by improper means, tried to or did
7 prevent PLAINTIFF from doing something he had the right to do under the law or to force
8 PLAINTIFF to do something that he was not required to do under the law. The defendants' actions,
9 including their use of official transcripts as currency for administrative purposes, their
10 misrepresentation of State Bar rules, and their unfair practices of unit issuance under the "color of
11 law," all aimed at frustrating PLAINTIFF's attempts to hold the defendants accountable for their
12 misconduct.
13

14 335. Therefore, if the finder of fact concurs that PLAINTIFF is a member of a minority protected
15 class and the Defendants, including PCL and the State Bar, engaged in conduct intentionally or
16 otherwise discriminated to the detriment of Plaintiff in fashion likely to yield disparate and similar
17 injuries to students like the plaintiff.
18

19 336. For making false representations about the quality of PCL's law program and the State Bar's
20 enforcement of rules and regulations related to unaccredited fixed facility law schools, upon which
21 for all matter PLAINTIFF relied on. As previously argued, Defendants engaged in a pattern of
22 illegal conduct, including false advertising and unfair competition. Defendants violated 42 U.S.C. §
23 1981 by discriminating against Plaintiff in the making and enforcement of contracts.
24

25 337. Plaintiff may be entitled to declaratory, injunctive, and monetary relief from the defendants for
26 their violation of 42 U.S.C. § 1981.
27

1 **EIGHTH CAUSE OF ACTION**

2 **NEGLIGENCE**

3
4 (SPIRO, GONZALEZ, FRANCO, DURAN, LEONARD, CHING, NUNEZ, WILSON,
5 SOWELL, KRAMER, CHEN, WONG, SHORES-BROOKS, LAWRENCE, XIANG,
6 HERMAN, CISNEROS)
7

8 338. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
9 Paragraphs 1 through 337.

10 339. LEONARD: As a STATE BAR administrator, LEONARD owed a duty of care to ensure that
11 PCL was operating in compliance with state bar rules and regulations. By facilitating the unfair
12 practice of unit issuance under the "color of law" and misrepresenting or failing to correct state bar
13 rules in electronic communications, LEONARD breached that duty. This breach of duty caused
14 PLAINTIFF to suffer damages, including emotional distress and reputational harm.
15

16 340. SPIRO: As a member of PCL's Executive Committee and purportedly the school's "Chairman,"
17 SPIRO had a duty to ensure that PCL was operating in compliance with STATE BAR rules and
18 regulations. By constructing a D&O insurance policy application without any input or knowledge
19 beyond that of the EC, PENA and GONZALEZ, SPIRO breached that duty. This breach of duty
20 caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.
21

22 341. GONZALEZ: As a member of PCL's Executive Committee, GONZALEZ had a duty to ensure
23 that PCL was operating in compliance with state bar rules and regulations. By issuing a letter of
24 resignation that gaslit and maligned PLAINTIFF and encouraging the Board to take "decisive
25 action" against him, GONZALEZ breached that duty. This breach of duty caused PLAINTIFF to
26
27

1 suffer damages, including emotional distress and reputational harm. In addition, as PCL's President,
2 GONZALEZ had a duty to actively manage SPIRO, SARINANA, GONZALEZ and others in the
3 performance of their duties and compliance with schools rules and the law.

4
5 342. FRANCO: As a member of Community Board, FRANCO had a duty to ensure that PCL was
6 operating in compliance with the Bylaws, STATE BAR rules and regulations. By facilitating the
7 unfair practice of unit issuance under the "color of law" and stating that "we must not unilaterally
8 change the unit allocations since it would constitute a major change" without any legal basis,
9 FRANCO breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including
10 emotional distress and reputational harm.

11
12 343. KRAMER: As CHAIR of CSBARS, KRAMER is an appointee and accountable for oversight of
13 law school compliance or registration. KRAMER is entrusted to take reasonable measures or prevent
14 misconduct from STATE BAR agents like LEONARD. As Chair and Appointee and individual,
15 KRAMER is alleged to have negligently or willfully failed to perform when he owed a duty of care
16 to ensure that both PCL and LEONARD were operating in compliance with the rules and regulations
17 or that the STATE BAR ensured PCL was publicly noticed otherwise and suffered appropriate
18 sanctions.

19
20 344. KRAMER likely has a fiduciary or other protective duty to report the misconduct of licensees
21 that he knows to have occurred within his sphere of service on CSBARS because he is an active
22 market participant appointed to and acting in the capacity of regulatory authority and the misconduct
23 is directly related to the successful performance of his role.

24
25 345. In addition, as Committee Chair and public appointee, KRAMER had a duty to actively manage
26 or oversee either LEONARD, WILSON, NUNEZ, HERSHKOWITZ, KRASILNIKOFF and others
27 in the performance of their duties and compliance with schools rules and the law, or the work

product of these individuals and possibly others in furtherance of the reasonable performance of their duties pursuant to the State Bar Act and other statutes.

346. By facilitating the unfair practice of unit issuance by PCL under the "color of law" or misrepresenting or failing to correct state bar rules in electronic communications, LEONARD breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm and a violation of his rights and interest as they are likely protected under the 14th Amendment.

347. SARINANA: As a PCL Dean, SARINANA had a duty to ensure that PCL was operating in compliance with STATE BAR rules and regulations. Through lack of adequate oversight or participation and allowing mandatory routing of student complaints through "proper channels" and potentially violating state bar rules and laws, SARINANA breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm. SARINANA had an affirmative duty to act to correct the unit's issuance issue; he failed to do so.

348. GILLENS: As a member of PCL's Executive Committee, GILLENS had a duty to ensure that PCL was operating in compliance with state bar rules and regulations. By failing to produce a report related to the election results and denying membership on the board, GILLENS breached that duty. This breach of duty caused PLAINTIFF to suffer damages, including emotional distress and reputational harm.

NINTH CAUSE OF ACTION

RICO

DAMAGES PURSUANT TO RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT [RICO] AS AGAINST ALL DEFENDANTS - VIOLATION OF
18 U.S.C § 1962 to (CIVIL RICO) and (d) (RICO CONSPIRACY)

(AGAINST CARDONA, DAVYTYAN, AREPYTYAN, WILSON, DURAN, HERNANDEZ,
POMPOSO, SPIRO, LEONARD, GONZALEZ, PENA, BOUFFARD, SOWELL, TONEY, SHELBY,
HERNANDEZ, MCFARLAND, WONG, NUNEZ, CUMMINS, CAMPBELL, GARCIA, BROOKS,
CHEN, MORGENSTERN, KRISILNIKOFF, ZUNIGA1, and DOES 1-88)

349. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
Paragraphs 1 through 348.

350. Plaintiff alleges damages pursuant to the Racketeer Influenced and Corrupt Organizations Act
(RICO), 18 U.S.C, sections 1961 et seq. Federal Courts have jurisdiction over cases arising under
federal laws unless Congress has made express provision to the contrary. The RICO statute does not
state or suggest that jurisdiction is to be exclusive and therefore concurrent jurisdiction is applicable
for the claims herein.

351. Here, DEFENDANTS refers to ALL DEFENDANTS named and appearing immediately
below the caption for the Ninth cause of action.

352. Here, PCL DEFENDANTS refers to all previously associated named directors and officers of
either PCL or Enterprise P, named and appearing immediately below the caption for this Ninth
cause of action.

1 353. STATE BAR DEFENDANTS refers to all previously associated named directors and officers of
2 either STATE BAR or Enterprise S, named and appearing immediately below the caption for this
3 Ninth cause of action.
4

5 354. At least since May 2018, supported by the written explanation by Robert Skeels, Esq., PCL and
6 STATE BAR Defendants have been engaged in or facilitated the noncompliant operation of PCL as
7 a scheme to take unfair business advantage or defraud students and donors, as alleged herein.
8

9 355. The STATE BAR is the statutory and monopoly regulator in the field of postsecondary legal
10 education leading to licensure, tasked with interpretation, rulemaking and enforcement in all areas
11 pursuant to §6000 - §6243, et seq.
12

13 356. PCL is an active market participant and vertical downward “competitor” as a “regulated” entity
14 of the STATE BAR.
15

16 357. UCLA is an active market part and vertical downward “competitor” as a “regulated” entity of the
17 STATE BAR.
18

19 358. PCL and UCLA are active market participants and horizontal competitors for purposes of RICO
20 or antitrust analysis because they both operate postsecondary law schools; the difference in
21 accreditation is not believed substantive for purposes of establishing whether or not an organization
22 is a prima facie competitor.
23

24 359. Therefore, were a group of persons associated together for a common purpose of engaging in a
25 course of conduct. This association-in-fact was an "enterprise" within the meaning of RICO, 18
26 U.S.C. § 1961(4). At all relevant times, Defendants enterprise was used to carry out the illegal and
27 fraudulent activities set forth herein.
28

1 360. At all relevant times, Defendants' enterprise was engaged in activities that affected interstate
2 commerce within the meaning of RICO, 18 U.S.C. § 1962(c).

3
4 361. 18 U.S.C. § 1343, prohibits the use of wire in interstate or foreign commerce to further any
5 scheme or artifice to defraud.

6
7 362. As described herein, perpetrated their fraudulent Extortion Scheme through the use of wire
8 affecting interstate and foreign commerce.

9
10 363. Plaintiff alleges that each Defendant sent emails and text messages in furtherance of the various
11 acts or schemes, all conducted for Defendants' direct pecuniary benefit, and therefore each such
12 email and text message constitute a separate violation of 18 U.S.C. § 1343, which prohibits the use
13 of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

14
15 364. Plaintiff seeks declaratory determinations for any and all violations sufficient to meet the criteria
16 for "predicate acts", as determined by the finder of fact under 18 U.S.C. § 1343, be so counted
17 whether or not the acts themselves avail themselves to a damages or legal remedy.

18
19 365. Defendants' acts in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 2315 constitute a pattern of
20 racketeering activity" within the meaning of RICO, 18U.S.C. § 1961(5).

21
22 366. Such racketeering activity included, but is not limited to, the extortion of money,
23 misrepresentations of law, misrepresentations of fact, conversion, defamation, interference with
24 business relationships, breaches of duty, privacy and civil rights violations or other injuries to
25 Plaintiff.

26
27 367. PCL DEFENDANTS, and each of them, committed mail and wire fraud by the continuous use of
28 the mail, the internet, emails and texts to accomplish their purpose of extorting money from Plaintiff.

1 As a result of Defendants' violation of RICO, 18 U.S.C. § 1962(c) and (d), Plaintiff has suffered
2 damages in an amount to be determined at trial, including, but not limited to, out of pocket costs and
3 tuition payments, interference with business relationships, loss of future earnings, Plaintiffs
4 monetary payment to Defendants and the damages resulting from the failure to offer him classes or
5 his degree, defamatory publications intended to damage Plaintiff's name, goodwill and reputation in
6 the marketplace irrevocably.
7

8 A. Gonzalez letter written November 2021, believed published to Populi by PENA, BOUFFARD,
9 or SARIN, is an example of a “predicate act”, as the effort here was to discredit the PLAINTIFF
10 and end the pursuit of resolution AND not to correct the compliance issues.
11

12 B. SPIRO and LEONARD’s September 2022 solicitation letter, just one month after PCL provides
13 an almost complete and “units corrected” transcript but has essentially blocked and prevented the
14 PLAINTIFF’s transfer.
15

16 C. CHING, HOLTON and WILSON’s letters on various dates supporting the STATE BAR’s non-
17 intervention or inability to assist in the matter, counter to the public protection mandate and their
18 roles as public agents.
19

20 D. CARDONA failed to intervene or otherwise facilitated intentional avoidance of proper procedure
21 or due consideration when he was expressly or constructively aware.
22

23 E. AYRAPETYAN proposed and published misleading statements in meeting minutes and
24 otherwise facilitated and assisted STATE BAR DEFENDANTS in her capacity as Secretary.
25

26 F. WILSON, NUNEZ, CHING, DURAN, SOWELL, SHELBY, TONEY, CHEN, WONG, and
27 POMPOSO failed to intervene or facilitated the targeting of PLAINTIFF for retaliation by PCL
28

1 DEFENDANTS and LEONARD when all were expressly or constructively aware of duty as well
2 as imminent or already realized harms to the Plaintiff.

3
4 368. At all relevant times, CARDONA was and is a "person" within the meaning of RICO, 18 U.S.C.
5 §1961 (3) and §1 962 (c)-(d).

6
7 369. At all relevant times, DAVYTYAN was and is a "person" within the meaning of RICO, 18
8 U.S.C. §1961 (3) and §1 962 (c)-(d).

9
10 370. At all relevant times, AREPYTYAN was and is a "person" within the meaning of RICO, 18
11 U.S.C. §1961 (3) and §1 962 (c)-(d).

12
13 371. At all relevant times, WILSON was and is a "person" within the meaning of RICO, 18 U.S.C.
14 §1961 (3) and §1 962 (c)-(d).

15
16 372. At all relevant times, DURAN was and is a "person" within the meaning of RICO, 18 U.S.C.
17 §1961 (3) and §1 962 (c)-(d).

18
19 373. At all relevant times, HERNANDEZ was and is a "person" within the meaning of RICO, 18
20 U.S.C. §1961 (3) and §1 962 (c)-(d).

21
22 374. At all relevant times, POMPOSO was and is a "person" within the meaning of RICO, 18 U.S.C.
23 §1961 (3) and §1 962 (c)-(d).

24
25 375. At all relevant times, SPIRO was and is a "person" within the meaning of RICO, 18 U.S.C.
26 §1961 (3) and §1 962 (c)-(d).

27
28 376. At all relevant times, LEONARD was and is a "person" within the meaning of RICO, 18 U.S.C.
§1961 (3) and §1 962 (c)-(d).

1 377. At all relevant times, GONZALEZ was and is a "person" within the meaning of RICO, 18 U.S.C.
2 §1961 (3) and §1 962 (c)-(d).

3
4 378. At all relevant times, PENA was and is a "person" within the meaning of RICO, 18 U.S.C. §1961
5 (3) and §1 962 (c)-(d).

6 379. At all relevant times, BOUFFARD was and is a "person" within the meaning of RICO, 18 U.S.C.
7 §1961 (3) and §1 962 (c)-(d).

8
9 380. At all relevant times, SOWELL was and is a "person" within the meaning of RICO, 18 U.S.C.
10 §1961 (3) and §1 962 (c)-(d).

11
12 381. At all relevant times, TONEY was and is a "person" within the meaning of RICO, 18 U.S.C.
13 §1961 (3) and §1 962 (c)-(d).

14
15 382. At all relevant times, SHELBY was and is a "person" within the meaning of RICO, 18 U.S.C.
16 §1961 (3) and §1 962 (c)-(d).

17 383. At all relevant times, HERNANDEZ was and is a "person" within the meaning of RICO, 18
18 U.S.C. §1961 (3) and §1 962 (c)-(d).

19
20 384. At all relevant times, MCFARLAND was and is a "person" within the meaning of RICO, 18
21 U.S.C. §1961 (3) and §1 962 (c)-(d).

22
23 385. Defendants' actions violate the Racketeer Influenced and Corrupt Organizations Act ("RICO"),
24 18 U.S.C. §§ 1961 -1968, and specifically, 18 U.S.C. § 1962(c) and (d) (RICO Conspiracy).

25 386. At all relevant times, WONG was and is a "person" within the meaning of RICO, 18 U.S.C.
26 §1961 (3) and §1 962 (c)-(d)."
27

1 387. At all relevant times, NUNEZ was and is a "person" within the meaning of RICO, 18 U.S.C.
2 §1961 (3) and §1 962 (c)-(d)."
3

4 388. At all relevant times, CUMMINS was and is a "person" within the meaning of RICO, 18 U.S.C.
5 §1961 (3) and §1 962 (c)-(d)."
6

7 389. At all relevant times, CAMPBELL was and is a "person" within the meaning of RICO, 18 U.S.C.
8 §1961 (3) and §1 962 (c)-(d)."
9

10 390. At all relevant times, GARCIA was and is a "person" within the meaning of RICO, 18 U.S.C.
11 §1961 (3) and §1 962 (c)-(d)."
12

13 391. At all relevant times, BROOKS was and is a "person" within the meaning of RICO, 18 U.S.C.
14 §1961 (3) and §1 962 (c)-(d)."
15

16 392. At all relevant times, CHEN was and is a "person" within the meaning of RICO, 18 U.S.C.
17 §1961 (3) and §1 962 (c)-(d)."
18

19 393. At all relevant times, MORGENSTERN was and is a "person" within the meaning of RICO, 18
20 U.S.C. §1961 (3) and §1 962 (c)-(d)."
21

22 394. At all relevant times, ZUNIGA was and is a "person" within the meaning of RICO, 18 U.S.C.
23 §1961 (3) and §1 962 (c)-(d).
24

25 395. Defendant natural persons held responsibility for implementing and ensuring compliance with
26 antitrust and competition policy within the defendant organization or other relevant capacity.
27

28 396. For purposes of RICO or predicate acts, LEONARD is believed based on the evidence to operate
as a “nexus” and point of interoperation or is otherwise engaged or entangled or entwined in

1 unfortunate combination or conspiracy, demonstrated by her sheer resiliency to stay in the same
2 position, and the April 2023 promotion of her supervisor CHING to Director by WILSON, signaling
3 to the public entrenched support by STATE BAR DEFENDANTS for Enterprise S agents and
4 operators.

5
6 397. Defendant Peoples College of Law (PCL) and all PCL Defendants either participated in or failed
7 to intervene in unfair business practices related to PCL's advertising, recruitment, administration,
8 misrepresentations, extortion, conversion, conspiracy, constructive fraud, and other conduct that
9 likely violates RICO and Antitrust statutes, operating an enterprise for unlawful purposes.

10
11 398. Plaintiff believes, based on information, personal experience, and Defendant reporting, that the
12 lack of principled compliance enforcement by agents and responsible parties at the STATE BAR is a
13 significant factor in Plaintiff's harms. The system's stated purpose is to protect the public by ensuring
14 that market participants provide timely notice.

15
16 399. The California STATE BAR implemented underground rules and charged arbitrary and
17 “capricious” fees while consistently failing to follow mandated administrative procedures to
18 establish “due process” compliance under the APA and CAPA or other statutes.

19
20 400. When made expressly aware of conduct or rule with attached requirement for review under the
21 APA, the STATE BAR continued the unlawful conduct in multiple areas of its daily operations, in
22 violation of mandate and breach of duty clearly outside the threshold of “good faith and fair
23 dealing”.

24
25 401. The State Bar operated to unfairly restrict law school transfers, restraining public liberty and
26 trade while sustaining increased costs and risks to the Federal Government for legal education. By
27

1 allowing schools in its system to not provide “full faith and credit” by use of exclusionary rule that
2 gives the public institution permission to exclude for meritorious review state citizens and taxpayers
3 based on origin; here, the STATE BAR administers a test to students in this category as objective
4 assessment and measure of student fitness.
5

6 402. The State Bar's violation of the Federal Administrative Procedure Act and State CAPA statutes,
7 failure to perform Constitutional review of statutes, rules, or procedures, implementation and
8 enforcement of underground rules and procedures, and capricious and arbitrary use and application
9 of determination or decision-making authority all constitute unlawful, unfair, or fraudulent business
10 practices under California Business and Professions Code sections § 17200 and § 17500.
11

12 403. The State Bar's failure to follow established procedures may also be considered a violation of
13 California Business and Professions Code section § 17200 and § 17500, which prohibit any
14 unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules
15 and regulations related to the regulation of unaccredited fixed facility law schools, including credible
16 reports of unfair collection practices, extortion, conversion, harassment, defamation, interference
17 with business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment
18 privilege and Fourth Amendment protections; all aforementioned acts likely fall under the category
19 of unlawful, unfair, or fraudulent business practice. Professions Code section 17200;
20
21

22 404. Causing or allowing PCL to violate its duties of care and failing to warn the public when the
23 parties were aware of noncompliance or had unlawful operation for a protracted period when it had
24 credible records and auditor documentation sufficient to trigger its statutory duties.
25

26 405. Failing to observe corporate formalities as required by law and by PCL's bylaws.
27

1 406. At all times relevant, the Officer/Director Defendants failed to act in good faith, in the best
2 interests of PCL, and with such care as an ordinarily prudent person in a like position would use
3 under similar circumstances.
4

5 407. The State Bar's failure to follow established procedures and other misconduct breached their
6 statutorily assigned and sworn duties under California Code, Business and Professions Code (BPC) §
7 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member Defendants failed
8 to support the Constitution and the Rule of Law, to respect the courts of justice and judicial officers,
9 to maintain actions, proceedings, or defenses that are legal or just, candor and truth in statements of
10 law or legal proceedings, to advance no fact prejudicial to the honor or reputation of a party for
11 unjust cause, not to encourage either the commencement or the continuance of an action or
12 proceeding from any corrupt motive of passion or interest, to never reject, for any consideration
13 personal to himself or herself, the cause of the defenseless or the oppressed, and to cooperate with
14 the tribunal.
15
16

17 408. Defendants engaged in a pattern of illegal conduct including failure to properly apply, use, and
18 enforce the antitrust policy more than once.
19

20 409. Office of General Counsel failed to recuse on multiple occasions; Office of Chief Trial Counsel
21 failed to intervene on multiple occasions. Board of Trustees failed to intervene. All at varying times
22 had constructive or express knowledge of the circumstance.
23

24 410. No one at STATE BAR has substantively responded to PLAINTIFF's complaints or conducted
25 any investigations related to my complaints, although the school was put on probation and
26 PLAINTIFF's reports are credible with supporting evidence.
27

1 411. Failure to treat PLAINTIFF's complaints with the gravamen deserved by any member of the
2 public is likely a violation of equal protection in other contexts, but here it is the purest form of
3 intimidation tactic applied to isolate and demonstrate to the victim that there is no one to help them
4 so their best chance is to be quiet.
5

6 412. STATE BAR DEFENDANTS likely invested the proceeds of their illegal activities into
7 Enterprise S, as alter ego of the STATE BAR, to continue the "illusion" of proper regulatory
8 function in law school regulation. They charged arbitrary and "capricious" fees because they failed
9 to follow mandated administrative procedures to establish due process compliance under the APA
10 and CAPA or other statutes required to pass evaluation prior to implementation. Plaintiff here asserts
11 an established violation of 18 U.S.C. § 1962.
12

13 413. California STATE BAR implemented underground rules while by failing to follow mandated
14 administrative procedure to establish "due process" compliance under the APA and CAPA or other
15 statutes.
16

17 414. When made expressly aware of conduct or rule with attached requirement for review under the
18 APA, STATE BAR continued in the unlawful conduct in multiple areas of its daily operations, in
19 violation of mandate and breach of duty clearly outside the threshold of "good faith and fair
20 dealing".
21

22 415. State Bar operated to unfairly restrict law school transfers restraining public liberty and trade
23 while sustaining increased costs and risks to the Federal Government for legal education by allowing
24 schools in its system to not provide "full faith and credit" by use of exclusionary rule that gives the
25 public institution permission to exclude for meritorious review state citizens and taxpayers based on
26
27

origin; here, the STATE BAR administers a test to students in this category as objective assessment and measure of student fitness.

416. Violation of the Federal Administrative Procedure Act and State CAPA statutes; failure to perform Constitutional review of statutes, rules, or procedures; implementation and enforcement of underground rules and procedures; capricious and arbitrary use and application of determination or decision-making authority.

417. STATE BAR DEFENDANTS allowed or facilitated PCL's violation of Rule 4.246 (F) providing law study credit for a fixed-facility law school program or class offered more than ten miles from the site of the law school, outside California, or in multiple locations required a "major change" approval from the STATE BAR.

418. PCL matriculated at least one student from Arizona and other states in August 2020; that is a "major change" because it is INTERSTATE COMMERCE. PCL performed its standard "operations" here, including the award of fewer units than required, paid headhunter to bolster recruitment, contracting and payments. 18 U.S.C. § 1343, prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to defraud.

419. Similarly, "in-state" students, Nancy Popp and the Plaintiff, receive the same erroneous unit awards, indicating that the scheme is universally applied.

420. Violation of California Business and Professions Code sections § 17200 and § 17500 violations: The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules

1 and regulations related to the regulation of unaccredited fixed facility law schools, including credible
2 report of unfair collection practices, extortion, conversion, harassment, defamation, interference with
3 business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment
4 privilege and Fourth Amendment protections. Because the acts likely fall under the category of
5 unlawful, unfair, or fraudulent business practice. These violations are particularly suggestive and
6 lend themselves to being declared predicate acts for qualification purposes.
7

8 421. Violation of California Code, Business and Professions Code (BPC) § 6068 (a), (b), (c), (d), (f),
9 (g) (a), (b),;; The State Bar and PCL licensee or member Defendants failure to follow established
10 procedures and other misconduct breached their statutorily assigned and sworn duties to support the
11 Constitution and the Rule of Law; to respect the courts of justice and judicial officers; to maintain
12 actions, proceedings, or defenses that are legal or just, candor and truth in statements of law or legal
13 proceedings; to advance no fact prejudicial to the honor or reputation of a party for unjust cause; Not
14 to encourage either the commencement or the continuance of an action or proceeding from any
15 corrupt motive of passion or interest; Never to reject, for any consideration personal to himself or
16 herself, the cause of the defenseless or the oppressed; and cooperation with the tribunal. These
17 violations are likely considered predicate acts for qualification purposes.
18
19
20

21 422. Violations of 18 U.S.C. § 1962(c) RICO Acts in Furtherance of Enterprise; by engaging in a
22 pattern of illegal conduct including failure to properly apply, use, and enforce the antitrust policy
23 more than once. Office of General Counsel failed to recuse; Office of Chief Trial Counsel failed to
24 intervene. Board of Trustees failed to intervene. All at varying times had constructive or express
25 knowledge of the circumstance.
26
27
28

423. Violations of 18 U.S.C. § 1962(a) RICO Investing Proceeds of Racketeering; by investing the proceeds of their illegal activities into the enterprise. Plaintiff here asserts an established violation of 18 U.S.C. § 1962(a) under RICO, based on credible report and personal experience that the defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the STATE BAR, to continue the “illusion” of proper regulatory function in law school regulation.

424. PLAINTIFF believes the Court will likely find they charged “arbitrary and capricious” fees while failing to follow mandated administrative procedures to establish due process compliance under the APA and CAPA or other statutes. Here, PLAINTIFF must pay a mandatory student registration fee and testing fees for the FYLSX. Fees paid here, as part of the ADMISSIONS pogrom, are not considered included in the general fund and are re-utilized to perpetuate the pogrom.

425. Violations of 18 U.S.C. § 1962(b) in that PCL DEFENDANTS PEÑA and SPIRO maintain control of the People’s College of Law through a pattern of conduct and racketeering activity, where PEÑA maintains formal control as President and SPIRO as “arms-length” muckraker.

a) Plaintiff based on personal experience and credible information, believes the control of PCL was illegitimately obtained and maintained by SPIRO, GONZALEZ, PENA and others Enterprise P operators through specific conduct of the defendants, including, but not limited to intimidation, harassment, gaslighting, unfair business and debt collection practices, deceit and misrepresentation.

a. SPIRO’S letter of resignation letter of July 14, 2021 [asserts this as evidence of PCL’s operation as an alter ego for the DEFENDANTS, as what would ordinarily be a “substantive” change and release of control is “hobbled” for dubious cause with the effect of THE status quo preservation of actual control.

1
2 b) PEÑA or SPIRO directed or aided BOUFFARD to issue invoice and collect moneys, totaling
3 \$7,934 under unfair terms, retaliatory intent and extortionary threat, because the PLAINTIFF did
4 not owe the sum AND PENA, SPIRO and BOUFFARD express and constructive knowledge of
5 this fact.
6

7 i) had prior requested accounting, the amount claimed owed did so based on the renege of an
8 earlier employment contract and service hours already performed under PLAINTIFF's
9 contract. PLAINTIFF was specifically targeted and threatened in intimidating with, and
10

11 c) BOUFFARD, when asked to produce proof of debt and an accounting promised that one would
12 be forthcoming after the money was paid and review was made. No evidence of legitimate
13 review has ever been offered by PCL or the defendants

14 426. PCL for its own benefit and contrary to law offered fewer units – credit hours - as a practice
15 designed to “trap” the student after matriculation and passage of the First Year Law School Exam to
16 strengthen the perception of its operation as a legitimate enterprise and reduce reporting and
17 inspection burden related to STATE BAR compliance as well as attract more student prospects.
18
19

20 **TENTH CAUSE OF ACTION**

21
22 **CONSPIRACY**

23 (DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GONZALEZ, LEONARD, CHING, NUNEZ,
24 HOPE, WILSON, DURAN, SHELBY, TONEY, STALLINGS, MCFARLAND, SOWELL, ZUNIGA1,
25 KRASILNIKOFF, MAZER)
26
27

1 427. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
2 Paragraphs 1 through 426.

3
4 428. Conspiracy is an agreement by two or more persons to commit a wrongful act. The conspiracy
5 need not be secret and may be implied by the conduct of the parties.

6
7 429. California requires an overt act by at least one of the parties.

8 430. From the evidence presented, it appears likely that DEFENDANTS SARIN, BOUFFARD,
9 PEÑA, SPIRO, GONZALEZ, LEONARD, CHING, NUNEZ, HOPE, WILSON, DURAN,
10 SHELBY, TONEY, STALLINGS, MCFARLAND, SOWELL, ZUNIGA¹, and others participated
11 in a conspiracy to deny PLAINTIFF equal protection under the law. Specifically, by refusing to
12 provide PLAINTIFF with accurate transcripts or viable transfer options, failure to in good faith
13 compose or fairly process the request for a "Special Circumstance Exemption" under GULSR
14 Section 5.6 without adequate consideration, in addition to the other overt acts or steps concomitant
15 with the breach their contract and duty to him, the DEFENDANTS effectively prevented
16 PLAINTIFF from completing his legal education and obtaining his degree. DEFENDANTS planned,
17 announced and repudiated their obligations, including the statutory requirement to provide 270 hours
18 of legal education for 4 years, and thus failed to take reasonable steps to ensure its provision.
19 Additionally, DEFENDANTS violated STATE BAR guidelines and regulations, which resulted in
20 the denial of PLAINTIFF's rights to due process and equal protection under the law because the
21 defendants were aware of the required conduct at the time of negligent or intentional lapse.
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1 431. When made expressly aware of conduct or rule with attached requirement for review, the
2 STATE BAR continued or allowed to continue as the sole regulator in the field, the improper
3 conduct in multiple areas for protracted periods of time conducted by PCL.
4

- 5 a. PCL was allowed to continue in its non-compliant unit awards for years;
- 6 b. Lack of intervention by STATE BAR facilitated PCL DEFENDANTS
7 misconduct, as the anti-protective policy was published and followed as
8 Rule.
9

10 432. The defendant parties are assisted by the legitimate regulatory relationship that exists between
11 the parties, but the nature and quantity of communications from the PLAINTIFF and
12 DEFENDANTS “in their own words” adds additional support to an affirmative finding.
13

14 433. The parties operate separate and distinct qualifying enterprises because the STATE BAR and
15 PCL both engaged in likely tortious conduct for a continuous period to accomplish
16

17 434. The State Bar IN EFFECT facilitated an unfair circumstance, where it fails to inform the public
18 of the known risk and then, when the unwitting is trapped, works in concert with the predator to
19 prevent both escape and accurate record of the incident.to unfairly restrict law school transfers,
20 restraining public liberty and trade while sustaining increased costs and risks to the Federal
21 Government for legal education.
22

23 435. There exists an acute threat to the public because the schemes to defraud students and consumer
24 market participants like Plaintiff are ongoing; DURAN, LEONARD, WILSON, HOLTON,
25 RANDOLPH, CHING, NUNEZ, STALLINGS, HERMAN, SHELBY, TONEY, MCFARLAND
26 and SPIRO, HCP, GONZALEZ, BOUFFARD, ANTONIO, GILLENS, DUPREE, FRANCO,
27

SARINANA as well as other members of Enterprise P and Enterprise S, as actors in actual or proximate privity to the harms to Plaintiff or the concealment of the culpable conduct, conducted individually and under “vertical merger” under the auspices of state authorized regulatory activity.

436. Here, the conduct related to an issue that could be so easily and quietly resolved by correcting a few transcripts was egregious, so egregious that it is hard to imagine any reasonable person adopting baseless position and then defending it in writing in front of the regulator. Here, licensees asserted to law enforcement and the regulator that PLAINTIFF consented to multiple privacy violations under state statute, and by allowing SPIRO, GONZALEZ, and PENA to make direct and spurious statements, knowing the issue was a “criminal matter” and providing no clarification to PCL or assistance to PLAINTIFF, seems consistent with a consolidated conspiratorial cause.

437. The State Bar's violation of the Federal Administrative Procedure Act and State CAPA statutes, failure to perform Constitutional review of statutes, rules, or procedures, implementation and enforcement of underground rules and procedures, and capricious and arbitrary use and application of determination or decision-making authority all constitute unlawful, unfair, or fraudulent business practices under California Business and Professions Code sections § 17200 and § 17500, although separate as causes or acts, suggests the DEFENDANTS concerted action. All relevant and proven violations here Plaintiff will allege are also “predicate acts” for purposes of RICO determination.

438. The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice.

1 439. The State Bar's failure to enforce the rules and regulations related to the regulation of
2 unaccredited fixed facility law schools, including credible reports of unfair collection practices,
3 extortion, conversion, harassment, defamation, interference with business relationships, and
4 conspiracy to deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment
5 protections; all aforementioned acts likely fall under the category of unlawful, unfair, or fraudulent
6 business practice. Professions Code section 17200; all of the latter are acts compatible with
7 conspiracy or inchoate acts, and here the failings are systemic.

9
10 440. Failing to observe corporate formalities as required by law and by PCL's bylaws, including the
11 Community Boards continuous failure to hold legitimate elections, illegitimate and likely ultra vires
12 conduct, combined with the submission of false statements to the Secretary of State all likely qualify
13 as unfair business practice under BPC § 17200.

14
15 441. PCL DEFENDANTS did not request, nor did they receive written resignation from the
16 PLAINTIFF. Because the PCL DEFENDANTS are both expressly and constructively aware of these
17 issues yet act in clear disregard, it strongly suggests concerted action for singular purpose.

18
19 442. PLAINTIFF has demanded an accounting, where PCL has performed fundraising guaranteeing
20 the use of funds but refuses to demonstrate that it will comply with any non-judicial demand.
21 DEFENDANTS had a duty of reasonable care. Because the PCL DEFENDANTS are both expressly
22 and constructively aware of these issues yet act in clear disregard, it strongly suggests concerted
23 action for singular purpose.

1 443. At all times relevant, the PCL DEFENDANTS failed to act in good faith, in the best interests of
2 PCL, and with such care as an ordinarily prudent person in a like position would use under similar
3 circumstances.
4

5 444. The State Bar's failure to follow established procedures and other misconduct breached their
6 statutorily assigned and sworn duties under California Code, Business and Professions Code (BPC) §
7 6068 (a), (b), (c), (d), (f), (g) (a), (b). The State Bar and PCL licensee or member Defendants failed
8 to support the Constitution and the Rule of Law, to respect the courts of justice and judicial officers,
9 to maintain actions, proceedings, or defenses that are legal or just, candor and truth in statements of
10 law or legal proceedings, to advance no fact prejudicial to the honor or reputation of a party for
11 unjust cause, not to encourage either the commencement or the continuance of an action or
12 proceeding from any corrupt motive of passion or interest, to never reject, for any consideration
13 personal to himself or herself, the cause of the defenseless or the oppressed, and to cooperate with
14 the tribunal.
15
16

17 445. Defendants engaged in a pattern of illegal conduct including failure to properly apply, use, and
18 enforce the antitrust policy more than once. Office of General Counsel failed to recuse; Office of
19 Chief Trial Counsel failed to intervene. Board of Trustees failed to intervene. All at varying times
20 had constructive or express knowledge of the circumstance. This also implies cooperation, as non-
21 conforming results are posted on the STATE BAR's public web site.
22

23 446. Defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the
24 STATE BAR, to continue the "illusion" of proper regulatory function in law school regulation. They
25 charged arbitrary and "capricious" fees while failing to follow mandated administrative procedures
26
27

1 to establish due process compliance under the APA and CAPA or other statutes. Plaintiff here asserts
2 an established violation of 18 U.S.C. § 1962.

3
4 447. California STATE BAR implemented underground rules while by failing to follow mandated
5 administrative procedure to establish “due process” compliance under the APA and CAPA or other
6 statutes.

7
8 448. When made expressly aware of conduct or rule with attached requirement for review under the
9 APA, STATE BAR continued in the unlawful conduct in multiple areas of its daily operations, in
10 violation of mandate and breach of duty clearly outside the threshold of “good faith and fair
11 dealing”.

12
13 449. State Bar operated to unfairly restrict law school transfers restraining public liberty and trade
14 while sustaining increased costs and risks to the Federal Government for legal education by allowing
15 schools in its system to not provide “full faith and credit” by use of exclusionary rule that gives the
16 public institution permission to exclude for meritorious review state citizens and taxpayers based on
17 origin; here, the STATE BAR administers a test to students in this category as objective assessment
18 and measure of student fitness.

19
20 450. Violation of the Federal Administrative Procedure Act and State CAPA statutes; failure to
21 perform Constitutional review of statutes, rules, or procedures; implementation and enforcement of
22 underground rules and procedures; capricious and arbitrary use and application of determination or
23 decision-making authority.

24
25 451. The January 20, 2023, and RANDOLPH, in her capacity as secretary for the Office of General
26 Counsel, sent the first unsigned antitrust determination to plaintiff with OGC masthead, dated
27

January 20, 2022 and identified as “ANTITRUST DETERMINATION 2023-0001” from unsigned author. The determination includes OGC selected excerpts of the original complaint that appear selected to obscure the actual issues and exacerbate the appearance of incoherence.

452. On or about September 26, 2022, and January 20, 2023, OGC fails to recuse or in other clear, apparent, and transparent fashion remove conflict of interest issues using its own conflict of interest policy, as earlier referenced in EXHIBIT AO-1. Here, KRISILINIKOF peers and immediate supervisors, including HOLTON, GRANDT, DAVYTYAN, RANDOLPH and WILSON

453. OCTC fails to do the intervene upon OGC’s failures.

454. PLAINTIFF alleges that the STATE BAR and DEFENDANTS to this cause, were constructively and expressly aware of the circumstances, yet continued to operate in virtually “unchanged” and violative fashion to the present day.

455. Violation of California Business and Professions Code sections § 17200 and § 17500 violations: The State Bar's failure to follow established procedures may also be considered a violation of California Business and Professions Code section § 17200 and § 17500, which prohibit any unlawful, unfair, or fraudulent business act or practice. The State Bar's failure to enforce the rules and regulations related to the regulation of unaccredited fixed facility law schools, including credible report of unfair collection practices, extortion, conversion, harassment, defamation, interference with business relationships, and conspiracy to deprive Plaintiff of constitutional First Amendment privilege and Fourth Amendment protections. Because the acts likely fall under the category of unlawful, unfair, or fraudulent business practice. These violations are particularly suggestive and lend themselves to being declared predicate acts for qualification purposes.

1 456. Violation of California Code, Business and Professions Code (BPC) § 6068 (a), (b), (c), (d), (f),
2 (g) (a), (b),;; The State Bar and PCL licensee or member Defendants failure to follow established
3 procedures and other misconduct breached their statutorily assigned and sworn duties to support the
4 Constitution and the Rule of Law; to respect the courts of justice and judicial officers; to maintain
5 actions, proceedings, or defenses that are legal or just, candor and truth in statements of law or legal
6 proceedings; to advance no fact prejudicial to the honor or reputation of a party for unjust cause; Not
7 to encourage either the commencement or the continuance of an action or proceeding from any
8 corrupt motive of passion or interest; Never to reject, for any consideration personal to himself or
9 herself, the cause of the defenseless or the oppressed; and cooperation with the tribunal. These
10 violations are likely considered predicate acts for qualification purposes.
11
12

13 457. Violations of 18 U.S.C. § 1962(c) RICO Acts in Furtherance of Enterprise; by engaging in a
14 pattern of illegal conduct including failure to properly apply, use, and enforce the antitrust policy
15 more than once. Office of General Counsel failed to recuse; Office of Chief Trial Counsel failed to
16 intervene. Board of Trustees failed to intervene. All at varying times had constructive or express
17 knowledge of the circumstance.
18
19

20 458. Violations of 18 U.S.C. § 1962(a) RICO Investing Proceeds of Racketeering; by investing the
21 proceeds of their illegal activities into the enterprise. Plaintiff here asserts an established violation of
22 18 U.S.C. § 1962(a) under RICO, based on credible report and personal experience that the
23 defendants invested the proceeds of their illegal activities into Enterprise S, as alter ego of the
24 STATE BAR, to continue the “illusion” of proper regulatory function in law school regulation.
25 STATE BAR charged fees while failing to follow mandated administrative procedures to establish
26 due process compliance for its rulemaking and scope of authority under the APA and CAPA or other
27
28

1 statutes. Here as example, PLAINTIFF must pay mandatory fees for registration as a law school
2 student and subsequent testing for the FYLSX. Fees paid here, as part of the ADMISSIONS pogrom,
3 are not considered included in the “general fund” and are re-utilized to perpetuate the pogrom.
4

5 459. Violations of 18 U.S.C. § 1962(b) RICO Control of Interests in Enterprise by exerting control
6 over the enterprise through illegal means or underground rule.
7

8 460. The September 15, 2022, email exchange to PLAINTIFF with SPIRO, PEÑA, ZUNIGA1 and
9 LEONARD’s soliciting his “consent” change the status of classes he had already taken for credit or
10 had retaken due to PCL’s failure to provide adequate resources for the successful operation of its
11 programs.
12

13 461. Plaintiff is informed and believes upon credible evidence that this request was likely in direct
14 violation of STATE BAR guidelines, that expressly prohibit taking courses for credit twice or
15 market participant misrepresentations.
16

17 462. Plaintiff believes this is evidence of conspiracy, in that the “offer” was presented uniformly and
18 in concert.
19

20 463. PLAINTIFF believes this was an inappropriate solicitation because the rules for law schools
21 appear to preclude encouraging misrepresentation or falsifying records.
22

23 464. PLAINTIFF repudiated the scheme in a writing of the same day, September 15, 2022,
24 communicated to WILSON, DAVYTYAN, LEONARD, CHING, NUNEZ, DURAN and others.
25 Plaintiff asked specifically why the conflict of interest issues were not being addressed because he
26 believed the continued “runaround” with the same parties acting in clear and coherent alliance
27 abusive.
28

1 465. Plaintiff believes this reflects the intent to create or alter records or misrepresentation by SPIRO
2 and LEONARD because both are acting in their “official capacity”, i.e., LEONARD as Principal
3 Analyst left responsible for compliance oversight of PCL and SPIRO presumably as pro bono
4 counsel.

5
6 466. Violations of 18 U.S.C. § 1962(d) RICO Conspiracy under Subsections (a)-(d); by conspiring to
7 engage in illegal racketeering activities, including arbitrary and exclusionary policy enforcement to
8 the detriment of a specific targeted market speech.

9
10 467. Operation of RICO Enterprise: RICO Acts in Furtherance of Enterprise

11 468. Violations of the State Bar Act § 6001.1 - Protection of the Public by unlawfully awarding 2/3
12 rds. of the Federal and State Mandated unit hours—credits—for its regulated postsecondary legal
13 education services as defined for use under Higher Education Act Title IV requirements for
14 postsecondary institutions.

15
16 469. Tortious Breaches of the Implied Covenant of Good Faith & Fair Dealing

17
18 470. Contracts [Matriculation and Regulatory]

19
20 471. Performance of Fiduciary Obligations – Here, the State Bar has a duty to protect the public under
21 CBPC §6001.1 and has failed to comport its conduct or its regulatory system to the law.

22 472. Violations of 42 U.S.C. § 1981 Equal Protection 14th Amendment (U.S.) by violating or
23 discriminating against students based on their constitutional rights including:
24
25
26
27

- c. The UCLA is allowed to operate using exclusionary rules that prohibit merit-based application by **“Students from law schools that are only state-approved are not eligible for admission.”**
- d. PCL is allowed to violate various laws and regulatory rules with the express knowledge and facilitation of STATE BAR personnel.
- e. STATE BAR maintains policies as the sole regulator in the sphere that denies students substantive or procedural protection, in clearly stated policies communicated to every school in the marketplace.
- f. When STATE BAR receives complaints related to schools or licensees, it “fails” to address them. Michael S. Tilden, in his capacity as acting State Auditor, released a report dated April 14, 2022, that detailed that in “more than one-third of the cases we reviewed” the STATE BAR “allowed staff members to review and close complaints” when it was already known that someone in the organization had a “conflict of interest” with that attorney. A copy of the reports “Fact Sheet” can be found on the California State Auditors web site (<https://www.bsa.ca.gov/pdfs/factsheets/2022-030.pdf>).

1. Here alleged the above schools have been granted “superpowers” that have disparate negative impact in the vulnerable communities the state run unaccredited schools like PCL recruit students.

473. First Amendment - Free Speech Suppression by Conduct including violations of:

474. Penal Code 132 PC - offering false evidence.

475. Penal Code 134 PC - preparing false evidence.

1 476. Penal Code 135 PC - destroying evidence with "intent to deprive".

2 477. Penal Code 136.1 PC - tampering or intimidating witnesses.

3
4 478. Penal Code 148 PC - resisting arrest or obstructing a police officer (passive)

5 479. Penal Code 632.PC – violation of privacy by unlawful recording.

6
7 480. Violation Fourth Amendment – Takings Clause -By deprivation of actual constitutional rights
8 and privileges and by unlawful discrimination without rational basis or in direct conflict of protected
9 status.

10
11 481. Violations of 18 U.S.C. § 1962(b) in that PCL defendants PEÑA and SPIRO maintain control of
12 the People’s College of Law through a pattern of conduct and racketeering activity, where PEÑA
13 maintains formal control as President and SPIRO informal control.

14
15 d) Plaintiff based on personal experience and credible information, believes the control of PCL was
16 illegitimately obtained and maintained by SPIRO, GONZALEZ, PENA and others Enterprise P
17 operators through specific conduct of the defendants, including, but not limited to intimidation,
18 harassment, gaslighting, unfair business and debt collection practices, deceit and
19 misrepresentation.

20
21 482. For example, the November 28, 2021, publication of GONZALEZ’s letter, likely defamatory,
22 PLAINTIFF evidences both concerted effort to damage PLAINTIFF’s reputation and encourage
23 antagonistic-levels of ill will amongst his community peers, as the messages content was both
24 “gaslighting” and foreseeably incendiary.

- e) PEÑA or SPIRO directed or aided BOUFFARD to issue invoice and collect moneys, totaling \$7,934 under unfair terms and retaliatory intent, since the plaintiff did not owe the sum, had prior requested accounting, the amount claimed owed did so based on the renege of an earlier employment contract and service hours already performed under PLAINTIFF's contract. PLAINTIFF was specifically targeted and threatened in intimidating with, and
- f) BOUFFARD, when asked to produce proof of debt and an accounting promised that one would be forthcoming after the money was paid and review was made. No evidence of legitimate review has ever been offered by PCL or the defendants

483. PCL for its own benefit and contrary to law offered fewer units – credit hours - as a practice designed to “trap” the student after matriculation and passage of the First Year Law School Exam to strengthen the perception of its operation as a legitimate enterprise and reduce reporting and inspection burden related to STATE BAR compliance as well as attract more student prospects.

484. Although PCL DEFENDANTS conduct violated the law or breached its own regulatory rules, STATE BAR facilitated its continuance or concealment.

485. Pursuant to RICO, 18 U.S.C. § 1964(c)-(d), Plaintiff is entitled to recover treble damages plus costs and attorneys' fees from Defendants.

486. Plaintiff alleges that the Defendants acted willfully, maliciously and fraudulently in coercing Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving Plaintiff of not only the money paid to Defendants, but the right under due process to receive the award of his degree, thereby justifying an award of punitive damages.

ELEVENTH CAUSE OF ACTION

COMMON LAW EXTORTION

**(DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GILLENS, FRANCO, TORRES,
SANCHEZ, SILBERGER, DEUPREE and DOES 1-88)**

487. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 486.

488. Common law extortion is the obtaining of property from another induced by a wrongful use of force or fear, or under color of official right.

489. Here, DEFENDANTS refers to ALL DEFENDANTS named and appearing immediately below the caption for the Eleventh cause of action.

490. Here, PCL DEFENDANTS refers to all previously associated named directors and officers of either PCL or Enterprise P, named and appearing immediately below the caption for this Eleventh cause of action.

491. As alleged herein, DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO, GILLENS, FRANCO, TORRES, SANCHEZ, SILBERGER, DEUPREE and DOES 1-88, acting under color of official right from their positions of authority with PCL, demanded or abetted and received payment from Plaintiff.

492. The PLAINTIFF was in the midst of successfully completing his studies and had made all required payments when Defendants threatened to block and not allow Plaintiff to complete his

1 studies at PCL timely if the additional sum of \$7934 was not immediately paid; Defendants
2 eventually reneged on the provision of Plaintiff's 4L year of classes, carrying out the "threat" even
3 after he had paid the \$7934.

4
5 493. Notwithstanding the payment to Defendants to continue his studies "unmolested", Plaintiff's
6 harassment was ongoing; PCL reneged on its promise to allow him to pursue his studies without
7 further interference, its agents engaging instead in targeted conduct.

8 494. As alleged herein, it appears likely that DEFENDANTS SARIN, BOUFFARD, PEÑA, SPIRO,
9 GILLENS, FRANCO, TORRES, SANCHEZ, SILBERGER, DEUPREE and DOES 1-88
10 participated in a conspiracy to deny PLAINTIFF equal protection under the law. Specifically, by
11 refusing to provide PLAINTIFF with accurate transcripts or viable transfer options, failure to in
12 good faith compose or fairly process the request for a "Special Circumstance Exemption" under
13 GULSR Section 5.6 without adequate consideration, in addition to the other overt acts or steps
14 concomitant with the breach their contract and duty to him, the DEFENDANTS effectively
15 prevented PLAINTIFF from completing his legal education and obtaining his degree.
16
17 DEFENDANTS planned, announced and repudiated their obligations, including the statutory
18 requirement to provide 270 hours of legal education for 4 years, and thus failed to take reasonable
19 steps to ensure its provision. Additionally, DEFENDANTS violated STATE BAR guidelines and
20 regulations, which resulted in the denial of PLAINTIFF's rights to due process and equal protection
21 under the law because the defendants were aware of the required conduct at the time of negligent or
22 intentional lapse.
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1 495. When made expressly aware of conduct or rule with attached requirement for review, the
2 STATE BAR continued or allowed to continue as the sole regulator in the field, the improper
3 conduct in multiple areas for protracted periods of time conducted by PCL.
4

5 496. Plaintiff alleges that the Defendants acted willfully, maliciously and fraudulently in coercing
6 Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving
7 Plaintiff of not only the money paid to Defendants, but the due process right to lawfully obtain his
8 degree, thereby justifying an award of punitive damages.
9

10
11 **TWELFTH CAUSE OF ACTION**

12 **VIOLATIONS OF CIV. CODE §52.1 – BANE ACT**

13
14 **(DEFENDANTS LEONARD, PEÑA, SPIRO, CHING, WILSON, BOUFFARD, SARIN)**

15 497. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
16 Paragraphs 1 through 496.
17

18 498. Plaintiff claims that DEFENDANTS LEONARD, PEÑA, SPIRO, CHING, WILSON,
19 BOUFFARD, SARIN intentionally interfered with or attempted to interfere with his civil rights by
20 threats, intimidation, or coercion. To establish this claim Plaintiff will show:
21

22 499. That by threats, intimidation or coercion based on a nonviolent threat with severe consequences,
23 BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused HILL to
24 reasonably believe that if he exercised his right to report misconduct, SARIN or PENA would block
25 him from classes, causing the loss of at least one year of study.
26
27

1 500. Additionally, that by threats, intimidation or coercion based on a nonviolent threat with severe
2 consequences, BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused
3 HILL to reasonably believe that if he did not pay them moneys they knew or should have known
4 were not owed in the amount of \$7934, SARIN or PENA would block him from classes, causing the
5 loss of at least one year of study and interfering in the “fair and just” pursuit of his degree.
6

7 501. Additionally, that by threats, intimidation or coercion based on a nonviolent threat with severe
8 consequences, BOUFFARD, SPIRO, SARIN, PENA, LEONARD, CHING and WILSON caused
9 HILL to reasonably believe that if he did not pay them moneys they knew or should have known
10 were not owed in the amount of \$7934, SARIN or PENA would block him from classes, causing the
11 loss of at least one year of study and interfering in the “fair and just” pursuit of his degree.
12

13 502. Here, in fact, as demonstrated at various times SPIRO, LEONARD, PENA and SARIN did in
14 fact act to interfere with Plaintiff’s pursuit of education.

15 503. Furthermore, that WILSON, CHING and LEONARD, under “color of law” by threats,
16 intimidation or coercion based on a nonviolent threat with severe consequences, caused HILL to
17 reasonably believe that if he did not pay them moneys ALL likely knew or should have known were
18 not owed in the amount of \$7934, SARIN or PENA would be allowed to block him from classes,
19 causing the loss of at least one year of study, as it was clear from their prior communications that
20 they would enforce the “non-intervention” policy.
21

22 504. BOUFFARD, PENA and SARIN intended to deprive the Plaintiff of enjoyment of the interests
23 protected by his contractual rights; here PENA and SARIN, as members of the “EC”, had the ability
24 and controlled the means required to carry out the threats and did in fact carry out the threats even
25 after payment, including blocking or expelling the student from his classes.
26
27

1 505. The Plaintiff was harmed and the harm continues as BOUFFARD, SPIRO, SARIN, and PENA
2 have failed to return moneys owed and have reneged on their contractual and statutory obligations.

3 506. Additionally, DEFENDANTS violated STATE BAR guidelines and regulations, which resulted
4 in the denial of PLAINTIFF's rights to due process and equal protection under the law because the
5 defendants were aware of the required conduct at the time of negligent or intentional lapse.
6

7 507. When made expressly aware of conduct or rule with attached requirement for review, the
8 STATE BAR continued or allowed to continue as the sole regulator in the field, the improper
9 conduct in multiple areas for protracted periods of time conducted by PCL.
10

11 508. Plaintiff alleges that the Defendants acted willfully, maliciously, and fraudulently in coercing
12 Plaintiff to pay Defendants under threat and coercion and duress, and intentionally depriving
13 Plaintiff of not only the money paid to Defendants, but the due process right to lawfully obtain his
14 degree, thereby justifying an award of punitive damages.
15

16 509. Here, the coercion and deprivation of money was also enacted to “disincentivize” student
17 transfer and the exercise of consumer liberty.
18

19 510. Plaintiff alleges that WILSON, CHING, SPIRO, LEONARD, sent emails and text messages in
20 furtherance of the Extortion Scheme, a scheme that was for Defendants' direct pecuniary benefit, and
21 therefore each such email and text message constitutes a separate violation of 18 U.S.C. § 1343,
22 which prohibits the use of wire in interstate or foreign commerce to further any scheme or artifice to
23 defraud.
24

25 **IV. REMEDIES**

26
27

1 511. Plaintiff re-alleges and incorporates by reference each and every allegation contained in
2 Paragraphs 1 through 650.

3
4 512. Plaintiff prays for judgment as follows:

5 513. For a permanent injunction, enjoining PCL Defendants, their employees, agents, servants,
6 representatives, successors, and assigns, any and all persons acting in concert or participation
7 with them, and all other persons, corporations, or other entities acting under, by, through or on
8 their behalf, from doing any of the following until they have first provided a full and complete
9 accounting for all funds received by, and disbursed from; any and all financial accounts of
10 PCL from its inception to the present: (1) expending, disbursing, transferring, encumbering,
11 withdrawing or otherwise exercising control over any funds received by or on behalf of PCL
12 or rightfully due PCL except as authorized by the Court; (2) conducting business of any kind
13 on behalf of, or relating to PCL other than as necessary to assist with disgorgement, transfer
14 or dissolution; and (3) controlling or directing the operations and affairs of any California
15 nonprofit or public benefit corporation;
16
17

18 514. That an order issue directing that PCL Defendants and each of them, render to the Court
19 and to the Plaintiff a full and complete accounting of the financial activities and condition of
20 PCL from their inception to the present, to include the expenditure and disposition of all
21 revenues and assets received by or on behalf of PCL. Upon the rendering of such accounting,
22 that the Court determine the property, real or personal, or the proceeds thereof, to which PCL
23 and other beneficiaries thereof are lawfully entitled, in whatsoever form in whosoever hands
24 they may now be, and order and declare that all such property or the proceeds thereof is
25 impressed with a trust for charitable purposes, that defendants are constructive trustees of all
26
27

1 such charitable funds and assets in their possession, custody or control, and that the same shall
2 be deposited forthwith in Court by each and every defendant now holding or possessing the
3 same or claiming any rights, title or interest therein. In addition, that these defendants be
4 surcharged and held liable and judgment entered against each of them for any and all such
5 assets for which they fail to properly account, together with interest thereon at the legal rate
6 from the date of liability thereon; and that any and all expenses and fees incurred by
7 Defendants in this action be borne by the individual defendants and each of them and not by
8 PCL or any other public or charitable corporation or fund;
9

10
11
12 515. Plaintiff seeks grant of an earned Juris Doctorate and asks for the court to direct specific
13 performance for its delivery to the State Bar as regulator and degree authority.
14

15 516. Plaintiff seeks admission to the Federal Bar and provides an initial attestation in specific support
16 of that request.
17

18 517. Plaintiffs ask for Declaratory relief and for this Court to expressly affirm that Defendant STATE
19 OF CALIFORNIA (“State”) through its monopoly regulatory entity THE STATE BAR has a self-
20 executing, threshold duty to determine the “actual costs” needed to provide law students in all
21 California districts with the opportunity to obtain a sound basic legal education in a manner
22 correspondent with public safety and its statutory obligations, and then to operate in good faith
23 seeking to fully fund its share of such costs and perform its regulatory responsibilities. The State Bar
24 cannot possibly “ensure” its finance system can provide constitutionally sufficient funding until it
25 adheres to this threshold duty, and it apparently will not without this Court’s express affirmation
26 that it must as it has failed to follow the mandates of its own policies or state administrative orders.
27

1 518. For damages resulting from Defendants' violations of RICO and fiduciary duty, Plaintiff
2 seeks an amount to be determined following an accounting, but believed to be more than \$5
3 million, plus interest at the legal rate until the judgment is paid.
4

5 519. Plaintiff also seeks punitive and exemplary damages against Defendants according to proof.

6 520. Plaintiff seeks special damages.
7

8 521. Plaintiff requests that the Court assess civil penalties against all Defendants under California
9 Civil Code section 51 for violating the Unruh Civil Rights Act (Civ. Code§ 51 et seq.) of four
10 thousand dollars (\$4,000) against Defendants for each violation of Business and Professions
11 Code section 17200, as proved at trial, for at least \$100,000.
12

13 522. Under Business and Professions Code section 17206, Plaintiff requests that the Court assess
14 a civil penalty of two thousand five hundred dollars (\$2,500) against Defendants for each
15 violation of Business and Professions Code section 17200, as proved at trial, for at least
16 \$100,000.
17

18 523. By Business and Professions Code section 17536, Plaintiff requests that the Court assess a
19 civil penalty of two thousand five hundred dollars (\$2,500) against Defendants for each
20 violation of Business and Professions Code section 17500, as proved at trial, for at least
21 \$100,000.
22

23 524. Under Business and Professions Code section 17206.1, Defendants and each of them should
24 be ordered to pay a civil penalty of \$2,500 for each violation of Business and Professions Code
25 section 17200 that was perpetrated against a senior citizen or disabled person, as proved at trial,
26 for at least \$500,000.
27

1 525. Pursuant to Business and Professions Code section 17203, Plaintiff seeks a permanent
2 injunction enjoining Defendants, their successors, agents, representatives, employees, and all
3 persons who act in concert with, or on behalf of, defendants from engaging in unfair
4 competition as defined in Business and Professions Code section 17200, including, but not
5 limited to, those acts and omissions alleged in this Complaint.
6

7 526. Plaintiff also requests that the Court order the involuntary dissolution of PCL under
8 Corporations Code section 6518 and establish a procedure for determining the disposition of
9 PCL's assets in a manner consistent with their charitable purposes and consistent with any
10 lawful restrictions that have been placed upon any of their remaining assets or oversight of a
11 Trustee to oversee that appropriate elections are held.
12

13 527. Related to the above, Plaintiff requests that the Court order the permanent removal of the
14 defendants under Corporations Code section 5223 as the Court deems appropriate.
15

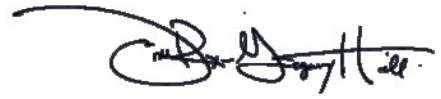
16 528. Plaintiff seeks declaration of his "good faith" indemnification, as such indemnity was
17 unfairly questioned and denied by PCL DEFENDANTS.
18

19 529. For Plaintiff's costs of suit and other costs under Government Code section 12598, and for
20 Plaintiff's attorney fees as provided in Government Code section 12598 and Code of Civil
21 Procedure section 1021.8, and for such other relief as the Court may order.
22
23
24
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27

1 **PLAINTIFF VERIFIES THE TRUTH AND BELIEF IN THE TRUTH OF THOSE MATTERS**
2 **DESCRIBED “UNDER PENALTY OF PERJURY” AND THEREFORE THIS COMPLAINT IS**
3 **DEEMED VERIFIED UNDER THE PROVISIONS OF CODE OF CIVIL PROCEDURE**
4 **SECTION 446.**

5
6 Dated: April 28, 2023

7 Respectfully submitted,
8

9 
10

11 TODD R. G. HILL
12

13 PRO SE LITIGANT
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ATTACHMENT 13



Todd Hill <toddryangregoryhill@gmail.com>

Antitrust Determination Request

13 messages

Todd Hill <toddryangregoryhill@gmail.com>

Sat, Jul 22, 2023 at 10:46 PM

To: Antitrust@calawyers.org, antitrustrequest@calbar.ca.gov, fbi_ncra_duty@fbi.gov

Cc: fbi_ncra_duty@fbi.gov, j3fletch@lasd.org, matt.rodriquez@doj.ca.gov

Bcc: "Christina Gonzalez (christina.marin.gonzalez@gmail.com)" <christina.marin.gonzalez@gmail.com>, "Clemente Franco (cfranco@cfrancolaw.com)" <cfranco@cfrancolaw.com>, Dennis Romero <dennisjromero@gmail.com>, GC@calbar.ca.gov, "Hough, Kris" <kris.hough@sen.ca.gov>, Juan Manuel Sarinana <sarinanaesquire@gmail.com>, "Matt.Hamilton@latimes.com" <matt.hamilton@latimes.com>, Matthew Yates <matthew.yates@calbar.ca.gov>, antitrust@ftc.gov, antitrustrequest@calbar.ca.gov, ctc@calbar.ca.gov, harriett.ryan@latimes.com, jcutler@bloombergindustry.com, joshuah@auditor.ca.gov, judicialcouncil@jud.ca.gov, sydney.hill@sen.ca.gov

This is request for a revised Antitrust determination based on the discovery of new facts.

[REDACTED]

Of note is that the VERY SAME State Bar investigator was assigned to review a case involving 1 of the named defendants [REDACTED] in my case within less than 6 months and at the same time violating the State Supreme Courts 2017 Executive Order detailing the mandatory recusal and COI avoidance requirements.

Of course, correlation is not causation.

But the truth is that I have not been in possession of a single correct copy of my transcript since my matriculation in 2019. 4 years.

PCL has not been in compliance a SINGLE DAY in 4 years. Unlawful unit awards, student harassment, extortion and intimidation, fraud.....the list is multitudinous and ongoing...

Not just my experience..... but that of every student in my understanding since at least 2017 correspondent to a change in administrative control.

Importantly, two questions arise as beggars here?

1. When does individual or group negligence morph into willful misconduct and what is the standard for determination of the difference, if any, between sworn attorneys and the general public?

2. Is a transcript a document for the purposes of the California Corporations Code Section 2255, which makes alterations and omissions of documents a felony.

The irony here is a search warrant was already issued related to a CPC 637 in this matter....

Todd

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Tue, Jul 18, 2023 at 7:32 PM

Subject: Re: You requested an informal transcript

To: administrator <administrator@peoplescollegeoflaw.edu>

CC: Kevin Clinton <antitrust@ftc.gov>, <Antitrust@calawyers.org>, Kevin Clinton <fbi_ncra_duty@fbi.gov>, Kramer, Paul

<paul.kramer@calbar.ca.gov>, Kevin Clinton <Ruben.duran@calbar.ca.gov>, <Jorge.Navarrete@jud.ca.gov>, Kevin Clinton <leaht.wilson@calbar.ca.gov>, <melanie.shelby@calbar.ca.gov>, Sowell, Arnold <arnold.sowell@calbar.ca.gov>, <mark.toney@calbar.ca.gov>, Linda Keller <lkeller@tjisl.edu>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Negligence (§§76, §94, §95, §106, §112, §114): As the entity responsible for regulating law schools and enforcing the State Bar Act of 1927, the State Bar could be held liable for negligence. This could be due to its alleged failure to take substantive action in response to the notifications about potential violations of California law by PCL's agents, Directors & Officers. It is also argued that the State Bar's gross negligence allowed PCL to operate irresponsibly and implement inappropriate public policies or regulatory rules, engaging in protracted egregious conduct.

Breach of Fiduciary Duty (§§84, §103, §106): If the State Bar was aware of PCL's violations and failed to act, it might be seen as a breach of their fiduciary duty. This is especially applicable if they had constructive or express knowledge of PCL's non-compliant status and continued solicitation of students and board participation.

Conflict of Interest and Misrepresentation (§§103, §84): The State Bar could be accused of a conflict of interest, particularly if they knowingly allowed PCL to recruit students without properly informing them of the institution's non-compliant status. In addition, if any of the individual defendants, including SPIRO, GONZALEZ, PENA, and others, made intentional misrepresentations of facts, it could lead to liability for those individuals as well as the institution they represent.

Violation of Fair Business and Debt Collection Practices (§§97, §111, §104): PCL's failure to provide the plaintiff with

accurate records and a proper accounting for the funds they claimed were owed could be seen as a violation of fair business practices and debt collection laws. Under California Business and Professions Code Section § 8330, businesses are required to maintain and provide access to accurate records.

Failure to Uphold Institutional Bylaws and Regulatory Rules (§§78, §79, §89, §103): If PCL and the State Bar failed to uphold and enforce their own bylaws and regulatory rules, such as the "Unaccredited Law School Rules" or the egalitarian decision-making principles outlined in PCL's bylaws, they could face additional liability.

Retaliation (§84): If the individual defendants retaliated against the plaintiff for trying to address compliance issues, this could lead to legal consequences. It's illegal for organizations to retaliate against individuals who attempt to exercise their legal rights or expose illegal practices.

Willful Negligence and Anticompetitive Behavior (§85): The plaintiff's allegations of a pattern of willful negligence and anticompetitive combinations that removed student consumer protections, if proven, could expose PCL and the individual defendants to additional liability, potentially under both state law and federal antitrust law.

d. Specific issues as to State Bar conduct:

Fraudulent Misrepresentation: If the law school administrators knowingly misrepresented the student's grades to them or any other party, there might be grounds for a claim of fraudulent misrepresentation.

Negligence: If there has been an error in recording or reporting the grades, then this could be seen as a form of negligence. If the administrators failed to provide a reasonable standard of care in recording and reporting the grades, the school might be liable for damages.

Breach of Contract: Most students and educational institutions have a form of contract, whether written or implied. The school promised and is required to accurately record and report grades, and failed to do so. More importantly, when the parties were made aware of the conflict or questions of law, they persisted in the conduct. When does mere negligence become gross or reckless? This question goes beyond breach of contract to inquire when something is identified in the civil and penal code.

Breach of Fiduciary Duty: Educational institutions often have a fiduciary duty to their students. If the administrators failed to act in the best interest of the students, they could be held liable for breaching their fiduciary duties.

Privacy Violations: If the administrators were discussing a student's grades inappropriately or sharing the grades without the student's consent, this could potentially be a violation of privacy laws or regulations, like FERPA in the U.S.

As for criminal activity:

Forgery: If an administrator or faculty member changed a student's grades without the student's knowledge or permission, this could potentially be considered forgery.

Identity Theft/Fraud: If any part of the grade-changing process involved impersonating a student or faculty member, or using their login credentials without their permission, this could potentially fall under identity theft or fraud.

Computer Crime/Cybercrime: Unauthorized access to, or manipulation of, computer systems or data may constitute a computer crime or cybercrime.

State Bar - Negligence (§§76, §94, §95, §106, §112, §114): Being responsible for regulating law schools and enforcing the State Bar Act of 1927, the State Bar might be held liable for negligence. The State Bar's alleged failure to respond substantively to the plaintiff's notifications of potential violations of California law by PCL's agents, Directors & Officers could be seen as such. Additionally, the claim that the State Bar, in a grossly negligent manner, allowed PCL to operate and implement inappropriate public policies or regulatory rules could be grounds for negligence.

State Bar - Breach of Fiduciary Duty (§§84, §103, §106): If the State Bar knew about PCL's violations and didn't act, it might be considered a breach of their fiduciary duty. This liability becomes more potent if it can be proved that they had constructive or express knowledge of PCL's non-compliant status and its ongoing solicitation of students and board participation.

State Bar and Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Conflict of Interest and Misrepresentation (§§103, §84): The State Bar might face accusations of a conflict of interest, especially if it knowingly allowed PCL to recruit students without properly disclosing the institution's non-compliant status. Moreover, if the individual defendants, including SPIRO, GONZALEZ, PENA, and others, intentionally misrepresented facts, it could lead to their individual liability as well as liability for the institution they represent.

PCL - Violation of Fair Business and Debt Collection Practices (§§97, §111, §104): PCL's failure to provide the plaintiff with accurate records and a proper accounting for the funds they claimed were owed could be construed as a violation of fair business practices and debt collection laws. Under California Business and Professions Code Section § 8330, businesses are mandated to maintain and provide access to accurate records.

PCL and State Bar - Failure to Uphold Institutional Bylaws and Regulatory Rules (§§78, §79, §89, §103): Potential liability could arise if PCL and the State Bar failed to uphold and enforce their own bylaws and regulatory rules, such as the "Unaccredited Law School Rules" or the egalitarian decision-making principles in PCL's bylaws.

Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Retaliation (§84): If the individual defendants retaliated against the plaintiff for his attempts to address compliance issues, this could lead to their individual liability. Retaliation against individuals who seek to exercise their legal rights or expose illegal practices is prohibited by law.

PCL and Individual Defendants (SPIRO, GONZALEZ, PENA, and others) - Willful Negligence and Anticompetitive Behavior (§85): The plaintiff's allegations of a pattern of willful negligence and anticompetitive combinations that removed student consumer protections, if proven, could expose PCL and the individual defendants to additional liability, potentially under both state law and federal antitrust law.

g. Spiro misrepresented the facts in his motion in opposition, indicating that I had never told him or attempted to meet with him on the filing of the SFAC (attached); I have provided you with additional evidence of the false submission for you to further review. Below the list of accompanying documents, please also see a relevant email chain.

Thanks for the time and attention taken to re-open and review this matter.

When might I reasonably expect a response?

Todd

SPIRO MOTION IN OPPOSITION TO SUPPLEMENTED FAC 05212023.pdf (362K)

email to spiro with SFAC 05052023.pdf (77K)

TRANSCRIPT 08-29-22 with full Civ Pro Grades & cover letter (2).pdf (114K)

Todd Hill Eviction Defense Timesheet - Clinical Course v6.xls (208K)

Todd Hill Criminal Defense Timesheet - Clinical Course v7.xls

(3,027K)

(5,433K)

Email exchange below because I have NEVER received accurate transcripts. I claim the scheme was to disincentivize transfer. Waiting 3 years for a transcript?

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Mon, Jul 17, 2023 at 1:16 PM

Subject: Re: You requested an informal transcript

To: administrator <administrator@peoplescollegeoflaw.edu>

Cc: Edith Pomposo <dean@peoplescollegeoflaw.edu>, Kevin Clinton <natalie.leonard@calbar.ca.gov>, Kevin Clinton <leaht.wilson@calbar.ca.gov>, Kevin Clinton <hectorpena@ucla.edu>, Kramer, Paul <paul.kramer@calbar.ca.gov>, <melanie.shelby@calbar.ca.gov>, Sowell, Arnold <arnold.sowell@calbar.ca.gov>, <brandon.stallings@calbar.ca.gov>, Kevin Clinton <audrey.ching@calbar.ca.gov>, Elena Popp <elenaipopp17@gmail.com>, Héctor C. Peña Ramírez <hpena@peoplescollegeoflaw.edu>, <mark.toney@calbar.ca.gov>, Kevin Clinton <Ruben.duran@calbar.ca.gov>, <president@peoplescollegeoflaw.edu>, <president@peoplescollegeoflaw.edu>, Rebecca Hirsch <registrar@peoplescollegeoflaw.edu>

Dear Administrator,

While I acknowledge your response, I must say I find it exasperating in its tone and content.

You suggest that this process is subject to time-consuming procedures, with the handbook quote of the Dean needing 30 days to reach a decision on transcript changes. However, it's worth emphasizing that **my previous requests date back**

years, not days. It's not as if this issue has suddenly sprung up out of nowhere. Your invocation of policy at this juncture seems more like a deflection rather than a genuine effort to solve the issue at hand and produce the required documents.

Your contention that former Dean Spiro does not issue grades is accurate but misrepresents the facts. The course logs provided should suffice for the validation of my clinical grades, and it's unreasonable to require validation from instructors who may be difficult to reach years after the course completion. You may remember that both the clinicals in question were indeed offered by PCL and completed by me - facts that have not been contested.

I provided Ms. Popp's contact details to facilitate the process. However, it seems like you are using this as another delay tactic, rather than an opportunity to expedite the process. Moreover, there's no indication of a "dispute" related to Mr. Kapelovitz' Criminal Defense clinical; Please confirm and produce corrections for that uncontested work.

You mention keeping the board informed and planning to update them tomorrow. I would appreciate it if you could expedite this process, given my impending application deadlines and their assumed roles and statutory responsibilities.

In addition, your email didn't answer my earlier question about the names of the "current"; please provide them per school policy and as proscribed under statute.

Your communication, while appearing comprehensive on the surface, fails to address the central issue: the pressing need for a resolution. Your assertions of working on the issue don't equate to tangible progress. I still don't have a corrected transcript, and I am still unclear on when I will receive it.

I implore you to approach this issue with the urgency it deserves. The repercussions of this discrepancy are not merely theoretical; they have real present consequences and future negative implications for my educational and professional trajectory.

Remember, TIME IS OF THE ESSENCE!

I expect a prompt resolution and a rectified transcript without further delay.

Regards,

Todd

On Sat, Jul 15, 2023 at 8:54 PM administrator <administrator@peoplescollegeoflaw.edu> wrote:

As I indicated the information that I had on Elena Popp was not current. I have attempted to contact her office but that is going to take time. The fact that you gave me her name is good, but it is only step 1.

Former Dean Spiro did not and does not issue grades. Instructors do. The instructor must validate the grade.

The policy concern is that the Dean must investigate transcript discrepancies. By definition, this requires time and runs into the practical issue of former instructors who are attorneys responding to inquiries. See page 15, section E "changes to transcript" where the Dean investigates ("Dean must investigate the facts and circumstances" section 2) to the section where the Dean has 30 days to reach a decision on Transcript changes (section 3), in the handbook available online.

That's 30 days after you submitted a request.

Staff, including myself keep the board informed. Since you were on the board, you know of the general time frame. As I write this, I will be informing the board tomorrow.

I have been forthcoming with you as to the progress we are making. I am responding to your emails to let you know we are working on the issue. I have told you we contacted one of your instructors. I am communicating with you. However, I am limited by what exists before me in the record. I am doing my best to ascertain what happened but again, I am limited by the ascertainable facts.

Rest assured we will notify you of further progress.

On Jul 14, 2023, at 12:54 PM, Todd Hill <toddryanggregoryhill@gmail.com> wrote:

Roger (although I am not sure who this is in fact.....)

The Board is already well aware of the issues here and has been for years. The deadline for Loyola is tomorrow, July 15, 2023. Of course, the courses requiring credit were definitively offered by PCL and taken by me, and there is no reason you have stated or expression of doubt related to any of what I have presented as untrue.....in fact it is clearly the opposite, for why would the Board have to approve a grade correction or approve that a transcript actually reflect the students PAST solicited and completed participation?

And there is the matter of the "ultra vires" status of the Board, which no one has denied, even rhetorically. One point and five questions follow:

1. This seems like another stalling tactic. I have included Elena Popp so that you may be able to more quickly reconcile any concerns you may have and facilitate generation of the corrected records, now long overdue. That said:

It should not be necessary to "RECREATE" anything and SPIRO can certainly confirm the course of study, so reaching out to Ms. Popp should not be necessary; what if she was completely unreachable?

2. Please indicate what "policy concerns" there are and where they are located in the Student Handbook or other governing authority relevant to the school and this topic?

3. Who will be communicating with "the Board" and in what time frame?

4. When will you be able to provide me with an accurate transcript?

5. Please provide the names of the current individuals claiming Board Membership?

I look forward to receipt of the corrected record and transcript. I have already waited three years for an accurate copy of my record.

Thanks for the update. TIME IS OF THE ESSENCE.

Todd

On Fri, Jul 14, 2023 at 12:10 PM administrator <administrator@peoplescollegeoflaw.edu> wrote:

I am making progress on recreating what happened. Unfortunately, I do not have current contact info for Elena Popp. Also, my work will have to be discussed with the board for policy reasons. I am mostly focused on the summer courses you indicated you took.

On Jul 12, 2023, at 3:37 PM, Todd Hill <toddryangregoryhill@gmail.com> wrote:

Thanks, I look forward to hearing from you.

Todd

On Wed, Jul 12, 2023 at 3:11 PM administrator <administrator@peoplescollegeoflaw.edu> wrote:

I should have an update for you by the end of the week.

On Jul 11, 2023, at 6:18 PM, Todd Hill <toddryangregoryhill@gmail.com> wrote:

Roger,

Hope all is well.

Any updates?

Todd

On Mon, Jul 10, 2023 at 3:43 PM administrator <administrator@peoplescollegeoflaw.edu> wrote:

I am looking into this. I will try and resolve this matter soon.

On Jul 10, 2023, at 12:49 PM, Todd Hill
<toddryangregoryhill@gmail.com> wrote:

Roger,

Thank you for your email response. I attach the last record I received from one of your predecessors, Ms. Adriana Zuniga. I also attach the logs for the two clinicals

The PCL official record was clearly altered, since you can see that at least one grade is different. [see Real Property III C+ earned and known recorded versus C- entered.] My understanding is that access to make grade changes in Populi is closely held and extremely limited.

The two clinicals undertaken and performed in Summer 2020 are missing. (Dan Kapelovitz - Criminal Defense) and (Elena Popp - Eviction Defense) I presume were P/NP for grading purposes, but the units are still viable. I have included my complete time and activity logs from Summer 2020, prior timely issued to the faculty, including Mr. Spiro, at course completion. You see that essentially

Eviction Defense: 120.5 hours / 8 weeks ≈ 15 hours per week - 5 unit course?.

Criminal Defense: 117.8 hours / 11 weeks ~ 10 hours per week - 4 unit course?

Hope this helps. It would be nice to know the record is corrected in all of the appropriate places for purposes of posterity. I believe it is a duty you have assumed and thus you have a duty to provide the appropriately corrected documents and to see to the changes being applied.

Your status as "new" is not lost upon me.

The circumstances here are unfortunate but I bear no grudge against PCL, as an entity, or those who reasonably support its mission.

I am not vindictive nor am I in the wrong. We do not know each other, and I am inclined to believe in your good intent or that "nice words and lulling tones" and a "past history" convinced you to take on a challenging role for the cause. There is nothing non-laudable in the intention. I have no interest in promulgating false or frivolous claims.

In my experience at the school, what happens is that one is placed in a series of "uncomfortable", "last minute", and "impossible workload" paradoxes, and that through negligence or good intent poorly applied end up "mired in the bog" because no one told them (intentionally) that there was a bog under the carpet in their office. Once clearly liable, the "logic of the culpable"

and a series of rationalizations follows inappropriate conduct.

Unfortunately, I believe it is a fairly argued question that when a person assumes a role they might necessarily subsume certain duties and obligations and that this may at times give rise to joint and several liability because issue or enterprise is ongoing. For rhetorical example, it is impossible to ratify an ultra vires Board; What are your duties if you have knowledge that one is operating? Who are they to?

I hope this assists you in providing me with a correct and updated record promptly, as the application deadlines for Loyola and other schools are imminent.

TIME IS OF THE ESSENCE!

Thank you for your time and attention.

Todd

On Mon, Jul 10, 2023 at 11:07 AM administrator
<administrator@peoplescollegeoflaw.edu> wrote:

Hello, Todd. Attached is a PDF and a letter explaining and memorializing what we talked about.

Hope this finds you well.

...R.

<TRANSCRIPT 08-29-22 with full Civ Pro Grades & cover letter (2).pdf><Todd Hill Criminal Defense Timesheet - Clinical Course v7.xls><Todd Hill Eviction Defense Timesheet - Clinical Course v6.xls>

8 attachments



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email to spiro with SFAC 05052023.pdf
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SPIRO MOTION IN OPPOSITION TO SUPPLEMENTED FAC 05212023.pdf
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Todd Hill Eviction Defense Timesheet - Clinical Course v6.xls
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HILL v STATE BAR and PEOPLES COLLEGE of LAW SFAC Complaint 223cv01298JLSPDx 050523_.pdf
927K

Todd Hill <toddryangregoryhill@gmail.com>

Sat, Jul 22, 2023 at 10:57 PM

To: Brenda Young <bharrisonyoung@outlook.com>, Law Offices <vesta@pticom.com>, Norman Young <ngyoung1@outlook.com>

Bcc: echemerinsky@law.berkeley.edu

What do you think the response will be?

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Sat, Jul 22, 2023 at 11:00 PM

To: Justin Beck <justintimesd@gmail.com>

What do you think their response will be?

[Quoted text hidden]

8 attachments



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Todd Hill <toddryangregoryhill@gmail.com>

Sun, Jul 23, 2023 at 2:02 AM

To: asheeler@sacbee.com

Mr. Sheeler,

On the surface this might appear to be a trivial "student" dispute with a law school and the regulator.

Section 6001.1 of the State Bar Act is "Protection of the public is the highest priority no matter the conflict of interest."

Please feel free to contact me if you have any questions.

Todd

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8 attachments



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Todd Hill <toddryangregoryhill@gmail.com>

Mon, Jul 24, 2023 at 12:47 AM

To: Amanda Hill <amanda.s.h.2001@gmail.com>, Ulysses Hill <uly.j.h.2004@gmail.com>

What's the maneuver?

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Sat, Jul 22, 2023 at 10:46 PM

Subject: Antitrust Determination Request

To: <Antitrust@calawyers.org>, <antitrustrequest@calbar.ca.gov>, <fbi_ncra_duty@fbi.gov>

CC: <fbi_ncra_duty@fbi.gov>, <j3fletch@lasd.org>, <matt.rodriquez@doj.ca.gov>

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Todd Hill <toddryangregoryhill@gmail.com>

Mon, Jul 24, 2023 at 7:04 AM

To: James Kosnett <jameskosnett@kosnettlaw.com>

FYI

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Sat, Jul 22, 2023 at 10:46 PM

Subject: Antitrust Determination Request

To: <Antitrust@calawyers.org>, <antitrustrequest@calbar.ca.gov>, <fbi_ncra_duty@fbi.gov>

CC: <fbi_ncra_duty@fbi.gov>, <j3fletch@lasd.org>, <matt.rodriguez@doj.ca.gov>

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Todd Hill <toddryangregoryhill@gmail.com>

To: Carl@douglashickslaw.com

Mon, Jul 24, 2023 at 7:04 AM

FYI

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Sat, Jul 22, 2023 at 10:46 PM

Subject: Antitrust Determination Request

To: <Antitrust@calawyers.org>, <antitrustrequest@calbar.ca.gov>, <fbi_ncra_duty@fbi.gov>

CC: <fbi_ncra_duty@fbi.gov>, <j3fletch@lasd.org>, <matt.rodriguez@doj.ca.gov>

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Todd Hill <toddryangregoryhill@gmail.com>

Mon, Jul 24, 2023 at 12:48 PM

To: amy.quist@sen.ca.gov

Cc: Sydney Hill <sydney.hill@sen.ca.gov>, scott.wilk@sen.ca.gov

Dear Ms. Quist and Senator Wilk,

I hope this letter finds you in good health and spirits. This is a formal request for a meeting.

My name is Todd Hill, a former student of the Peoples College of Law (PCL) and a resident of your constituency. Throughout my studies at PCL, I developed a strong belief in the power of law as a tool for achieving social justice. This belief led me to serve on PCL's Board of Directors, and eventually, I was entrusted with the role of Secretary of the corporation. I sought to use these positions to ensure the school was upholding its mission and serving its students to the best of its ability.

However, throughout my tenure at PCL, I noticed several discrepancies that conflicted with the school's mission, integrity, and compliance with both state and federal regulations. I made numerous attempts to rectify these issues, but my efforts were met with resistance and even retaliation.

Consequently, I informed the State Bar, initially as a student and ultimately in my capacity as fiduciary and corporate officer. The State Bar may have failed here to operate within the bounds of law; if so, then the Judiciary has failed to curtail the misconduct, although it issues clear mandates related to antitrust and other operational concerns.

See email communications below and attached documents for clear and compelling evidence of my claims.

The allegations are severe and point towards breaches of fiduciary duty and contract, violations of the implied covenant of good faith and fair dealing, negligence, unfair business practices, and false advertising. They also suggest possible RICO-like anticompetitive behavior, violation of California Business and Professions Code Section 8330, retaliation, and violation of Government Code section 11342.600.

These allegations do not merely reflect my personal grievances. They expose a systemic problem that could undermine public trust in our educational and legal institutions, potentially causing irreparable harm to our community.

As we find ourselves in an election year, I believe that our shared commitment to transparency, justice, and service to the public becomes even more crucial as an opportunity to foment substantive change in the current regime.

Therefore, I kindly request a meeting with you at your earliest convenience to discuss these serious allegations and potential corrective measures. I am confident that with your influence and support, we can address this issue and reaffirm our community's trust in our institutions.

Thank you for your attention to this critical matter. I understand that your schedule is incredibly demanding, and I am willing to accommodate it to ensure this important conversation happens. I look forward to your favorable response.

Sincerely,

Todd Hill

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Sat, Jul 22, 2023 at 10:46 PM

Subject: Antitrust Determination Request

To: <Antitrust@calawyers.org>, <antitrustrequest@calbar.ca.gov>, <fbi_ncra_duty@fbi.gov>

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Quist, Amy <Amy.Quist@sen.ca.gov>

Mon, Jul 24, 2023 at 1:55 PM

To: Todd Hill <toddryangregoryhill@gmail.com>

Hello Mr. Hill,

Thank you for your request to meet with Senator Wilk. Unfortunately he will not be able to meet.

Thanks and have a great day!

Respectfully,

AMY QUIST

EXECUTIVE ASSISTANT/SCHEDULER

OFFICE OF SENATOR SCOTT WILK

1021 O St. Suite 7140 Sacramento, CA 95814

Office: 916.651.4021

WWW.SENATE.CA.GOV/WILK



Sign up for Senator Scott Wilk's Updates, Click [HERE](#)

Please consider the environment before printing this e-mail.

****Please note for scheduling requests****

Meetings are subject to change or substitution of staff should the Senator become unavailable.

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>
To: "Quist, Amy" <Amy.Quist@sen.ca.gov>

Mon, Jul 24, 2023 at 1:57 PM

Amy,

Thanks for your quick response.

Please cite the reasoning for not taking the meeting?

Todd

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Wed, Jul 26, 2023 at 6:41 PM

To: cdavidson@engine.systems, "jheupel@engine.systems" <jheupel@engine.systems>

Cc: "RE: CASE 2:23-cv-01298-JLS-PDx TODD HILL, STATE BAR, PEOPLES COLLEGE" <sydney.hill@sen.ca.gov>

Ms. Davidson,

Per your inquiry regarding my reason for exit from PCL:

PCL has not been in compliance one day in 4 years. Unlawful unit awards, student harassment, extortion and intimidation, fraud.....the list is multitudinous....

Board Executive Committee 7-20-23 THILL Public Comment

<https://youtu.be/k8x7UeHxJNY?t=416>

<https://youtu.be/xKNQARrCWR4?t=86>

PCL communicated to me today their intent to have my complete and updated transcript by COB tomorrow.

Todd

----- Forwarded message -----

From: **Todd Hill** <toddryangregoryhill@gmail.com>

Date: Sat, Jul 22, 2023 at 10:46 PM

Subject: Antitrust Determination Request

To: <Antitrust@calawyers.org>, <antitrustrequest@calbar.ca.gov>, <fbi_ncra_duty@fbi.gov>

Cc: <fbi_ncra_duty@fbi.gov>, <j3fletch@lasd.org>, <matt.rodriquez@doj.ca.gov>

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Candi Davidson <cdauidson@engine.systems>

Thu, Jul 27, 2023 at 9:44 AM

To: Todd Hill <toddryangregoryhill@gmail.com>, Jaye Heupel <jheupel@engine.systems>

Hey Todd,

Thank you for providing this information, I am sorry you have to go through all of this with Peoples College.

I just want to clarify, did you voluntarily leave the program at People's College? Or were you dismissed? I just want to be sure before I reach out to academics at ALU to see if we can accept this as the exit reason or if we absolutely need to have it printed on the transcript.

Thank you,

Candi Davidson

Administrative Candidate Manager | Engine Systems
(323) 593-6488
cdauidson@engine.systems

From: Todd Hill <toddryangregoryhill@gmail.com>**Sent:** Wednesday, July 26, 2023 7:41 PM**To:** Candi Davidson <cdauidson@engine.systems>; Jaye Heupel <jheupel@engine.systems>**Cc:** RE: CASE 2:23-cv-01298-JLS-PDx TODD HILL, STATE BAR, PEOPLES COLLEGE <sydney.hill@sen.ca.gov>**Subject:** Re: Antitrust Determination Request

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com>

Thu, Jul 27, 2023 at 11:21 AM

To: Candi Davidson <cdauidson@engine.systems>

What follows is an oversimplification:

They breached their contract. That said, PCL did apply to have me graduate and the application should have succeeded; so I was not dismissed.....they did not have any additional classes to offer me and there was bad behavior on their part.

I will forward additional info on what was acceptable to the State Bar at the time.

At this point, I suspect there will not be any issues beyond those requisite for compliance for any course of action you take related to mitigation of this situation.

At this stage the State Bar is also aware that the SBA 4-year requirement and other portions of the law are likely unconstitutional in this context.

Todd

[Quoted text hidden]

ATTACHMENT 14

STUDENT NAME: TODD HILL

NAME of COURSE: Criminal Defense Clinical

Hours Total: **117.8**

Date:	Hours:	Task
05/24/20	1.0	Conversation wit D. Kapelovitz re: class structure and initial case. (ESP - knife fight)
06/04/20	0.8	Conversation wit D. Kapelovitz re: class structure and initial case. (ESP - knife fight)
06/04/20	1.5	Initial document review. Preliminary question set
06/05/20	0.5	Conversation wit R. Wymms re: work approach. (ESP - knife fight)
06/05/20	7.5	Body cam footage review. Question
06/08/20	2.0	Case questions starter completion and submission
06/08/20	2.0	First Class via Zoom
06/15/20	2.0	Class via Zoom
06/27/20	0.8	Conversation with D. Kapelovitz, Case #2 (Sexual Assault)
06/28/20	1.0	Initial case file review
06/29/20	2.0	Case file review and initial questions documentation
06/29/20	3.0	Class via Zoom
07/06/20	3.0	Class via Zoom
07/07/20	3.5	Review of Cunningham v. California; People v. Black
07/08/20	2.0	Blakely v. Washington; Apprendi v. New Jersey
07/11/20	2.0	Meeting with Nicole R. re Case Assignment via Zoom
07/13/20	3.0	Class via Zoom - Issues with Witness Identification
07/14/20	3.0	Strickler v. Greene
07/16/20	2.0	Evans v. Superior Court
07/20/20	3.3	Class via Zoom
07/22/20	2.0	People v. Rodriguez
07/25/20	2.0	Assigned Case Review
07/26/20	0.5	Case review call with Dan
07/26/20	1.0	4th Amendment
07/26/20	4.0	Strickland v. Washington; Lee v. United States
07/27/20	2.0	Class via Zoom - Immigration Implications
07/28/20	3.0	Gilbert v. Municipal Court
07/29/30	6.0	Brady v. Maryland; Riley v. California
07/31/20	4.0	McQuiggin v. Perkins
08/01/20	5.0	Motions review
08/02/20	3.0	Kimmelman v. Morrison
08/03/20	3.0	Class via Zoom - Prosecutors
08/04/20	7.0	People v. Howard; Case review
08/04/20	1.0	Case review call with Dan
08/10/20	3.0	Class
08/13/20	6.0	Commonwealth v. Redline;
08/17/20	3.0	Class; Jim Allard guest speaker.
08/18/20	4.0	995 Motion reviews
08/18/20	3.0	Garabedian v. Superior Court of San Francisco; People v. Kuhn; People v. Leutholtz
08/19/20	2.0	People v. McKee; People v. McMurchy
08/21/20	4.0	Lemus (waiting for BWC footage)
08/22/20	3.5	United States v. Robinson; Riley v. California; Brightline rules.

ATTACHMENT 15

STUDENT NAME: Todd Hill

NAME of COURSE: Eviction Defense Clinical Course

Total Hours: 69.0

Date:	Hours:	Task
07/08/20	4.0	Review of C. Sanabria UD action
07/08/20	1.0	C. Sanabria UD Appeal Client call
07/09/20	2.0	JRPC v. Ramos Oppo Review/ Comments
07/10/20	1.8	Daily Zoom Meeting/ Case status briefings
07/13/20	1.0	Daily Zoom Meeting/ Case status briefings
07/15/20	2.3	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/15/20	1.0	Client inquiry response
07/17/20	1.0	Client interview and onboarding/update activity
07/15/20	1.0	EDN Staffing Pattern Proposal Funding Spreadsheet Review
07/20/20	2.5	Eviction process video assignment (per Ira)
07/20/20	1.5	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/21/20	2.0	Daily Zoom Meeting/ Case status briefings / ACT and Slack training
07/22/20	1.0	Daily Zoom Meeting / Case status briefings
07/23/20	1.5	Daily Zoom Meeting / Case status briefings
07/24/20	1.5	Daily Zoom Meeting/ Case Status briefings
7/27/2020	0.5	R. Ortiz; emails and communications.
07/27/20	1.5	Daily Zoom Meeting / Case status briefings
07/28/20	0.3	Client call; appointment setting.
07/28/20	1.5	Client call and email response.
07/28/20	1.5	Daily Zoom Call / Case status briefings
07/28/20	2.0	Call and prep with client (DR)
07/28/20	1.8	Call, intial response to Elena's questions (RO)
07/29/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/29/20	1.5	Daily Zoom Call
07/30/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/30/20	1.0	Daily Zoom Call
07/30/20	0.5	Hurley inquiry call
07/30/20	0.8	Mia inquiry call
07/31/20	0.8	Communications related to case 20STUD0617
07/31/20	1.0	ACT! AND Slack review
07/31/20	1.5	Daily Zoom Call / Case status briefings
08/03/20	1.8	Daily Zoom Call / Case status briefings
08/04/20	8.0	Call log, referrals, admin, etc.
08/04/20	0.5	Daily Zoom Call / Case status briefings
08/05/20	1.0	Daily Zoom Call / Case status briefings
08/07/20	1.3	Ask An Attorney - Ramon Ortiz, Rocio Castellano
08/07/20	1.5	Daily Zoom Call / Case status briefings
08/10/20	1.0	RC / RO client calls
08/10/20	1.0	Daily Zoom Call / Case status briefings

STUDENT NAME: Todd Hill

NAME of COURSE: Eviction Defense Clinical Course

Total Hours: 120.5

Date:	Hours:	Task
06/29/20	4.0	Initial Class Meeting and AB 1486 Presentation
06/29/20	1.0	Daily Zoom Meeting/ Case status briefings
07/01/20	1.5	Daily Zoom Meeting/ Case status briefings
07/01/20	1.0	AB 1436 review and credit reporting language suggestions..
07/02/20	0.5	Daily Zoom Meeting/ Case status briefings
07/02/20	3.0	Arrieta v. Mahon; Drouet v. Superior Court
07/06/20	2.0	Dennis Block interview and summary document production
07/06/20	1.0	Daily Zoom Meeting/ Case status briefings
07/06/20	2.0	Ellis Act Tenant Eviction Document research and Document Production
07/07/20	2.3	Ellis Act Tenant Eviction Document research and Document Production
07/07/20	0.5	Conversation with Q. Fisher re Ellis Act Info Sheet
07/07/20	1.0	Ellis Act Tenant Eviction Document research and Document Production
07/08/20	4.0	Review of C. Sanabria UD action
07/08/20	1.0	Daily Zoom Meeting/ Case status briefings
07/08/20	1.0	C. Sanabria UD Appeal Client call
07/09/20	2.0	JRPC v. Ramos Oppo Review/ Comments
07/09/20	1.0	Daily Zoom Meeting/ Case status briefings
07/10/20	1.8	Daily Zoom Meeting/ Case status briefings
07/13/20	1.0	Daily Zoom Meeting/ Case status briefings
07/13/20	2.0	Completion of Ellis Act document.
07/14/20	3.0	Training for Eviction Process via Zoom and client response.
07/15/20	2.3	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/15/20	1.0	Client inquiry response
07/17/20	1.0	Client interview and onboarding/update activity
07/15/20	1.0	EDN Staffing Pattern Proposal Funding Spreadsheet Review
07/20/20	2.5	Eviction process video assignment (per Ira)
07/20/20	1.5	Daily Zoom Meeting/ Case status briefings / Planning for self-service centers/ Grant
07/21/20	2.0	Implied Warranty of Habitability Rules Coverage
07/21/20	3.0	Green v. Superior Court
07/21/20	2.0	Daily Zoom Meeting/ Case status briefings / ACT and Slack training
07/22/20	2.0	Zoom Class with Dean Ira Spiro
07/22/20	1.0	Daily Zoom Meeting
07/23/20	1.5	Daily Zoom Meeting
07/23/20	3.5	Hinson v. Delis; Knight v. Hallsthammar
07/24/20	1.5	Daily Zoom Meeting
7/27/2020	0.5	R. Ortiz; emails and communications.
07/27/20	2.5	UD Discovery with Ira Spiro
07/27/20	1.5	Daily Zoom Meeting
07/28/20	2.3	Class via Zoom; S. Chandra guest speaker
07/28/20	0.3	Client call; appointment setting.
07/28/20	1.5	Client call and email response.
07/28/20	1.5	Daily Zoom Call
07/28/20	2.0	Call and prep with client (DR)
07/28/20	1.8	Call, intial response to Elena's questions (RO)

07/29/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/29/20	1.5	Daily Zoom Call
07/30/20	6.0	Client conversations; interview briefs; email communications; responses; DB updates; referral prep
07/30/20	1.0	Daily Zoom Call
07/30/20	4.0	Orozco v. Casimiro; Beasley v. Wells Fargo Bank; Hitz v. First Interstate Bank
07/30/20	0.5	Hurley inquiry call
07/30/20	0.8	Mia inquiry call
07/31/20	0.8	Communications related to case 20STUD0617
07/31/20	1.0	ACT! AND Slack review
07/31/20	1.5	Daily Zoom Call
08/03/20	3.0	Ex parte motion review; Industrial Indemnity Co. v. Levine
08/03/20	1.8	Daily Zoom Call
08/04/20	2.0	Class via Zoom;
08/04/20	8.0	Call log, referrals, admin, etc.
08/04/20	0.5	Daily Zoom Call
08/05/20	1.0	Daily Zoom Call
08/07/20	1.3	Ask An Attorney - Ramon Ortiz, Rocio Castellano
08/07/20	1.5	Daily Zoom Call
08/10/20	1.0	RC / RO Calls
08/10/20	1.5	Daily Zoom Call
08/11/20		

ATTACHMENT 16



People's College of Law

660 S. Bonnie Brae, L.A., CA 90057 Tel.:

213 483-0083 Fax: 213 483-2981

E-mail: administrator@peoplescollegeoflaw.edu

"Over 48 Years of Educating People's Lawyers"

August 29, 2022

Sent via Certified Mail

Todd Hill
41459 Almond Avenue
Palmdale, CA 93551

RE: Incomplete Transcript/Updated Transcript

Dear Mr. Hill,

I received an email from Professor Cyrus Whittaker regarding your incorrect transcript. Enclosed herein please find an updated official transcript. I apologize for the delay and inconvenience this may have caused. Should you have any objections with the grades reflected on your transcript, please follow the procedures in the Student Handbook.

Sincerely,

A handwritten signature in black ink, appearing to read "Adriana Zuniga Nunez", with a long, flowing horizontal line extending to the right.

Adriana Zuniga Nunez, JD
Administrator/Registrar
People's College of Law

Peoples College of Law

Official Transcript

660 S. Bonnie Brae, Los Angeles, CA 90057

Phone: (213)483-0083, Fax:

RECIPIENT:

STUDENT:

Hill, Todd

Student ID: 007-2019

SSN (Last 4):

Enrollment Date: Sep 3, 2019

Previous Degree(s): BA

Degrees/Certificates

Juris Doctorate

Pursuing as of 9/3/2019

Transcript

2019-2020: Fall Quarter - 09/03/2019 - 11/15/2019

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT I	Contracts I	30.00	3.00	A	12.00
LEGAL WRTG I	Legal Writing I	30.00	3.00	A-	11.10
TORT I	Torts I	30.00	3.00	A-	11.10
Totals		90.00	9.00	Term GPA: 3.80	Cum. GPA: 3.80

2019-2020: Winter Quarter - 11/18/2019 - 02/21/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT II	Contracts II	30.00	3.00	A	12.00
CRIM L I	Criminal Law I	30.00	3.00	C-	5.10
LEGAL WRTG II	Legal Writing II	30.00	3.00	B+	9.90
TORT II	Torts II	30.00	3.00	B-	8.10
Totals		120.00	12.00	Term GPA: 2.93	Cum. GPA: 3.30

2019-2020: Spring Quarter - 03/02/2020 - 05/15/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONT III	Contracts III	30.00	3.00	A	12.00
CRIM L II	Criminal Law II*	30.00	3.00	A-	11.10
LEGAL WRTG III	Legal Writing III	30.00	3.00	A	12.00
TORT III	Torts III*	30.00	3.00	A-	11.10
Totals		120.00	12.00	Term GPA: 3.85	Cum. GPA: 3.50

2020-2021: Fall Quarter - 08/31/2020 - 11/13/2020

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L I	Constitutional Law I*	30.00	3.00	A-	11.10
CRIM PROC I	Criminal Procedure I*	30.00	3.00	A-	11.10
TRIAL ADVOC	Trial Advocacy	30.00	3.00	P	--
Totals		90.00	9.00	Term GPA: 3.70	Cum. GPA: 3.53

2020-2021: Winter Quarter - 11/14/2020 - 02/26/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L II	Constitutional Law II*	30.00	3.00	A	12.00
CRIM PROC II	Criminal Procedure II*	30.00	3.00	A+	12.90
REM I	Remedies I*	30.00	3.00	C	6.00
WILLS/TR I	Wills & Trusts*	30.00	3.00	B-	8.10
Totals		120.00	12.00	Term GPA: 3.25	Cum. GPA: 3.46

2020-2021: Spring Quarter - 03/01/2021 - 05/14/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
CONST L III	Constitutional Law III*	30.00	3.00	A	12.00

LEGAL RES	Legal Research	30.00	3.00	P	--
REM II	Remedies II*	30.00	3.00	D+	3.90
WILLS/TR II	Wills & Trusts II*	30.00	3.00	B	9.00
Totals		120.00	12.00	Term GPA: 2.77	Cum. GPA: 3.36

2021-2022: Fall Quarter - 08/30/2021 - 11/13/2021

Course #	Name	Earned Hours	Earned Units	Grade	Points
BUSN	Business Transactions Clinical Course	30.00	3.00	B+	9.90
TRANS					
CLINIC					
CIV PROC I	Civil Procedure I*	30.00	3.00	A+	12.90
EVID I	Evidence I*	30.00	3.00	A-	11.10
REAL PROP I	Real Property I*	30.00	3.00	B+	9.90
Totals		120.00	12.00	Term GPA: 3.65	Cum. GPA: 3.41

2021-2022: Winter Quarter - 11/15/2021 - 02/19/2022

Course #	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC II	Civil Procedure II*	30.00	3.00	A+	12.90
CORP & BUS ASSOC	Corporations & Business Associations*	30.00	3.00	B	9.00
EVID II	Evidence II*	30.00	3.00	A-	11.10
REAL PROP II	Real Property II*	30.00	3.00	C	6.00
Totals		120.00	12.00	Term GPA: 3.25	Cum. GPA: 3.39

2021-2022: Spring Quarter - 02/28/2022 - 05/14/2022

Course #	Name	Earned Hours	Earned Units	Grade	Points
CIV PROC III	Civil Procedure III*	30.00	3.00	C-	5.10
CMTY PROP	Community Property*	30.00	3.00	C-	5.10
PROFL RESP	Professional Responsibility*	30.00	3.00	D	3.00
REAL PROP III	Real Property III*	30.00	3.00	C+	6.90
REM II	Remedies II*	--	--	AUD	--
Totals		120.00	12.00	Term GPA: 1.68	Cum. GPA: 3.17

Cumulative


	Earned Hours	Earned Units	Points	GPA
Resident	1,020.00	102.00	304.50	3.17
Transfer	0.00	0.00	0.00	0.00
Overall	1,020.00	102.00	304.50	3.17

- (1) One semester unit is defined as fifteen (15) hours of classroom instruction. Generally, one hour of instruction per week for fifteen (15) weeks equals one semester unit of credit.
(2) One quarter unit is defined as ten (10) hours of classroom instruction. Generally, one hour of instruction per week for ten (10) weeks equals one quarter unit of credit.

AUD = Audit
FN = Failure for non-attendance
I = Incomplete
IP = In Progress
R = Retake
W = Withdraw

FYLS Information
Date(s) Taken: --
Date Passed: --

CBE Information
Date(s) Taken: --
Date Passed: --


Adriana Zúñiga Núñez - Registrar

