SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. DRB 25-211
District Docket No. XIV-2025-0029E

In the Matter of Leo M. Mulvihill, Jr.
An Attorney at Law

Argued
November 20, 2025

Decided
February 26, 2026

Saleel V. Sabnis appeared on behalf of the
Office of Attorney Ethics.

Respondent waived appearance for oral argument.

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 motion for reciprocal discipline filed by the Office of Attorney Ethics (the OAE), pursuant to R. 1:20-14(a), following the issuance of an April 12, 2023 order by the Disciplinary Board of the Supreme Court of Pennsylvania (the Pennsylvania Board) directing that respondent be publicly reprimanded.[1]

The OAE asserted that, in the Pennsylvania matter, respondent was found to have violated the equivalents of New Jersey RPC 3.5(c) (engaging in conduct intended to disrupt a tribunal); RPC 4.4(a) (engaging in conduct that has no substantial purpose other than to embarrass, delay, or burden a third party); RPC 8.2(a) (making a statement with reckless disregard for the truth or falsity thereof concerning the qualifications of an adjudicatory officer); RPC 8.4(b) (two instances – committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer); and RPC 8.4(d) (engaging in conduct prejudicial to the administration of justice).

For the reasons set forth below, we determine to grant the motion for

[1] Pa. R.D.E. 204(a)(5) and Pa. R.D.E. 205(c)(8) authorize the Pennsylvania Board to impose public reprimands without further order of the Pennsylvania Supreme Court.

reciprocal discipline and conclude that a censure, 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 2010. During the relevant timeframe, he maintained a practice of law in Philadelphia, Pennsylvania. He has no disciplinary history in New Jersey.

Facts

In or around 2020, VRTX Investments, a general contractor located in Pennsylvania, retained respondent to pursue an appeal of a determination by the City of Philadelphia (the City) to suspend its contracting license. Deputy City Solicitors E.C. and C.J. represented the City in connection with VRTX's appeal.

In January 2021, respondent and E.C. exchanged e-mail messages concerning the scheduling of VRTX's appeal hearing before the Philadelphia Board of License and Inspections Review (the PBLIR). Subsequently, in February 2021, following additional e-mail messages exchanged with E.C., respondent concluded that E.C. had been discourteous to him by not replying to certain e-mail and voicemail messages. Respondent also expressed his belief that E.C. had "reneged" on their agreed upon hearing date.

On March 3, 2021, respondent and E.C. appeared for a virtual hearing, before the PBLIR, in connection with VRTX's appeal.

At the outset of the hearing, respondent objected to the proceeding going forward as scheduled, claiming that the City had not provided all relevant discovery and alleging that VRTX's license had been suspended for more than a year, without the "opportunity to be heard." Following E.C.'s attempt to reply to respondent's objections, the PBLIR determined that the hearing would proceed, "based on existing standards." During the proceeding, respondent repeatedly interrupted the PBLIR members, injected numerous, duplicative objections to the City's witness testimony, and launched abusive and personal attacks against E.C.

The PBLIR informed respondent that, if he disagreed with the rulings on any of his objections, he could appeal those determinations. Despite those expressed parameters, respondent engaged in the following colloquy with the PBLIR almost immediately after the City's first witness began testifying:

> RESPONDENT: Note my objection for the record based on testimony previously.
>
> CHAIR K.W.: So noted. So noted.
>
> RESPONDENT: I must state my basis on the record –
>
> MEMBER R.P.: [Respondent], I'm an attorney. I've seen you many times on the zoning board. You have noted an objection earlier. The chairman has responded.

I believe you owe the respect to the chairman as he proceeds with the hearing to wait until he speaks. Your objections with respect to the presentation of testimony regarding [the inspection site address] were put on the record earlier. The chairman has acknowledged that. You don't need to go into further detail at this point in time.

RESPONDENT: Respectfully, the Superior Court disagrees with you. Unless I renew my objection at every point it can be potentially considered waived. That happens in criminal cases and from time to time it does happen in civil cases. Respectfully I disagree. I must renew my objection every time and state the basis on the record or else it could be considered waived and I cannot risk that . . . I apologize . . . I do not mean to interrupt you, but I must state my objections and the basis every time, I must.

CHAIR K.W.: Stating your objections is absolutely fine and I've noted your objections. But I will not tolerate interference with the proceedings. So you can note your objection, we'll note those for the record and we will proceed. If I decide – if the board decides you're being unreasonable, we'll mute you and then we'll have another legal matter to resolve at some later date.

RESPONDENT: If I am muted without my permission during this proceeding, then that's a decision the board will have to make, because I'm zealously advocating for my client.

CHAIR K.W.: You've understood our position, so we'll proceed.

[OAE039-OAE041.][2]

[2] "OAE001" through "OAE286" refers to the Bates numbers of the exhibits appended to the OAE's motion.

Thereafter, respondent objected to nearly every attempt by the City's witness to testify, arguing that he disagreed with the witness's use of certain pronouns and that the witness lacked foundational knowledge to answer E.C.'s direct examination questions. After an off-the-record discussion with counsel, the PBLIR instructed respondent as follows:

> CHAIR K.W.: We're reconvening. What I'll say to all parties is this. We will get through this today. The board has set aside a special hearing time for this day. We want to hear the facts as they are. However . . . there is always hiccups with technology and it leaves a lot to be desired as opposed to hearing a case in person. If anyone who is being represented or participating in this matter is not cooperative and is creating a disruption as determined by the board itself, we'll suspend these hearings and do it when we can all do it in person.
>
> But I want all of us to be heard. Everyone has the right to legally represent their client and their interests and to put forth their positions. I will allow everyone that has a role to play to be heard. So that's not an issue. What I will not abide by is disruptive behavior. And if that happens I will suspend the hearing and we'll do it in person. When that happens, I'm not sure when, but that's when we'll do it. What I will do now, everybody listen to me, is we'll go back to the testimony that was in progress before we went off the record. . . .
>
> RESPONDENT: Mr. [K.W.], may I be heard?
>
> CHAIR K.W.: Please, I asked [E.C.] to start. When your turn comes, you can speak. [E.C.]?
>
> MEMBER R.P.: [Respondent], just so you understand, we are trying to conduct an administrative hearing. And you've done this many, many times. This is not the first

time you've been in a hearing. If you'll listen and not interrupt, because I know you're a very respectful attorney, at least that's my experience with you and I've seen you in community meetings as well.

RESPONDENT: Yes.

MEMBER R.P.: So if you have an objection, make your objection and then allow us as a board to hear the witness' testimony. And if you need to make a further objection, make it. But at the end of your objections don't interrupt with an objection after each sentence is presented. Your objections will be noted. You have the right at the end of the testimony to state the reasons. We would like to have the witnesses testify and you can nod your head in objection, but that's the way we have decided to proceed in this matter. Please do not interrupt every time a sentence is – a question is asked. Make your objection. You don't have to state your reason. You can state your reason at the completion of the testimony. Allow us . . . to hear the testimony.

RESPONDENT: Mr. [R.P.], you are legally incorrect under Superior Court precedent. I will not –

MEMBER R.P.: [Respondent], I may be legally incorrect. You have the right to point that out in your brief on appeal.

RESPONDENT: No. I must preserve the record. Otherwise I waive those objections for purposes – Mr. [R.P.] I do.

CHAIR K.W.: [E.C.], would you proceed. We are not –

RESPONDENT: I'm going to continue to have these arguments if I cannot make my objection after every statement that is objectionable which is required that I do so.

> CHAIR K.W.: And if it is deemed you're being disruptive, we will suspend this hearing.
>
> [OAE044-OAE047.]

Thereafter, following respondent's objection to the City's request that the hearing move forward that same day, as scheduled, the PBLIR directed E.C. to describe the documents she intended to introduce into evidence, in order to determine whether witness testimony concerning those documents was required. However, respondent objected to each of E.C.'s statements describing the City's documents, arguing, among other theories, that E.C. had "assume[d] facts not in evidence" and was "testifying." The PBLIR acknowledged each of respondent's objections and instructed E.C. to proceed with her summary of the City's documents. After respondent made more than a dozen duplicative objections, the PBLIR and respondent engaged in the following colloquy:

> MEMBER R.P.: [Respondent], you've made objections with almost every statement [E.C.] has made. Please make your objections. That's fine, you can show the rules of evidence. You'll have an opportunity to present them in any appeal you have. You've made your objections. The chairman is being polite and courteous to you and he's ruling on each time you've raised an objection.
>
> RESPONDENT: Mr. [R.P.], there have been no rulings. They've only been noted.
>
> MEMBER R.P.: You've made your objections. Allow the chairman to proceed, please.

RESPONDENT: Mr. [R.P.], let's correct the record respectfully. There have been no rulings on the objections. They have been noted. I'm not being noted as overruled or sustained at any point, to the best of my recollection. So I disagree with your assertion that any of my objections have been ruled upon, which is a problem as well for purposes of appeal. That's not my problem, because I'm not the administrative body. I'm only counsel here and that's fine.

MEMBER R.P.: [Respondent], one would get the impression that your repeated assertions, requests, objections are only intended to delay the proceedings. It's clear that you are aggressively advocating for your client and raising objections in order to protect your clients' interests.

RESPONDENT: Yes.

MEMBER R.P.: It would also appear that you're trying to delay and impede the ability of this board to hear the case.

RESPONDENT: Mr. [R.P.], it is not –

MEMBER R.P.: I haven't finished talking.

RESPONDENT: Okay. Well, I'm making my objections respectfully.

MEMBER R.P.: I haven't finished talking. You can't interrupt me in the middle of a sentence and object when I haven't – you can't object to me speaking.

RESPONDENT: I can. And I do with judges as well, especially when the judge is incorrect in the law and does not make rulings on my objections and insinuates that my advocacy is somehow intended to delay a proceeding when I'm doing what I have to under the rules of evidence – and that's not correct and I will

interrupt you.

MEMBER R.P.: This is an administrative proceeding. It's not a court hearing. It's an administrative hearing, where the rules of evidence are not required to be strictly applied.

RESPONDENT: Of course. However, on appeal they will be.

MEMBER R.P.: We are trying to allow this matter to be presented and we expect that you cooperate as well as an officer of the court.

RESPONDENT: If this board will not allow me to make objections as I'm required to, just as if I were in [the] Court of Common Pleas or municipal court and a judge did not allow me to do my job, I'd be held in contempt and they'd throw me in jail. If this board has the ability to do that, fine. I'll accept your sanction. I will not be told by this board how I must advocate for my client zealously which I'm required to do under my obligations under the rules of professional conduct. So if this board wishes to suspend this hearing, and by the way I agreed to stipulate to everything the City wished to admit in its packet. Instead we must go through it seriatim and that's fine if we are going to do that, cool, and I will make my objections as I'm required to. But I will not be told by this board how to do my job respectfully, Mr. [R.P.].

[OAE063-OAE066.]

Following the PBLIR's warnings to respondent regarding his disruptive behavior, he continued to object to each of E.C.'s attempts to summarize the City's documents and planned witness testimony. In support of his numerous objections, respondent claimed that E.C.'s statements (1) lacked personal

knowledge or "foundation;" (2) constituted inadmissible hearsay; (2) "assume[d] facts not in evidence;" (3) "assume[d] a conclusion of law;" and (4) were "irrelevant." Additionally, he "renewed" his objection that the City had not disclosed all relevant discovery. When the PBLIR informed respondent that his objection had been "heard" previously and that he did not "need to spell it out in long detail," he replied that "[t]he Superior Court disagrees and respectfully until you're on the Superior Court, respectfully, the Superior Court precedent has a little bit of clout over what this board determines."

Following respondent's remarks, the PBLIR directed E.C. to call her next witness, a records custodian. Respondent, however, repeatedly interrupted the witness to lodge his objections, even when the PBLIR informed him that there was "no need to . . . read the rule" purportedly governing his objections. During cross-examination, respondent continued to engage in disruptive behavior:

> RESPONDENT: Do you ever share your password or log-in with anybody?
>
> THE WITNESS: No.
>
> RESPONDENT: You've never done that? Do you know anyone who's ever done that, share a Hulu or Netflix log-in?
>
> E.C.: Objection. This is well beyond –
>
> CHAIR K.W.: Move on, please.
>
> THE WITNESS: I'll correct myself. I shared some log-

> in information for Hulu and Netflix with my wife, as do many people. . . . I would never share any work passwords that give access to protected systems. . . .
>
> RESPONDENT: But you don't know if any inspectors do that, do you?
>
> E.C.: Objection. Calls for speculation.
>
> RESPONDENT: This is cross-examination. This is what I get to do.
>
> MEMBER R.P.: [Respondent], you get to cross examine. If the City objects then the board gets to rule on the objection. And if they rule and overrule or support the objection, then you get to proceed with the next question. Can you proceed to the next question please?
>
> RESPONDENT: Has there been a ruling on a single objection I've made? I don't believe there has been. So with respect –
>
> MEMBER R.P.: At this point you're asking questions, the City is objecting with respect to certain questions.
>
> RESPONDENT: Okay. I will await the ruling of the board.
>
> CHAIR K.W.: I think the board – you heard the rule of the board is that we overruled and asked you to move on. We want you to realize the matter of custodian of records, which is why he was testifying.
>
> [OAE085-OAE087.]

Thereafter, in connection with the PBLIR's attempt to determine whether to continue the proceeding in a virtual format, E.C.'s co-counsel, C.J., offered

the following remarks:

> C.J.: . . . I'd like to point out to the board, although [respondent] has asked to reschedule the matter yet again, he's articulated absolutely no reason why that's necessary. He's clearly able to examine witnesses, he's been able to make every objection he's needed to make, the board has been able to conduct the proceeding thus far, every necessary person is here on the call, all the evidence is available and before the board. There is no reason to reschedule the matter other than to play into [respondent's] strategy of delaying and obstructing the board from making a decision.
>
> RESPONDENT: Get out of here. Come on, [C.J.]. How dare you.
>
> CHAIR K.W.: [Respondent], please.
>
> RESPONDENT: No. When somebody (inaudible) my professional integrity like that, no.
>
> CHAIR K.W.: You've questioned other individuals' objectivity today on the record. So what I'm saying is the outrage is overdone.
>
> RESPONDENT: No. No.
>
> CHAIR K.W.: [Respondent], if you can't calm yourself down, we will –
>
> RESPONDENT: I'm calmer than you are, Mr. [K.W.], please.
>
> [OAE106-OAE107.]

E.C. also requested that the PBLIR continue the hearing, arguing that the "only reason the delay has even been suggested is due to [respondent's]

disruptive pattern of objections that has stopped us from being able to move forward." In reply, respondent asserted "[E.C.] just stated that we cannot proceed, because of my disruptive pattern of objections. I don't know how many cases [E.C.] actually tried in real court where the big boys play." When the PBLIR Chair directed that respondent be "muted" for his inappropriate remark, respondent simply stated "I'm leaving. Goodbye. If I'm being muted[,] I'm leaving." The PBLIR Chair then cautioned respondent that he could "choose to act out if you'd like. You're doing that to the detriment of your case and to your client. We will not abide by personal attack." Thereafter, the PBLIR determined to allow the proceeding to continue, in a virtual format, concerning another licensing matter related to VRTX.[3]

When E.C. requested that the PBLIR excuse certain witnesses for the City, respondent objected, claiming that those witnesses were relevant to the related VRTX licensing matter. Addressing respondent's objection, the PBLIR instructed him as follows:

> CHAIR K.W.: If you don't have them on your list of witnesses to call then you can't make that determination.
>
> RESPONDENT: Chair, I disagree strenuously. I get to cross-examine any of those witnesses, Chair.

[3] The related matter purportedly concerned the owner or operator of VRTX allegedly utilizing his daughter's contractor's license, while VRTX's license remained suspended.

> CHAIR K.W.: They're not being called to testify.
>
> RESPONDENT: I'm calling them to testify right now, Chair.
>
> CHAIR K.W.: You can't do that. We are not doing that.
>
> RESPONDENT: Well, then I request this be suspended[.]
>
> CHAIR K.W.: Your request is denied. Proceed, [E.C.].
>
> [OAE124.]

Subsequently, while E.C. attempted to introduce her theory of the case, respondent engaged in the following behavior:

> E.C.: In this matter, the theory of this case . . . is the suspended contractor . . . through his license with VRTX, was using the license of another person to continue working[,] in violation of that suspension.
>
> RESPONDENT: Objection. Assumes facts not in evidence.
>
> CHAIR K.W.: [Respondent], she's presenting the overview of her case. I've asked her to do that. And when the specific facts have been put on the record, you can object.
>
> . . . .
>
> MEMBER R.P.: I just wanted to say that we have not eaten our lunches, [respondent]. Would you mind refraining from taking or having a meal while the rest of us are hearing this case? Thank you.
>
> RESPONDENT: May we take a lunch break or a brief recess to get a snack? I haven't eaten today.

> CHAIR K.W.: We are going to proceed and get this done.
>
> RESPONDENT: Mr. [R.P.], respectfully I'll turn off my camera if I'm going to snack.
>
> MEMBER R.P.: Fine. Whatever you wish to do.
>
> [OAE126-128.]

During E.C.'s attempt to directly examine her first witness connected to the related VRTX licensing matter, respondent again injected numerous, duplicative objections, at times before E.C., a PBLIR member, or the witness could finish speaking. Respondent also cited "hearsay" as a basis for many of his objections, despite the PBLIR Chair repeatedly reminding him that hearsay was permitted in administrative hearings. At one point, the PBLIR Chair informed respondent that there was "no need to scream" his objection. After expressly noting each of respondent's objections, the PBLIR Chair instructed E.C. to continue her direct examination.

The following exchange occurred at the outset of respondent's cross-examination of the City's witness:

> RESPONDENT: All right, fine. [witness], let's go. You have a dad, right? You got a dad?
>
> CHAIR K.W.: We will limit your cross-examination to relevant questions.
>
> RESPONDENT: This is relevant. It's cross-

examination. They opened the door. They brought in my client's father as a result.

CHAIR K.W.: We will – I'll direct you to direct your questions to relevant testimony –

RESPONDENT: It's relevant.

CHAIR K.W.: If it is not relevant, I'll ask you to move on.

RESPONDENT: No. It's relevant.

CHAIR K.W.: Let's move on, sir.

RESPONDENT: Let's look up (inaudible). Let's talk about it. Let's talk about 401, Chair.

CHAIR K.W.: No. No. No.

RESPONDENT: Let's look up 402. Let's do it.

CHAIR K.W.: No. No.

RESPONDENT: Let's do it. No. It's cross. She opened the door, Chair. I'm annoyed.

CHAIR K.W.: Being annoyed is okay. We will not do that.

RESPONDENT: Well, I'm doing it, Chair.

CHAIR K.W.: If you want to now decide that you forfeited your opportunity to –

RESPONDENT: I'm not forfeiting anything, Chair. So let me continue with my cross. Under Rule 401 – (inaudible).

CHAIR K.W.: I've asked you to restrict your questions

–

RESPONDENT: I am. Okay. [Witness], do you have a dad? You have a dad, don't you?

E.C.: Objection to relevance.

RESPONDENT: It's relevant under 401, [E.C.]. Please state your basis for the objection.

MEMBER R.P.: [Respondent] –

RESPONDENT: No. I'm annoyed, Mr. [R.P.].

MEMBER R.P.: You're allowed to be annoyed, but you have to respect –

RESPONDENT: I do not. I do not have to respect this. It has not been respecting my time or my clients' time or my relevant objections being made in front of this board. No, I don't have to.

MEMBER R.P.: Then you have a right to be muted by the chairman because – (inaudible).

RESPONDENT: If you mute me that will be up for the City to determine on appeal if I'm going to be muted for advocating for my client.

MEMBER R.P.: [Respondent], can I finish talking?

RESPONDENT: I don't know. I will allow you to finish now.

MEMBER R.P.: You're not the hearing chairman.

RESPONDENT: You're right, I'm not. But I know the rules of evidence and apparently this board does not and is refusing to apply them here.

[OAE188-191.]

Following respondent's exchange, he continued to argue with the PBLIR Chair concerning the relevance of the City's witness's parentage, claiming that "[t]he [C]hair is giving leeway to the City that I'm not getting. This is a kangaroo court." Respondent, however, continued the same line of questioning toward the City's witness, despite the PBLIR Chair's repeated instructions that he move on to a new question:

> CHAIR K.W.: I'd ask you to move on, please.
>
> RESPONDENT: Okay. Let me ask my question, then, Chair.
>
> CHAIR K.W.: That question is not relevant and I'm asking you to move on.
>
> RESPONDENT: It is. [Witness], is your dad an attorney?
>
> CHAIR K.W.: Don't answer that. Please move on.
>
> RESPONDENT: No, Chair, you don't get to make that decision.
>
> CHAIR K.W.: Yes, I do. As the chair I do get to make that decision.
>
> RESPONDENT (addressing the witness): Has your father ever helped you out in anything in life?
>
> CHAIR K.W.: Please don't answer.
>
> RESPONDENT: [Witness], were you in a bad situation during the pandemic when the City was closed?

CHAIR K.W.: Don't answer.

RESPONDENT: [Witness], did you have problems with your income when the City was closed?

E.C.: I'd like to object to the nature of the questioning. The tone is rather abusive and –

RESPONDENT: I'm sorry, [E.C.], cite in the rules of evidence where that is a thing. Please, do it.

MEMBER R.P.: May I interrupt? [Respondent], you keep citing the rules of evidence. I don't know if you've been listening, but the Chair has continuously been stating to you –

RESPONDENT: Uh-huh. Mr. [R.P.] –

MEMBER R.P.: For once stop interrupting. Allow the stenographer to take notes and allow one person to complete a sentence.

RESPONDENT: If I was afforded the same respect from this board, yes, I would do that. I have tried more cases than probably this entire board combined. I understand how difficult it is –

MEMBER R.P.: Congratulations –

RESPONDENT: Yeah, congratulations to me, Mr. [R.P.]. But I understand how difficult it is for the stenographer, especially with my rate of speech, to take down my notes. So I get it. So if this board is going to continually subject itself and lay belly-up to the City and not give me the time of day, fine. I will appeal and take it up with a real court instead of this feckless kangaroo court that does whatever the City wants. I do not care.

[OAE193-195.]

Respondent's belligerent behavior persisted as he continued his cross-examination of the City's witness:

> RESPONDENT: That's not the question I asked you, [witness]. You have to answer my questions. You don't get to ask me a question. You're not the lawyer here, you're the witness.
>
> MEMBER R.P.: Wait a moment, please.
>
> RESPONDENT: No, I will not wait a moment. This is how cross-examination happens, members of the board.
>
> CHAIR K.W.: No, it isn't.
>
> RESPONDENT: Yes, it is. This is how cross-examination in court occurs. I'm not going to take this from the board, I'm not. Let me do my cross or don't. You let [E.C.] go on for hours over nothing.
>
> CHAIR K.W.: Let's do this . . . [respondent], you will cooperate with the board –
>
> RESPONDENT: I am.
>
> CHAIR K.W.: -- or we'll just suspend today's hearing and we'll reconvene at whatever time is appropriate or we can bring the whole matter to a vote.
>
> RESPONDENT: If the board wishes to do that, then be my guest and we'll see you back on appeal, board. If you're not going to let me make my record and do my cross as I'm allowed to do as an advocate for my clients, cool. Let's do that.
>
> CHAIR K.W.: The reality of it is this.

RESPONDENT: I don't care about the reality. I care about the legality. Okay?

CHAIR K.W.: Sir –

RESPONDENT: – might be here and when we go on appeal to the Court of Common Pleas and/or Commonwealth Court and/or petition for allowance of appeal to Supremes, fine. I don't care. I'll do it. I understand the formalities versus legalities.

. . . .

CHAIR K.W.: [Respondent], what I've said to you and to everyone who comes before this body as long as I've been chair is that each person will have the opportunity to zealously prosecute their case. What we will not do is allow for disrespect, which you have now crossed the line.

. . . .

RESPONDENT: Well, I'm sorry. I have contempt for this board right now and it's very difficult.

CHAIR K.W.: You've crossed the line. It's clear that you've harbored that contempt and what I'm saying to you is that's not helping the matter at all.

RESPONDENT: That's not my job. I don't care. I don't need to help the matter. I need to defend my client legally speaking. And for the record, I'm vaping my nicotine pen again. Thank you, [C.J.] I appreciate that disrespect from [the] City attorneys.

[OAE197-200.][4]

[4] Previously, C.J. had expressed his observation to the PBLIR Chair that respondent was "smoking in his office" during the hearing.

Following respondent's exchange, he continued to engage in hostility toward the PBLIR:

> MEMBER R.P. (addressing respondent): . . . I just want to say the chairman is the person entitled to conduct the hearings. You've been disrespectful of his request. When he makes a ruling you've been disrespectful of that ruling. You haven't allowed me to complete my questions or statements and I just want to be on record. If you take an appeal that you haven't allowed me as a member of the board to complete my sentences and you've interrupted the chairman and disrespected his rulings whenever he's made them and he's instructed you to proceed with questions even though he said he didn't want to hear this line of testimony.
>
> RESPONDENT: Make your record for appeal, please. It's my job to defend my clients and when the board is wrong legally, guess what? I get to tell you you're wrong. You can make whatever decisions you want and call me disrespectful. I don't care. I will disrespect this board if you disrespect me, which the board has done since the inception of both of these cases by disallowing any ruling on any objections, by not allowing the discovery I'm entitled to under the law, under the case law from [the] Pennsylvania Supreme Court I have cited. So kindly, please, I will gladly be held in contempt by the board, if you can do it, for doing my job. Because guess what? I'm a trial attorney. Getting held in contempt is a badge of honor for me.
>
> [OAE201-202.]

Thereafter, when confronted regarding the relevancy of his cross-examination questions, respondent again accused the PBLIR of "acting like a kangaroo court and not acting in accordance with the law of the

Commonwealth." For the remainder of the hearing, the PBLIR continued to instruct respondent to "move on" from his questions that drew objections from the City, including inquiring whether the witness (1) had children; (2) had "ever done a favor for someone;" (3) was aware of respondent's client's purported status as a game show winner; and (4) was affected by the COVID-19 pandemic.

Following the conclusion of the March 3, 2021 hearing before the PBLIR, respondent, on that same date, called E.C. and utilized "abusive language towards her."

Additionally, at various intervals throughout March 3, respondent made at least three posts, on his personal social media profile page, denigrating either E.C. or the PBLIR:

> I HAVE BEEN IN THIS STUPID HEARING SINCE 10AM BECAUSE THE CITY ATTORNEYS ARE LUMMOXES AND WON'T JUST DO THINGS THE RIGHT/EASY WAY. THEY HAVE PERSONALLY IMPUGNED MY PROFESSIONALISM MULTIPLE TIMES AND CALLED ME OUT FOR USING A NICOTINE VAPE BECAUSE THEY WILL NOT STRAMLINE STUFF AS I OFFERED TO DO. THEY ARE NOT MAKING ANY FRIENDS TODAY. THEY ALSO HAVE NO IDEA HOW TO TRY A CASE.
>
> LAWYERS WHO DON'T KNOW HOW TO PUT ON A CASE AND THEN IMPUGN THE INTEGRITY OF THOSE WHO DO ARE SCUM. YES I AM VERY ANNOYED. EVEN THE MOST ANNOYING BABY TRUE BELIEVER DISTRICT ATTORNEY IS LESS ANNOYING THAN THIS IDIOCY.

[OAE009.][5]

It [] doesn't help when the administrative board doesn't know the wall, doesn't know the rules, and when you try to do your job, they shut you down and call you rude.

I told the chair straight up that I WAS rude and I didn't respect this proceeding because it was a kangaroo court and they weren't letting me do my job, all the while letting the city do whatever they wanted.

I don't care. They're not a judge. A judge can tell me what to do. An administrative board can eat it.

[OAE008 (alternation in original).]

Do they not teach anything about putting on cases in the Solicitor's office? [E.C.] is an embarrassment to Drexel law.

She has consistently misrepresented the facts of my case, and has been unprofessional, rude, and rage quit a zoom meeting because she is a petulant child.

[E.C.'s] now made herself an enemy for the rest of her career.

Sorry toots. You dug your own grave

#doyoudoubtmetraitor

[OAE008.]

[5] Respondent's original social media posts were not included in the record before us. However, the relevant excerpts of those posts are quoted, at length, in the ODC's November 10, 2021 letter to respondent. Throughout our decision, all typographical errors contained in the quoted statements by respondent are contained in his original statements.

Finally, on March 3, 2021, respondent made the following post on his law firm's social media account:

> A city attorney has made a forever enemy of me today. [E.C.] #doyoudoubtmetraitor #mayfailurebeyournoose I'm embarrassed that this City solicitor went to Drexel. Sorry toots, not a single professional courtesy granted for the rest of your professional career. Hope it was worth it. #maythebridgesiburnlightthe way
>
> [OAE009.]

The Pennsylvania Disciplinary Proceedings

On November 10, 2021, the Pennsylvania Office of Disciplinary Counsel (the ODC) sent respondent a letter, directing him to submit a written position statement concerning both his behavior during the March 3, 2021 hearing and his related social media posts. The OAE maintained that respondent failed to reply to the ODC's letter.

On April 12, 2023, the Pennsylvania Board issued an order concluding that respondent be subject to a public reprimand at an in-person proceeding.

Approximately three months later, on July 20, 2023, the Pennsylvania Board publicly reprimanded respondent. During that live proceeding, the Pennsylvania Board found that respondent "engaged in conduct that was disruptive to the" March 3, 2021 hearing "by continually arguing with members of the [PBLIR]" and "constantly interrupting them and interposing repeated, duplicative objections." The Pennsylvania Board observed that the PBLIR

"repeatedly chastised" respondent for his "obstreperous and disrespectful conduct, which included using an abusive tone, personal attacks against opposing counsel, and calling the [PBLIR] on several occasions a 'kangaroo court.'" The Pennsylvania Board further noted that respondent "engaged in nonverbal disruptive acts" during the March 3, 2021 hearing, including "using nicotine, snacking, and receiving a call." Moreover, the Pennsylvania Board found that respondent's social media posts caused E.C. "psychological distress and fear for her safety."

The Pennsylvania Board concluded that respondent violated Pa. RPC 3.5(d) and Pa. RPC 8.2(a), respectively, by engaging in "disrespectful and obstreperous conduct" before the PBLIR and making numerous false statements concerning the qualifications of that tribunal. Similarly, the Pennsylvania Board determined that respondent violated Pa. RPC 4.4(a) by making both derogatory statements toward the PBLIR and threatening and embarrassing statements toward E.C. Additionally, the Pennsylvania Board found that respondent violated Pa. RPC 8.4(b) by "harass[ing] and stalk[ing] [his] opposing counsel."[6] Finally, the Pennsylvania Board determined that respondent violated Pa. RPC 8.4(d) by causing an "inordinate delay in the hearing" and wasting the resources

[6] The Pennsylvania Board did not identify a Pennsylvania criminal statute in connection with its determination that respondent violated Pa. RPC 8.4(b).

of both that tribunal and the City's attorneys.

In imposing a public reprimand, the Pennsylvania Board considered that respondent expressed remorse, had sent letters of apology to E.C. and to the PBLIR, and had no prior discipline in that jurisdiction.

Respondent failed to notify the OAE of his Pennsylvania discipline, as R. 1:20-14(a)(1) requires.

The Parties' Positions Before the Board

In its written submission to us, and during oral argument, the OAE asserted that respondent's unethical conduct in Pennsylvania constituted violations of RPC 3.5(c); RPC 4.4(a); RPC 8.2(a); RPC 8.4(b); and RPC 8.4(d).

First, the OAE alleged that respondent violated RPC 3.5(c) and RPC 8.4(d) by engaging in a course of obstreperous conduct that disrupted the March 3, 2021 hearing before the PBLIR.

Second, the OAE asserted that respondent violated RPC 8.2(a) by knowingly or recklessly making false statements, during the March 3, 2021 hearing, concerning the qualifications of the PBLIR members.

Third, the OAE alleged that respondent violated RPC 4.4(a) by making derogatory or threatening statements about E.C. and the PBLIR which had no purpose other than to embarrass E.C. and delay the hearing.

Finally, the OAE asserted that respondent violated RPC 8.4(b) by committing petty disorderly persons harassment, in violation of N.J.S.A. 2C:33-4(a), and fourth-degree stalking, in violation of N.J.S.A. 2C:12-10(b), in connection with his "threatening" social media posts and his "course of conduct" directed at E.C.

In recommending the imposition of a reprimand, the OAE argued that respondent "sought to insult and intimidate" both his opposing counsel and the PBLIR members. The OAE contended that respondent not only engaged in "disrespectful and flippant behavior throughout the hearing," but also attempted to denigrate the parties both during and after the proceeding. In the OAE's view, respondent utilized the proceeding "as his own personal battleground," thereby delaying the hearing and forcing the participants to address his behavior rather than the merits of the case. The OAE, however, acknowledged that respondent's conduct did not constitute "a long pattern of repugnant behavior."

Citing disciplinary precedent, discussed below, the OAE primarily analogized respondent's conduct to that of attorneys who have received reprimands for engaging in flippant and discourteous behavior toward those involved in the legal process. The OAE urged, in mitigation, respondent's lack of prior New Jersey discipline, his expression of remorse and contrition to the Pennsylvania Board, and his apology letters sent to E.C. and the PBLIR.

However, in aggravation, the OAE cited respondent's failure to report his Pennsylvania discipline to New Jersey disciplinary authorities. Arguing that the aggravating and mitigating factors were in equipoise, the OAE asserted that a reprimand is the appropriate sanction for respondent's misconduct.

In his submission to us, respondent expressed his concurrence with the OAE's recommendation for a reprimand.

Analysis and Discipline

Following a review of the record, we determine to grant the OAE's motion for reciprocal discipline. Pursuant to R. 1:20-14(a)(5), "a final adjudication in another court, agency or tribunal, that an attorney admitted to practice in this state . . . is guilty of unethical conduct in another jurisdiction . . . shall establish conclusively the facts on which it rests for purposes of a disciplinary proceeding in this state." Thus, with respect to reciprocal attorney discipline, as in reciprocal judicial discipline, "[t]he sole issue to be determined . . . shall be the extent of final discipline to be imposed." R. 1:20-14(b)(3).

In Pennsylvania, as in New Jersey, the standard of proof in attorney disciplinary proceedings is clear and convincing evidence. Off. Of Disciplinary Couns. v. Anonymous Atty., 331 A.3d 523, 539 (Pa. 2025).

Reciprocal discipline proceedings in New Jersey are governed by R. 1:20-14(a)(4), which provides in pertinent part:

> The Board shall recommend the imposition of the identical action or discipline unless the respondent demonstrates, or the Board finds on the face of the record on which the discipline in another jurisdiction was predicated that it clearly appears that:
>
> (A) the disciplinary or disability order of the foreign jurisdiction was not entered;
>
> (B) the disciplinary or disability order of the foreign jurisdiction does not apply to the respondent;
>
> (C) the disciplinary or disability order of the foreign jurisdiction does not remain in full force and effect as the result of appellate proceedings;
>
> (D) the procedure followed in the foreign disciplinary matter was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process; or
>
> (E) the unethical conduct established warrants substantially different discipline.

We conclude that subsection (E) applies in this matter because the unethical conduct established by the record warrants substantially different discipline. In our view, based on New Jersey's disciplinary precedent, respondent's belligerent behavior during the March 3, 2021 administrative hearing before the PBLIR, as exacerbated by his abusive and threatening social media posts, warrants a censure, with a condition, rather than the reprimand imposed in Pennsylvania.

Violations of the Rules of Professional Conduct

Turning to the charged violations, we determine that the record contains clear and convincing evidence that respondent violated RPC 3.5(c) and RPC 8.4(d) by engaging in disruptive and belligerent conduct during the administrative hearing.

The Court has observed that "[c]ommon courtesy and civility are expected from a member of the bar whether he appears before the State's highest court or presents a matter to some administrative body." In re Mezzacca, 67 N.J. 387, 390 (1975). Consequently, "[a]n attorney who exhibits the lack of civility, good manners and common courtesy here displayed tarnishes the entire image of what the bar stands for." In re Vincenti, 92 N.J. 591, 601 (1983) (quoting In re McAlevy, 69 N.J. 349, 392 (1976)). Consistent with those principles, violations of RPC 3.5(c) and RPC 8.4(d) can result if a lawyer disregards the instructions of a tribunal by repeatedly interrupting the proceeding with inappropriate remarks. See In the Matter of David Richard Cubby, Jr., DRB 20-304 (August 3, 2021) (sustaining RPC 3.5(c) and RPC 8.4(d) charges when, contrary to the instructions of the judge and the sheriff's officer, the attorney repeatedly interrupted the judge's bench decision and accused the judge of being "corrupt"), so ordered, 250 N.J. 426 (2022).

Here, despite the PBLIR's good faith attempts to elicit respondent's

cooperation during the hearing, he continuously interrupted nearly everyone involved in the proceeding, made numerous, duplicative objections to the questions posed to the City's witnesses (at one point while screaming his objection), and engaged in an utter lack of civility toward E.C., the City's witnesses, and the PBLIR members.

Consistent with his scorched-earth strategy of denigrating the hearing process, respondent repeatedly demanded answers to seemingly irrelevant cross-examination questions, including whether the City's witness had "a dad." Respondent, however, openly refused to comply with the PBLIR Chair's instruction to refrain from posing inappropriate questions, announcing that he did "not have to respect" the Chair's directives while proclaiming that he had "tried more cases than probably this entire board combined." Likewise, respondent openly defied the PBLIR's efforts to control his behavior, declaring that he had "contempt for this board right now" and, after the Chair had warned respondent that he had "crossed the line," announcing that he did not "care" and was "vaping my nicotine pen again."

Toward the conclusion of the hearing, when the PBLIR admonished respondent for his disruptive and disrespectful behavior, he declared that he did "not care. I will disrespect this board if you disrespect me." Alarmingly, he proclaimed that he would be "gladly held in contempt by the board," a sanction

which he described as a "badge of honor." Viewing respondent's volatile behavior in its totality, we conclude that he unquestionably intended to disrupt the hearing process, malign those who attempted to control his inappropriate behavior, and prejudice the PBLIR's good faith attempt to fairly adjudicate the matter.

Similarly, we determine that respondent violated RPC 8.2(a) by brazenly and publicly denigrating the qualifications of the PBLIR. Specifically, during the administrative hearing, he repeatedly accused the PBLIR of acting like a "kangaroo court." He also attacked that tribunal by calling it a "feckless" entity "that does whatever the City wants." Likewise, in a March 3, 2021 post to his personal social media profile page, he again called the PBLIR "a kangaroo court" that "let[] the [C]ity do whatever they wanted." In that same social media post, he also declared that the PBLIR was "not a judge. A judge can tell me what to do. An administrative board can eat it."

Additionally, we determine that respondent violated RPC 4.4(a) by making insulting and threatening statements concerning E.C. and derogatory statements concerning the PBLIR. See In the Matter of Joshua F. McMahon, DRB 22-169 (March 27, 2023) (finding that the attorney violated RPC 4.4(a) by belittling a hearing officer and engaging in hostile treatment toward opposing counsel, among others; during depositions, the attorney engaged in bullying

behavior and conducted himself in an obnoxious manner), so ordered, 254 N.J. 404 (2024).

Specifically, during the administrative hearing, respondent attempted to both denigrate the PBLIR members' collective experience and qualifications and embarrass E.C. by attempting to insult her professional abilities, declaring that he did not "know how many cases [E.C.] actually tried in real court where the big boys play."

Moreover, in his March 3, 2021 posts to his personal and law firm social media profile pages, respondent expressly referred to E.C. as "toots," and he declared that she (1) was "an embarrassment;" (2) "rage quit a zoom meeting because she [was] a petulant child;" (3) had "dug [her] own grave;" and (4) had "made a forever enemy of me today." Respondent's posts expressly referencing E.C. also contained disturbing phrases, including "#doyoudoubtmetraitor," "#maythebridgesiburnlightthe way," and "#mayfailurebeyournoose." Unsurprisingly, as the Pennsylvania Board observed, respondent's social media posts caused psychological distress to E.C. and made her fear for her safety. Echoing the Pennsylvania Board's findings, we conclude that respondent's vindicative and threatening statements had no substantial purpose other than to alarm, embarrass, and cause distress to his adversary.

However, we dismiss, on jurisdictional grounds, the related charges that respondent violated RPC 8.4(b) by committing petty disorderly persons harassment, in violation of N.J.S.A. 2C:33-4(a), and fourth-degree stalking, in violation of N.J.S.A. 2C:12-10(b).

In this matter, because respondent's misconduct appeared to have occurred exclusively in his Philadelphia, Pennsylvania law office, while appearing virtually before the PBLIR (a tribunal located in Philadelphia), and while making statements concerning E.C., in her capacity as a Deputy City Solicitor for the City of Philadelphia, respondent's conduct does not clearly and convincingly fall within the jurisdiction of Title 2C of the New Jersey Code of Criminal Justice. See N.J.S.A. 2C:1-3 (noting that, in general, the "territorial applicability" of the New Jersey Code of Criminal Justice covers conduct wherein an element of the criminal offense or the result of such an offense occurs in New Jersey).

In sum, we find that respondent violated RPC 3.5(c); RPC 4.4(a); RPC 8.2(a); and RPC 8.4(d). For the reasons set forth above, we dismiss the charge that respondent violated RPC 8.4(b) (two instances). The sole issue left for our determination is the proper quantum of discipline for respondent's misconduct.

Quantum of Discipline

Attorneys who engage in disrespectful, disruptive, or insulting conduct in connection with the practice of law have received a broad spectrum of discipline, ranging from an admonition to disbarment, depending on the severity of the misconduct, the attorney's disciplinary history, and the presence of other ethics violations.

Discipline less than a term of suspension was imposed in the following matters. See, e.g., In the Matter of Beverly Giscombe, DRB 19-326 (February 24, 2020) (admonition for an attorney who, while walking out of a courtroom after the court clerk had provided her with a future trial date she could not attend, called the court clerk a "fat a**;" the attorney apologized immediately and repeatedly expressed remorse to both the trial judge and the court clerk; no prior discipline); In re Hickerson-Breedon, 258 N.J. 518 (2024) (reprimand for an attorney who, during a status conference, engaged in disruptive conduct by challenging the trial judge's authority to direct when counsel could address the court; when the judge warned the attorney that his conduct was disrespectful and directed him to not interrupt, the attorney became incensed and made inappropriate and insensitive remarks, including that he was "in a free court" and that he was "not a slave;" we found that the attorney's inexperience did not excuse his indignant behavior; no prior discipline); In re Ziegler, 199 N.J. 123

(2009) (reprimand for an attorney who told his client's spouse in a domestic relations matter that she should be "cut up into little pieces . . . and put in a box and sent back to India;" in a letter to his adversary, the attorney accused the spouse of being an "unmitigated liar" and threatened that he would prove it and have her punished for perjury; in that same letter; he also threatened his adversary with a "Battle Royale" and ethics charges; mitigating factors included the attorney's unblemished forty-year career at the bar, his recognition that his conduct had been intemperate, and the passage of seven years from the time of the misconduct until the imposition of discipline); In re Cubby, 250 N.J. 426 (2022) (Cubby I) (censure for an attorney who engaged in insulting conduct spanning two consolidated matters; in the first matter, the attorney, in his capacity as a pro se defendant in a landlord tenant case, repeatedly interrupted his adversary during mediation and called him a "scumbag;" during a subsequent court appearance, he interrupted the judge with insulting remarks, called her "corrupt," refused to accept her rulings, and left the courtroom after she had directed that the matter proceed to trial; despite the attorney's initial success in obtaining an emergent order from the Appellate Division staying his eviction, he subsequently accused the Appellate Division of "either dropp[ing] the ball or [being] in on the scam" when the Appellate Division informed him that it no longer retained jurisdiction; in the second matter, while representing a defendant

in a Chancery Division matter, he repeatedly interrupted the trial judge's decision delivered from the bench, called the judge "corrupt," and accused the judge of issuing an "extrajudicial decision;" he also referred to opposing counsel as "clowns" and accused the sheriff's officer of threatening him after the officer had directed him not to interrupt; the attorney continued his vitriolic and conspiratorial behavior during the ensuing ethics proceedings and allowed his matter to proceed as a default; in declining to recommend a term of suspension, we observed that the attorney did not "threaten[] others" or engage in dishonesty; no prior discipline).

Terms of suspension were imposed in the following matters. See, e.g., In re Cubby, 250 N.J. 428 (2022) (Cubby II) (three-month suspension for an attorney who, in an e-mail to a judicial secretary, baselessly accused her of engaging in a criminal conspiracy and threatened her with personal liability for transmitting a letter from Chief Counsel to the Office of Board Counsel (the OBC), which informed relevant parties of basic procedural information regarding Cubby I; in that same e-mail, the attorney attacked our integrity and that of the OBC by baselessly stating that we were "deliberate[ly] attempt[ing] to deny [him] his civil and due process rights;" the attorney further accused the OAE and New Jersey prosecutors and judges of "deliberately disregarding the law and maintaining false charges [against him] in retaliation;" in aggravation,

we weighed the attorney's failure to learn from his mistakes underlying Cubby I); In re Van Syoc, 216 N.J. 427 (2014) (six-month suspension for an attorney who, during a deposition, called opposing counsel "stupid" and a "bush league lawyer;" the attorney also impugned the integrity of the trial judge by stating that he was in the defense's pocket; in aggravation, we considered the attorney's disciplinary history, which included an admonition and a reprimand, the absence of remorse, and the fact that his misconduct occurred in the presence of his two clients, who, as plaintiffs in the very matter in which their lawyer had accused the judge of being in the pocket of the defense, were at risk of losing confidence in the legal system); In re McMahon, 256 N.J. 356 (2024) (one-year suspension for an attorney who, for several years, exhibited a total inability to conform himself with the professional standards expected of a lawyer; the attorney baselessly accused members of law enforcement agencies of official misconduct and perjury, and he threatened civil litigation, ethics grievances, and criminal charges against members of those same agencies whom he erroneously accused of engaging in conspiracies against him; he also belittled and demeaned the credentials of a hearing officer, engaged in belligerent and hostile treatment towards everyone involved in depositions, and referred to opposing counsel as "burdens on taxpayers," resulting in a court reporter walking out of one

deposition in tears; moreover, the attorney baldly alleged that a judge and his adversary had engaged in collusion, thus, impugning the integrity of the court).

Here, like the reprimanded attorney in Hickerson-Breedon and the censured attorney in Cubby I, respondent was outwardly indignant toward the PBLIR's attempts to control his disruptive and belligerent conduct during the March 3, 2021 administrative hearing. Rather than abide by the PBLIR's directives to comport himself in an appropriate manner, he repeatedly interrupted the hearing with duplicative objections, engaged in hostility toward E.C., the City's witnesses, and the PBLIR members, and boldly proclaimed that he did not "have to respect" the PBLIR's attempts to control his behavior.

Indeed, as the hearing progressed, respondent increasingly lashed out against almost everyone whom he perceived as expressing any form of disagreement with him. Specifically, he continued to pose inappropriate personal questions to the City's witness, despite the PBLIR's attempts to limit the scope of his cross-examination to a relevant line of inquiry. Moreover, when E.C. noted respondent's disruptive behavior, he attempted to belittle her by declaring that he did not "know how many cases [E.C.] actually tried in real court where the big boys play." Further, near the conclusion of the hearing, following a PBLIR member's attempt to remind respondent of his obligation to respect the Chair's determinations, he accused that tribunal of "lay[ing] belly-

up to the City" and stated that he would "appeal and take it up with a real court instead of this feckless kangaroo court."

However, unlike Hickerson-Breedon, whose inappropriate behavior was confined to a single status conference, and Cubby, who did not engage in any threatening behavior, respondent escalated his abusive conduct, outside of the hearing, by making several spiteful and, at times, threatening social media posts. Specifically, one of respondent's social media posts referred to the City's attorneys as "scum," expressing his belief that they did not "know how to put on a case" and had "impugn[ed]" his "integrity."

Additionally, at least two of respondent's social media posts expressly referenced E.C., by name, and referred to her as "toots," an "embarrassment," and someone who had "dug [her] own grave" and "made herself an enemy for the rest of her career." Alarmingly, in those same social media posts, respondent included veiled threats against E.C., declaring "#mayfailurebeyournoose," "#doyoudoubtmetraitor," and "#maythebridgesiburnlightthe way." Respondent's vitriolic posts, laced with violent imagery, distressed E.C. and made her fear for her safety.

Nevertheless, in our view, applicable disciplinary precedent does not support a term of suspension. Specifically, unlike the suspended attorneys in Cubby II, Van Syoc, and McMahon, respondent's conduct occurred during a

relatively limited timeframe, following which he, ultimately, sent letters of apology to the PBLIR and to E.C. Further, unlike Cubby, Van Syoc, and McMahon, respondent expressed remorse to the Pennsylvania Board and concurred with the OAE's recommendation that his conduct warrants the imposition of reciprocal discipline in New Jersey. Finally, respondent has had no prior discipline in New Jersey in his sixteen-year career at the bar.

Conclusion

On balance, based on disciplinary precedent, and considering that respondent has accepted responsibility for his serious vitriolic behavior which, fortunately, did not result in a prolonged pattern of abuse, we determine that a censure is the appropriate quantum of discipline necessary to protect the public and preserve confidence in the bar.

Additionally, given respondent's intemperate and unprofessional behavior underpinning this matter, we recommend that, within sixty days of the Court's disciplinary Order in this matter, respondent be required to complete a continuing education course in legal ethics and professionalism, as approved by the OAE.

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 Leo M. Mulvihill, Jr.
Docket No. DRB 25-211

Argued: November 20, 2025

Decided: February 26, 2026

Disposition: Censure

Members	Censure
Cuff	X
Boyer	X
Campelo	X
Hoberman	X
Menaker	X
Modu	X
Petrou	X
Rodriguez	X
Spencer	X
Total:	9

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