

STATE OF MINNESOTA
BOARD OF LAW EXAMINERS

In re Application of

LAWRENCE JUSTIN MILLS,

Applicant.

**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND DETERMINATION**

This matter came on for hearing before the Minnesota Board of Law Examiners (“Board”) on December 9, 2025, at which time the Board heard testimony from Lawrence Justin Mills (“Applicant”) and Harris S. Ammerman, Esq., and received stipulated Exhibits 1 through 46 into the record. Melissa M. Heinlein, Esq., appeared on behalf of Applicant. David M. Genrich, Assistant Attorney General, appeared as Board counsel.

Based upon the evidence introduced at the hearing, the arguments of the parties, and all the records and proceedings herein, the Board makes the following:

FINDINGS OF FACT

Background

1. Applicant’s full name is Lawrence Justin Mills.¹
2. Applicant was born on April 28, 1991.²
3. Applicant received a Juris Doctor from Lincoln Memorial University – Duncan School of Law (“Lincoln Memorial University School of Law” or “School of Law”) in 2022. He earned a bachelor’s degree from the University of Baltimore in 2017.³

¹ Ex. 3-0002; Parties’ Stipulated Facts

² *Id.*; Parties’ Stipulated Facts

³ Ex. 3-0004 – 3-0005; Parties’ Stipulated Facts

4. Applicant is currently employed as a law clerk at the Law Office of Harris S. Ammerman and has worked in that capacity since May 2024.⁴

5. Applicant applied for admission to the California State Bar in August 2022. He sat for the California bar exam in August 2022 and again in January 2024 and did not achieve a qualifying score on either examination. In October 2024, the State Bar of California issued an adverse moral character determination, finding that Applicant had not established good moral character under its standards.⁵

6. On November 30, 2024, the Minnesota Board of Law Examiners received Applicant's application to sit for the February 2025 administration of the Minnesota Bar Exam.⁶

7. The Minnesota Board of Law Examiners provided an acknowledgement letter to Applicant on December 2, 2024, indicating his application had been received.⁷

8. Applicant obtained a total score of 290 on the February 2025 Uniform Bar Examination, which exceeds the minimum qualifying score in Minnesota.⁸

9. By letter dated June 23, 2025, the Board informed Applicant that it had made an adverse determination with respect to his application, and it recited the following grounds for its determination:

1. Rule 5A(1) requires that an applicant must have "[t]he ability to be honest and candid with clients, lawyers, courts, the Board, and others." The following matters from your file appear to raise concerns related to your ability to meet this requirement:

a. In 2022, you were found to have violated your law school's honor code by submitting falsified evidence in order to attempt

⁴ Ex. 3-0021; Parties' Stipulated Facts

⁵ Ex. 3-0006; Ex. 35-3; Parties' Stipulated Facts

⁶ Ex. 3; Parties' Stipulated Facts

⁷ Ex. 5-2; Parties' Stipulated Facts

⁸ Ex. 4-2; Parties' Stipulated Facts

to receive a higher grade in your Professional Responsibility course.

- The plea agreement with Lincoln Memorial University State of Law, dated 7/26/2022, states that in addition to submitting falsified evidence, you filed a grievance against your Professional Responsibility professor despite knowing that your statements and evidence were false.
 - In your grievance against your professor, dated April 8, 2022, you claimed that the course grading was “arbitrary and capricious.” You also indicated that the test proctoring company had made a “material misrepresentation” to you which caused you to fail the class. Based upon your later admissions, it appears you made these and other claims of unfairness, knowing that the statements were false.
- b. Your September 2018 law school application required that you disclose whether you have been a party to a legal proceeding and if so, to explain the incident(s) and all relevant facts. In your application to law school you disclosed only one civil matter, *Mills v. PPE Casino Resorts, et al.* You failed to disclose a number of matters that were required including:
- *Mills v. Anne Arundel County State’s Attorney’s Office (2014)*
 - *Mills v. SunTrust Bank (2015)*
 - *Mills v. Wynn Las Vegas, LLC (2015)*
 - *Mills v. Howard County States Attorney’s Office (2016)*
 - *Mills v. Maryland State Police (2016)*
 - *Mills v. Office of The State Prosecutor (2017)*
 - *Mills v. Harford County State’s Attorney’s Office (2017)*
 - *Mills v. Department of State Police (2017)*
 - *Mills v. Hassan, et al. (2018)*
 - *Mills v. SunTrust Bank (2018)*
 - *Mills v. Jackson, et al. (2018)*

The fact that your only civil disclosure to your law school was in regards to your successful lawsuit against PPE Casino Resorts, et al but that you did not disclose any of the denied and/or dismissed matters involving your 2014 and 2015 arrests raises concerns about your ability to meet Rule 5A(1).

2. Rule 5A(5) requires that an applicant have “[t]he ability to conduct oneself with respect for and in accordance with the law.” Rule 5A(7) requires “[t]he ability to comply with the requirements of the Rules of Professional Conduct, applicable state, local,

and federal laws, regulations, statutes, and any applicable order of a court or tribunal.” The following matters from your file appear to raise concerns about your ability to meet one or more of these essential eligibility requirements or combination(s) of these requirements:

- a. August 2010—Driving While Intoxicated
- b. January 2011—Intoxicated Endangerment
- c. June 2011—Underage Drinking
- d. July 2011—Driving While Intoxicated
- e. August 2012—Reckless Driving/No Valid License
- f. November 2014—Felony Failure to Pay Casino Marker
- g. July 2015—Driving on a Suspended License
- h. March 2019—Felony Driving While Intoxicated

In addition, your driving record also indicated the following incidents:

- a. May 2009—Failure to Display License
- b. May 2011—Fail to Drive on Right Side of Roadway
- c. July 2011—Driving Without a License
- d. December 2011—Violation of License Restriction Notice
- e. September 2012—Driving Without a License
- f. August 2013—License Revocation
- g. October 2014—Interlock Non-Compliance/Driving Unreasonable Speed
- h. November 2014—Operating Handheld Telephone while Operating Vehicle
- i. July 2015—Violation of Interlock Restriction
- j. February 2016—Violation of License Restriction Suspension
- k. September 2017—No License in Possession
- l. September 2019—Failure to Pay Fine in District Court

3. Rule 5A(4) requires that an applicant must have “[t]he ability to use good judgment on behalf of clients and in conducting one’s professional business.” Rule 5A(2) requires that an applicant must have “[t]he ability to reason, recall complex factual information, and integrate that information with complex legal theories.” And Rule 5A(6) requires that applicants must show “[t]he ability to avoid acts which exhibit disregard for the rights or welfare of others.” The following matters from your file appear to raise concerns about your ability to meet these requirements:

- a. Records indicate that since 2014 you have filed at least seven petitions for writs of mandamus that have all been dismissed or denied for being improper.

- In *Mills v. Anne Arundel County State's Attorney's Office* Judge Silkworth denied the writ of mandamus stating that the decision to prosecute lies with the prosecutor absent gross abuse or a legal duty.
 - In *Mills v. Howard County State's Attorney* the Court of Special Appeals of Maryland upheld the district court's dismissal of your petition for administrative mandamus on the grounds that the petition was inapplicable to challenge a prosecutor's decision to decline prosecution.
 - In *Mills v. Maryland State Police* the Court of Special Appeals of Maryland upheld the district court's decision to deny your petition for administrative mandamus holding that the decision to prosecute is not a "quasi-judicial order" and that "having a personal desire to see Trooper Hassan punished" did not provide standing to seek the relief you were requesting.
 - In *Mills v. Office of the State Prosecutor* the Court of Special Appeals of Maryland found that your petition writ of common law mandamus was properly dismissed by the district court stating again that mandamus was not an appropriate measure to force prosecution.
 - In *Mills v. Harford State's Attorney's Office* the district court dismissed your petition for writ of administrative mandamus and declaratory judgment.
 - In *Mills v. Office of Bar Counsel* the court dismissed the petition for writ of mandamus, finding that the Office of Bar Counsel had the authority to determine whether to initiate proceedings due to a complaint.
 - In *Mills v. Sandmann, et. al.* you again filed for a writ of mandamus to compel a State Attorney to act and the Court again dismissed the case finding no grounds for a writ of mandamus.
 - You continued to file these improper writs against multiple individuals and entities despite multiple court orders on both the district and appellant level indicating that mandamus and similar writs are not appropriate in the circumstance.
4. You were denied admission to the State Bar of California on October 24, 2024, after the Bar found that you had failed to meet

your burden of establishing good character. The California Bar based its decision in part on

- the circumstances surrounding multiple arrests and convictions from 2010–2019;
- the circumstances surrounding the 2022 reckless violation of the Code of Academic Integrity, involving dishonesty, at Lincoln Memorial University School of Law;
- a lack of candor;
- a lack of insight;
- insufficient rehabilitation; and,
- failure to establish good moral character as required by Section 6060 of the California Business and Professions Code and Title 4, Division 1, Chapter 4 of the Rules of the State Bar of California.⁹

10. The Board's June 23, 2025, letter advised Applicant of his right to a hearing.

11. Applicant timely appealed the Board's adverse determination and requested a formal hearing.¹⁰

12. The hearing occurred on December 9, 2025, after which the Board made the following findings:

CHARACTER AND FITNESS QUESTIONS

Felony Matters

13. Applicant answered "yes" to Question 4.01A on his application to the Minnesota bar ("bar application"), which asks: "Have you EVER been charged with, arrested for, pleaded guilty to, or been convicted of a felony or the equivalent?" Applicant identified two (2) matters that are referenced in the Adverse Determination Letter issued

⁹ Ex. 1; Parties' Stipulated Facts

¹⁰ Ex. 1; Ex. 2; Parties' Stipulated Facts

by the Board: a January 2014 Failure to Timely Pay Casino Marker and a March 2019 Driving Under the Influence of Alcohol.¹¹

14. Applicant submitted a Supplemental Form 1 and a narrative explanation disclosing that he was charged in January 2014 with Failure to Timely Pay Casino Marker, a felony offense in Las Vegas, NV. Applicant stated that he inadvertently missed the payment due date for the \$5,000 casino marker. Applicant also stated that after receiving a letter from the Clark County District Attorney's Office notifying him that he missed the payment due date, he promptly paid the \$5,000 marker and associated collection fee. Applicant further stated that the charge was then dismissed, and records related to the case were sealed.¹²

15. On January 14, 2025, Board staff asked Applicant to provide complete records relating to the January 2014 incident, including police records, court records, and any other pertinent documentation.¹³

16. Applicant replied on January 21, 2025. Applicant stated that he contacted the Las Vegas Police Department, the Las Vegas District Attorney's Office, and the Justice Court in Nevada to request records, and each replied either that records could not be located or could not be provided because the case had been sealed.¹⁴

17. On January 14, 2025, Board staff asked Applicant to "provide a more detailed narrative describing the complete events and circumstances surrounding [the

¹¹ Ex. 3-0007; Parties' Stipulated Facts

¹² Ex. 12-01 – 12-04; Parties' Stipulated Facts

¹³ Ex. 12-06; Parties' Stipulated Facts

¹⁴ Ex. 12-06 – 12-15; Parties' Stipulated Facts

Failure to Pay Casino Marker incident], including but not limited to any important context and the specific events leading up to it.”¹⁵

18. Applicant replied on March 1, 2025, and stated:

In approximately January 2014, I went to Las Vegas. During that trip, Red Rock Casino extended me \$5,000 in gaming chips on credit for use at the tables. After I returned home I inadvertently failed to pay the marker by the due date. Then I received a letter from the Clark County District Attorney’s Office stating that they had charged me under a Nevada statute concerning casino markers and requesting payment of \$5,000 plus an additional collection fee.

When I received the letter I realized my oversight and promptly mailed the requested payment and fee to the District Attorney’s Office. They then sent me a letter stating that they had dismissed the matter. With payment made, the issue was fully resolved. I understand that I did not fulfill my responsibility to keep track of this important obligation and regret that I allowed this to happen.¹⁶

19. At the hearing, Applicant testified that he “inadvertently missed the payment due date” and when he “received a letter regarding that from the Las Vegas D.A.’s office” he promptly paid what was owed, plus the additional collection fee.¹⁷ Applicant testified that the matter was “then dismissed and sealed.”¹⁸

20. When asked how the experience impacted how he handles his financial obligations today, Applicant testified he is now “careful to always pay any credit” and is “more responsible” as a result of this incident.¹⁹

21. In response to Question 4.01A on his bar application, Applicant also submitted a Supplemental Form 1, a narrative explanation, and court records disclosing

¹⁵ Ex. 12-16; Parties’ Stipulated Facts

¹⁶ Ex. 12-16 – 12-18; Parties’ Stipulated Facts

¹⁷ Board Hearing Transcript at p. 62, lines 3 – 8.

¹⁸ Tr. 62: 8 - 9

¹⁹ Tr. 62: 10 - 15

that he was charged in March 2019 with felony Driving Under the Influence of Alcohol (“DUI”). Applicant stated that he pleaded guilty to an amended charge of Reckless Driving - Alcohol Related.²⁰

22. The court records submitted by Applicant in connection with the March 2019 DUI charge reflect that the felony DUI charge was reduced to a misdemeanor Reckless Driving - Alcohol Related for “willful and wanton disregard for the safety of persons or property and alcohol was a contributing factor.” During the same incident, Applicant was also charged with speeding, failure to maintain lane, lack of a vehicle registration card, and having no proof of insurance.²¹

23. In his written narrative, Applicant stated this DUI charge occurred in March 2019 after he consumed alcohol during a social visit and later drove in Delaware, where he was stopped by law enforcement. Applicant referenced having an alcohol concentration of 0.11. Applicant further stated and court documents reflect that he received a thirty-day suspended sentence and was placed on one-year probation as a result of his plea to the amended charge of Reckless Driving – Alcohol Related in October 2019. He stated that since this offense, he has never consumed alcohol before driving.²²

24. When asked about this felony-level DUI at the hearing, Applicant testified that he “regret[s] that [he] let that happen” and feels “frustrated” that he let it happen.²³ He stated that he understands that driving under the influence “puts others at risk” and now views this as a “non-negotiable.”²⁴ On cross-examination, Applicant acknowledged

²⁰ Ex. 14-01 – 14-05; Parties’ Stipulated Facts

²¹ Ex. 14-30 – 14-32; Parties’ Stipulated Facts

²² Ex. 14-03 – 14-05; Ex. 14-34; Parties’ Stipulated Facts

²³ Tr. 64:10 - 12

²⁴ Tr. 64: 18; 65: 2

that although he admitted to driving while intoxicated, he sued the blood draw company, an Internal Affairs investigator, and the police office involved in the matter.²⁵ Applicant also testified that before he filed the lawsuit, he filed an Internal Affairs complaint stating that false statements had been made in the blood draw affidavit. Applicant acknowledged that the Internal Affairs department had closed the file as unfounded. Applicant then sued the investigator for \$800,000 in compensatory damages and \$800,000 in punitive damages.²⁶ Applicant also sued the police officer who had stopped him on the bridge. Applicant testified that matter was dismissed in 2022, but that he ultimately recovered \$4800 from the blood draw company, as discussed later herein.²⁷

Gross Misdemeanor Matters

25. Applicant answered “yes” to Question 4.01B on his bar application, which asks: “Have you EVER been charged with, arrested for, pleaded guilty to, or been convicted of a gross misdemeanor or the equivalent, other than a matter already disclosed in Question 4.01A?” Applicant disclosed two matters that are referenced in the Adverse Determination Letter issued by the Board:

- August 2010: Driving Under the Influence of Alcohol; Driving While Impaired
- July 2011: Driving Under the Influence of Alcohol; Possessing Fictitious License²⁸

26. Applicant submitted a Supplemental Form 1 and a narrative explanation stating that he was charged in August 2010 with Driving Under the Influence of Alcohol

²⁵ Tr. 120: 14 - 17

²⁶ Tr. 121: 1 - 8; 21 - 25; 122: 18 - 21

²⁷ Tr. 123: 4 - 10; 14 - 17

²⁸ Ex. 3-0008; Parties’ Stipulated Facts

and Driving While Impaired offenses in Maryland. Applicant stated and court records reflect that he pleaded guilty to Driving While Impaired by Alcohol in October 2010.²⁹

27. In his narrative statement, Applicant stated that, on the day of the incident, he consumed alcohol with a relative, was impaired while driving, and collided with a truck while attempting to pass. He reported that he pulled over, provided insurance information to the other driver, and was arrested for DUI when police arrived.³⁰

28. On January 14, 2025, Board staff asked Applicant to provide complete police records relating to the August 2010 incident, including police records, court records, and other pertinent documentation.³¹

29. On January 24, 2025, Applicant provided police reports and court records related to the incident. The police reports stated that law enforcement responded to an accident scene in the early morning hours of August 3, 2010, and that Applicant identified himself as the driver of a vehicle with extensive front-end damage. The reports also stated that Applicant told law enforcement he had not consumed any alcoholic beverages. Based upon observation of bloodshot eyes and the odor of alcohol, law enforcement performed field sobriety tests, which Applicant failed. A breath test administered after Applicant's arrest revealed an alcohol concentration of .13.³²

30. Court records related to the incident reflect that Applicant was sentenced to a 60-day suspended sentence and a one-year probationary term that included

²⁹ Ex. 7-01 – 7-04; Ex. 7-13; Parties' Stipulated Facts

³⁰ Ex. 7-03 – 7-04; Parties' Stipulated Facts

³¹ Ex. 7-07; Parties' Stipulated Facts

³² Ex. 7-20; Parties' Stipulated Facts

requirements that Applicant remain law-abiding, participate in alcohol and drug educational programming, and attend a Mothers Against Drunk Driving Impact Panel.

31. In response to Question 4.01B, Applicant also submitted a Supplemental Form 1 and a narrative explanation disclosing that he was charged in July 2011 with Driving Under the Influence of Alcohol and Possessing Fictitious License offenses in Maryland. Applicant pleaded guilty to both offenses, as well as Driving on a Suspended License and Failure to Properly Maintain License Plate in Visible Position, in July 2013.³³

32. In his narrative statement, Applicant stated that this incident occurred in the summer of 2011, when he was 20 years old and under the legal drinking age. He reported that he consumed alcohol at a bar in Bethesda, Maryland, and that he was arrested for Driving Under the Influence with an alcohol concentration of 0.18 after leaving the bar. Applicant also stated that he had been using the fake ID to drink at the bar before he got pulled over.³⁴

33. On January 14, 2025, Board staff asked Applicant to provide complete police records relating to the August 2010 incident, including police records, court records, and other pertinent documentation.³⁵

34. On January 24 and March 1, 2025, Applicant provided police reports and court records related to the incident. The police reports indicated that law enforcement encountered Applicant as he was attempting to drive his car out of a parking garage through a non-functioning exit. Law enforcement followed Applicant as he drove his car out of a functioning parking garage exit. Law enforcement conducted a registration check

³³ Ex. 10-01; Ex. 10-11 – 10-12; Parties' Stipulated Facts

³⁴ Ex. 10-04; Parties' Stipulated Facts

³⁵ Ex. 10-07; Parties' Stipulated Facts

and determined that Applicant's driver's license was suspended. Law enforcement stated that they observed that the car's rear license plate was covered in a way that was designed to obscure the plate from automatic photographic tag readers in violation of the traffic code. Law enforcement activated the squad's lights and siren to initiate a traffic stop. Law enforcement stated that, upon activating their lights and siren, Applicant led law enforcement on a vehicle chase of approximately four blocks before pulling over.³⁶

35. After Applicant pulled over, law enforcement approached and stated in police reports that as Applicant stepped out of the vehicle at the request of law enforcement, the officer noticed a very strong odor of alcohol on Applicant's breath, as well as watery eyes, slurred and confused speech, and difficulty maintaining balance. Applicant's Maryland driver's license was suspended, and he had a fictitious South Carolina driver's license in his possession. After Applicant refused field sobriety tests, he was arrested and placed in the squad car. Two additional fictitious driver's licenses (Iowa and California) in Applicant's name were recovered from Applicant during the arrest.³⁷

36. The arresting officer stated in the police report that after placing Applicant in the squad car, Applicant began to mimic police transmissions and made a series of profane statements.³⁸

37. The arresting officer also stated in the report that when Applicant was asked about the plastic cover over his rear license plate, Applicant stated that he had the cover

³⁶ Ex. 10-23; Parties' Stipulated Facts

³⁷ Ex. 10-23 – 10-25; Parties' Stipulated Facts

³⁸ Ex. 10-24; Parties' Stipulated Facts

to keep electronic tag readers like those on speed cameras and red-light cameras from reading his tag.³⁹

38. At the time of his July 2011 arrest, Applicant was on probation for the August 2010 DUI summarized above.

39. Applicant was sentenced to 90 days at the pre-release center and additional probationary terms as a result of the July 2011 offenses.⁴⁰

40. Applicant stated that the July 2011 charges led him to recognize that his drinking had become excessive and that driving after drinking was dangerous, that he stopped abusing alcohol after that one-year period, and that he redirected his focus to his studies and pursued an associate degree at Montgomery College shortly after this incident.⁴¹ Applicant further stated that following the July 2011 offenses, he enrolled in a 28-day intensive inpatient treatment program to address his excessive drinking.⁴²

41. Applicant also stated in his narrative response related to the July 2011 offenses, "I am deeply ashamed of how I acted during that incident and, more broadly, of how I was during that period of my life. I was out of control, and it is hard to reconcile the person I was then with the person I am now."⁴³

42. Applicant testified at the hearing that he was still on probation from the 2010 DUI when he was arrested for DUI in 2011.⁴⁴ Applicant acknowledged at the hearing that the police reports from the 2011 DUI reflected that Applicant mimicked police

³⁹ Ex. 10-25; Parties' Stipulated Facts

⁴⁰ Ex. 10-04; Ex. 10-12; Ex. 10-54; Parties' Stipulated Facts

⁴¹ Ex. 10-04; Parties' Stipulated Facts

⁴² *Id.*; Parties' Stipulated Facts

⁴³ Ex. 10-17; Parties' Stipulated Facts

⁴⁴ Tr. 112: 20 – 25; 113: 1 - 2

transmissions and make a series of profane statements when he was placed in the squad car.⁴⁵ Applicant testified that he had a plastic cover over his license plate at the time of the 2011 arrest to “keep electronic tag readers like those on speed cameras and red light cameras from reading [his] tag.”⁴⁶ Applicant further acknowledged at the hearing that reports reflect that he told officers that he was “going to try [his] best to get out of this because it's ridiculous” and he would “hire the best lawyer in the area to get [him] out of this kind of crap.”⁴⁷

43. In response to Question 4.01B, Applicant submitted Supplemental Forms and narrative explanations in connection with two other incidents that resulted in gross misdemeanor charges: (1) a November 2011 incident that resulted in Driving While Intoxicated and a Possession of a Controlled Dangerous Substance charges, among others, and (2) a March 2015 incident that resulted in Driving Under the Influence and Reckless Driving charges, among others.⁴⁸

Misdemeanor and Non-Traffic Matters

44. Applicant answered “yes” to Question 4.02A on his bar application, which asks: “Have you EVER been charged with, cited for, arrested for, pleaded guilty to, or been convicted of any violation of ANY law, other than a matter already disclosed in Question 4.01A or 4.01B or a non-criminal traffic/vehicle violation?” Applicant identified five (5) matters that are referenced in the Adverse Determination Letter issued by the Board:

⁴⁵ Tr. 116: 5 - 9

⁴⁶ Tr. 117: 11 - 22

⁴⁷ Tr. 117: 23 – 25; 118: 1 - 6

⁴⁸ Information about the incidents can be found in the record at Ex. 3-0008; Ex. 3-0078 – 3-0079; Ex. 3-0083 – 3-0085; Ex. 3-0269 – 3-0272; Parties’ Stipulated Facts

- January 2011: Intoxicated Endangerment
- June 2011: Underage Drinking (referenced as “unknown” in Ex. B3-08)
- July 2011: Driving Without a License
- August 2012: Reckless Driving
- July 2015: Driving on a Suspended License⁴⁹

45. Applicant submitted a Supplemental Form 1 and a narrative explanation disclosing that he was arrested in January 2011 for public intoxication and later charged with Intoxicated Endangerment in Maryland. Applicant stated that the matter was concluded on April 26, 2013, when the Intoxicated Endangerment charge was dismissed and subsequently expunged. Applicant provided documentation of the expungement, along with a written response from the Montgomery County Police Department indicating that the police report is not available because the case was expunged. Applicant stated that court personnel similarly informed him that the court records are not available due to the expungement.⁵⁰

46. In his narrative statements regarding the January 2011 incident, Applicant stated that he consumed alcohol with a cousin before going to an indoor amusement venue, became intoxicated in public, and was arrested for public intoxication. He further explained that this incident occurred during the same general period as his early alcohol-related offenses and shortly before he stopped drinking heavily.⁵¹

⁴⁹ Ex. 3-0008; Parties’ Stipulated Facts

⁵⁰ Ex. 8-03 – 8-15; Parties’ Stipulated Facts

⁵¹ Ex. 8-03; Parties’ Stipulated Facts

47. In response to Question 4.01B, Applicant also submitted a Supplemental Form 1 and a narrative explanation disclosing that he was charged in June 2011 with Underage Drinking in New Jersey. Applicant stated that he was arrested, pleaded guilty to a disorderly-persons-level offense, and paid a fine of approximately \$800.⁵²

48. In his narrative statement regarding the June 2011 incident, Applicant stated that, while under the legal drinking age, he attempted to purchase beer at a restaurant in Seaside Heights, New Jersey, using a fictitious license and was cited for underage drinking.⁵³

49. On January 14, 2025, Board staff asked Applicant to provide complete records relating to the August 2010 incident, including police reports, court records, and other pertinent documentation.⁵⁴

50. Applicant replied on January 22, 2025, and attached court records indicating he pleaded guilty in July 2011 to Public Nuisance and Possession/Consumption of Alcohol Under Legal Age. Applicant provided correspondence from the Seaside Heights (NJ) Police Department stating that he was issued a summons in connection with the offenses and that there is no police report.⁵⁵

51. In response to Question 4.01B, Applicant submitted a Supplemental Form 1 and a narrative explanation disclosing that he was charged in August 2012 in Virginia with Reckless Driving and No Valid Operating License. Applicant stated and court

⁵² Ex. 9-01 – 9-03; Parties' Stipulated Facts

⁵³ Ex. 9-03; Parties' Stipulated Facts

⁵⁴ Ex. 9-07; Parties' Stipulated Facts

⁵⁵ Ex. 9-07 – 9-13; Parties' Stipulated Facts

records reflect that Applicant pleaded guilty to both offenses in November 2012. The court imposed a \$250 fine.⁵⁶

52. In his written narrative related to the August 2012 incident, Applicant stated that he was “traveling 92 mph on the highway at the time I got pulled over. The Dinwiddie County officer searched my car (without asking for consent) and then issued tickets for Reckless Driving based on the speed and for no valid O.L.”⁵⁷

53. On January 14, 2025, Board staff asked Applicant to provide complete police records relating to the August 2012 incident, including police reports, court records, and other pertinent documentation.⁵⁸

54. On January 17, 2025, Applicant stated he contacted the Dinwiddie (VA) Sheriff’s Office and was told that the Sheriff’s Office does not create police reports in reckless-driving-by-speed matters. Applicant stated he had already provided a certified copy of the pertinent court records in his application. Board staff replied that the item would be marked complete.⁵⁹

55. In response to Question 4.01B, Applicant submitted a Supplemental Form 1 and a narrative explanation disclosing that he was charged in July 2015 in Maryland with Driving on a Suspended License. Applicant stated, and court records reflect, that Applicant pleaded guilty to the offense in July 2016.⁶⁰

⁵⁶ Ex. 11-03; Ex. 11-06 – 11-07; Parties’ Stipulated Facts

⁵⁷ Ex. 11-03; Parties’ Stipulated Facts

⁵⁸ Ex. 11-08; Parties’ Stipulated Facts

⁵⁹ Ex. 11-08; Parties’ Stipulated Facts

⁶⁰ Ex. 13-01 – 13-03; Ex. 13-06 – 13-07; Parties’ Stipulated Facts

56. On January 14, 2025, Board staff asked Applicant to provide complete records relating to the August 2010 incident, including police reports, court records, and other pertinent documentation.⁶¹

57. Applicant replied on January 24, 2025, and provided court records that reflected his plea of guilty to the offense. Applicant also provided documentation of his request for police reports related to the incident. The Montgomery County (MD) police department replied that no records existed.⁶²

58. On January 14, 2025, Board staff requested that Applicant provide a more detailed narrative describing the events and circumstances surrounding the July 2015 incident.⁶³

59. On March 1, 2025. Applicant stated his license was suspended at the time as a result of an administrative hearing held in connection with a prior DUI charge. Applicant further stated that he “was pulled over in Bethesda, I believe I had an appointment on that day. That I had an appointment was no excuse however for my driving on a license when it was suspended.”⁶⁴

60. Applicant also stated that “[i]t showed a disregard for the law and my obligation to follow the instructions of the MVA hearing judge regarding my driving privileges. I regret that I drove when I was not supposed to and that is something I would now never do nor even consider for a moment doing with who I am today.”⁶⁵

⁶¹ Ex. 13-08; Parties’ Stipulated Facts

⁶² Ex. 13-10 – 13-19; Parties’ Stipulated Facts

⁶³ Ex. 13-20; Parties’ Stipulated Facts

⁶⁴ Ex. 13-22 – 13-23; Parties’ Stipulated Facts

⁶⁵ *Id.*; Parties’ Stipulated Facts

61. Applicant stated he performed community service over two weekends and received negative points on his driver's license as a result of the offense.⁶⁶

62. On January 30, 2025, after the Board had marked this request "Completed" in the online portal, Applicant reopened the portal item and uploaded an additional written response from the Prince George's County Police Department, obtained after Montgomery County Police suggested that agency might have records, confirming that no police reports of the incident could be located.⁶⁷

63. Also in response to Question 4.01B, Applicant submitted Supplemental Forms and narrative explanations in connection with three other incidents that resulted in misdemeanor charges: (1) a July 2011 incident that resulted in Driving Without a License charge; (2) a December 2012 incident that resulted in a Driving Without a License charge; and (3) a January 2013 incident that resulted in Driving Without Required Authorization and Possessing Fictitious ID charges.⁶⁸

Additional Driving Incidents

64. In addition to the charged matters summarized above, Applicant's driving record includes the following traffic entries referenced in the Adverse Determination Letter issued by the Board:

- May 2009 Failure to Display License
- May 2011 Fail to Drive on Right Side of Roadway
- July 2011 Driving Without a License

⁶⁶ *Id.*; Parties' Stipulated Facts

⁶⁷ Ex. 13-24 – 13-26; Parties' Stipulated Facts

⁶⁸ Information about the incidents can be found in the record at Ex. 3-0076 – 3-0077; Ex. 3-0079; Ex. 3-0081 – 3-0082; Ex. 3-0102 – 3-0103; Ex. 3-0127 – 3-0132; Ex. 3-0136 – 3-0152 Ex. 3-0281 – 03-0282; Ex. 3-0285 – 3-0288; Parties' Stipulated Facts

- December 2011 Violation of License Restriction Notice
- September 2012 Driving Without a License
- August 2013 License Revocation
- October 2014 Interlock Non-Compliance/Driving Unreasonable Speed
- November 2014 Operating Handheld Telephone While Operating Vehicle
- July 2015 Violation of Interlock Restriction
- February 2016 Violation of License Restriction Suspension
- September 2017 No License in Possession
- September 2019 Failure to Pay Fine in District Court (Suspension)⁶⁹

Party to Legal Proceeding

65. Applicant answered “yes” to Question 4.06C on his bar application, which asks: “Have you EVER been a party to any civil proceeding?” Applicant identified thirty-one (31) matters in which he was a party to a civil proceeding.⁷⁰ A summary of all thirty-one proceedings is not included herein, but summaries and materials related to each proceeding are found in Applicant’s bar application and supplemental submissions.⁷¹ The findings herein focus primarily on civil matters referenced in the Adverse Determination Letter.

⁶⁹ Ex. 3-0036 – 3-0052; Parties’ Stipulated Facts

⁷⁰ Ex. 3-0009 – 3-0010; Parties’ Stipulated Facts

⁷¹ Ex. 3-0312 – 3-1597; Ex. 30; Parties’ Stipulated Facts

Party to a Legal Proceeding: Law School Application Disclosures

66. As part of his initial Minnesota bar application, Applicant submitted a complete copy of his September 2018 application to Lincoln Memorial University School of Law.⁷²

67. In December 2024, Board staff requested records from Lincoln Memorial University School of Law.⁷³

68. Lincoln Memorial University submitted Applicant's September 2018 application to its School of Law to the Board office in December 2024.⁷⁴

69. Character and Fitness Question 8 on the law school application asked applicants if they had "ever been a party to a legal proceeding?" Applicant checked "Yes." Character and Fitness Question 8(a) instructed applicants who answered "yes" to "explain the incident(s) and all relevant facts."⁷⁵

70. Applicant disclosed a single legal proceeding (*Mills v. PPE Casino Resorts, LLC, et al.*, referred to herein as the "PPE Casino Matter") and described it as a federal civil-rights and false-imprisonment case against Maryland Live Casino and two Anne Arundel County police officers. Applicant stated that the court found the Casino liable for false imprisonment and that the case later settled shortly before trial.⁷⁶

71. At the time Applicant submitted his law school application, he was the Plaintiff in eleven (11) other civil lawsuits that he did not list in his responses to Questions 8 and 8a on the law school application. Those lawsuits were:

⁷² Ex. 3-2084 – 3-2111; Parties' Stipulated Facts

⁷³ Ex. 16-01 – 16-03; Parties' Stipulated Facts

⁷⁴ Ex. 16-03 – 16-32; Parties' Stipulated Facts

⁷⁵ Ex. 16-09; Parties' Stipulated Facts

⁷⁶ Ex. 16-09; Parties' Stipulated Facts

- *Mills v. Anne Arundel County State's Attorney's Office* (2014)⁷⁷
- *Mills v. SunTrust Bank* (2015)⁷⁸
- *Mills v. Wynn Las Vegas, LLC* (2015)⁷⁹
- *Mills v. Howard County State's Attorney* (2016)⁸⁰
- *Mills v. Maryland State Police* (2016)⁸¹
- *Mills v. Office of the State Prosecutor* (2017)⁸²
- *Mills v. Harford State's Attorney's Office* (2017)⁸³
- *Mills v. Department of State Police* (2017)⁸⁴
- *Mills v. Hassan, et al.* (2018)⁸⁵
- *Mills v. SunTrust Bank* (2018)⁸⁶
- *Mills v. Jackson, et al.* (2018)⁸⁷

72. On January 17, 2025, Board staff asked Applicant to confirm whether he had failed to disclose the eleven matters identified above and, if so, provide a narrative explanation as to why the information was not disclosed to his law school.⁸⁸

73. Applicant replied with a narrative statement on February 12, 2025. Applicant stated that he did not intend to hide his involvement in any civil matters and

⁷⁷ Ex. 17; Parties' Stipulated Facts

⁷⁸ Ex. 18; Parties' Stipulated Facts

⁷⁹ Ex. 19; Parties' Stipulated Facts

⁸⁰ Ex. 20; Parties' Stipulated Facts

⁸¹ Ex. 21; Parties' Stipulated Facts

⁸² Ex. 22; Parties' Stipulated Facts

⁸³ Ex. 23; Parties' Stipulated Facts

⁸⁴ Ex. 24; Parties' Stipulated Facts

⁸⁵ Ex. 25; Parties' Stipulated Facts

⁸⁶ Ex. 26; Parties' Stipulated Facts

⁸⁷ Ex. 27; Parties' Stipulated Facts

⁸⁸ Ex. 29-1 – 29-2; Parties' Stipulated Facts

that, when applying to law school, he discussed his civil-rights litigation in his personal statement and specifically disclosed *Mills v. PPE Casino Resorts*, as well as his intention to file *Mills v. Golden Nugget Atlantic City*. He stated that he focused on “the case that was most prominent in my mind.” Applicant stated that “my failure to identify the other cases was clearly an oversight on my part that I regret.”⁸⁹

74. Applicant testified at the hearing that there were indeed 11 additional civil matters in which he was the plaintiff at the time he submitted his law school application.⁹⁰ He testified that he should have listed all the matters and he “intended to look them up” and he “forgot to do that.”⁹¹ Applicant testified that some of the matters he intended to “look up” were dismissed as recently as a few month before he submitted the law school application and one matter was pending on appeal at the time of that law school application.⁹²

75. As to why he didn’t update his application to the law school as to his civil matters when he updated the law school as to the criminal matters applicant testified that when the dean came and talked to the class, he focused on the criminal matters and had the dean focused on the civil matters, he would have updated those as well.⁹³

76. Applicant secured a judgment or received a settlement payment in four (4) of the civil actions that were not listed in his law school application:

- In *Mills v. SunTrust Bank* (2015), the court entered judgment for \$1892.26 in Applicant’s favor against SunTrust, which had withheld

⁸⁹ Ex. 29-3 – 29-5; Parties’ Stipulated Facts

⁹⁰ Tr. 52:6 - 7

⁹¹ Tr. 52: 10 - 14

⁹² Tr. 165: 5 - 12

⁹³ Tr. 53: 11-24.

those funds in Applicant's bank accounts.⁹⁴ However, three years later, Applicant sued SunTrust Bank again, regarding the same \$1,776 withheld in his bank account, and sought \$20,000 in compensatory damages and \$500,000 in punitive damages.⁹⁵ Applicant alleged in this second lawsuit that he suffered severe emotional distress and the bank acted with "depravity and actual malice and acted in the spirit of criminal indifference."⁹⁶ The second matter was dismissed on res judicata grounds and the Fourth Circuit affirmed the trial court's dismissal.⁹⁷ Applicant testified that he sued the bank three years later because he "thought [his] attorney should have sued for more than the amount withheld."⁹⁸

- In *Mills v. Department of State Police* (2017), the Circuit Court for Montgomery County ordered the Maryland State Police to produce records requested by Applicant under the Maryland Public Information Act and awarded Applicant \$3,500 in attorney's fees.⁹⁹
- In *Mills v. Jackson, et al.* (2018), the court entered judgment in Applicant's favor in the total amount of \$3,000 for compensatory damages against three individuals who had not paid Applicant back for

⁹⁴ Ex. 18; Parties' Stipulated Facts

⁹⁵ Tr. 150: 10 – 25; 151: 1 - 2

⁹⁶ Tr. 151: 6 - 10

⁹⁷ Tr. 151: 11 - 16

⁹⁸ Tr. 151: 17 - 23

⁹⁹ Ex. 24; Parties' Stipulated Facts

a \$1,000 loan he provided to each of the three individuals. The court denied Applicant's request for punitive damages.¹⁰⁰

- In *Mills v. Wynn Las Vegas, LLC* (2015), Applicant sued a casino for \$10,000 in compensatory and punitive damages. Applicant alleged that the casino had improperly breached his room contract and improperly banned him from the casino based on allegations of card counting. The Applicant settled the matter with the casino for \$83.¹⁰¹

Party to a Legal Proceeding: Petitions for Writs of Mandamus

77. Between 2014 and 2022, Applicant filed seven (7) petitions for writs of mandamus in Maryland courts. One of the petitions related to the PPE Casino Matter summarized above.¹⁰² The other six petitions arose from the arresting State Trooper's testimony in connection with the 2015 prosecution of Applicant on suspicion of drunk driving, a charge on which Applicant was ultimately acquitted.¹⁰³ The seven petitions, along with the underlying 2015 matter, are summarized below.

Mandamus Petition re: PPE Casino Matter

78. *Mills v. Anne Arundel County State's Attorney's Office* (2014): Applicant sought the criminal prosecution of a security shift manager involved in detaining him at a PPE Casino. The Anne Arundel County State's Attorney's Office declined to prosecute. Applicant filed an administrative mandamus petition, through counsel, asking a Maryland circuit court to review the Anne Arundel County State's Attorney's Office's decision to

¹⁰⁰ Ex. 27; Parties' Stipulated Facts

¹⁰¹ Ex. 19; Parties' Stipulated Facts

¹⁰² Ex. 17; Parties' Stipulated Facts

¹⁰³ Exs. 20, 21, 22, 23, 31, 32; Parties' Stipulated Facts

decline criminal prosecution of the security shift manager. Applicant stated in his Minnesota bar application that the prosecutor “feigned” that it would be too difficult to prosecute because of a lack of evidence, and he believed that assessment was inconsistent with the available video and other evidence. Applicant, through counsel, also alleged that the prosecutor’s office and state’s attorney had an actual or apparent conflict of interest arising from casino-related funding to local law enforcement. The circuit court denied the petition, stating that (1) the decision to prosecute lies in the discretion of the prosecuting authority absent a gross abuse of discretion, and (2) the prosecutor’s office had not grossly abused its discretion in this matter, either on the merits or due to any personal benefit or funding by the casino to Anne Arundel County.¹⁰⁴

Mandamus Petitions re: 2015 Arrest and Prosecution

79. In 2015, Applicant was stopped on suspicion of drunk driving by Maryland State Trooper Anthony Hassan. Trooper Hassan arrested Applicant. Applicant was charged with Driving Under the Influence and related offenses in Howard County, Maryland.¹⁰⁵

80. Applicant was convicted of DUI after a bench trial in the District Court for Howard County (MD). Applicant appealed the conviction, resulting in a jury trial in the Circuit Court for Howard County. After a de novo jury trial, Applicant was found not guilty of driving under the influence.¹⁰⁶

81. Following the acquittal of the DUI charge, Applicant filed an administrative complaint with the Maryland State Police alleging that Trooper Hassan, who testified at

¹⁰⁴ Ex. 17-01 – 17-06; Parties’ Stipulated Facts

¹⁰⁵ Ex. 36-01 – 36-02; Ex. 36-51 – 36-57; Parties’ Stipulated Facts

¹⁰⁶ Ex. 36-03; Parties’ Stipulated Facts

both the bench trial and the jury trial, had committed perjury. The complaint was investigated by the Maryland State Police's Internal Affairs Division (IAD). The IAD determined that Applicant's claim was "unfounded." In addition, Applicant requested that state court prosecutor's offices charge Trooper Hassan with perjury. State court prosecutors declined to charge Trooper Hassan.¹⁰⁷

82. After the IAD's determination and prosecutorial declinations, Applicant filed six petitions for a writ of mandamus in connection with the Trooper's testimony. As is summarized in additional detail below, Applicant asked a court to order Maryland State Police to terminate Trooper Hassan's employment, to compel state prosecutors to file perjury charges against Trooper Hassan, to direct state prosecutors to permit Applicant to present evidence to the grand jury in support of a perjury indictment of Trooper Hassan, and to compel the Maryland bar to take action against a state prosecutor who Applicant alleged had falsely represented to IAD that Trooper Hassan did not commit perjury.

83. The six (6) mandamus petitions filed by Applicant in connection with the 2015 incident were:

- a. *Mills v. Maryland State Police* (2016): Applicant filed an administrative mandamus petition asking a Maryland circuit court to "modify" the IAD's determination from unfounded to "sustained" and order the Maryland State Police to terminate Trooper Hassan's employment. The circuit court dismissed the petition. Applicant appealed, and a Maryland appellate court affirmed the dismissal. The appellate court concluded that administrative mandamus was not available as to the IAD's determination and that, even

¹⁰⁷ Ex. 21-001; Ex. 21-003 – 21-005; Ex. 21-009 – 21-012; Parties' Stipulated Facts

if it were, Applicant “lacked standing to file a petition for writ of administrative mandamus in any event,” because “having a personal desire to see Trooper Hassan punished did not give Mills a ‘clear legal right or protected interest’ in the outcome of the Division’s investigation.” The appellate court did not address whether Trooper Hassan in fact testified falsely.¹⁰⁸

- b. *Mills v. Howard County State’s Attorney* (2016): After a Howard County (MD) prosecutor declined to charge Trooper Hassan with perjury, Applicant filed a petition for a writ of administrative mandamus in a state court in Maryland. Applicant asked the court to compel the state prosecutor to charge Trooper Hassan. The court dismissed the petition after concluding Applicant’s requested relief was not cognizable. Applicant appealed, and a Maryland appellate court affirmed the dismissal. The appellate court concluded that administrative mandamus was not applicable to a prosecutor’s decision to decline prosecution. The court further concluded that even if Applicant’s petition was recharacterized as a petition for non-administrative writ of mandamus, the court would still affirm the dismissal given Applicant’s petition did not allege a gross abuse of discretion as required or any other basis for mandamus relief recognized under Maryland law and therefore mandamus was unavailable.¹⁰⁹

- c. *Mills v. Office of the State Prosecutor* (2017): Applicant filed a petition for a writ of common law mandamus against a state court prosecutor in a state

¹⁰⁸ Ex. 21-001 – 21-005; Ex. 21-009 – 21-012; Parties’ Stipulated Facts

¹⁰⁹ Ex. 20-001 – 20-006; Parties’ Stipulated Facts

court in Maryland. Applicant alleged that the prosecutor's declination of perjury charges was "arbitrary and capricious and constitutes a gross abuse of discretion." Applicant asked the court to compel the prosecutor's office to charge Trooper Hassan with perjury or order the prosecutor to allow Applicant to present evidence to the grand jury in furtherance of such a charge. The state court dismissed the petition. Applicant appealed the dismissal, and a Maryland appellate court affirmed the dismissal. The appellate court concluded that common law mandamus was not available to Applicant because the decision of whether to bring charges was discretionary and the prosecutor had not committed a gross abuse of that discretion. With respect to Applicant's grand jury presentment claim, the court stated that "Mr. Mills, like any citizen, has the right to offer to ask the grand jury foreman for permission to appear before that body," but held that his request for declaratory relief was not ripe because, under Maryland common law precedent, that right arises only after exhausting other remedies, including requesting a statement of charges from a District Court Commissioner—steps Applicant had not yet alleged he had taken.¹¹⁰

- d. *Mills v. Harford State Attorney's Office* (2017): During proceedings related to the 2015 Driving While Intoxicated charge, Trooper Hassan testified in both Howard County (MD) and Harford County (MD). Prosecutors in both counties declined Applicant's request to charge Trooper Hassan with perjury. Approximately one year after filing a mandamus petition in Howard

¹¹⁰ Ex. 3-0453 – 3-0455; Ex. 22-001 – 22-012; Parties' Stipulated Facts

County challenging the declination there as summarized above, Applicant filed a mandamus petition in Harford County alleging that the Harford County prosecutor's declination of perjury charges was "patently arbitrary and capricious." Applicant asked the court to compel the prosecutor's office to charge Trooper Hassan with perjury. The circuit court granted the prosecutor's motion to dismiss. Applicant stated in his application that after reading the judicial opinion, Applicant voluntarily withdrew his Harford County mandamus appeal.¹¹¹

- e. *Mills v. Office of Bar Counsel* (2018): Applicant filed a bar complaint in Maryland against a former Assistant State's Attorney regarding statements she made to the Maryland State Police Internal Affairs Division ("IAD") during its investigation of Applicant's perjury complaint against Trooper Hassan. Applicant alleged that the prosecutor had committed misconduct by, he asserted, falsely representing to the IAD that Trooper Hassan had not perjured himself and inaccurately stating that Applicant had been found guilty of DUI charges in the Circuit Court. The Office of Bar Counsel concluded that there was not sufficient evidence to support a finding of an ethics violation. Applicant then filed a petition for common law mandamus asking a Maryland court to compel the Office of Bar Counsel to reinstate and pursue an ethics investigation. The Maryland state court dismissed the petition for lack of standing.¹¹²

¹¹¹ Ex. 23-01 – 23-21; Parties' Stipulated Facts

¹¹² Ex. 31-01 – 31-10; Parties' Stipulated Facts

f. *Mills v. Sandmann, et al.* (2022): Applicant filed a lawsuit against a Howard County prosecutor and the prosecutor's office seeking \$150,000 in damages and issuance of a writ of common law mandamus. Applicant alleged that the prosecutor had denied Applicant his right to appear in front of a grand jury to present evidence of alleged perjury by Trooper Hassan.¹¹³ In 2023, a Howard County circuit court judge allowed Applicant's mandamus and injunctive relief claims to proceed to the discovery phase while granting the state's motion for summary judgment on two other claims.¹¹⁴ Applicant stated in his Minnesota bar application that this matter was pending.¹¹⁵ Applicant testified at the December 2025 hearing that a bench trial resulted in an adverse decision for him "several, several months ago" and that he updated the Board office when he received that order.¹¹⁶

84. In 2018, Applicant filed a federal civil-rights action under 42 U.S.C. § 1983 in the United States District Court for the District of Maryland against Trooper Hassan and other officers in federal district court in Maryland arising out of his 2015 DUI arrest and related proceedings. Applicant alleged that Trooper Hassan testified falsely regarding the facts and circumstances of the arrest. Applicant sought \$2 million in compensatory and \$2 million in punitive damages. The district court dismissed the lawsuit without reaching the merits of Applicant's allegations regarding the Trooper's testimony. Applicant appealed, and the Fourth Circuit Court of Appeals affirmed the dismissal.

¹¹³ Ex. 32-01 – 32-24; Parties' Stipulated Facts

¹¹⁴ Ex. 38-28 – 38-33; Ex. 38-41– 38-43; Parties' Stipulated Facts

¹¹⁵ Ex. 32-01; Parties' Stipulated Facts

¹¹⁶ Tr. 97: 1 -13

Applicant petitioned the Supreme Court for a writ of certiorari, and the petition was denied.¹¹⁷

85. During the December 2025 hearing, Applicant acknowledged that no court had ever determined that the trooper testified falsely in the 2015 matter.¹¹⁸ Applicant also acknowledged that he did not know why the jury reached the conclusion to acquit him of the DUI charge and had in fact convicted him of unsafe lane change and negligent driving.¹¹⁹ He also admitted that he had approached three different prosecutors to compel prosecution after they declined prosecution, and sued the officer twice in civil matters for \$4,000,000 each time and conceded that both of the cases were dismissed.¹²⁰

Violation of Law School's Code of Academic Integrity

86. Applicant answered “yes” to Question 4.17(C) on his bar application, which asks: “Have you EVER been warned, placed on probation, suspended, requested to discontinue your studies, allowed to discontinue your studies in lieu of discipline, expelled, dismissed, or otherwise disciplined, by a post-secondary school, college, university, or law school” due to any reason other than academic performance or conduct related to alcohol or drugs?¹²¹

87. Applicant submitted a Supplemental Form and related materials disclosing a violation of his law school's Code of Academic Integrity committed during his last year at Lincoln Memorial University School of Law. The materials, which Applicant states are

¹¹⁷ Ex. 25; Parties' Stipulated Facts

¹¹⁸ Tr. 124: 13-21

¹¹⁹ Tr. 124: 22; 125: 24

¹²⁰ Tr. 126: 3-16

¹²¹ Ex. 33-01; Parties' Stipulated Facts

everything provided to him by the School of Law regarding the violation¹²², include the following:

- a. Narrative explanation submitted on Supplemental Form within bar application ¹²³
- b. Confidential Plea Agreement¹²⁴
- c. Memorandum from Law Professor April Meldrum to Law School Administrators re: Professor Meldrum's Response to Mr. Mills' Academic Grievance and re: Professor Meldrum's Complaint against Applicant for a violation of the Code of Academic Integrity, all dated May 26, 2022.¹²⁵ Professor Meldrum's Response to the Academic Grievance, as referenced in the Memorandum, is not in the materials.
- d. Pages 1 and 3 of Applicant's "Academic Grievance Against Law Professor April Meldrum Seeking Grade Change Based on Arbitrary and Capricious Grading" dated April 8, 2022, with accompanying email correspondence.¹²⁶ Page 2 of the Academic Grievance is not in the materials.
- e. "Notice of Academic Integrity Violation" from Lincoln Memorial University School of Law to Applicant dated June 1, 2022¹²⁷

¹²² Ex. 44; Parties' Stipulated Facts

¹²³ Ex. 33-02; Parties' Stipulated Facts

¹²⁴ Ex. 33-03 – 33-05; Parties' Stipulated Facts

¹²⁵ Ex. 33-07; Parties' Stipulated Facts

¹²⁶ Ex. 33-09 – 33-12; Parties' Stipulated Facts

¹²⁷ Ex. 33-13 – 33-14; Parties' Stipulated Facts

- f. Written Reprimand for Violation of the LMU Law Code of Academic Integrity from Lincoln Memorial University School of Law to Applicant dated July 27, 2022¹²⁸
- g. Email exchange between National Conference of Bar Examiners and Applicant re: MPRE Exam dated March 21, 2022¹²⁹
- h. Email exchanges between Law School Professor April Meldrum and Applicant re: MPRE Exam from March and April 2022¹³⁰
- i. Exhibit 1 through Exhibit 6 to Law Professor April Meldrum's Response to Applicant's Academic Grievance¹³¹
- j. Applicant's Response to Professor Meldrum's Complaint Alleging Violation of the Academic Integrity Code submitted to Lincoln Memorial University School of Law on or about June 9, 2022¹³²
- k. Preservation of Evidence Demand Letter from Mr. Mills's counsel to Lincoln Memorial University School of Law dated June 7, 2022¹³³
- l. Notice of Representation Letter from Applicant's counsel to Lincoln Memorial School of Law dated June 6, 2022¹³⁴
- m. Notice of Voluntary Dismissal by Applicant of his Academic Grievance against Law Professor April Meldrum dated June 22, 2022¹³⁵

¹²⁸ Ex. 33-17; Parties' Stipulated Facts

¹²⁹ Ex. 33-18 – 33-19; Parties' Stipulated Facts

¹³⁰ Ex. 33-20 – 33-22; Parties' Stipulated Facts

¹³¹ Ex. 33-23 – 33-38; Parties' Stipulated Facts

¹³² Ex. 33-39 – 33-44; Parties' Stipulated Facts

¹³³ Ex. 33-45 – 33-47; Parties' Stipulated Facts

¹³⁴ Ex. 33-48; Parties' Stipulated Facts

¹³⁵ Ex. 33-49; Parties' Stipulated Facts

n. Investigative Subcommittee Questions dated June 30, 2022, and Applicant's Responses dated July 5, 2022, re: Academic Integrity Committee Complaint lodged against Applicant¹³⁶

88. Applicant was a student in Professor April Meldrum's Professional Responsibility course at Lincoln Memorial University School of Law in Spring 2022. One of the requirements of Professor Meldrum's course was to take the Multistate Professional Responsibility Exam (MPRE). The MPRE test was one component of a student's grade in Professor Meldrum's course.¹³⁷

89. Applicant completed initial steps to register for the MPRE with Pearson Vue, the third-party test administrator. Applicant did not read all the details of the "Authorization to Test" email and did not realize that he needed to take additional steps to complete the registration process. As a result, Applicant was not permitted to take the MPRE during the Spring 2022 semester.¹³⁸

90. After being informed by Pearson Vue that he had failed to complete test registration and thus could not take the MPRE in Spring 2022, Applicant communicated with Professor Meldrum seeking to avoid a negative impact on his course grade. Applicant asserted that he reasonably believed based on the "Authorization to Test" email, that he had done everything required to register and take the test. Applicant forwarded the "Authorization to Test" email that Pearson Vue had sent Applicant, but the

¹³⁶ Ex. 33-50 – 33-55; Parties' Stipulated Facts

¹³⁷ Ex. 33-03; Parties' Stipulated Facts

¹³⁸ Ex. 33-03.; Parties' Stipulated Facts

version of the email he forwarded did not include details Pearson Vue provided regarding the additional steps required to complete the process of registering for the exam.¹³⁹

91. When Professor Meldrum declined to grant Applicant's requested relief with respect to his course grade, Applicant submitted an academic grievance to the Dean of Academic Affairs seeking a grade change based upon an allegation that Professor Meldrum's grading was "arbitrary and capricious." Applicant requested that "either that the MPRE grade be omitted from the course grade or in the alternative, that the upcoming exam result from his August 2022, MPRE be used to calculate the 20% of the course grade allocated to the MPRE."¹⁴⁰ Applicant also asserted that his "inability to take the MPRE in March [2022] was directly caused by Pearson Vue's material misrepresentation" about what was required to register for the MPRE.¹⁴¹

92. In connection with his Grievance, Applicant forwarded to the Dean of Academic Affairs the same, incomplete version of the Pearson Vue "Authorization to Test" email that he had provided to Professor Meldrum.¹⁴²

93. In Professor Meldrum's response to Applicant's Grievance, Professor Meldrum submitted the full version of the "Authorization to Test" email, including the instructions about the additional test-registration steps Applicant had failed to complete. Professor Meldrum also submitted a Complaint alleging that Applicant had violated the Law School's Academic Integrity Code by acting dishonestly when he omitted relevant

¹³⁹ *Id.*; Parties' Stipulated Facts

¹⁴⁰ Ex. 33-09 – 33-10; Parties' Stipulated Facts

¹⁴¹ Ex. 33-10; Parties' Stipulated Facts

¹⁴² Ex. 33-03; Parties' Stipulated Facts

language from the email in his submissions to Professor Meldrum and to the Dean of Academic Affairs.¹⁴³

94. In his June 9 response to Professor Meldrum's Complaint, Applicant, by and through counsel, denied all allegations in the complaint.¹⁴⁴ Applicant stated that "after some time to reflect on the matter, [he] now realizes he was negligent in failing to read the entire email sent by Pearson Vue, which led to his lack of knowledge of the other steps he needed to take" to register for the MPRE.¹⁴⁵

95. Applicant stated, with respect to his submission of the partial "Authorization to Test" email to Professor Meldrum and the Dean of Academic Affairs, that the portion of the email he submitted was the portion he had relied upon in registering for the MPRE. He stated he did not intentionally mislead or act recklessly by not submitting the entire email.¹⁴⁶

96. On June 22, 2022, Applicant voluntarily dismissed his Academic Grievance against Professor Meldrum.¹⁴⁷

97. On July 26, 2022, Applicant entered into a confidential Plea Agreement to resolve the Complaint filed against him by Professor Meldrum. The Agreement states that the Law School's Academic Integrity Committee had "determined that sufficient evidence exists to demonstrate that Mr. Mills violated the Code [of Academic Integrity]."¹⁴⁸

¹⁴³ Ex. 33-03 – 33-04; Parties' Stipulated Facts

¹⁴⁴ Ex. 33-39; Parties' Stipulated Facts

¹⁴⁵ Ex. 33-41; Parties' Stipulated Facts

¹⁴⁶ Ex. 33-41 – 33-43; Parties' Stipulated Facts

¹⁴⁷ Ex. 33-49; Parties' Stipulated Facts

¹⁴⁸ Ex. 33-03; Parties' Stipulated Facts

The Committee concluded that Applicant “recklessly violated [the Code] by acting dishonestly in an academic pursuit.”¹⁴⁹

98. The Committee determined that two sanctions would be imposed for the violation: a written reprimand and suspension from the School of Law for five months, with the totality of the suspension to be served on probation.¹⁵⁰

99. Applicant agreed to the terms of the Plea Agreement, admitted to and accepted responsibility for the conduct stated within the Plea Agreement, and consented to the sanctions imposed by the Committee.¹⁵¹

100. In the narrative statement submitted by Applicant with his bar application regarding the Academic Integrity Code violation, Applicant stated:

During my last year of law school, we were assigned to take the MPRE exam as 20% of our grade for the Professional Responsibility Course. The test was administered by Pearson Vue who sent us emails with instructions on how to register for the exam. I failed to completely read all of the exam registration instructions and that’s why I did not take all of the steps necessary to register properly. I was notified by Pearson Vue that I could not take the exam because I failed to register properly and pay to schedule the exam.

I was unable at the time to accept that it was my fault and blamed Pearson Vue. I failed to forward the complete email I received from Pearson to the Professor, and I asked her if she would let me take the test at the next administration and use that for my grade since I could not take it at the intended date. When the Professor refused and told me she did not know how it would adversely affect my grade, at the time I thought that it was not fair. So, I wrongly filed an academic grievance against her. I first wrongly blamed Pearson Vue then wrongly blamed the Professor when all along it was my mistake and my failure to fully read the instructions that I could not take the test along with all of my classmates.

¹⁴⁹ Ex. 33-04; Parties’ Stipulated Facts

¹⁵⁰ *Id.*; Parties’ Stipulated Facts

¹⁵¹ Ex. 33-05; Parties’ Stipulated Facts

I signed a plea agreement with my law school accepting responsibility, and as sanctions was given probation and a written reprimand.¹⁵²

101. Applicant answered “yes” to Question 4.18 on his bar application, which asks: “Have allegations, complaints, or charges (formal or informal) EVER been made against you during your enrollment in a post-secondary school, college, university, or law school alleging academic or personal misconduct, including but not limited to honor code violations, plagiarism, cheating, or Title IX violations?” Applicant submitted a Supplemental Form disclosing the same Code of Academic Integrity violation identified in response to Question 4.17(C) and summarized above. Applicant’s narrative statement and the supplemental materials submitted in connection with Question 4.18 are identical to the statement and materials submitted in connection with his affirmative answer to Question 4.17(C).¹⁵³

102. Applicant acknowledged in the December hearing that as part of the proceedings with his law school that he acknowledged that he “wrongly filed an academic grievance against [the professor], first wrongly blaming Pearson Vue, then wrongfully blaming the professor, when all along it was [his] mistake.”¹⁵⁴

103. Applicant testified at the December 2025 that, as a result of this incident, he “learned to be careful and thoughtful when [he is] reviewing documents and to not rush to blame other people and see...and take a close look to see if the issue is due to [his] own oversight.”¹⁵⁵

¹⁵² Ex. 33-02; Parties’ Stipulated Facts

¹⁵³ Ex. 3-0014; Ex. 3-1705 – 3-1761; Parties’ Stipulated Facts

¹⁵⁴ Tr. 161: 10-15

¹⁵⁵ Tr. 59: 7 - 11

OTHER BAR APPLICATION

California Bar Application: Adverse Character and Fitness Determination

104. Applicant answered “yes” to Question 3.02 on his bar application, which asks: “Have you ever applied for or registered for any bar exam in any other state (than Minnesota), other jurisdiction, or foreign jurisdiction?” Applicant disclosed one bar application, and two associated exam attempts for admission to the California bar. Applicant submitted his application to the California bar in August 2022.¹⁵⁶

105. In connection with his California bar application, Applicant submitted a Character and Fitness Application to the California bar (“California CFA”).¹⁵⁷

106. Applicant’s California CFA included:

- a. Reference letters¹⁵⁸
- b. A narrative submission regarding “Circumstances of Criminal Matters and History of Drug and Alcohol Use” and accompanying court documents¹⁵⁹
- c. A narrative submission regarding “Circumstances of Academic Integrity Matter” and accompanying documents¹⁶⁰
- d. A narrative submission regarding “Circumstances of Civil Matters” and accompanying court documents¹⁶¹

107. As part of the California CFA process, Applicant participated in an informal conference with a California State Bar attorney and others.¹⁶²

¹⁵⁶ Ex. 34-0001 – 34-0004; Parties’ Stipulated Facts

¹⁵⁷ Ex. 34-0004; Parties’ Stipulated Facts

¹⁵⁸ Ex. 34-0007 – 34-0015; Parties’ Stipulated Facts

¹⁵⁹ Ex. 34-0016 – 34-0110; Parties’ Stipulated Facts

¹⁶⁰ Ex. 34-0111 – 34-0357; Parties’ Stipulated Facts

¹⁶¹ Ex. 34-0374 – 34-1424; Parties’ Stipulated Facts

¹⁶² Ex. 34-0005 – 34-0006; Parties’ Stipulated Facts

108. After the consideration of Applicant's CFA and the informal conference, the State Bar of California determined that Applicant had not met his burden of establishing good moral character.¹⁶³

109. In its letter scheduling Applicant's informal conference, the State Bar of California specifically identified Applicant's November 2017 arrest in New Jersey for felony theft by deception as one of the character and fitness issues to be addressed.¹⁶⁴

110. Applicant asserted in his written submissions to this Board that the State Bar of California misapprehended his felony 2017 theft by deception arrest as misconduct even though the felony theft by deception charge was dismissed "in the interest of justice" by the New Jersey Deputy Attorney General.¹⁶⁵

111. In subsequent federal civil litigation arising from the same incident, the United States District Court for the District of New Jersey held that no reasonable officer could have believed there was probable cause for theft by deception or any other crime.¹⁶⁶ The court entered summary judgment in Applicant's favor on his false-arrest and related constitutional claims, and the New Jersey officers later settled with Applicant for \$285,000.¹⁶⁷

112. The State Bar of California stated that:

This decision was reached after a consideration of factors including, but not limited to:

- the circumstances surrounding multiple arrests and convictions from 2010–2019;

¹⁶³ Ex. 35-3; Parties' Stipulated Facts

¹⁶⁴ Ex. 34-1425; Parties' Stipulated Facts

¹⁶⁵ Ex. 3-0689 – 3-0690; Ex. 6-2446 – 6-2449; Parties' Stipulated Facts

¹⁶⁶ Ex. 3-0864; Ex. 3-0922; Parties' Stipulated Facts

¹⁶⁷ Ex. 3-0829 – 3-0834; Ex. 3-0936 – 3-0942; Parties' Stipulated Facts

- the circumstances surrounding the 2022 reckless violation of the Code of Academic Integrity, involving dishonesty, at Lincoln Memorial University School of Law;
- a lack of candor;
- a lack of insight;
- insufficient rehabilitation; and,
- generally, their failure to establish that they are of good moral character as required by Section 6060 of the California Business and Professions Code and Title 4, Division 1, Chapter 4 of the Rules of the State Bar of California (Admissions Rules).¹⁶⁸

113. The Board sent a written inquiry to the State Bar of California asking whether Applicant had ever failed to disclose any information in connection with the California CFA process. The State Bar of California responded in writing, “No.”¹⁶⁹

114. Applicant did not pursue further review by the California Committee of Bar Examiners of the adverse determination. Applicant is eligible to submit another California CFA in October 2026.¹⁷⁰

115. Applicant submitted his California CFA to the Board.¹⁷¹ The California CFA contained many of the same disclosures and documents already provided in Applicant’s Minnesota bar application. Where material from the California CFA is relevant to matters summarized in these Stipulated Facts, it has been incorporated into the corresponding factual stipulations and exhibits.

¹⁶⁸ Ex. 35-3; Parties’ Stipulated Facts

¹⁶⁹ Ex. 6-0199; Parties’ Stipulated Facts

¹⁷⁰ Ex. 34-0006; Ex. 35-3; Parties’ Stipulated Facts

¹⁷¹ Ex. 34-0007 – 34-1424; Parties’ Stipulated Facts

116. Applicant acknowledged in the hearing that he did not know what motivated California to reach their conclusions despite asserting in his testimony that California's decision appeared to be based on a misapprehension of his felony by deception arrest.¹⁷²

117. He acknowledged that the letter he received before the California interview drew a clear distinction between the incidents that resulted in an arrest and those that resulted in an arrest and conviction.¹⁷³ He further acknowledged that the letter clearly indicated that California knew he had not been convicted of any charge arising out of the arrest.¹⁷⁴

PENDING MATTERS

118. Applicant identified four (4) litigation matters as pending at the time of his Minnesota bar application¹⁷⁵:

- a. *Mills v. Sandmann, et al.* (2022): This lawsuit is summarized above as one of the mandamus matters. Applicant, through counsel, sued a Howard County prosecutor and the prosecutor's office seeking \$150,000 in damages and issuance of a writ of common law mandamus. Applicant alleged that the prosecutor had denied Applicant his right to appear in front of a grand jury to present evidence of alleged perjury by Trooper Hassan.¹⁷⁶ At a May 1, 2023, hearing, a Howard County circuit court denied defendants' motion to dismiss and request for summary judgment on the

¹⁷² Tr. 170: 3-21

¹⁷³ Tr. 170-172

¹⁷⁴ Tr. 173: 10-14

¹⁷⁵ To the extent there are other matters referred to in the application as pending, other documentation submitted by Applicant appears to demonstrate that those matters have concluded; Parties' Stipulated Facts

¹⁷⁶ Ex. 32-01 – 32-24; Parties' Stipulated Facts

mandamus and injunctive relief counts and allowed Applicant's claims to proceed.¹⁷⁷

- b. *Mills v. Rosen, et al.* (2024): Applicant sued Trooper Hassan and a former Howard County (MD) prosecutor for \$4 million, alleging that (1) Trooper Hassan perjured himself in court proceedings related to the 2015 DWI arrest and prosecution, and (2) that the prosecutor defamed Applicant by making statements to State Police investigators that were adverse to Applicant's perjury complaint against Trooper Hassan and that Applicant alleged were false.¹⁷⁸ Applicant testified that the district court dismissed the matter and it is currently pending on appeal in Maryland.¹⁷⁹
- c. *Mills v. Caesar Entertainment, Inc.* (2024): Applicant filed a civil action in New Jersey against an Atlantic City casino for \$700,000, alleging that the casino violated New Jersey's common law right of access by denying him access to gaming tables contrary to *Uston v. Resorts International Hotel, Inc.* after having identified him as a skilled player.¹⁸⁰ Applicant testified that this matter is currently in the discovery stage.¹⁸¹
- d. *Mills v. Leguen* (2024): Applicant sued the District Health Officer of the Southern Nevada Health District for \$500,000 and injunctive relief, alleging that Nevada's statutory exemption in the Nevada Clean Indoor Air Act that excludes casino resorts from the statute's general prohibition on indoor

¹⁷⁷ Ex. 38; Parties' Stipulated Facts

¹⁷⁸ Ex. 3-1486 – 3-1580; Parties' Stipulated Facts

¹⁷⁹ Tr. 97: 22 – 25; 98: 2 - 4

¹⁸⁰ Ex. 3-1478 – 3-1484; Parties' Stipulated Facts

¹⁸¹ Tr. 99: 24 -25; 98: 1

smoking in other public places is unconstitutional (violates Equal Protection) and violates common law rights.¹⁸² The matter was dismissed on “multiple grounds” including qualified immunity; Applicant testified that he has appealed this matter to the Ninth Circuit.¹⁸³ On November 20, 2025, the Court denied a motion to dismiss for lack of jurisdiction to renewing the arguments in the answering brief.¹⁸⁴

119. Applicant testified that he filed a lawsuit against Airbnb in January 2023, seeking \$350,000 in compensatory damages and \$350,000 in punitive damages, alleging that because of the air freshener and Tide detergent “deliberately added” to the bedsheets and into the air of the room, he was unable to sleep and thus failed the California bar exam.¹⁸⁵ The arbitrator dismissed Applicant’s claims and noted, “It is undisputed that [Applicant] did not tell the host or Airbnb that [Applicant] had a heightened sensitivity to scents or ask whether the host used scented products” and that after issues with the air freshener arose, Applicant messaged the Airbnb host and said “I should have mentioned those chemicals, air freshener things make me nauseous.”¹⁸⁶

120. Following the testimony related to his \$700,000 dismissed Airbnb lawsuit, counsel asked Applicant:

Q: And you indicated that your record of multiple civil claims perhaps suggests litigiousness; is that right?

A: Well, I think – yeah, that sounds accurate.

¹⁸² Ex. 3-1582 – 3-1597; Parties’ Stipulated Facts

¹⁸³ Tr. 100: 2 – 4; 16

¹⁸⁴ Ex. 43; Parties’ Stipulated Facts

¹⁸⁵ Tr. 153: 10 – 13; 20 - 25

¹⁸⁶ Tr. 154: 12-16: 17 - 22

Q: But you indicated you could assure the Board that you initiated all of your civil claims only in the interest of justice; is that right?

A: Yes.¹⁸⁷

AFFIDAVITS AND TESTIMONY OF GOOD CHARACTER

121. Applicant submitted with his bar application an Affidavit of Good Character from Greta Kathryn Siebentritt. Affiant Siebentritt stated that she was a long-time friend of Applicant's parents and has known Applicant since he was born. She attested to his intellect, curiosity and awareness, and his "remarkable sense of fairness and justice."¹⁸⁸

122. Applicant submitted another Affidavit of Good Character from Marcy Campos. Affiant Campos stated that she was a family friend and has known Applicant since he was 9 years old. She attested that he is "honest and trustworthy" and "empathetic and compassionate." Affiant Campos also discussed that Applicant produced and filmed a docudrama about the Salvadorian civil war to raise awareness and "give voice to innocent victims of the conflict." She highlighted examples of other ways Applicant has advocated for justice for immigrants and environmental issues.¹⁸⁹

123. Attorney Harris Ammerman testified at the hearing on Applicant's behalf.¹⁹⁰ Mr. Ammerman has been licensed to practice in Pennsylvania for over 50 years and owns his own firm, practicing "exclusively" bankruptcy work.¹⁹¹ Applicant has been employed by Mr. Ammerman as a law clerk since the summer of 2024.¹⁹² Mr. Ammerman testified

¹⁸⁷ Tr. 156: 2 - 10

¹⁸⁸ Ex. 3-0055; Parties' Stipulated Facts

¹⁸⁹ Ex. 3-0056; Parties' Stipulated Facts

¹⁹⁰ Tr. 3: 5 - 8

¹⁹¹ Tr. 15: 20 – 21; 17: 13 – 15; 30: 20 - 23

¹⁹² Tr. 19: 4 - 7

that Applicant is “extremely knowledgeable in civil procedure and he does excellent work in his filings.”¹⁹³ Mr. Ammerman described Applicant as a “self-starter” and testified that Applicant told Mr. Ammerman about past issues, including his “vehicular infractions” and some of the civil matters Applicant has filed.¹⁹⁴ Mr. Ammerman testified that Applicant also told him about academic misconduct that occurred while Applicant was in law school.¹⁹⁵ Mr. Ammerman called the matter “a misunderstanding” and testified that the “professor involved was a little excessive in her review of what took place” and was “very aggressive.”¹⁹⁶ Mr. Ammerman testified that Applicant “was in a position where he had no choice but to accept the sanction as it was” and that Applicant “explained [the situation] well.”¹⁹⁷

124. When asked on direct examination at the hearing about rehabilitation, Applicant responded that he has worked as a law clerk, received positive results for clients, and he “volunteered to assist immigrant families” in law school.¹⁹⁸ Applicant further testified that he produced a “human rights film regarding the Salvadoran civil war” and volunteered to film interviews with Holocaust survivors.¹⁹⁹ Applicant testified that he has “been engaging in different civic contributions and volunteering in projects for several years.”²⁰⁰

¹⁹³ Tr. 19: 16 - 18

¹⁹⁴ Tr. 20: 9; 23: 6; 24: 7 - 12

¹⁹⁵ Tr. 23: 19 - 22

¹⁹⁶ Tr. 23: 22 – 23; 24: 1 – 2; Tr. 34: 15

¹⁹⁷ Tr. 24: 2 - 5

¹⁹⁸ Tr. 91: 6, 9, 17-18

¹⁹⁹ Tr. 92: 6-7, 14 - 16

²⁰⁰ Tr. 93: 15 - 17

**ADDITIONAL PROFESSIONAL AND CHARACTER REFERENCES
(CALIFORNIA APPLICATION)**

125. Applicant provided character reference letters as a part of his August 2022 California bar application as follows:

- a. William Kirtley, Esq., managing partner of an international arbitration boutique in Geneva, New York & D.C. bars, former Shearman & Sterling / Dentons, World Bank ADR expert, says Applicant is “honest, trustworthy and reliable” and “certainly possess the requisite moral character for the practice of law.”²⁰¹
- b. Jennifer Mills, National Certified Counselor and Applicant’s cousin, provided a character reference letter for Applicant. She stated, “Justin demonstrates characteristics fit to practice law such as trustworthiness, loyalty, determination, empathy, and hard work. I am only writing this letter due to my strong belief that Justin will follow the ethical codes as a lawyer and maintain good moral character as he practices law throughout his career.” Ms. Mills went on to state, “I have witnessed Justin overcome his own personal challenges, with strength, courage, and determination.”²⁰²
- c. Maurice Jefferson, Esq., provided a character reference letter for Applicant. He identified himself as a public sector attorney and former member of the Middlesex County Ethics Committee. He stated that he had known Applicant for 8 years and “found him to be an impressive and bright young man who had a passion for the law even before he seriously considered law

²⁰¹ Ex. 34-0009; Parties’ Stipulated Facts

²⁰² Ex. 34-0011; Parties’ Stipulated Facts

school.” He went on to attest that he found Applicant “to have a developed moral compass, and I have every expectation that he will zealously represent his future clients . . .”²⁰³ Mr. Jefferson is currently the Assistant Section Chief Deputy Attorney General of New Jersey.

- d. Terri Bailey, Professor and Counseling and Advising faculty member of Montgomery College in Maryland, provided a character reference for Applicant. Affiant Bailey described Applicant as “intellectually gifted and hard-working” and provided additional accolades for his film about torture survivors of the Salvadoran civil war. Applicant was further described as “passionate, talented, and deeply empathetic.”²⁰⁴

126. By letter dated June 23, 2025, the Board informed Applicant that it had made an adverse determination with respect to his bar application. The Board determined that Applicant had not met his burden of proving good character and fitness to practice law.²⁰⁵

127. The Board stated that the grounds upon which the Board made the adverse determination included:

- a. Concerns about Applicant’s ability to satisfy Rule 5A(1) considering the Code of Academic Integrity violation at Lincoln Memorial School of Law and the non-disclosure in Applicant’s law school application of several civil matters to which Applicant had been a party and not prevailed²⁰⁶

²⁰³ Ex. 34-0013; Parties’ Stipulated Facts

²⁰⁴ Ex. 34-0015; Parties’ Stipulated Facts

²⁰⁵ Ex. 1-2 – 1-7; Parties’ Stipulated Facts

²⁰⁶ Ex. 1-3 – 1-4; Parties’ Stipulated Facts

- b. Concerns about Applicant's ability to satisfy Rule 5A(5) and Rule 5A(7) considering, as summarized above, Applicant's history of criminal charges and convictions and driving incidents²⁰⁷
- c. Concerns about Applicant's ability to satisfy Rule 5A(2), Rule 5A(4), and Rule 5A(6) considering, as summarized above, Applicant's filing of a series of petitions for a writ of mandamus despite multiple trial and appellate court orders concluding that the petitions were not appropriate under the circumstances²⁰⁸
- d. Concerns about Applicant's ability to meet his Rule 5B(2) burden of proving good character and fitness to practice law considering, as summarized above, the basis for the California Bar's adverse character and fitness determination.²⁰⁹

128. By submissions dated June 25 and June 30, 2025, Applicant timely appealed the Board's adverse determination by requesting a hearing.²¹⁰

POST-ADVERSE DETERMINATION SUBMISSIONS

129. Applicant made the following supplemental submissions on November 20, 2025, to his application after the Board's adverse determination:

- a. Docket Entry filed November 20, 2025, in ongoing matter *Mills v. Leguen*, in which the Court denied motion to dismiss for lack of jurisdiction to renewing the arguments in the answering brief.²¹¹

²⁰⁷ Ex. 1-4 – 1-5; Parties' Stipulated Facts

²⁰⁸ Ex. 1-5 – 1-6; Parties' Stipulated Facts

²⁰⁹ Ex. 1-6; Parties' Stipulated Facts

²¹⁰ Ex. 2-2; Ex. 2-5; Parties' Stipulated Facts

²¹¹ Ex. 43; Parties' Stipulated Facts

- b. Applicant's Supplemental Narrative Response to Question 4.17 C. Honor Code Violation in which Applicant attests that he submitted the full Academic Integrity Complaint file he was provided by Lincoln Memorial University School of law with his bar application.²¹²

130. On November 20, 2025, by way of Applicant's Discovery Production to opposing counsel, Applicant submitted the following documents into the record:

- a. Professional and character support letter from Matthew R. Lyon, Vice President and Dean of Lincoln University Duncan School of Law dated November 20, 2025. In his letter, Dean Lyon states that he has known Applicant since Fall of 2019 when he taught him Civil Procedure I when he was a first-year student. Dean Lyon indicates that in all his interactions Applicant has been respectful and hard-working. He describes Applicant as engaged, persistent, resilient and intellectually curious, characteristics he feels will serve him well as an attorney. Dean Lyon acknowledges being aware of Applicant's plea agreement with the Academic Integrity Committee as well as his character and fitness disclosures (both timely and late) to the law school. He indicates ongoing communication with Applicant since his graduation gives him hope that he has "matured and understands the importance of candor and complete honesty in all of his dealings as an attorney."²¹³

²¹² Ex. 44; Parties' Stipulated Facts

²¹³ Ex. 37; Parties' Stipulated Facts

- b. Court Transcript from Hearings on Motions, May 1, 2023, from mandamus action *Mills v. Howard County State's Attorney's Office*, in the Circuit Court for Howard County, Maryland, Case No. C-13-CV-22-001097, in which Judge Niklaus denied the motion for summary judgment to dismiss the mandamus action.²¹⁴
- c. Cases for consideration and analysis as follows:
 - i. *In Re Application of Notestine*, Slip Opinion No. 2525-OHIO-2415, July 8, 2025.²¹⁵
 - ii. *In the Matter of the Bar Admission of Charles A. Nichols*, Supreme Court of Wisconsin, June 2, 2017.²¹⁶
 - iii. *In Re Petition of Zbiegien*, 433 N.W.2d 871 (Minn. 1988).²¹⁷
 - iv. *In re Haukebo*, 322 N.W.2d 752 (Minn. 1984).²¹⁸

131. Additionally, on November 21, 2025, by way of Applicant's Amended Discovery Production to opposing counsel, Applicant submitted the following documents into the record:

- a. Email exchange between Applicant and Dean Lyon from May 6, 2024, and April 18, 2024, regarding Applicant's California and Minnesota bar examination results.²¹⁹

²¹⁴ Ex. 38; Parties' Stipulated Facts

²¹⁵ Ex. 39; Parties' Stipulated Facts

²¹⁶ Ex. 40; Parties' Stipulated Facts

²¹⁷ Ex. 41; Parties' Stipulated Facts

²¹⁸ Ex. 42; Parties' Stipulated Facts

²¹⁹ Ex. 45; Parties' Stipulated Facts

- b. Professional and character support letter on behalf of Applicant by Harris S. Ammerman, Esq., dated August 25, 2025. In his letter, Mr. Ammerman indicates that Applicant has worked for him as a law clerk in his private bankruptcy law practice since early 2024. He describes working closely with Applicant and observing him as “diligent, reliable, and conscientious in his responsibilities to clients. He states that he is aware of Applicant’s prior alcohol-related incidents, law school matter, and involvement in civil actions. Mr. Ammerman indicates that “he has consistently demonstrated a sound professional judgment and a strong moral compass.” He goes on to state, “[h]is judgment, integrity, and performance reflect the quality the legal profession expects of its members.”²²⁰

CONCLUSIONS OF LAW

The Board has considered Applicant’s application for admission to the Bar of the State of Minnesota on both a regular and conditional basis, in accordance with the Rules of Admission to the Bar. The Board concluded as follows:

1. Under the Rules, the applicant has the burden of proving by clear and convincing evidence that he or she possesses good character and fitness to practice law and is eligible for admission. Rule 15D.

2. The purpose of the character and fitness process is to “protect the public and to safeguard the justice system.” Rule 5B(1). Applicant bears the burden of proof. Rule 5B(2).

²²⁰ Ex. 46; Parties’ Stipulated Facts

3. In making the determination as to whether an applicant meets their burden, the Board will consider (a) the applicant's age at the time of the conduct, (b) the recency of the conduct, (c) the reliability of the information concerning the conduct, (d) the seriousness of the conduct, (e) the factors underlying the conduct, (f) the cumulative effect of the conduct or information, (g) evidence of rehabilitation, (h) the applicant's candor in the admissions process, and (i) the materiality of any omissions or misrepresentations. Rule 5B(4).

4. In this matter, Applicant has not met his burden. The record shows a pattern of Applicant:

- a. Failing to conduct himself with respect for and in accordance with the law. While the conduct is not recent, it is significant and the record demonstrates that rather than accept responsibility, Applicant has frequently challenged the validity of the arrests even while admitting the actions. Applicant testified that he is remorseful, yet his actions indicate otherwise.
- b. Failing to be honest and candid with the Board, courts, or others. For example, Applicant failed to disclose multiple civil lawsuits to which he was a party and did not prevail as when he updated his law school application to disclose additional criminal matters. After the dean spoke to the class, he amended his application as to the criminal matters, but still omitted the civil actions. In his last year of law school, he engaged in an honor code violation in which he admittedly provided only a portion of a relevant email communication, and rather than accept responsibility,

he filed a grievance action against the professor. Shortly before applying to the Minnesota bar, Applicant was denied admission in California based upon his lack of candor, insight, and lack of rehabilitation, but when asked about the denial at hearing, Applicant argued California incorrectly considered his felony charges.

- c. Failing to use good judgment on behalf of clients and in conducting professional business and in conducting his affairs. Applicant filed seven petitions for a writ of mandamus despite multiple trial and appellate court orders concluding that the petitions were not appropriate under the circumstances. Applicant testified that he did not receive sanctions and the court did not hold him in contempt as justification for his continued filings.
- d. Failing to avoid acts which exhibit disregard for the rights or welfare of others. As noted above, after Applicant engaged in academic misconduct, Applicant filed a grievance against his law school professor despite knowing his statements and evidence related to his misconduct were false. He also filed numerous actions against the officer who arrested him in one of the DUI charges, accusing him of providing false testimony. During the hearing, he acknowledged that this was his opinion and that this allegation had not been proven true.
- e. Failing to demonstrate an ability to comply with the requirements of the Rules of Professional Conduct, applicable state, local, and federal laws, regulations, statutes, and any applicable order of a court or tribunal.

Applicant has an extensive history of criminal charges and convictions, including felony charges and multiple DUIs.

- f. Failing to provide sufficient evidence of rehabilitation from a pattern of misconduct, false statements, and misrepresentations, and failing to meet his burden of showing good character and fitness to be admitted to the Bar of Minnesota.

5. This record demonstrates that Applicant has not met the essential eligibility requirements for the practice of law, as described in Rule 5A.

6. Applicant's record shows a pattern of unlawful conduct, inappropriate use of the legal process, and misrepresentations to this Board and others.

7. Applicant does not appear to understand the significance of his pattern of misuse of the legal process, nor does he exhibit insight into why his behavior is troublesome should he be licensed to practice law.

8. Rule 5B(5) outlines specific types of evidence that an applicant may submit to provide evidence of rehabilitation. Applicant noted civil contributions when asked about rehabilitation at the hearing. His actions, though, contradict his claim that he has rehabilitated from past conduct. In fact, he continues to engage in the troubling conduct noted herein, including vexatious litigation. Applicant seems to believe that being sanctioned by a court is required for the Board to consider the litigation inappropriate.

9. Based upon the record as constituted, including the application, the various submissions to the Board, and the testimony at the hearing, Applicant has not provided sufficient evidence of rehabilitation from his pattern of misconduct.

10. Applicant has not satisfied his burden to show good character and fitness

to be admitted to the Minnesota Bar.

MEMORANDUM

Practicing law is an honor and a privilege. At the time of admission, prospective lawyers take the following oath before the Supreme Court of Minnesota:

You do swear that you will support the Constitution of the United States and that of the state of Minnesota, and will conduct yourself as an attorney and counselor at law in an upright and courteous manner, to the best of your learning and ability, with all good fidelity as well to the court as to the client, and that you will use no falsehood or deceit, nor delay any person's cause for lucre or malice. So help you God.

Minn. Stat. § 358.07(9). Those principles are further defined in the Rules for Admission to the Bar, including Rule 1:

The Board of Law Examiners is established to ensure that those who are admitted to the bar have the necessary competence and character to justify the trust and confidence that clients, the public, the legal system, and the legal profession place in lawyers.

The Board has carefully evaluated the facts and assessed the credibility of the Applicant. Too many times, when something happened that Applicant did not like or created a problem for him, he responded with false allegations, meritless litigation, or serial litigation. During the application process, Applicant provided incomplete, inaccurate, and in some cases, false information to the Board. Many of Applicant's explanations and excuses raised additional questions regarding his veracity, his lack of candor, his lack of insight into his behavior, and his failure to take responsibility for his actions.

When the Board determines that an applicant's conduct raises questions regarding the applicant's ability to meet the Essential Eligibility Requirements for admission to the bar, the Board looks for evidence of rehabilitation relating to those actions. Applicant's

response to the Board inquiries relating to the matters described herein was to lack recollection, to deny responsibility, to blame others, or, as to his felony charges and his California bar application process, to say there wasn't any misconduct at all on his part. Missing from his submissions and his testimony at the hearing was sufficient credible evidence of rehabilitation. While Applicant offered some direct testimony related to rehabilitation, his actions throughout the admission process contradict that testimony, and indicate that he will continue the concerning behavior moving forward.

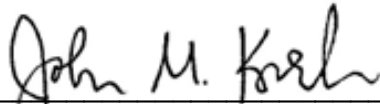
The common thread running through the evidence presented at the hearing is a pattern of failing to act in a manner expected of members of the Minnesota Bar. In light of the facts as outlined above, the Board must conclude that the Applicant has failed to carry his burden of showing good character and fitness, has not established sufficient evidence of rehabilitation, and is not currently qualified to practice law as a licensed lawyer in the State of Minnesota.

DETERMINATION

Applicant has failed to meet his burden of proof regarding “good character and fitness” to practice law. Accordingly, the Board’s final determination is that Applicant’s admission to the Bar of the State of Minnesota is denied, and Applicant shall not be recommended to the Supreme Court for admission. Rule 18 states that unless the Board designates a shorter time period in its final decision, an applicant who has not satisfied the character and fitness requirement is prohibited from reapplying for admission in Minnesota for three years from the date of the Board’s final decision. The Board declines to shorten the re-application period in this case and hereby determines that Applicant shall be permitted to reapply on or after February 26, 2029.

Dated: February 26, 2026

MINNESOTA STATE BOARD OF LAW EXAMINERS


/s/ _____
JOHN M. KONECK
President