

FILED

No. _____

March 18, 2026

**APPEAL FROM DECISION OF THE MINNESOTA
STATE BOARD OF LAW EXAMINERS**

**OFFICE OF
APPELLATE COURTS**

**STATE OF MINNESOTA
IN SUPREME COURT**

In re Application of
Lawrence Justin Mills,

Petitioner.

**PETITION FOR REVIEW OF MINNESOTA BOARD OF LAW
EXAMINERS' DECISION FILED FEBRUARY 26, 2026**

David Genrich (281311)
OFFICE OF THE MINNESOTA
ATTORNEY GENERAL
445 Minnesota Street, Suite 600
St. Paul, MN 55101
David.Genrich@ag.state.mn.us
(651) 296-3353

*Counsel for Respondent
Minnesota State Board of Law
Examiners*

Aaron Gott (395167)
BONA LAW PC
331 Second Avenue South
Suite 422
Minneapolis, MN 55401
(612) 284-5001

*Counsel for Petitioner
Lawrence Justin Mills*

ISSUES PRESENTED

1. Whether the Board erred by treating Mr. Mills' lawful civil litigation as character "misconduct" and by labeling it "vexatious," "meritless," or "false allegations" without considering the merits of the individual cases where there was no judicial finding of frivolousness, bad faith, or otherwise sanctionable conduct and where judicial and prosecutorial records and decisions demonstrate the underlying matters as proper for adjudication and, in some instances, were affirmatively established as well-founded.

2. Whether the Board failed to weigh the required factors under Rule 5 by disregarding the remoteness of Mr. Mills' alcohol-related conduct, his age at the time of the conduct, his completion of inpatient treatment, years of subsequent law-abiding conduct, his candor and cooperation with the Board, his positive social contributions, and the professional character evidence he submitted.

3. Whether the record warrants conditional admission under Rule 16 instead of outright denial of admission.

4. Whether the Court should exercise its discretion to shorten the three-year reapplication period where the applicant has shown tremendous progress toward rehabilitation.

Petitioner Lawrence Justin Mills passed the Minnesota Bar Examination, earned his J.D. from an ABA-accredited law school, and has since worked for two years as a supervised law clerk for an attorney who endorses him without reservation. He demonstrated his rehabilitation from a troubled past of alcohol-abuse and associated run-ins with the law with evidence of his treatment, and a seven-year period as a law-abiding citizen and positive force in society—during which he has contributed substantial time, energy, and money to humanitarian causes and took all the steps necessary to become a lawyer. His candor and cooperation with the Board is not in dispute. None of this mattered to the Minnesota Board of Law Examiners. Without substantively engaging with this undisputed record evidence, the Board issued an adverse determination citing Mr. Mills’ past, an isolated academic integrity incident that was fully resolved, and a personal litigation history that the Board characterized as “vexatious” contrary to the record. Mr. Mills has carried his burden to prove his character and fitness by clear and convincing evidence. This Court should grant the petition and, ultimately, order Mr. Mills’ admission to the courts of the State of Minnesota.

FACTS AND PROCEDURAL HISTORY¹

Lawrence Justin Mills is a 34-year-old law school graduate. He has no negative criminal or traffic history in the past seven years. He earned three degrees—an associate degree, a bachelor’s degree, and a J.D. from an ABA-accredited law school. He has worked under the supervision of a practicing lawyer since graduating, and that lawyer testified that Mr. Mills is capable, trustworthy, and ready for the practice of law. He overcame a troubled past of poor judgment and alcohol-related run-ins with the law that began in his teens by completing an extended intensive inpatient treatment program for alcohol abuse and turning his life around. Since then, he has devoted countless hours and tens of thousands of dollars to humanitarian causes. His character evidence includes letters endorsing his character and fitness to practice law from, among others, his law school dean. And throughout the admissions process, he provided full, candid disclosure of every aspect of his history to the Board. This is the applicant who now stands before this Court for admission to the practice of law.

-
1. References in this Petition use standard abbreviations as follows:
 - Tr. __ refers to pages in the December 9, 2025 hearing transcript.
 - Finding __ refers to the paragraphs of the Board’s Findings of Fact.
 - Conclusion __ refers to the paragraphs of the Board’s Conclusions of Law.

The Board did not focus on that applicant and his current character and fitness. When Mr. Mills applied for admission as a lawyer in Minnesota, he fully and completely disclosed his personal history, which included his alcohol abuse and related run-ins with the law from years before. The Board did not look beyond that history.

Mr. Mills has acknowledged and accounted for the many reckless, selfish decisions he made earlier in life—and that he was heading down the wrong path. As an adolescent and young adult, he blurred through life, making poor decisions and wracking up a record along the way. But nearly a decade ago, he took control, worked to turn his life around and, eventually, began law school. *See* Finding 1; Conclusion 4(e). He was not perfect—along the way, he stumbled as he struggled the impulse to blame others for his errors—that impulse got the better of him once while he was in law school. But the evidence of his rehabilitation today is indisputable.

Mr. Mills engaged in 31 days of intensive inpatient treatment to address his drinking. Finding 40; Tr. 60:16-21. He has had no run-ins with law enforcement since the year he began attending law school—now nearly seven years ago. Tr. 40:21-23, 61:11-15; Finding 23.

Education, Employment, and Volunteering

Mr. Mills is now a law school graduate who passed the February 2025 Minnesota Bar Examination exam. Finding 6. He earned his associate degree

from Montgomery College in Maryland, his Bachelor's degree from the University of Baltimore in 2017, and his J.D. from Lincoln Memorial University – Duncan School of Law in 2022. Findings 3, 40. He has been working as a law clerk under the supervision of a lawyer since May 2024—and that lawyer, who knows both Mr. Mills' past and Mr. Mills as the person he is today—testified that Mr. Mills is capable, skilled, responsible, trustworthy, and ready for the practice of law. Findings 4, 123, 131(b); Tr. 18:20-30:11.

The key to Mr. Mills' turnaround: he found his passion in the law, with a particular inclination toward litigating in the public interest. He volunteered to assist immigrant families while in law school. He volunteered to assist in environmental litigation. Leveraging his legal knowledge, he gave countless hours and \$50,000 of his own money—money that he had collected in successful civil litigation—to produce a human rights documentary about the Salvadoran civil war, and volunteering to record interviews with Holocaust survivors. Findings 122, 124, 125(d); Tr. 91:11-93:17. This applicant is a person who has come a long way.

Criminal and Traffic Infractions

For the first decade that Mr. Mills was technically an adult he did not behave as one. His problems with alcohol and poor judgment led to reckless behavior, criminal charges, and a litany of traffic offenses. Finding 9(2); Tr. 119:18-120:2. Among his offenses: DUI, driving on a suspended license,

violating his interlock restriction, and other senseless traffic violations. *Id.* Not all of his offenses involved alcohol, but all stemmed from his failure to act responsibly—and Mr. Mills has been open and honest about his past, both in fully disclosing his criminal history and fully cooperating to provide additional information throughout the admissions process. Findings 15–18, 20. His most serious non-alcohol-related offense was a felony charge for failure to timely pay a casino marker—an inadvertence he corrected with payment promptly after realizing his delinquency. Findings 14, 19. That charge was dismissed and sealed. Today, nearly as much time has passed since his last run-in with the law.

Mr. Mills’ rehabilitation involved both hard work and treatment, including 31 days of intensive inpatient treatment for alcohol dependence. Finding 40; Tr. 60:16-61:15. Mr. Mills does not offer his alcohol abuse or young age as an excuse for his history; he has not only shown remorse but demonstrated his rehabilitation, detailed the lessons he has learned, and clearly has committed to change himself for the better. Tr. 62:10-65:10.

Civil Litigation

Civil Suits Filed

What led Mr. Mills to discover his passion for the law and vindicating the public interest was his own litigation concerning what he viewed as constitutional violations, abuses of authority, and corruption. Mr. Mills was a

plaintiff in lawsuits before and during law school. Ultimately, he brought twelve actions—half of which were related to one incident—and ultimately prevailed in obtaining a judgment or favorable settlement in five of those actions. Findings 9(1)(b), 76, 77.

As an example, Mr. Mills *prevailed* in a claim for false imprisonment and obtained a settlement relating to the PPE Casino incident. Finding 70. The court specifically held that card counting is not illegal under Maryland law and the casino defendants “had no legal justification” to detain him. *Mills v. PPE Casino Resorts Md., LLC*, Civ. No. RDB-15-495, 2017 WL 2930460, at *4–5 (D. Md. July 10, 2017). That action resulted in a \$215,000 recovery. Tr. 47:25-48:2. In a separate but related action, he sought to have a court review the prosecutor’s decision to decline to prosecute the casino manager that had violated his rights, which was denied. Finding 78.

The other six writs of mandamus he filed related to his 2015 arrest for drunk driving, an offense Mr. Mills was ultimately *acquitted* of by a jury. In other words, a jury did *not* believe the testimony of a state trooper who testified that Mr. Mills was under the influence of alcohol. The mandamus actions that followed concerned Mr. Mills’ efforts to hold accountable a state trooper who had committed perjury—a conclusion that the Howard County State’s Attorney’s Office reached as well, having reviewed certified transcripts of the trooper’s testimony and prepared a draft criminal indictment charging the

trooper with perjury, obstruction of justice, and filing a false police report. Findings 79-83; Tr. 72:6-18, 82:1-21.

While the writs were ultimately denied, he filed the first and last petitions through counsel and upon their advice. Tr. 68:11-69:10, 81:14-25. For the remaining five, he had no legal counsel (and had not attended law school yet), and filed the writs *pro se* on the belief that his attorneys' advice in the prior matter might be applicable again and have a better chance of prevailing because the factual circumstances were different and he could cure the deficiencies identified by the courts. Tr. 72:6-73:17, 75:8-17, 78:9-18.

Mr. Mills was not sanctioned for bringing any of these actions; no court found any of the actions frivolous; and no court found that he filed any action in bad faith. Tr. 89:11-17. In one instance, the presiding judge even noted that the particular area of law was "murky" and still developing through recent legal decisions. The claim survived both a motion to dismiss and summary judgment and proceeded to a bench trial on the merits. Tr. 82:22-84:21. Mr. Mills testified that he brought each of these actions in interest of justice and in good faith. Tr. 89:24-90:1, 156:7-10. Yet the Board cited Mr. Mills' litigation as a significant factor in denying his admission.

Civil Suits Disclosed in Law School Application

The Board faults Mr. Mills for failing to disclose several of these suits in his law school application. Mr. Mills disclosed one lawsuit (the PPE Casino

matter, which he prevailed in) in his law school application. Finding 70. Mr. Mills inadvertently failed to disclose the other suits in his law school application. Findings 9(1)(b), 9(3), 71. Mr. Mills provided testimony regarding the nature of these various suits and his failure to disclose them. Mr. Mills testified that his nondisclosure was indeed an oversight, and he intended to update his application with these suits but forgot and only updated it with respect to criminal proceedings. Findings 74–75. Mr. Mills obtained favorable judgments or settlements in four of these undisclosed suits. Finding 76. Mr. Mills has recovered approximately \$550,000 from his civil suits. Tr. 89:18-20.

Notably, for both Mr. Mills’ criminal and civil record, \$285,000 came from a settlement for a 2017 arrest in New Jersey. The state’s own attorney general dismissed the charge in the interest of justice. Finding 110. In subsequent civil rights litigation, Mr. Mills prevailed on summary judgment, and the court held that “no reasonable officer could have believed there was probable cause for theft by deception or any other crime” by Mr. Mills. Findings 109–111. This incident was one that caused concern for the California Bar (Finding 109), but it was ultimately resolved overwhelmingly in Mr. Mills’ favor.

Finally, there is nothing in the record to suggest that the law school would have rejected Mr. Mills’ amended application had it contained the full

disclosure, nor that Mr. Mills repeated this mistake in his communications with the Board.

Mr. Mills' Ill-Considered Academic Grievance

A relative few succeed in recovering from years of substance abuse and a systematically displayed lack of judgment. None experience a sudden and complete personal transformation. Mr. Mills' personal transformation was like most—not perfect. In his final year of law school, he stumbled—he did not revert to abusing alcohol, and he did not commit a crime. But he did give into the impulse to shift blame to others and avoid accountability for his own errors by filing an academic grievance over a poor grade that his own oversight had earned.

Mr. Mills was required as part of his professional responsibility class to take the Multistate Professional Responsibility Exam (MPRE). Finding 88; Tr. 53:25-54:17. Mr. Mills began registering for the exam with the testing company but misunderstood and failed to fully read an email containing additional registration instructions, and subsequently was not able to take the exam. Finding 89; Tr. 54:18-55:22.

Mr. Mills reached out to his professor to inform her of the problem, sent her the portion of the email that he had read, and asked to have a later-administered exam count towards his course grade. Tr. 55:23-56:20. The professor denied his request, and Mr. Mills filed a grievance complaint seeking

to have her decision overruled. Tr. 56:13-57:9. In response, the professor filed an integrity complaint against Mr. Mills, asserting that he had violated the honor code by failing to send her the entire email from the testing company, rather than just the part he had read. Tr. 57:14-19. Mr. Mills ultimately signed a plea agreement with the law school, accepting responsibility for a reckless (rather than willful) violation of the law school code, and received a five-month suspension, to be served on a probationary basis. Tr. 58:11-20.

Mr. Mills testified that he had no intention to deceive the professor and was merely demonstrating the portion of the email that he had read, which formed the basis for his mistaken belief that the steps he had taken to register were sufficient. Tr. 57:20-58:3. He had convinced himself it couldn't have been his fault and that he needed to protect his grade. Tr. 56:21-57:13. In the course of those proceedings, he was confronted with the possibility that it was his fault and that he had earned his poor grade. It was and he did. He overcame his impulse to avoid accountability, but too late—he then accepted responsibility. Tr. 58:4-10, 58:21-23, 59:6-16. There were no other academic integrity violations, including plagiarism or cheating. 59:17-20. The law school's then-Dean Gill, who had overseen the grievance and his resulting punishment, told Mr. Mills he was glad to see the issue resolved, and the current-Dean Lyon provided a reference letter on Mr. Mills' behalf and even purchased a Themis

Bar Review course to aid in Mr. Mills' Bar Exam preparation. Tr. 58:24-59:5, 93:18-94:15.

The Board's Investigation, Hearing, and Final Determination

Throughout the admissions process and the Board's investigation, Mr. Mills did what someone with the character and fitness to practice law does: he disclosed everything, corrected oversights without being asked, provided full and complete responses to follow-up requests, and submitted to cross-examination, and even reopened a portal item the Board had already marked "Completed" to add further documentation. *E.g.*, Findings 14, 21, 26, 31, 43, 45, 47, 51, 55, 57, 62, 63, 87, 101, 129; Tr. 49:23-50:4. As part of that process, the California Bar was asked whether Mr. Mills ever failed to disclose any information during his California Bar application process, and the California Bar responded "No." Finding 113.

As part of his application, Mr. Mills submitted several character reference letters and affidavits, including from attorneys, a family member, a college professor, and his law school dean. Findings 121, 122, 125, 130(a). Each one stated that Mr. Mills was an honest person with the requisite character and fitness to practice law.

Mr. Ammerman, Mr. Mills' supervising attorney, testified on Mr. Mills' behalf at the board hearing. Mr. Ammerman stated that he was impressed by Mr. Mills' writing samples, "demeanor," and "candor," found him "very

knowledgeable” and a “self-starter,” and has never had any concerns about Mr. Mills’ work quality, honesty, judgment, or character—and maintained these beliefs even knowing Mr. Mills’ past, including about his criminal record, civil litigation, and academic integrity investigation. Tr. 18:20-30:11; Findings 123-124. Mr. Mills also testified on his own behalf, and was subject to cross-examination. Mr. Mills was fully transparent and cooperative with the Board throughout this process. The Board offered none of its own witnesses in response and failed to rebut the sworn testimony of Mr. Mills’ character witness.

On June 23, 2025, the Board informed Mr. Mills that it had made an adverse determination on his application. Finding 9. Specifically, the Board concluded that Mr. Mills lacked honesty, candor, the ability to comply with and show respect for the law, good judgment, and sufficient rehabilitation. *Id.* The Board cited Mr. Mills’ violation of his law school’s honor code in 2022, his criminal and driving infraction history, his filing of writs of mandamus that were dismissed or denied, omissions of some civil cases from his law school application, and the California Bar’s previous denial of his admission on the basis of his criminal history. *Id.*

Mr. Mills timely requested a hearing, which was held December 9, 2025. Findings 10–12. The Board issued a decision on February 26, 2026 standing by its initial determination. Finding 12; Conclusions 4-10. Despite the remoteness

of the principal alcohol-related conduct, the record of treatment and rehabilitation, the strong professional endorsements, the supervised legal work, and the evidence of public-serving contributions, the Board denied admission and imposed the maximum three-year reapplication period. The Board's final decision rested heavily on its characterization of Mr. Mills' later civil litigation as "vexatious," "meritless," or otherwise inconsistent with rehabilitation and present fitness. This petition challenges that characterization, the Board's treatment of the Rule 5B factors, and the resulting denial.

STANDARD OF REVIEW

The Court reviews the record and the Board's findings independently, as the "ultimate determination of admission to the Bar is reserved to this [C]ourt alone, and [it] may not delegate that power." *In re Zbiegien*, 433 N.W.2d 871, 874 (Minn. 1988). The Court gives "great weight" to the Board's factual findings in reaching its conclusion. *Id.*; *see also In re Cunningham*, 502 N.W.2d 53, 57 (Minn. 1993). But denial of bar admission must rest on conduct bearing a rational connection to present fitness to practice law. *Schware v. Bd. of Bar Exam'rs of N.M.*, 353 U.S. 232, 239 (1957). That principle matters here, because the Board repeatedly treated lawful and appropriate civil litigation as though it were itself evidence of unfitness or somehow negated his rehabilitation from entirely unrelated criminal conduct. It did not consider

whether the record demonstrates present character and fitness under Rule 5B. With a full transcript of the hearing available in this case, the Court can conduct its own independent review of the record and exercise its inherent authority over admission.

The burden of establishing good moral character is on the applicant. *In re Haukebo*, 352 N.W.2d 752, 754 (Minn. 1984). The factors to be considered include (1) the applicant's age at the time of the conduct, (2) the recency of the conduct, (3) the reliability of the information concerning the conduct, (4) the seriousness of the conduct, (5) the factors underlying the conduct, (6) the cumulative effect of conduct or information, (7) the evidence of rehabilitation, (8) the applicant's positive social contributions since the conduct, (9) the applicant's candor in the admissions process, and (10) the materiality of any omissions or misrepresentations. *Zbiegien*, 433 N.W.2d at 875; *see also* Rules for Admission to the Bar ("Board Rule"), Rule 5.

ARGUMENT

Mr. Mills carried his burden to show good character and fitness by clear and convincing evidence, contrary to the Board's determination. Mr. Mills' criminal history has been reformed following treatment for alcohol abuse. His civil litigation produced substantial recoveries and sought in good faith to hold government actors accountable for misconduct—the same litigation the Board now wrongly characterizes as "vexatious" or "meritless." His law school

misstep was isolated—and a reckless rather than willful lapse—and was also forgiven by the school. And Mr. Mills fully cooperated with both the California and Minnesota Boards during his applications. The record demonstrates Mr. Mills is fit to practice. But even if the Court declines to reverse the Board's conclusion and grant his immediate admission, it should exercise its discretion to grant conditional admission or shorten the reapplication period.

I. PETITIONER CARRIED HIS BURDEN OF PROVING HIS GOOD CHARACTER AND FITNESS TO PRACTICE LAW BY CLEAR AND CONVINCING EVIDENCE

Unlike in *Cunningham*, the Board's decision was not the result of a fair review of the record, and it is not indicative of Mr. Mills' current suitability to practice law. 502 N.W.2d at 57. Review of the decision is essential to protecting the integrity of the bar admissions process. When the Court evaluates Mr. Mills' character and fitness *de novo*, the record will demonstrate that Mr. Mills has carried his burden.

Mr. Mills has the requisite present character and fitness to practice law in Minnesota. His run-ins with law enforcement occurred early in his adult life and are now in the distant past. He has demonstrated his rehabilitation. And while one incident in law school reflected poorly on Mr. Mills' integrity, it was a relatively minor stumble that his dean believed would not be repeated, that he was appropriately sanctioned for, and that he fully disclosed to the Board. Since graduating from law school, Mr. Mills has been performing work as a law

clerk with supervision from an experienced attorney. He has donated his time and money to advance noble causes. This is an applicant who started his life in the wrong direction but who has long since managed to turn it around. The Board discounts or ignores evidence of his transformation, instead laser-focused on mistakes that he has already overcome.

In a character and fitness investigation, the applicant bears the burden of proving his good character and fitness to practice law. Board Rules 5B(2), 15D. Specifically, the applicant must show: 1) he is at least 18 years old; 2) has good character and fitness; 3) graduated with a J.D. from an ABA-accredited law school; 4) received a passing score on the Uniform Bar Examination; 5) received a passing score on the Multistate Professional Responsibility Exam; and 6) no current suspension or disbarment in another jurisdiction. Board Rule 4A. It is undisputed that Petitioner meets five of the six elements, and the only element at issue here is good character and fitness.

Rule 5A lists the “essential eligibility requirements” for character and fitness, including honesty and candor (including with the Board), reasoning, memory, organization, communication, good judgment, respect for and compliance with the law, respect for the welfare of others, diligence, and timeliness. Board Rule 5A.

Relevant considerations include (among others): unlawful conduct, academic misconduct, acts involving dishonesty or fraud, abuse of the legal

process, violations of court orders, drug or alcohol dependence/abuse, denial of admission to other Bars on character and fitness grounds, and the making of false statements. Board Rule 5B(3). The Board also weighs the applicant's age at the time of the conduct, the recency, the seriousness, underlying factors, evidence of rehabilitation, the applicant's candor during the process, and the materiality of any omissions or misrepresentations. Board Rule 5B(4).

Evidence of rehabilitation includes the applicant's acknowledgment and acceptance of responsibility for any wrongful conduct, strict compliance with any disciplinary or other orders, lack of malice towards those who enforce the rules against them, cooperation with the Board's investigation, makes positive social contributions through employment or community service, recent conduct indicating good character and fitness, changes in behavior that indicate a reduced likelihood of misconduct going forward, and any other evidence of rehabilitation. Board Rule 5B(5). It is not genuinely disputable that the evidence submitted by Mr. Mills checks each of these boxes.

If the Board concludes that an applicant fails to carry his burden following a character and fitness hearing, it must issue written findings of fact and conclusions of law in a final decision. Board Rule 15H. The applicant can petition this Court for review. Board Rule 17.

Mr. Mills has a troubled past, and the Board was not wrong to consider that past. Board Rules 4A(2), 5A, 5B(3). But the Board must consider not only

that conduct, but all of the relevant factors under the Board Rules. Board Rules 5B. Mr. Mills has shown that, regardless of his *past* actions, he *currently* has the requisite character and fitness to practice law. The Board erred in disregarding substantially all the evidence of Mr. Mills' rehabilitation, in giving undue weight to certain events, in drawing unwarranted inferences, and in disregarding uncontroverted testimony and other character evidence that weighed squarely in Mr. Mills' favor.

A. Mr. Mills' Past Criminal Conduct Has Been Mitigated and Rehabilitated

Mr. Mills' criminal history—which began in his teens and concluded seven years ago was almost entirely alcohol-related and was punctuated by acquittals and a dismissal—presents no genuine concern for his current fitness to practice law. His well-documented recovery from substance abuse is exactly the kind of rehabilitation contemplated by the standards of admission. Mr. Mills has expressed remorse for his past conduct and has backed up his words with actions. *See supra* pp. 4-6. Mr. Mills has (literally) rehabilitated himself through successful inpatient alcohol addiction treatment and has not had another single criminal arrest or traffic infraction since 2019—before he started law school, and now nearly seven years ago. *See supra* pp. 3, 5–6; *see also* Board Rule 5B(5) (stating that applicant's age and the recency of his conduct should be considered); *cf. Haukebo*, 352 N.W.2d at 756 (remanding for

further proceedings consistent with holding that alcoholism alone is not a valid basis for denying admission, and past criminal conduct associated with alcohol abuse could be overcome with evidence of rehabilitation); *cf. In re Brown*, 467 N.W.2d 622, 623–24 (Minn. 1991) (recent felony arson conviction, with continued denial of guilt during admissions process, was “serious, **recent**, and **continuing**” behavior that precluded finding of rehabilitation) (emphases added).

B. Mr. Mills’ Civil Litigation Implicates no Character or Fitness Concern

Mr. Mills’ civil litigation produced judgments and settlements totaling approximately \$550,000, and every suit—successful or not—was brought in good faith and without any finding of frivolity, bad faith, or otherwise sanctionable conduct. His omission of civil cases from his law school application was an inadvertent oversight that he—notably—did not repeat in his application for admission. Accordingly, neither Mr. Mills’ civil litigation activity nor his inadvertent omission of that activity from his law school application raises any genuine concern about his character or current fitness to practice law.²

2. The Board also lumps together Mr. Mills’ criminal history and his civil litigation. For example, the Board appears to doubt or not credit Mr. Mills’ otherwise undisputed evidence of rehabilitation *because* of his continued civil litigation. Setting aside the demonstrated propriety of Mr. Mills’ civil

1. The Civil Suits Were Not Baseless

While it is true that Mr. Mills did not prevail in some of his lawsuits, the Board uses that fact to infer an improper motive (*e.g.*, Conclusion 8) and labels it a pattern of vexatious litigation without support from the record.

For example, Mr. Mills brought several petitions for writs of mandamus after he was wrongly prosecuted and ultimately acquitted for a DUI charge. The charge was based on the false sworn testimony of a state trooper. That is not a person abusing process—that’s a person using the processes available for redress of serious misconduct by a government official. No court ever found Mr. Mills’ filings frivolous, vexatious, or worthy of sanctions, and at least one court acknowledged that the area of law was “murky” and “changing” and permitted the claim to proceed to a bench trial. The general legal premise of the petitions was grounded in Maryland authority: *Brack v. Wells*, 184 Md. 86, 40 A.2d 319 (1944), recognized mandamus to require a State’s Attorney to present proposed charges to a grand jury; *Sibley v. Doe*, 227 Md. App. 645, 135 A.3d 883 (2016), and *Holloman v. Mosby*, 253 Md. App. 1, 262 A.3d 1142 (2021), recognized that a private citizen may compile evidence for submission to the grand-jury process. What proved “murky” was not whether the right existed but the

litigation, his involvement in civil litigation does not bear on the question of whether he has rehabilitated from his earlier criminal and substance-related conduct.

precise manner of exercising it in an evolving area of law—as the court itself acknowledged when it denied dismissal and summary judgment. Mr. Mills also filed these writs (a) through and on the advice of counsel, or (b) *pro se* (and before he finished law school) based on advice he had been given by that counsel. Mr. Mills also testified that every suit was brought in good faith and in the interest of justice. *See supra* pp. 6–8.

The Board’s characterization of this record in reaching its determination deserves a direct response. The Board wrote that when something did not go Mr. Mills’ way, he responded with “false allegations, meritless litigation, or serial litigation.” Finding Memorandum. That conclusion cannot be squared with the record it reviewed, which showed: a jury acquitting Mr. Mills after a trial at which the trooper’s testimony was challenged; the Howard County State’s Attorney drafting a criminal indictment against the trooper for perjury; a mandamus petition surviving a motion to dismiss, with the court stating it was “not persuaded” Mr. Mills had been afforded his rights; the New Jersey civil rights suit resulting in a federal summary judgment ruling of no probable cause and a \$285,000 settlement; and a federal court holding that the PPE Casino defendants falsely imprisoned Mr. Mills. The Board did not address any of these facts. The Board perceived significance in quantity, and without actually considering the merits of the individual cases, declared it a pattern of “vexatious” litigation that is unsupported by the record.

After he was wrongly prosecuted and ultimately acquitted of his 2015 DUI charge, Mr. Mills was arrested for felony theft by deception in New Jersey in 2017. That charge was dismissed by the state’s own attorney general in the interest of justice, and in subsequent civil rights litigation against the officers, Mr. Mills prevailed on summary judgment and received a settlement of \$285,000. *See supra* p. 9. The very arrest that California Bar viewed as a concern was later resolved overwhelmingly in Mr. Mills’ favor, including with a success in civil litigation. Accordingly, his application to the Minnesota Bar is stronger today than his application to the California Bar was then.

The mere fact that Mr. Mills brought multiple lawsuits—most of which arose out of one incident—does not indicate that the suits were frivolous, vexatious, or brought in bad faith, even where he did not prevail. *See, e.g., Renneke v. Traveler’s Fare, Inc.*, No. C2-89-1307, 1989 WL 131610, at *4 (Minn. Ct. App. Nov. 7, 1989) (“In fact, Renneke prevailed on her claim, and although this is not dispositive under Minn. Stat. § 549.21, it certainly weighs heavily against a finding that Renneke acted in bad faith, or asserted a ‘frivolous’ or ‘unfounded’ claim.”); *Advanced Training Sys., Inc. v. Caswell Equip. Co.*, 352 N.W.2d 1, 12 (Minn. 1984) (“The mere fact that the court eventually dismissed a number of plaintiffs’ claims in no way proves these were groundless or brought in bad faith.”); *In re Gahan*, 279 N.W.2d 826, 828–29 (Minn. 1979) (use

of lawful bankruptcy process could not itself indicate immoral or irresponsible conduct).

Further, litigation in the public interest, including by holding government actors accountable and challenging the constitutionality of statutes, is precisely the type of conduct the profession expects from an advocate, but the Board has used it as a basis for exclusion from admission. The Rules require honesty, present fitness, and rehabilitation; they do not permit the Board to transform an applicant's lawful use of the legal system into evidence of unfitness for that very system.³

*2. The Omission of Civil Cases from his Law School Application
Was Inadvertent and Immaterial*

A major focus of the Board was Mr. Mills' omission of some civil actions from his law school application. The omission was obviously inadvertent when considering that Mr. Mills was ***not*** accused of having omitted any of his criminal history, and it was also immaterial—he did not gain any advantage in his law school admission as a result. And while the Board focuses on the undisclosed instances in which Mr. Mills was a plaintiff and did *not* prevail, they give little consideration to the **undisclosed** instances in which he *did*

3. Indeed, the right to petition for the redress of grievances is protected by the Minnesota Constitution and the U.S. Constitution. Minn. Const. art. 1, § 8; U.S. Const. amend. 1.; *see also Bill Johnson's Rests., Inc. v. NLRB*, 461 U.S. 731, 742–43 (1983) (holding that the NLRB's enjoining of a non-baseless lawsuit as an unfair labor practice violated the First Amendment).

prevail (and recovered \$550,000)—and the fact that winning and losing cases alike were not disclosed supports Mr. Mills’ testimony that the nondisclosure was an oversight. *See supra* pp. 8–9. Mr. Mills also did not repeat this mistake before either the California or Minnesota Board of Law Examiners, and instead provided every detail. *E.g.*, Finding 113.⁴

There is no basis to suggest that, had Mr. Mills disclosed these suits to his law school, it would have changed the school’s admission decision—thus, the omission was not material. *See* Board Rule 5B(4) (The Board should consider materiality of any omission). What’s more, omissions from law school admissions have repeatedly been found an insufficient basis to deny admission. *Zbiegien*, 433 N.W.2d at 876 (citing multiple cases). And, as noted above, these cases *were* disclosed to the Board.

C. Mr. Mills’ Honor Code Violation was an Isolated Event

The law school itself determined that Mr. Mills’ honor code violation was “reckless” rather than “willful”—a critical distinction reflecting a lapse in judgment, not malice. Mr. Mills testified that he did not intend to deceive anyone, and the school’s own charge confirms that his account was credible.

4. Mr. Mills’ 2017 arrest in New Jersey ultimately led to a civil suit that was resolved by a hefty settlement *in Mr. Mills’ favor*. *See supra* p. 9. This is an example of both the California Bar overstating Mr. Mills’ criminal record being overstated (a determination on which the Board relies) and the Board understating his civil litigation victories.

See supra pp. 10–11. He accepted responsibility for his actions, learned from them, and maintained a good relationship with his school thereafter. *Id.* There were no other integrity issues during law school, such as plagiarism or cheating. *Id.* That Mr. Mills accepted responsibility, completed his sanction, and maintained his relationship with the institution—with the dean later writing a reference letter in support of his good character on his behalf—confirms that this was a stumble, not a character flaw. This isolated incident is not a basis to deny admission. *See Zbiegien*, 433 N.W.2d at 877 (plagiarism in final year of law school even with subsequent dishonesty surrounding the disclosure of the plagiarism to the Board, was not sufficient to reject applicant). In *Zbiegien*, the Court found it significant that the petitioner’s law school “elected to give him another chance.” *Id.* Mr. Mills’ law school did too—and later the dean wrote his letter of recommendation to the Board. *See also In re Bar Admission of Padlock*, 960 N.W.2d 917, 926 ¶36 (Wis. 2021) (a board’s disbelief of an applicant’s explanation for insufficiencies does not “lead, inexorably, to the conclusion that she lacks the character and fitness to practice law”). Like the incident in *Zbiegien*, Mr. Mills’ isolated lapse in integrity “does not demonstrate such lack of character that he must be barred from the practice of law,” and like the applicant in *Zbiegien*, “he has been punished; he is ashamed. He has had his admission delayed for over a year.” *Zbiegien*, 433 N.W.2d at 877.

D. Mr. Mills Demonstrated Good Current Character and Fitness

When the Court looks at who Mr. Mills is today—not who he was at 19 or 22—the record is compelling. A lawyer with fifty years of experience who has supervised him for nearly two years and knows his entire history testified under oath that Mr. Mills is capable and has sound professional judgment. His law school dean wrote a letter of recommendation and purchased a bar prep course for him. The Board called no witnesses, offered no rebuttal, and made no credibility findings that undermine any of this evidence. That is not a record on which denial can stand.

Mr. Mills faced the adversity of overcoming his past and has now reached the threshold of the profession of law. He earned an associate degree from Montgomery College in Maryland, his Bachelor's degree from the University of Baltimore in 2017, and his J.D. from Lincoln Memorial University – Duncan School of Law in 2022. *See supra* p. 4. He achieved a passing score on the February 2025 Uniform Bar Exam. *Id.* Mr. Mills then began working as a law clerk for Mr. Harris Ammerman, a bankruptcy attorney, in May 2024. *Id.*

Mr. Ammerman testified on Mr. Mills' behalf at the Board hearing. Mr. Ammerman stated that he was impressed by Mr. Mills' writing samples, "demeanor," and "candor," found him "very knowledgeable" and a "self-starter," has never had any concerns about Mr. Mills' work quality, honesty, judgment, or character, and believes that Mr. Mills "can really do everything that a

lawyer can do”—and maintained these beliefs even knowing Mr. Mills’ past, including about his criminal record, civil litigation, and academic integrity misstep. Tr. 18:20-30:11; Findings 123-124. In a written letter submitted to the Board, Mr. Ammerman further described Mr. Mills as demonstrating “tenacity, guided by respect for legal process,” sound professional judgment, and a “strong moral compass,” and stated that he was “absolutely convinced” Mr. Mills possesses the requisite moral character and fitness to practice law.

Mr. Mills also submitted a number of character reference letters and affidavits on his behalf, including from attorneys, a family member, a college professor, and his law school dean. Findings 121, 122, 125, 130(a). Mr. Mills also testified on his own behalf and was subject to cross-examination. Mr. Mills was fully transparent and cooperative with the Board throughout this process, and he sat for cross-examination. *See supra* pp. 12–14.

The people that know Mr. Mills the best, including an attorney with 50 years of experience that works with Mr. Mills every day, have unanimously vouched for Mr. Mills. Conversely, the Board offered none of its own witnesses in response and failed to rebut the sworn testimony of Mr. Mills’ character witness. The Board made no findings as to the credibility of Mr. Mills’ witness and was silent on the reliability of or weight given to the character reference letters. *E.g.*, Findings 121-125, 130(a). Such a record compels admission to practice.

Mr. Mills also has contributed greatly to the community. Mr. Mills used \$50,000 of his own money (collected from the civil litigation that the Board improperly cast as “vexatious”) to produce a human rights documentary. He volunteered to film interviews with Holocaust survivors. He volunteered to assist families with immigration matters, and to participate in environmental litigation. *See supra* pp. 4–5; *see also* Board Rule 5B(5) (positive social contributions through employment or community service are evidence of rehabilitation).

Even if the Board could doubt Mr. Mills’ testimony, it had no basis to doubt the other evidence presented that shows Mr. Mills is fit to practice, and Mr. Mills’ recent conduct—including his sustained law-abiding behavior, supervised legal employment, and substantial charitable contributions—demonstrates that he has rehabilitated from the mistakes he made in the past.

II. ALTERNATIVELY, THE COURT SHOULD GRANT CONDITIONAL ADMISSION

If this Court concludes that some present safeguards are warranted notwithstanding the strong evidence of rehabilitation and present fitness, the appropriate alternative is conditional admission under Board Rule 16—not outright denial. Board Rule 16 provides a tailored mechanism to protect the public while permitting admission subject to appropriate conditions. That is the narrower and more proportionate response on this record.

Mr. Mills has completed inpatient treatment, has had no criminal charges, traffic citations, or other legal violations whatsoever in the ensuing years, passed the Minnesota bar examination, has successfully performed legal work under attorney supervision, and presented strong professional character evidence from those who know his present conduct best. Mr. Mills' tremendous progress warrants an alternative to outright exclusion from the profession: guardrails, which are available under Rule 16. If the Court elects for a cautious approach, it should be the imposition of beneficial monitoring and structure at the outset of Mr. Mills' practice.

Mr. Mills does not concede that the Board properly denied admission. To the contrary, he contends that the record supports admission now. But even if the Court affords "great weight" to the findings of the Board under these circumstances, it was legal error to deny admission outright, and this Court can address the concerns through Board Rule 16. On this record, conditional admission is more consistent with Board Rule 5B's focus on present fitness and rehabilitation than outright denial.

III. ALTERNATIVELY, THE COURT SHOULD SET A SHORTER REAPPLICATION PERIOD

If this Court does not believe admission is warranted now even with safeguards, it should still exercise its discretion to reduce the reapplication window. Mr. Mills has already been delayed in practicing law, and now must

wait another three years—until February 2029—to try again if the Board’s conclusion stands.

There is no reason to impose the upper limit for reapplication under these circumstances. Board Rule 18 sets a three-year reapplication ceiling—not a floor. No applicant is permanently disqualified from reapplying, and the reapplication period may be shortened under Board Rule 18. Rehabilitation and the passage of time are implicit in Board Rule 18, and explicit factors for consideration in Board Rule 5. Even if this Court decides Mr. Mills’ current character and fitness is insufficient, his tremendous progress demonstrates that he is well on his way. *Cf. Cunningham*, 502 N.W.2d 53, 58 (Minn. 1993) (reducing reapplication window from 2 years to 3 when “petitioner’s lack of candor and trustworthiness may be amenable to correction,” there was “no indication of an ingrained character flaw,” and “petitioner’s conduct appears simply obtuse”); *Zbiegien*, 433 N.W.2d at 877 (petitioner’s admission was already “delayed for over a year”).⁵

5. Petitioner also requests that, during his reapplication, the Board only be allowed to consider new conduct not already litigated in these proceedings. Petitioner’s past has already been heavily scrutinized. The relevant question for the Board is whether his recent conduct indicates sufficient rehabilitation. Accordingly, any future Board investigation should consider only his conduct since the Board’s February 2026 final written decision was issued.

CONCLUSION

Mr. Mills does not deny that his past warranted careful scrutiny. But the Rules require more than scrutiny of past mistakes in isolation. They require a fair assessment of present character and fitness, including age at the time of the conduct, remoteness, rehabilitation, candor, recent conduct, and positive social contribution. Those factors weigh decisively in Mr. Mills's favor.

The principal alcohol-related misconduct occurred approximately fifteen years ago, when Mr. Mills was 19 and 20 years old. He accepted responsibility for that conduct, completed intensive inpatient treatment, and has had no further criminal charges or traffic incidents since 2019. He passed the Uniform Bar Examination with a score of 290, has performed legal work under attorney supervision, presented substantial evidence of civic and public-serving contributions, and received strong endorsements from experienced attorneys and legal educators who knew the matters at issue and nevertheless concluded that he possesses the requisite character and fitness to practice law.

The Board denied admission by mischaracterizing lawful and appropriate civil litigation as “misuse of the legal process,” overstating the significance of the law-school omission and the 2022 academic-integrity matter, and making adverse candor findings that the record does not support. In doing so, it disregarded overwhelming evidence of mitigation, rehabilitation,

and present fitness that it was required to consider. That determination cannot be reconciled with the full record or the Board Rules.

For the foregoing reasons, upon review, the Court should grant the petition and (i) order the Board to admit Mr. Mills' admission to the practice of law or (ii) order full briefing on the merits and set the case for argument.

Respectfully submitted,

DATED: March 18, 2026

By:

s/Aaron Gott

Aaron Gott

Aaron Gott
BONA LAW PC
331 Second Avenue South
Suite 422
Minneapolis, MN 55401
(612) 284-5001
aaron.gott@bonalawpc.com

*Counsel for Petitioner
Lawrence Justin Mills*