

Exhibit 25

States where UNILIMI is authorized to enroll students:

1. North Carolina



P.O. Box 2688
Chapel Hill, NC 27515-2688

Constituent Universities

Appalachian
State University

East Carolina
University

Elizabeth City
State University

Fayetteville State
University

North Carolina
Agricultural and
Technical State
University

North Carolina
Central University

North Carolina
State University
at Raleigh

University of
North Carolina
at Asheville

University of
North Carolina
at Chapel Hill

University of
North Carolina
at Charlotte

University of
North Carolina
at Greensboro

University of
North Carolina
at Pembroke

University of
North Carolina
at Wilmington

University of
North Carolina
School of the Arts

Western Carolina
University

Winston-Salem
State University

Constituent High School

North Carolina
School of Science
and Mathematics

An Equal Opportunity/
Affirmative Action Employer

Kimberly van Noort
Vice President for Academic
Programs, Faculty & Research
Off. Use: 919-962-2620
Email: kvannoort@northcarolina.edu

November 27, 2017

Dr. Hattie Tiburcio
President
University of Leadership and Ministry
78 Technology Drive
Garner, NC 27529

Dear Dr. Tiburcio:

Following a review of your application and pursuant to N.C.G.S. 116-15(d) and the *Rules and Standards for Licensing Nonpublic Institutions to Conduct Post-Secondary Degree Activity in North Carolina*, this letter certifies that the following degree programs, to be conducted on the campus of the University of Leadership of Ministry in Garner, North Carolina, are exempt from requirements for licensure to conduct postsecondary activity in the state:

- Certificates in Ministry, Theological Studies, Christian Family Counseling, Christian Leadership and Communications, and Christian Education and Apologetics.
- Associate of Arts degrees in Ministry, Theological Studies, Christian Family Counseling, Christian Leadership and Communication, and Christian Education and Apologetics.
- Bachelor of Arts degrees in Ministry, Theological Studies, Christian Family Counseling, Christian Leadership and Communications, and Christian Education and Apologetics.
- Master of Arts degrees in Ministry, Theological Studies, Christian Family Counseling, Christian Leadership and Communications, and Christian Education and Apologetics.
- Doctor of Theological Studies and Leadership, Doctor of Christian Family Counseling, Doctor of Christian Education and Apologetics.

The following statement regarding licensure must be displayed in all catalogues and promotional materials:

Degree programs of study offered by the University of Leadership and Ministry have been declared by the appropriate state authority exempt from the requirements for licensure, under provisions of North Carolina General Statutes Section (G.S.) 116-15(d) for exemption from licensure with respect to religious education. Exemption from

2. Florida



FLORIDA DEPARTMENT OF
EDUCATION
fldoe.org

State Board of Education

Ben Gibson, *Chair*
Ryan Petty, *Vice Chair*
Members
Monesia Brown
Esther Byrd
Grazie Pozo Christie
Kelly Garcia
MaryLynn Magar

June 5, 2023

Jose Alicea
University of Leadership and Ministry
3203 Amberley Park Circle
Kissimmee, FL 34743

Re: Annual Verification

Dear Jose Alicea:

At the regularly scheduled meeting of the Commission for Independent Education held on May 25, 2023 in Orlando, Florida, your institution's annual verification by sworn affidavit was presented to the Commission for review.

The Commission accepted the affidavit as having complied with Section 1005.06(1)(f), Florida Statutes pursuant to religious institutions.

This letter serves as notification that your institution has met the requirements of state law and is not subject to governmental oversight for the period 5/25/2023 to 5/31/2024.

Sincerely,

Shun Brooks

Shun Brooks

Manny Diaz, Jr.
Commissioner of Education

Tiffany Hurst, Executive Director
Commission for Independent Education

325 W. Gaines Street, Suite 1414 | Tallahassee, FL 32399-0400 | 850-245-3200 | www.fldoe.org/cie

3. Ohio



Jose Santos <jsantos@unilimi.org>

License to operate

Mexline@highered.ohio.gov <Mexline@highered.ohio.gov>

Mon, Aug 30, 2021 at
2:30 PM

To: Jose Santos <jsantos@unilimi.org>

Dear Dr. Santos,

Our office moved away from issuing exemption letters. You may use this email trail for your documentation. Basically, we are saying you do not need to submit payment or documentation if a program/school is exempt. We don't specifically issue your institution an exemption as we are not doing any formal review to ensure the program follows our policy. We expect that all programs that require authorization are submitted for review.

I hope this makes sense. Please let me know if you have any questions.

Thanks,
Matt

Matt Exline
Ohio Department of Higher Education
614-728-3095

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 2:27 PM
To: Exline, Matthew <Mexline@highered.ohio.gov>
Subject: Re: License to operate

Thank you, again, for your prompt response. If I may ask, if possible, to send a letter (in letterhead) confirming that we are exempt. If so, please send it to my attention to:
Dr. José A. Santos, Director of Accreditation and Academic Effectiveness
University of Leadership and Ministry
[94 Technology Drive](#)
[Garner, NC 27529](#)

On Mon, Aug 30, 2021 at 2:17 PM Mexline@highered.ohio.gov <Mexline@highered.ohio.gov> wrote:

Thank you for the clarification, Dr. Santos.

So long as your distance education programs that can be completed entirely online, you are exempt from authorization. Should the need for authorization arise, please do not hesitate to reach out.

Thanks,
Matt

Matt Exline
Ohio Department of Higher Education
614-728-3095

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 2:08 PM
To: Exline, Matthew <Mexline@highered.ohio.gov>
Subject: Re: License to operate

Thank you for your response,
We are a Non-for-profit, Christian post secondary university operating online.

On Mon, Aug 30, 2021 at 12:22 PM Mexline@highered.ohio.gov <Mexline@highered.ohio.gov> wrote:

Dear Dr. Santos,

Thank you for reaching out to the Ohio Department of Higher Education. Are you enrolling Ohio residents in a distance education/online program, or are you looking to open a brick-and-mortar location in Ohio?

Distance education programs that can be completed entirely online are exempt from authorization. Authorization (or SARA participation) is needed for distance education programs that require an on-ground experience (e.g., clinical, internship, field placement, practicum) to be completed in Ohio. I have attached the form that is completed for such programs.

Face-to-face instruction in Ohio requires a Certificate of Authorization from the Chancellor of the Ohio Department of Higher Education. Our Guidelines manual outlines the initial authorization process beginning on page 17: https://www.ohiohighered.org/sites/ohiohighered.org/files/uploads/program-approval/Academic-Program-Review-Guidelines_070516.pdf.

Please let me know if you have any questions.

Sincerely,

Matt Exline
Director of Program Approval Operations
Ohio Department of Higher Education
[25 South Front Street](https://www.ohiohighered.org/)
[Columbus, OH 43215](https://www.ohiohighered.org/)
P: (614) 728-3095
<https://www.ohiohighered.org/>

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 11:38 AM
To: BOR Hotline <Hotline@highered.ohio.gov>
Subject: License to operate

Greetings!

The University of Leadership and Ministry is accepting enrollment from students who live in Ohio. In order to comply with the requirements of our accreditation agency ABHE, we need a license or certification to operate in Ohio. Please, send to us any relevant information on how to apply for that license or certification.

Thank you in advance for your advice and cooperation.

--

Dr. José A. Santos

University of Leadership and Ministry

Director of Accreditation and Institutional Effectiveness

Platform Coordinator/ Coordinador de Plataforma

Facultad/Faculty

(770) 856-2163 / jsantos@unilimi.org



CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

4. **Georgia**



Nonpublic Postsecondary Education Commission
2082 East Exchange Place, Suite 220
Tucker, Georgia 30084-5305

12-27-2021 01:03PM

Notice of Exemption Status #8033E

University of Leadership and Ministry

94 Technology Drive
Garner, NC 27529

University of Leadership and Ministry has complied with the requirements of O.C.G.A. § 20-3-250.3 (a)(6) by meeting reporting requirements. The institution is subject to compliance with all other statutory provisions of the Official Code of Georgia, annotated.

Please be reminded of the annual renewal process. All religious schools in the State of Georgia must file an annual renewal application for a Notice of Exemption Status. Submit the application prior to the expiration date on the certificate in order to ensure that institutional compliance is maintained.

University of Leadership and Ministry is in compliance with the Nonpublic Postsecondary Education Commission from **12/27/2021** to **12/26/2022**. Please submit the renewal application 30 days prior to the expiration date so that institutional compliance is maintained.

Respectfully Yours,

A handwritten signature in black ink, appearing to read 'K. Shook', written over a horizontal line.

Kirk Shook
Executive Director

5. Puerto Rico



GOBIERNO DE PUERTO RICO
DEPARTAMENTO DE ESTADO
Oficina de Registro y Licenciamiento de Instituciones de Educación



16 de marzo de 2022
Dr. José A. Santos
Presidente
Universidad de Liderazgo y Ministerio
94 Technology Drive Garner, NC 27529

Estimado doctor Santos:

Saludos cordiales. El pasado año usted solicitó una reunión a la Oficina de Registro y Licenciamiento para recibir una orientación relacionada a una licencia de autorización de una institución de carácter religioso. La Oficina asignó al Sr. Luis Negrón Berríos para que atendiera su solicitud de reunión.

A raíz de la información que se compartió en la misma, originalmente se determinó que no teníamos jurisdicción debido a que las horas de los programas eran pocas; y que no se catalogaban como programas universitarios. El Reglamento para el Licenciamiento de Instituciones de Educación Postsecundaria en Puerto Rico #9272 de 2021, así lo establece y hace dicha distinción en las Secciones 9.2 y 9.2.1.

Para documentar y redactar nuestra decisión sobre la jurisdicción de nuestra Oficina en su caso particular, se le solicitó que nos proveyera por escrito las horas exactas de los programas. Al recibir la información y analizarla, nos percatamos que en efecto, sí teníamos jurisdicción dado que la mayoría de los programas eran de carácter universitario (grado asociado y bachillerato).

Así las cosas, el Sr. Negrón le orientó sobre la información que debía proveernos; y comenzar el proceso sometiendo la solicitud de licencia de autorización por medio de la plataforma provista para esos fines. Como resultado de este proceso de cumplimentar la solicitud en la plataforma, usted le mencionó al Sr. Negrón que tenía programas online (a distancia) en su oferta. Se le procedió a orientar sobre el particular y la manera de presentar esos programas en la solicitud. Esto ocasionó que usted se comunicará con el Sr. Negrón para aclarar algunos puntos.

Posteriormente, y mediante conversación telefónica, usted menciona que la Universidad de Liderazgo y Ministerio, tiene su sede en Carolina del Norte y que los programas que impartirá en Puerto Rico son totalmente online (a distancia). Esta información fue confirmada mediante correo electrónico recibido el 13 de enero de 2022. Además, se confirmó que no existe una sede de operación dentro de los límites territoriales de Puerto Rico que podamos visitar para el proceso de la licencia de autorización.

A esos fines, el Reglamento para el Licenciamiento de Instituciones de Educación Postsecundaria en Puerto Rico #9272 de 2021 establece en la Sección 9.1 lo siguiente:

“Las normas aquí contenidas aplican a toda persona natural o jurídica, o grupo de ellas, que opere una institución de educación postsecundaria dentro de los límites territoriales de Puerto Rico que ofrezca o que de algún modo declare, prometa, anuncie o exprese la intención de otorgar en Puerto Rico grados o cursos conducentes a grados, certificados, títulos u otros reconocimientos académicos oficiales de los

que aquí se consideran como de educación postsecundaria, independiente del lugar donde se ofrezcan los cursos. Además, se entenderá que una institución opera en Puerto Rico cuando tiene presencia en la jurisdicción de Puerto Rico, según se define en este Reglamento”.

Finalmente, con la información disponible y aplicando la Ley 212 de 2018, así como la Sección del Reglamento antes mencionada, se concluye que la Oficina de Registro y Licenciamiento no tiene jurisdicción en este caso. En otras palabras, no podemos licenciarlos como institución educativa o expedirles un permiso para operar desde Puerto Rico.

Según relatado por ustedes, la intención de la Universidad es ofrecer los cursos online (a distancia) desde Carolina del Norte a personas en una o varias iglesias en Puerto Rico. Una alternativa que podría considerar es la Sección 9.2.3 del Reglamento sobre instituciones provenientes de Estados Unidos de América que sean participantes del State Authorization Reciprocity Agreement (SARA). La misma establece lo siguiente:

“Este reglamento no aplicará a las instituciones provenientes de Estados Unidos de América que interesen ofrecer cursos o programas a distancia (online) a estudiantes residentes en Puerto Rico que son participantes del State Authorization Reciprocity Agreement (SARA) en la jurisdicción de procedencia. Las instituciones extranjeras o aquellas provenientes de Estados Unidos de América que no sean parte de SARA que interesen ofrecer cursos o programas a estudiantes residentes en Puerto Rico deberán cumplir con el procedimiento de licenciamiento dispuesto en este Reglamento”.

De modo que, recomendamos verificar si en el Estado que tiene la cede de la Universidad, participa de NC-SARA. Si participan, deben comunicarse con ellos para que reciban una orientación al respecto y auscultar la posibilidad de ser parte de SARA en dicho Estado. Esto le permitirá poder dar los cursos online en Puerto Rico sin pasar por el proceso de licenciamiento. Pero si no interesan pertenecer a NC-SARA en dicho Estado y desean de todos modos ofrecer los cursos online en Puerto Rico, tienen que licenciarse en Puerto Rico, pero con presencia física en la Isla, desde donde operen como institución educativa. Esto conforme establece nuestro Reglamento; y la Ley 212-2018, específicamente la Sección 4 (p), (q), (r) y (x).

Cualquier duda al respecto estoy a su disposición.

Atentamente,

Damaris Nolasco Ortiz
Directora Ejecutiva

6. South Dakota

The following statement was taken from the South Dakota Secretary of State webpage:
<https://sdsos.gov/general-information/postsecondary-education/default.aspx>

Exempt Postsecondary Institutions

[SDCL 13-48-41](#) - The provisions of this Act do not apply to postsecondary institutions:

- Established by the government of the United States
- Established by the government of an Indian tribe whose tribal lands are located, in whole or in part, in this state
- Established or owned, controlled, operated, and maintained by a religious organization lawfully operating as a nonprofit religious corporation and awarding only religious degrees or certificates for the purpose of conferring clerical status or authority within that religion
- Subject to the jurisdiction and regulations to the South Dakota Cosmetology Commission.

If your institution meets the requirements for exemption you would not need to file with our office. Our office does not process letters of exemption.

7. Texas



March 10, 2022

José A. Santos Horta, MD, MCM
Accreditation and Effectiveness Director
University of Leadership and Ministry
94 Technology Drive
Garner, NC 27529

Dear Dr. Santos:

University of Leadership and Ministry, located in Garner, North Carolina has notified the Texas Higher Education Coordinating Board of its status as a religious postsecondary educational institution that will only offer online programs in religious studies. The institution will offer degrees in Ministry and Church Leadership at the Associate of Arts and Bachelor of Arts level. The institution will also offer religious instruction at the certificate level.

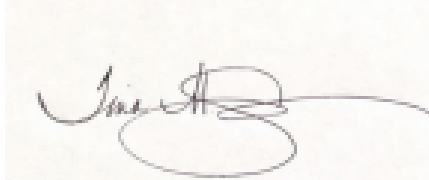
Provided that University of Leadership and Ministry's offered degrees are, as you have informed us, entirely religious in nature, it falls within the exception for authorization in 19 Texas Administrative Code

§ 7.9 implementing *H.E.B. Ministries v. Texas Higher Education Coordinating Board*, 235 S.W.3d 627 (2007), and does not require approval of the Coordinating Board.

The use of the term “university” does not violate Texas Education Code, Chapter 61, or the THECB’s rules.

As a reminder, it is also necessary that the University of Leadership and Ministry apply for and receive a license, exemption, or exclusion from Chapter 132 of the Texas Education Code through the Texas Workforce Commission.

If you have any questions, please contact Cathie A. Maeyaert, Director of Private Postsecondary Institutions, or me.



Sincerely,
Tina Jackson, Ph.D.
Assistant Commissioner
Workforce Education

WE/CAM

HIGHERED.TEXAS.GOV

1200 East Anderson Lane, Austin, TX 78752
Mail: PO Box 12788, Austin, TX 78711-2788
Phone: 512-427-6101 • Fax: 512-427-6127

Response from The Texas Workforce Commission.

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

From: **Career Schools** <career.schools@twc.texas.gov>
Date: Tue, Apr 26, 2022, at 4:58 PM
Subject: RE: Authorization to operate
To: Jose Santos <jsantos@unilimi.org>
Cc: Cathie.Maeyaert@highered.texas.gov <Cathie.Maeyaert@highered.texas.gov>, Paul.Shuler@highered.texas.gov <Paul.Shuler@highered.texas.gov>, Career Schools <career.schools@twc.texas.gov>

Good afternoon,

We believe that based on activities in the state of Texas, The University of Leadership and Ministry is not a “Career School or College”, as defined in Tex. Educ. Code § 132.001(1), and the information required to be posted per Tex. Educ. Code § 132.202 can be found on your [website](#). Accordingly, The University of Leadership and Ministry has been added to the Texas Workforce Commission Career Schools and Colleges database as a “not regulated” school.

This does not negate or supersede any requirements, including any postings, required by the Texas Higher Education Coordinating Board.

If the circumstances of the educational offerings in Texas should change, that would require licensing or exemption, please notify our office at career.schools@twc.texas.gov.

Please do not hesitate to contact us should you have additional questions or concerns.

Thank you,
Career Schools and Colleges
Texas Workforce Commission

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8. Connecticut



State of Connecticut Office of Higher Education

University of Leadership and Ministry, Inc
[94 Technology Dr, Garner, NC 27529, USA](https://www.technologydr.com)
June 16, 2022

Dear Colleague:

Based on our review of the information you submitted your institution is now approved to offer online courses/programs to Connecticut residents.

Your institution's registration will expire on December 31, 2022. Please note you will need to reapply one month prior to the expiration date and renew your approval to continue to operate in the State of Connecticut. Please mark your calendar accordingly as no notice will be sent to you regarding the expiration.

The registration is based on the information you provided. Should any of this information change during the period of your institution's approval, you must notify our Office immediately.

Failure to notify our Office of any changes that occur during the approval period may result in your institution being prohibited from operating in the State of Connecticut in the future.

In addition, your institution is required to resolve all student complaints within thirty (30) days of receipt. Failure to resolve student complaints may result in your institution being prohibited from operating in the state.

If you have any questions, please contact us via email ohc.osa@ct.gov. Thank you.

Sincerely,

Timothy D. Larson
Executive Director

Sean Seepersad, Ph.D.
Chief Academic Officer

9. New Jersey

(In relation to New Jersey students, we have started the license to operate process, and this is the response from an official from the State Department of Higher Education.)

A copy of the email received on August 1, 2022, at 9:59 am, is attached:

Harris-Ransom, Lori [OSHE]
9:59 AM

Aug 1, 2022,

Dear Dr. Santos Horta,

I am responding to your institution's most recent inquiry dated July 30, 2022, in regard to New Jersey's state authorization requirements and fee requirements. Please forgive any redundancy to any information I have previously provided.

When an out-of-State institution offers New Jersey residents no other programs except for distance education programs with no physical presence in the State, then licensure is not required. *N.J.A.C. 9A:1-7.5(b)*...

Sincerely,

Lori



Lori K. Harris-Ransom, JD MPA (she/her)
Assistant Director, Licensure & Accountability
Office of the Secretary of Higher Education (OSHE)
1 John Fitch Plaza, 10th Floor | PO Box 542
Trenton, NJ 08625-0542
609-984-2709 | lori.harris-ransom@oshe.nj.gov

10. Massachusetts

Stone, Kristen (DHE) <KStone@dhe.mass.edu>

August 18, 2022, 11:11 am

Dr. Santos,

Thank you for your inquiry. Massachusetts does not offer a religious exemption for degree-granting authorization. Rather, all out-of-state institutions are held to our physical presence policy, which I have included below. As long as your institution does not engage in the activities listed, Massachusetts Board of Higher Education authorization would not be required for your institution to offer 100% distance education programs.

At this time, the Massachusetts Board of Higher Education's (BHE) definition of physical presence does not include 100% distance education or experiential learning activities, such as internships, externships, clinical, or practical within the Commonwealth. However, if an institution also engages in the one of the following activities, BHE approval is required:

- 1. Occupying, regardless of ownership, an actual physical location for instructional purposes, whether synchronous or asynchronous instruction;*
- 2. Maintaining an administrative office to facilitate instruction in the Commonwealth, or for purposes of providing information to prospective students or the general public about the institution, or enrolling students or providing services to enrolled students;*
- 3. Providing office space to instructional or non-instructional staff;*
- 4. Establishing an institutional mailing address, street address or phone number in the Commonwealth.*

Please feel free to contact me directly if you have any questions.

Best,
Kristen

Kristen Stone, MPP

Assistant Director for Academic & Veterans Affairs
Massachusetts Department of Higher Education
One Ashburton Place, Room 1401
Boston, MA 02108
Phone: (617) 994-6959
Fax: (617) 727-0955

Follow us on Twitter [@MassDHE](https://twitter.com/MassDHE) / Join our newsletter list at mass.edu/newsletter

11. Maryland

From: oos authorization -MHEC- <oosauthorization.mhec@maryland.gov>

Subject: Re: Authorization to operate

Date: May 15, 2023 at 2:25:48 PM AST

To: Jose Santos <jsantos@unilimi.org>, Religious Exempt MHEC -MHEC- <religousexempt.mhec@maryland.gov>

Cc: Samantha Velez <samantha@unilimi.org>

Hello Dr. Santos and Samantha,

Thank you for submitting your institution questionnaire. **Based on the information provided it has been determined that your application would fall under religious-exempt per our regulations.** [Information regarding the religious exempt application can be found here.](#) I am also copying the religious exempt mailbox for further assistance.

Please feel free to reach out to religousexempt.mhec@maryland.gov for any questions regarding your status as a religiously-exempt institution

Kind regards,

Melissa Leuschel

Out-of-State Authorization

Collegiate Affairs Unit

MD Higher Education Commission

6 N. Liberty St. 10th Floor

Baltimore, MD 21201

oosauthorization.mhec@maryland.gov

Web: www.mhec.maryland.gov

Twitter: MDHigherEdComm

Facebook: MDHigherEdCom |

On Tue, May 9, 2023 at 11:52 AM Jose Santos <jsantos@unilimi.org> wrote:

To Whom It May Concern,

We are receiving applications from students that live in your state. Therefore, we request a religious exemption to operate in the state of Maryland. We are not planning to physically establish ourselves in Maryland as we operate entirely online. Our university is established in the state of North Carolina and we are in the process of accreditation with The Association for Biblical Higher Education in Canada and the United States (ABHE), where we have obtained applicant status.

The University of Leadership and Ministry (UNILIMI) is a religious, non-for-profit, online, post secondary education institution that primarily serves the Hispanic Christian population. Until now, UNILIMI offers four study programs at the service of the local church: 1) University Certificates: 30 credits; Associate of Arts in Leadership and Ministry: 60 credits, Bachelor of Arts in Leadership and Ministry: 120 credits, and 4) Master of Arts in Leadership and Ministry: 42 credits. Details of these programs can be viewed at www.unilimi.org.

Please guide us through this process, since this is a requirement in our accreditation journey. All communication can be made through me, Dr. José A. Santos Horta, Dean of Accreditation and Effectiveness at: jsantos@unilimi.org or by telephone at: 1 (787) 988-9337. Thanks in advance for your help and guidance.

At your service,

--

Dr. José A. Santos Horta

University of Leadership and Ministry

Dean of Accreditation and Institutional Effectiveness

Facultad/Faculty

(787) 988-9337 / jsantos@unilimi.org

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