SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. DRB 25-187
District Docket No. IV-2025-0021E

In the Matter of Bruce K. Warren, Jr.
An Attorney at Law

Argued
October 23, 2025

Decided
February 2, 2026

Robert N. Feltoon appeared on behalf of the
District IV Ethics Committee.

Respondent appeared pro se.

Table of Contents

Introduction

To the Honorable Chief Justice and Associate Justices of the Supreme Court of New Jersey.

This matter was before us on a disciplinary stipulation between the District IV Ethics Committee (the DEC) and respondent. Specifically, respondent stipulated to having violated RPC 1.3 (lacking diligence); RPC 1.4(b) (failing to communicate with a client); RPC 1.4(c) (failing to explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation); and RPC 1.16(d) (failing to refund an unearned legal fee upon termination of the representation).

For the reasons set forth below, we determine that a one-year suspension, with a condition, is the appropriate quantum of discipline for respondent's misconduct.

Ethics History

Respondent earned admission to the New Jersey and Pennsylvania bars in 2002 and to the New York bar in 2005. During the relevant timeframe, he maintained a practice of law in Westville, New Jersey.

Respondent has an escalating disciplinary history in New Jersey.

Warren I

On June 4, 2013, the Court reprimanded respondent for engaging in a conflict of interest by pursuing a six-week sexual relationship with an appointed client in a municipal court matter. In re Warren, 214 N.J. 1 (2013) (Warren I). The relationship spanned between June and July 2010 and involved sexual contact and explicit text messages, but not intercourse. In the Matter of Bruce K. Warren, Jr., DRB 12-360 (April 4, 2013) at 3, 6. Respondent also gave the client money for various personal expenses. Id. at 3. Sometime in July 2010, respondent's wife discovered his relationship with the client, following which he discontinued the relationship but continued to represent her. Id. at 6-7.

During the ethics hearing in that matter, respondent testified that, despite his relationship with the client, he did not seek to be relieved as counsel because, before his client's case would have been heard, in August 2010, he had planned to resign from his position as the conflict public defender in the municipality as a "gesture to his wife." Id. at 7. Respondent did not inform his client of his intent to resign. Ibid.

Additionally, sometime in July 2010, after respondent had resigned from his position as the conflict public defender, the client reported the relationship to the municipal court clerk, noting that it "was just overwhelming . . . to be picked up and then dropped by somebody emotionally and then, you know,

professionally, legally, he had my case in his hands." Id. at 7-8. Thereafter, the municipality transferred the client's case to another municipal court. Id. at 8.

In determining that a reprimand was the appropriate quantum of discipline, we emphasized that respondent knew that his client was emotionally vulnerable to his advances because she had attempted suicide the year before, was involved in a contentious custody dispute, and was undergoing treatment to end her drug dependence. Id. at 16-17. We also stressed that, had respondent not held a personal interest in his client, he would have informed her that he did not intend to represent her at the August 2010 hearing. Id. at 13. However, rather than assist her in obtaining new counsel, he informed his client, "at the eleventh hour," that he would not represent her, in an effort to maintain their relationship as long as possible. Id. at 13-14.

Warren II

On November 16, 2021, the Court admonished respondent for practicing law while administratively ineligible. In re Warren, 249 N.J. 4 (2021) (Warren II). Specifically, respondent admittedly practiced law while ineligible on two dates in 2017. In the Matter of Bruce K. Warren, Jr., DRB 20-130 (April 23, 2021) at 4. Respondent, however, did not do so knowingly, and he ceased practicing law once he learned of his ineligibility. Ibid.

Warren III

Effective March 8, 2024, the Court suspended respondent for six months in connection with his misconduct underlying two client matters and for failing to comply with the recordkeeping requirements of R. 1:21-6, in violation of RPC 1.15(d). In re Warren, 256 N.J. 363 (2024) (Warren III).

In the first client matter underlying Warren III, respondent failed to advise his client of the significant developments of his consumer protection lawsuit, including the fact that his claims against two credit reporting agencies had been settled, in 2013, while his claims against a debt collector had been withdrawn, in 2014, in violation of RPC 1.2(a) (failing to abide by a client's decisions concerning the scope and objectives of representation) and RPC 1.4(b). In the Matter of Bruce K. Warren, Jr., DRB 23-117 (November 1, 2023) at 49.

Respondent failed to consult with his client regarding whether he agreed to the settlements and the withdrawal of his claims. Ibid. Rather, in 2014, the client independently discovered his settlement with the first credit reporting agency when that agency sent him a tax form listing the settlement amount as taxable income. Ibid. Moreover, respondent failed to inform his client of his settlement with the second credit reporting agency, even after a purported 2015 discussion with his client regarding the reason for which he had received the tax form from the first agency. Ibid.

In the second client matter underlying Warren III, between June and October 2018, respondent sent sexually harassing and demeaning text messages to a client who sought to compel her former husband to pay child support, alimony, and her children's health insurance and college expenses, in violation of RPC 8.4(g) (engaging, in a professional capacity, in conduct involving discrimination – sexual harassment). Id. at 56.

Although the sexual nature of respondent's and his client's text messages appeared mutual at times, respondent knew that his client was in a precarious financial and emotional situation, requiring her to seek court action to compel her former husband to pay for her children's living expenses. Id. at 68. Moreover, respondent knew that his client was emotionally desperate and had been in an abusive relationship with her former husband. Ibid.

Rather than respect his client's personal dignity, he berated her, in July 2018, for not pursuing a sexual relationship with him and for going out to a bar with her friends. Ibid. In September 2018, respondent told his client that he did not "expect stand-offing" in response to his "lure[s]" to engage in sexual activity in his office. Ibid. Finally, in October 2018, just days prior to a hearing regarding the client's custody of her children, when the client asked respondent what she had done to him, he replied "[y]ou should have blown me." Ibid.

We determined that respondent's conduct was not only extremely degrading and humiliating toward the client, but it also reinforced her fears that, if she did not reciprocate his sexual advances, it could jeopardize the representation. Ibid.

Additionally, between August 2019 and April 2020, respondent repeatedly and falsely attempted to reassure the Office of Attorney Ethics (the OAE) that he never sent his client any inappropriate text messages suggesting that he wanted her "in a sexual way," in violation of RPC 8.1(a) (making a false statement of material fact to disciplinary authorities) and RPC 8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation). Id. at 69.

In determining that a six-month suspension was the appropriate quantum of discipline, we weighed, in aggravation, respondent's heightened awareness of his obligation to refrain from seeking inappropriate sexual relationships with vulnerable clients, considering his 2013 reprimand in Warren I for nearly identical misconduct. Id. at 70.

Effective January 10, 2025, following his petition for reinstatement, the Court restored respondent to the practice of law. In re Warren, 259 N.J. 449 (2025).

Warren IV

Effective October 11, 2025, the Court suspended respondent for three months in connection with his misconduct underlying two consolidated disciplinary matters. In re Warren, 261 N.J. 533 (2025) (Warren IV).

In the first matter comprising Warren IV, between January and March 2021, respondent failed to timely reply to his matrimonial client's inquiries concerning the status of his case and, thereafter, ignored his client's urgent e-mail concerning the location of his scheduled Early Settlement Program mediation. In the Matters of Bruce K. Warren, Jr., DRB 24-277 and DRB 24-279 (April 23, 2025) at 26-27. His failure to communicate placed his client at risk of not only being unable to participate in the mediation, but also the serious Rule-based sanctions that can result for failing to attend. Id. at 44-45. Additionally, respondent's conduct resulted in needless frustration to his client, who did not feel prepared to attend the mediation. Id. at 27.

Moreover, respondent lacked diligence by failing to timely comply with the Superior Court's December 2021 order directing him to prepare a draft final judgment incorporating the court's rulings, pursuant to R. 4:42-1(c). Id. at 28. Finally, respondent displayed a lack of courtesy in reply to his client's March 2022 request to appeal certain rulings contained in the proposed final judgment. Ibid. Specifically, rather than respectfully inform his client that he declined to

pursue an appeal, respondent told his client, among other things, that (1) he had "completely lost your mind," (2) was "disgusting" for "[t]hreatening the way I provide for my family because you didn't win," and (3) was a "sick person" who "should threaten your mental health provider not me." Id. at 30.

In the second matter comprising Warren IV, respondent altogether failed, throughout his representation of a client spanning from January 2022 through at least April 2023, to perform the legal work for which he had been retained. Ibid. Specifically, he failed to file a Superior Court application to compel the New Jersey Department of Health to release his client's genuine birth certificate. Id. at 30-31. Respondent's inaction deprived his client, an individual who was sold for cash as an infant and, thus, never legally adopted, the opportunity to obtain his legitimate birth certificate. Id. at 31. Compounding his inaction, between May 2022 and April 2023, respondent failed to reply to his client's repeated inquiries seeking updates on his matter. Ibid.

In determining the appropriate quantum of discipline, we weighed, in aggravation, the serious harm to the client who required his genuine birth certificate to obtain a federally compliant form of identification, without which he would be unable to enter certain federal facilities in connection with his employment. Id. at 46-47. Moreover, based on the timing of his prior disciplinary matters, we observed that respondent clearly had a heightened

awareness of his obligations to protect his clients' interests and refrain from engaging in inappropriate behavior toward his clients, consistent with the Rules of Professional Conduct. Id. at 44. Based on principles of progressive discipline, we determined that a three-month suspension was the appropriate quantum of discipline for the totality of his misconduct underlying Warren IV. Id. at 48-49.

To date, respondent remains suspended from the practice of law pursuant to the Court's Order in Warren IV.

Facts

Respondent and the DEC entered into a disciplinary stipulation, dated July 23, 2025, which sets forth the following facts in support of respondent's admitted ethics violations.

In March 2023, M.J.[1] retained respondent in connection with her concerns regarding the potential mismanagement of the estate of her late husband, H.R., who died, intestate, in January 2023. Specifically, according to M.J., H.R.'s girlfriend "took over everything," including H.R.'s home, "without speaking" to M.J. Because of M.J.'s limited English proficiency, her niece, A.J., communicated with respondent on her behalf. During the ethics investigation,

[1] Due to the sensitive nature of the facts underpinning M.J.'s matter, we have anonymized her name and her family's names in our decision.

A.J. informed the DEC that M.J. "hop[ed]" that respondent "could help us fight" to ensure that H.R.'s home could be titled in M.J.'s name.

On March 2, 2023, M.J. and respondent executed a written fee agreement, via which she agreed to pay a $2,000 retainer fee and to compensate him at a $300 hourly rate. The fee agreement described the scope of respondent's legal services merely as "[e]state." Five days later, on March 7, M.J. paid respondent the $2,000 retainer fee, following which he sent her an invoice reflecting his receipt of her payment.

On March 20, 2023, A.J. sent respondent a text message inquiring whether he was available "to meet to proceed with" M.J.'s "estate case." In reply, respondent claimed that he would "set the appointment for next week. We will go to [the] Surrogate together."

During the ethics investigation, A.J. informed the DEC that she had interpreted respondent's statement that they would "go to [the] Surrogate together" to mean that he was "beginning the paperwork" to title H.R.'s home in M.J.'s name. However, A.J. told the DEC that respondent was not "informing us much on what" visiting the Surrogate's office "was supposed to accomplish."

On March 29, 2023, A.J. sent respondent another text message inquiring when they would "go to the Surrogate together." Respondent, however, failed to reply.

One week later, on April 6, 2023, A.J. sent respondent's paralegal an e-mail, noting that:

> [M.J. was] concerned about her case not being worked on. We understand that [respondent] was out sick and he was on medical leave, we all hope he is having a good recovery, but [M.J.'s] time in the US is running out, her emergency visa expires in June-July if I'm not mistaken. She's worried that she paid for nothing. If you could give me a call with any updates on how we'll proceed with the case, I'd appreciate it.
>
> [Ex.3p.3.][2]

On April 10, 2023, respondent's paralegal replied to A.J., claiming that respondent was "back in the office and catching up on his cases." The paralegal also maintained that respondent "ha[d] a timeslot scheduled for the Surrogate's office this week," and that she would inform A.J. if respondent required her or M.J. to attend that "meeting."

One month later, on May 18, 2023, having received no updates regarding the status of the matter, A.J. sent respondent's paralegal another e-mail, stating that she had obtained H.R.'s death certificate and that she "hope[d] to see you soon." In reply, the paralegal told A.J. that she would "get back to [A.J.] with a date and time."

[2] "Ex." refers to the exhibits attached to the disciplinary stipulation.

On June 6, 2023, having received no further communication from either respondent or his staff, A.J. sent respondent the following text message:

> Good morning . . . I wanted an update on [M.J.'s] case. It's been about two months since we've hired you and we've heard nothing. I've been updating [your paralegal] about the Death Certificate because I know that it was very important in this matter and now that we have it, nothing else has been said. [M.J.'s] visa expires next month so she won't be here for much longer and with that, she also doesn't have a job meaning the money to hire you was borrowed money and we really hoped to see some progress.
>
> [Ex.3p.5.]

Respondent replied "[n]ow we need to go to Surrogate together."

Nine days later, on June 15, 2023, concerned about the lack of progress in M.J.'s matter, A.J. sent respondent's paralegal an e-mail asking whether respondent had "gone to the Surrogate's office," stressing that M.J.'s "time is very limited" and that her visa would expire in July. In reply, the paralegal stated that respondent had "an appointment on Tuesday the 22nd. He believes he should be able to take care of everything there."

On June 22, 2023, the date of respondent's purported appointment with the Surrogate's Court, A.J. sent respondent's paralegal an e-mail requesting an update on M.J.'s case. Neither respondent nor his paralegal replied to A.J.'s inquiry.

Two weeks later, on July 6, 2023, A.J. sent an additional e-mail to respondent's paralegal, emphasizing that "[l]ast we heard was that [respondent] had an appointment at the Surrogate's office and [M.J.] is very worried and stressed about this case." A.J. again underscored how M.J.'s "visa expires this month and she really wants to work on this case before she gets sent back." Respondent, however, failed to reply to A.J.'s urgent message. Consequently, on July 13, A.J. sent respondent a text message, noting that she had not "heard any updates since we last spoke. [M.J.] is very angry and she feels as though she isn't being helped." He again failed to reply.

However, on July 14, 2023, respondent's paralegal sent A.J. an e-mail inviting her to meet with respondent at his office on July 18. According to the disciplinary stipulation, the "meeting took place, at which time respondent provided an update on where things stood."

Between September 27 and October 25, 2023, A.J. sent respondent three text messages noting that, since their July 18 meeting, she neither had "heard" nor "receiv[ed] anything" from him. In her text messages, A.J. stated that she and M.J. were "desperate for updates" and pleaded with respondent to contact her as soon as possible. Respondent, however, failed to reply to A.J.'s messages.

Meanwhile, on August 28, 2023, respondent sent a letter, via regular mail, purportedly addressed to M.J. The letter directed M.J. to call respondent's office

and stated that "the [e]state is open but we need to remove the girlfriend and add you as administrator. I can do that but I need some more information." Although the letter listed M.J. as the recipient, the address listed on the letter was that of H.R.'s home – the same property which M.J. sought to acquire and the purported residence of H.R.'s girlfriend. Accordingly, neither M.J. nor A.J. received respondent's August 28 letter.[3]

Several weeks later, on October 10, 2023 – the same date on which A.J. sent respondent a text message noting that she and M.J. had not "received anything" and were "desperate for updates" – respondent sent another letter, via regular mail, again listing M.J. as the recipient but addressing it to H.R.'s home. The letter stated only "[p]lease call the office, if I am not available please ask for [my paralegal]." Neither M.J. nor A.J. received respondent's correspondence.

Five months later, on March 20, 2024, M.J. filed an ethics grievance against respondent, citing his prolonged failure to communicate.[4]

Based on the above facts, the parties stipulated that respondent violated RPC 1.3 by failing to perform any meaningful legal work, on M.J.'s behalf, to

[3] Notably, respondent's March 2023 invoice to M.J. contained her correct address.

[4] M.J. filed her ethics grievance twelve days after the effective date of respondent's six-month suspension in Warren III. In respondent's submissions to us in connection with his petition for reinstatement from that term of suspension, he did not list M.J. or A.J. as clients that he notified of his suspension, as R. 1:20-20(b)(10) requires.

allow her to administer H.R.'s estate. Specifically, respondent did not contest A.J.'s representation to the DEC that "nothing was ever concluded" in connection with H.R.'s estate and that M.J. never acquired title to H.R.'s home.

Additionally, the parties stipulated that respondent violated RPC 1.4(b) by failing to reply to A.J.'s numerous, urgent messages concerning the status of the matter.

The parties also stipulated that respondent violated RPC 1.4(c) by failing to adequately explain the scope of the representation to have allowed M.J. to make informed decisions concerning her matter, including advising her of the procedures to title H.R.'s home in M.J.'s name.

Finally, the parties stipulated that respondent violated RPC 1.16(d) by failing to refund his unearned $2,000 legal fee to M.J. upon termination of the representation.

The Parties' Positions Before the Board

In recommending the imposition of a censure, the DEC emphasized, in aggravation, respondent's escalating disciplinary history, which features his repeated mistreatment of clients. However, in the DEC's view, respondent's ethics history did not justify the imposition of a suspension in this matter,

considering that violations of RPC 1.3, RPC 1.4, and RPC 1.16(d), even when found together, ordinarily result in an admonition or a reprimand.

The DEC also argued that respondent's conduct was not as egregious as that of the censured attorney in In re Stolz, 229 N.J. 223 (2017), who failed to notify courts and opposing counsel of his prior term of suspension and retained his surname in his law firm's name during that period of suspension. In contrast to Stolz's "planned, intentional, and knowing" conduct, the DEC contended that respondent's actions were "not accompanied by intentional and planned efforts to deceive the legal system or his client."

In mitigation, the DEC underscored how respondent fully cooperated with the ethics investigation, stipulated to his misconduct, and exhibited sincere remorse and contrition concerning his improper behavior.

Respondent urged the imposition of a reprimand, characterizing his conduct as "delayed communication, inadequate follow-through, and administrative oversight." Although he conceded that he neglected M.J.'s matter and that his behavior was "regrettable," he argued that, unlike the attorney in Stolz, he did not engage in dishonest or "intentional misconduct."

In respondent's view, "[a]ny delay in responsiveness" toward A.J. and M.J. "was not willful neglect, but the direct result of a serious medical condition that caused me to miss more than sixty-five percent of workdays." He also

conceded that he "should have taken steps to have a trustee appointed to my firm." Nevertheless, citing either "ego or ignorance," he admittedly "did not take those steps," claiming that he "just continued to believe I would get better and get back to work."

Further, respondent represented that he "did not abandon the matter entirely," maintaining that he "visit[ed]" the Surrogate's Court, on two occasions, to attempt to advance M.J.'s interests. Specifically, he claimed that he placed a "freeze" on M.J.'s "open" estate and "ensured that a bond was issued." Moreover, he contended that he took "affirmative steps to alert the client to the possibility of fraud involving the estate."

Additionally, respondent claimed that he "spoke in detail with . . . [M.J.] and her family members," prompting M.J. to "obtain[] a copy of the marriage license." Respondent further contended that "there was no realistic way the estate could have been fully resolved before [M.J.'s] visa expired, regardless of my illness."

Respondent also argued that M.J.'s limited immigration status and English proficiency did not render her uniquely vulnerable, maintaining that her ability "to assert a claim remains intact, and estate protections are still in place."

Moreover, respondent alleged that both his August 28 and October 10, 2023 regular mail letters, which he inadvertently sent to H.R.'s home, did not

reveal any confidential information. Similarly, he represented that "there was not a 'girlfriend' at [H.R.'s] residence."[5]

In mitigation, respondent emphasized that his misconduct occurred while he was suffering from serious medical issues that impeded his ability to communicate with clients and perform "administrative follow-through." In support of his contention, he provided a July 14, 2025 letter from his treating physician, who noted that, because of respondent's medical issues developing in 2022, he had "considerable difficulty in completing his work-related responsibilities promptly."

Respondent also emphasized, in mitigation, that he has learned from his prior ethics matters and claimed that he is "drive[n] . . . to be better every day." Further, although he conceded that his conduct was "marked by delay and negligence," he maintained that his actions "arose during a period of illness and personal hardship." Finally, he emphasized that he cooperated with the DEC, stipulated to his misconduct, and has agreed to refund his entire unearned legal fee to M.J.

[5] During the disciplinary investigation, A.J. informed the DEC that H.R.'s girlfriend may have "ended up leaving" H.R.'s home.

Analysis and Discipline

Violations of the Rules of Professional Conduct

Following a review of the record, we find that the stipulated facts in this matter clearly and convincingly support respondent's admitted violations of RPC 1.3; RPC 1.4(b); RPC 1.4(c); and RPC 1.16(d).

Specifically, respondent admittedly violated RPC 1.4(b) by failing, throughout the representation spanning from March through at least October 2023, to reply to A.J.'s multiple urgent messages concerning the status of M.J.'s matter.

Specifically, between March 20 and July 13, 2023, A.J. sent respondent and his paralegal numerous messages inquiring about the status of the case. In her messages, A.J. repeatedly emphasized M.J.'s growing alarm regarding the lack of progress of her matter, considering her short-term immigration status in the United States and the fact that she had borrowed money to cover respondent's $2,000 retainer fee. Respondent, however, largely failed to reply to A.J.'s earnest pleas for information and, when he did respond, he merely would state that they would "go to the Surrogate."

Meanwhile, during that same timeframe, respondent's paralegal replied to only some of A.J.'s messages. When she did reply, she offered only vague assertions that respondent had a "scheduled" appointment with the Surrogate's

Court, during which she claimed that respondent "believe[d] he [would] be able to take care of everything." Despite the paralegal's representations, respondent failed to perform any meaningful legal work on M.J.'s behalf.

Following respondent's July 18, 2023 meeting with A.J., he abandoned any reasonable efforts to communicate with his client and her translator. Indeed, between September 27 and October 25, 2023, respondent refused to directly reply to A.J.'s text messages, which underscored how she and M.J. were "desperate for updates." Rather, on August 28 and October 10, 2023, respondent sent incorrectly addressed, regular mail letters to H.R.'s home – the same property which M.J. sought to acquire and the purported residence of H.R.'s girlfriend. Respondent's letters instructed M.J. to call his office and noted his intent to "remove [H.R.'s] girlfriend" and appoint M.J. as the administrator of H.R.'s estate. Respondent's actions not only risked revealing confidential information to a potential adversary but also demonstrated his complete inability to timely and appropriately reply to his client's desperate pleas for information.

Similarly, respondent violated RPC 1.4(c) by failing to adequately communicate with A.J. and M.J. to allow M.J. to make informed decisions concerning her matter. Specifically, at no point during the representation did respondent attempt to explain the procedures involved for M.J. to acquire title to her late spouse's property. Rather, on the limited occasions when respondent

replied to A.J., he merely told her that they would "go to the Surrogate." However, as A.J. informed the DEC during the ethics investigation, respondent did not inform her or M.J. "on what . . . visiting the Surrogate[']s office . . . was supposed to accomplish." Compounding his failure to adequately communicate, respondent's written fee agreement with M.J. noted the scope of the representation only as "[e]state." Respondent's refusal to adequately communicate unquestionably deprived M.J. of the ability to make informed decisions regarding her matter, particularly considering her short-term immigration status.

Moreover, respondent admittedly violated RPC 1.3 by failing to perform any meaningful legal work in furtherance of M.J.'s matter. Indeed, respondent failed to take the basic step of applying, on M.J.'s behalf, for letters of administration for H.R.'s estate. Respondent's inaction deprived M.J. of the opportunity to administer the estate of her late husband, who had died intestate, and to potentially acquire title to his residence, which, pursuant to New Jersey's intestacy laws, she may have stood to inherit.

Finally, as respondent conceded, he violated RPC 1.16(d) by failing to refund any portion of his unearned $2,000 legal fee upon the termination of the representation. Indeed, his failure to refund his unearned legal fee has persisted to date, despite having ceased the representation more than two years ago.

In sum, we find that respondent violated RPC 1.3; RPC 1.4(b); RPC 1.4(c); and RPC 1.16(d). The sole issue left for our consideration is the appropriate quantum of discipline for his misconduct.

Quantum of Discipline

The parties analyzed respondent's conduct, in part, against that of the censured attorney in Stolz, 229 N.J. 223, who failed to comply with the strictures of R. 1:20-20 in connection with his term of suspension. However, in our view, respondent's serious mishandling of M.J.'s matter is more aptly analyzed against disciplinary precedent involving the neglect of estate matters.

Attorneys who grossly neglect or lack diligence in estate matters have received discipline ranging from an admonition to a censure, even when accompanied by less serious infractions, such as violations of RPC 1.4 and RPC 1.16(d). See, e.g., In the Matter of Andrew V. Zielyk, DRB 13-023 (June 26, 2013) (admonition for an attorney who failed to reply to a tax auditor's request for information, thereby delaying the completion of the estate's tax returns; the attorney also failed, for fifteen months, to adequately communicate with the estate beneficiaries; no prior discipline); In re Burro, 235 N.J. 413 (2018) (reprimand for an attorney who grossly mishandled an estate matter for ten years and failed to file inheritance tax returns, resulting in the accrual of $40,000 in

interest and the imposition of a lien on property belonging to the executor; the attorney also failed to (1) keep the client reasonably informed about events in the case, (2) return the client file upon termination of the representation, and (3) cooperate with the disciplinary investigation; in aggravation, we considered the significant harm to the client and the attorney's prior private reprimand; in mitigation, the attorney expressed remorse and had suffered a stroke that forced him to cease practicing law); In re Trella, __ N.J. __ (2023) (censure for an attorney who failed to timely administer two estate matters by not promptly paying inheritance taxes; the attorney also negligently misappropriated estate funds and, in both estate matters, charged excessive fees; in a third client matter, the attorney engaged in a conflict of interest by loaning funds to his client, and he made misrepresentations to the OAE with respect to the loan; given the totality of the misconduct, the attorney's unblemished fifty-year career at the bar was insufficient mitigation to warrant a downward departure from the baseline discipline of a censure; we weighed, in aggravation, the harm to the clients caused by the attorney's delay, and the attorney's admission that he rarely entered into written fee agreements with clients); In re Cook, 233 N.J. 328 (2018) (censure for an attorney who, despite his expertise in estate law, failed to diligently administer an estate with a single beneficiary; the attorney failed to complete even the most routine tasks required of him as executor, including

providing written notice to the sole beneficiary that the will had been admitted to probate; in addition, the attorney failed to communicate with the beneficiary, despite her persistent attempts to obtain information regarding the estate; the attorney also failed to cooperate with the disciplinary investigation; we did not consider the attorney's prior admonition in aggravation, considering that his misconduct under scrutiny pre-dated the imposition of that sanction).

Varying terms of suspension have been imposed in estate matters involving more egregious neglect or more significant disciplinary histories, depending on the seriousness of other factors. See In re Wynn, 256 N.J. 465 (2024) (three-month suspension for an attorney who, for nine years, failed to properly administer an estate; he failed to liquidate securities, deposit dividend checks in the estate account, or locate outstanding beneficiaries; he also failed, without any reasonable explanation, to make bequests to various beneficiaries; despite his serious mishandling of the estate and his failure to pay $73,000 to seven beneficiaries, he disbursed to himself $66,000 in grossly excessive legal fees and $21,000 in executor commissions, without the knowledge or approval of anyone but himself; the attorney also committed recordkeeping infractions, engaged in commingling and negligent misappropriation in a second client matter, and failed to cooperate with the OAE in a third client matter; in aggravation, we weighed the substantial harm to the estate beneficiaries; no

prior discipline in his forty-year career at the bar), and In re Onorevole, 185 N.J. 169 (2005) (in a default matter, six-month suspension for an attorney who was retained to probate an estate but then failed, for more than three years, to file the tax forms for the estate, which he then filed without the necessary signature; as a result of the attorney's errors, interest was charged against the estate; the attorney's neglect forced substitute counsel to file an amended inheritance tax return; although the underlying conduct, without more, would generally result in a reprimand, we determined that a six-month suspension was the appropriate sanction based on the default status of the matter and the attorney's disciplinary history, which included a prior admonition and two reprimands for similar misconduct).

Recently, in In re Nussey, 261 N.J. 82 (2025), the Court suspended an attorney for three months for failing to begin the administration process for his client's spouse's estate. Specifically, for ten months, Nussey failed to apply for letters of administration and made no attempt to secure a new deed for the spouse's property to reflect his client's fee ownership. In the Matter of David Ryan Nussey, DRB 24-237 (April 9, 2025) at 23. Nussey's prolonged inaction resulted in significant harm to the client, given that an insurance company declined to release funds to repair the property until the client could demonstrate that he had taken those simple measures. Id. at 31. Nussey's misconduct forced

the client to secure substitute counsel, who promptly secured the appropriate materials to allow the insurance company to disburse the funds. Ibid.

In determining that a three-month suspension was the appropriate quantum of discipline, we weighed, in aggravation, the fact that Nussey's misconduct constituted his fourth consecutive disciplinary matter in less than five years. Ibid. Indeed, two of Nussey's prior ethics matters involved substantially similar misconduct, demonstrating his ongoing indifference to the interests of his clients. Id. at 31-32.

Here, like the attorney in Nussey, respondent advanced no compelling justification for his protracted failure to begin the administration process for H.R.'s estate. Specifically, for seven months, between March and October 2023, respondent failed to fulfill his purported commitment to M.J. to apply for letters of administration. Compounding his inaction, he repeatedly failed to reply to A.J.'s numerous, urgent inquiries requesting updates on the status of the case.

Like the circumstances in Nussey, wherein we accorded major aggravating weight to the serious harm caused by the attorney's refusal to begin the estate administration process, we similarly accord significant aggravating weight to the harm respondent's misconduct caused M.J., whom he deprived of the opportunity to not only administer H.R.'s estate, but also acquire ownership of her late husband's property, which she may have stood to inherit pursuant to

intestacy laws. The serious harm to M.J. was amplified by her limited financial means, considering that she was forced to obtain a loan to cover respondent's $2,000 retainer fee. However, given his decision to ignore his client's numerous messages and his failure to perform any meaningful legal work, M.J. – through A.J. – expressed her credible belief to respondent that "she paid for nothing."

Additionally, A.J. repeatedly informed respondent of M.J.'s short-term immigration status and M.J.'s request that respondent "work on [her] case" before she expected to "get[] sent back" to another country. We consistently have viewed individuals with limited English proficiency and immigration status, such as M.J., as a vulnerable class of clients who face unique and sensitive challenges. See In the Matter of Douglas Andrew Grannan, DRB 20-236 (June 2, 2021) at 49 (wherein we noted that the attorney's misconduct caused "serious harm to a vulnerable class of clientele who faced dire consequences – immigrants" with limited English proficiency who faced potential removal from the United States). Respondent, however, was not spurred into action by M.J.'s mounting concerns regarding her limited immigration status.

In contrast to the censured attorney in Cook, whose limited disciplinary history we did not consider in aggravation, this matter represents a continuation of the disturbing pattern of mistreating vulnerable clients that respondent has

exhibited since his 2013 reprimand in Warren I, his 2024 six-month suspension in Warren III, and his 2025 three-month suspension in Warren IV.

As we previously observed in Warren IV, based on the timing of his prior disciplinary matters, respondent clearly had a heightened awareness of his obligations to protect his clients' interests, consistent with the Rules of Professional Conduct. Nevertheless, without any compelling justification, he repeatedly refused or failed to adequately reply to A.J.'s urgent messages concerning M.J.'s matter. Further, he failed to perform any meaningful work to begin the estate administration process for M.J., his vulnerable client, who had limited financial means and proficiency in English, and an uncertain immigration status. Respondent's serious lack of diligence in this matter, thus, establishes that he clearly has failed to utilize his experiences with the disciplinary system as a foundation for reform. See In re Zeitler, 182 N.J. 389, 398 (2005) ("[d]espite having received numerous opportunities to reform himself, [the attorney had] continued to display his disregard, indeed contempt, for our disciplinary rules and our ethics system").

In our view, respondent's conduct is more egregious than that of the attorney in Nussey, who received a three-month suspension. Specifically, Nussey, upon termination of the representation, promptly refunded his entire legal fee to his client, who, ultimately, obtained letters of administration and

title to the estate property, after securing substitute counsel. By contrast, following respondent's decision to cease the representation, he failed to refund his $2,000 unearned legal fee to M.J., who did not appear to have the means (either financially or because of immigration status) to secure substitute counsel to complete her matter. Moreover, unlike Nussey, whose misconduct represented his fourth disciplinary matter, respondent's misconduct represents his sixth disciplinary matter in the last thirteen years.

There is limited mitigation for us to consider, given that respondent failed to establish a nexus between his medical issues and his gross mishandling of M.J.'s matter, including his refusal to directly reply to A.J.'s repeated pleas for information following their July 18, 2023 meeting. See In the Matter of Milena Mladenovich, DRB 22-207 (May 1, 2023) at 27 (declining to accord significant mitigating weight to the attorney's mental health issues, given the attorney's failure to establish a nexus between her health issues and her misconduct). Indeed, even if he had established such a nexus, respondent would have been ethically obligated, pursuant to RPC 1.16(a)(2), to withdraw from the representation if his physical condition had materially impaired his ability to represent clients. Alarmingly, despite respondent's representations concerning his medical issues, he admitted that his "ego or ignorance" prevented him from taking the necessary steps to protect his clients.

Finally, although respondent stipulated to his misconduct, thereby conserving disciplinary resources, we are troubled by his failure to appreciate the serious harm he caused to his client. Specifically, despite having ceased his representation of M.J. after she repeatedly expressed her growing alarm regarding the lack of progress of her case, respondent disingenuously characterized his conduct merely as an "administrative oversight" resulting from "delayed communication" and "inadequate follow-through." His cavalier attitude toward the significant harm he caused to M.J. demonstrates that, despite his recent and burgeoning disciplinary history, he remains indifferent toward his responsibilities to his clients, particularly those in vulnerable or precarious situations.

Conclusion

On balance, consistent with disciplinary precedent and principles of progressive discipline, we determine that a one-year suspension is the appropriate quantum of discipline necessary to protect the public and preserve confidence in the bar.

Finally, based on his failure to perform any meaningful legal work in this matter and his express commitment to refund his entire legal fee to his client,

we recommend that respondent be required to disgorge his unearned $2,000 fee to M.J. within sixty days of the Court's disciplinary Order in this matter.

Member Rodriguez voted to recommend the imposition of a six-month suspension, with the same condition.

Vice-Chair Boyer and Member Campelo were absent.

We further determine to require respondent to reimburse the Disciplinary Oversight Committee for administrative costs and actual expenses incurred in the prosecution of this matter, as provided in R. 1:20-17.

Disciplinary Review Board
Hon. Mary Catherine Cuff, P.J.A.D. (Ret.),
Chair

By: */s/ Timothy M. Ellis*
Timothy M. Ellis
Chief Counsel

SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
VOTING RECORD

In the Matter of Bruce K. Warren, Jr.
Docket No. DRB 25-187

Argued: October 23, 2025

Decided: February 2, 2026

Disposition: One-Year Suspension

Members	One-Year Suspension	Six-Month Suspension	Absent
Cuff	X		
Boyer			X
Campelo			X
Hoberman	X		
Menaker	X		
Modu	X		
Petrou	X		
Rodriguez		X	
Spencer	X		
Total:	6	1	2

/s/ Timothy M. Ellis
Timothy M. Ellis
Chief Counsel