

SUPREME COURT OF MINNESOTA

In re Petition for Reinstatement of Herbert A. Igbanugo, a Minnesota Attorney, Registration No. 0191139

In re Igbanugo · No. A24-1103 · Decided April 1, 2026

SUMMARY

The Minnesota Supreme Court denied Herbert A. Igbanugo’s petition for reinstatement from an indefinite suspension. Applying independent review, the court held that the Lawyers Professional Responsibility Board panel did not clearly err in finding that Igbanugo failed to prove by clear and convincing evidence the moral change required for reinstatement.

CASE DETAILS

COURT	Supreme Court of Minnesota
JURISDICTION	Minnesota Supreme Court
DECIDED	April 1, 2026
DOCKET	A24-1103
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for reinstatement from an indefinite suspension of the petitioner's Minnesota law license. A Lawyers Professional Responsibility Board panel recommended denial, and the Minnesota Supreme Court independently reviewed the record.
STANDARD OF REVIEW	The Supreme Court independently reviews the entire reinstatement record and is not bound by the panel's recommendation. When the petitioning attorney orders a transcript of the panel hearing, the court upholds the panel's factual findings if supported by the record and not clearly erroneous. A finding is clearly erroneous when the court is left with a definite and firm conviction that a mistake has been made.
PRECEDENTIAL VALUE	Published Minnesota Supreme Court opinion; precedential.
PARTIES	Herbert A. Igbanugo v. Office of Lawyers Professional Responsibility

TOPICS

- appellate procedure
- standard of review
- administrative law
- agency adjudication

PRACTICE AREAS

legal ethics and professional responsibility

attorney reinstatement

attorney discipline

QUESTIONS PRESENTED

1. Whether the Lawyers Professional Responsibility Board panel's factual findings concerning Igbanugo's lack of remorse, acceptance of responsibility, and change in conduct and state of mind were clearly erroneous.
2. Whether Igbanugo proved by clear and convincing evidence the moral change required for reinstatement to the practice of law.
3. Whether the court should consider Igbanugo's decision to challenge a separate disciplinary proceeding as evidence against his renewed commitment to ethical practice.

HOLDINGS

1. The Supreme Court independently reviews the entire reinstatement record, considers but is not bound by the Lawyers Professional Responsibility Board panel's recommendation, and reviews supported factual findings for clear error when a hearing transcript has been ordered.
2. An attorney seeking reinstatement must prove by clear and convincing evidence moral change, competence to practice law, compliance with the conditions of suspension, and compliance with Rule 18 of the Rules on Lawyers Professional Responsibility.
3. Igbanugo failed to prove by clear and convincing evidence that he underwent the moral change required for reinstatement because he did not establish remorse and acceptance of responsibility for his misconduct or a sufficient change in his conduct and state of mind.
4. The court should not consider Igbanugo's choice to challenge a separate disciplinary proceeding when analyzing whether he demonstrated a renewed commitment to the ethical practice of law in this reinstatement proceeding.

KEY QUOTATIONS

"We conduct an independent review of the entire record; although we consider a panel's recommendation, we are not bound by it." (at 4-5)

"To establish moral change, Igbanugo was required to "show [A] remorse and acceptance of responsibility for the misconduct, [B] a change in [his] conduct and state of mind that corrects the underlying misconduct that led to the suspension, and [C] a renewed commitment to the ethical practice of law." (at 5)

"But even if we were to determine that Igbanugo has demonstrated a renewed commitment to the ethical practice of law, that determination would be insufficient to overcome our other determinations that Igbanugo has failed to show remorse and acceptance of responsibility and that he has also failed to demonstrate a change in his conduct and state of mind." (at 12)

FACTUAL BACKGROUND

Igbanugo was admitted to practice law in 1988 and was indefinitely suspended in April 2023 after the Supreme Court found 50 rule violations across seven client matters, including neglect, improper fees, inadequate client communication, supervisory failures, and false or misleading statements. He petitioned for reinstatement and presented his testimony and four attorney character witnesses to a Lawyers Professional Responsibility Board panel. The panel found that he had not demonstrated sufficient remorse and acceptance of responsibility, a sufficient change in conduct and state of mind, or a renewed commitment to ethical practice. The Supreme Court agreed that he failed to prove the required moral change by clear and convincing evidence.

PROCEDURAL HISTORY

The Minnesota Supreme Court indefinitely suspended Igbanugo in April 2023, with no right to petition for reinstatement for a minimum of 10 months. Igbanugo petitioned for reinstatement in July 2024. After a hearing, a unanimous Lawyers Professional Responsibility Board panel found that he had not proved moral change by clear and convincing evidence and recommended denial. The Supreme Court denied the petition after independently reviewing the record.

DISPOSITION

dismissed

CASES CITED

- In re Kadrie, 602 N.W.2d 868, 870 (Minn. 1999)
- In re Tigue, 960 N.W.2d 694, 699 (Minn. 2021)
- In re MacDonald, 994 N.W.2d 547, 551 (Minn. 2023)
- In re Selmer, 19 N.W.3d 457, 468, 477 (Minn. 2025)
- In re Lieber, 834 N.W.2d 200, 204 (Minn. 2013)
- In re Mose (Mose V), 843 N.W.2d 570, 575 (Minn. 2014)
- In re Holker, 765 N.W.2d 633, 638 (Minn. 2009)
- In re Dedefo, 781 N.W.2d 1, 11 (Minn. 2010)
- In re Stockman, 896 N.W.2d 851, 859 (Minn. 2017)
- In re Severson, 923 N.W.2d 23, 32 (Minn. 2019)
- In re Klotz, 996 N.W.2d 165, 169 (Minn. 2023)
- In re Trombley, 947 N.W.2d 242, 249 (Minn. 2020)
- In re Igbanugo (Igbanugo II), 989 N.W.2d 310, 316-321 (Minn. 2023)
- In re Igbanugo (Igbanugo I), 863 N.W.2d 751, 755 (Minn. 2015)
- Cedillo v. Igbanugo, No. A18-0860, 2019 WL 2168766, at *1 (Minn. App. May 20, 2019), rev. denied (Minn. Aug. 20, 2019)
- Igbanugo v. Minn. Off. of Laws. Pro. Responsibility, No. 21-CV-0105-PJS-HB, 2021 WL 5216904, Order at *6 (D. Minn. filed Nov. 9, 2021)
- In re Ruffenach, 486 N.W.2d 387, 391 (Minn. 1992)

