

SUPREME COURT OF MINNESOTA

In re Petition for Disciplinary Action Against Bradley J. Haddy

No. A24-1439 (Minn. Apr. 29, 2026) · No. A24-1439 · Decided April 29, 2026

SUMMARY

The Minnesota Supreme Court reviews disciplinary proceedings against attorney Bradley J. Haddy. The court upholds the referee’s findings that Haddy misappropriated client funds, neglected multiple client matters, failed to follow a client’s decision, and initially failed to cooperate with disciplinary investigations. The court concludes that disbarment is the appropriate discipline; the provided text ends during the court’s disciplinary analysis.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Minnesota                                                                                                                                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Per Curiam                                                                                                                                                                                                                                                                                                                                                                            |
| JURISDICTION          | Minnesota Supreme Court                                                                                                                                                                                                                                                                                                                                                               |
| DECIDED               | April 29, 2026                                                                                                                                                                                                                                                                                                                                                                        |
| DOCKET                | A24-1439                                                                                                                                                                                                                                                                                                                                                                              |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                 |
| PROCEDURAL POSTURE    | Original-jurisdiction attorney-discipline proceeding arising from a petition filed by the Director of the Office of Lawyers Professional Responsibility. After an evidentiary hearing, a referee found multiple violations of the Minnesota Rules of Professional Conduct and recommended disbarment. Haddy challenged several findings and sought suspension rather than disbarment. |
| STANDARD OF REVIEW    | When a disciplinary party orders a hearing transcript, the referee's findings and conclusions are not binding, but they receive great deference and are upheld if supported by the evidence and not clearly erroneous. A referee's legal conclusion that professional-conduct rules were violated is reviewed for clear error, while interpretation of the rules is reviewed de novo. |
| PRECEDENTIAL VALUE    | Published Minnesota Supreme Court opinion; precedential.                                                                                                                                                                                                                                                                                                                              |
| PARTIES               | Susan M. Humiston, Director, Office of Lawyers Professional Responsibility v. Bradley J. Haddy                                                                                                                                                                                                                                                                                        |

## TOPICS

administrative law

appellate procedure

standard of review

remedies

## PRACTICE AREAS

legal ethics and professional responsibility

attorney discipline

professional misconduct

appellate review

## QUESTIONS PRESENTED

1. Whether the referee's findings and conclusions concerning misconduct in the M.B., S.Z., and R.R. matters were clearly erroneous.
2. Whether Haddy's misconduct constituted misappropriation of client funds, a pattern of client neglect, and failure to cooperate with the disciplinary investigation.
3. What discipline was appropriate in light of the nature and cumulative weight of the misconduct, harm to clients and the legal profession, aggravating factors, mitigating factors, and comparable disciplinary cases.

## HOLDINGS

1. The referee's findings and conclusions regarding the M.B., S.Z., and R.R. matters were supported by the record and were not clearly erroneous.
2. Haddy violated Minnesota Rules of Professional Conduct 1.15(a), 1.15(c)(5), 1.16(d), 1.3, 1.4(a)(4), 3.2, 8.4(c), and 8.4(d) in the M.B. matter.
3. Haddy violated Rule 1.2(a) by failing to abide by S.Z.'s repeated decisions concerning the objective of obtaining authorization to change the child's school.
4. Disbarment was the appropriate discipline for Haddy's intentional misappropriation of client funds, pattern of client neglect, initial failure to cooperate with the disciplinary investigation, prior discipline, substantial experience, and lack of remorse.

## KEY QUOTATIONS

*“The purpose of discipline for attorney misconduct is not punishment.” (18)*

*“Borrowing from client funds, no matter how temporary or no matter how seemingly safe, is misappropriation and is not to be countenanced.” (19)*

*“With these precedents in mind, we conclude that the appropriate discipline for Haddy’s misconduct is disbarment.” (31)*

## FACTUAL BACKGROUND

Haddy, admitted to practice in Minnesota in 2007, represented clients in five matters and engaged in multiple forms of misconduct. He intentionally transferred and used one client's funds from a trust account for business expenses, accepted another client's advance fee without a written fee agreement or trust-account deposit, failed to appear at hearings, failed to communicate with clients, failed to follow a client's representation objective, and

failed to respond timely to disciplinary-investigation requests. He had previously received a private admonition for failing to return client property and disobeying court orders.

#### PROCEDURAL HISTORY

The Director filed an initial petition in September 2024 and a supplemental petition in November 2024. A referee conducted an evidentiary hearing in January 2025, issued findings and conclusions in February 2025, and recommended disbarment. The Minnesota Supreme Court reviewed the challenged findings for clear error and independently determined the appropriate discipline.

#### DISPOSITION

other

#### REMAND INSTRUCTIONS

No remand. Haddy was disbarred effective April 29, 2026; he must comply with Rule 26, RLPR, pay \$900 in costs under Rule 24(a), RLPR, and remove his law firm's website completely within seven days if it remains active.

#### CASES CITED

- In re Kaminsky, 999 N.W.2d 866, 873 (Minn. 2024)
- In re Walsh, 872 N.W.2d 741, 745 (Minn. 2015)
- In re Kennedy, 946 N.W.2d 568, 578 (Minn. 2020)
- In re Bonner, 896 N.W.2d 98, 107 (Minn. 2017)
- In re Montez, 812 N.W.2d 58, 66, 68-69 (Minn. 2012)
- In re Odegaard, 15 N.W.3d 632, 634 (Minn. 2025)
- In re Klotz, 909 N.W.2d 327, 336-37, 339-40 (Minn. 2018)
- In re Fairbairn, 802 N.W.2d 734, 743, 746 (Minn. 2011)
- In re Lundeen, 811 N.W.2d 602, 608 (Minn. 2012)
- In re Lennington, 969 N.W.2d 76, 83, 85 (Minn. 2022)
- In re Grzybek, 567 N.W.2d 259, 263 (Minn. 1997)
- In re Davis, 542 N.W.2d 378, 378 (Minn. 1996) (order)
- In re Matson, 889 N.W.2d 17, 21-22 (Minn. 2017)
- In re Sayaovong, 909 N.W.2d 575, 582 (Minn. 2018)
- In re Rhodes, 740 N.W.2d 574, 578 (Minn. 2007)
- In re Laver, 984 N.W.2d 556, 566-67 (Minn. 2023)
- In re Moulton, 945 N.W.2d 401, 409 (Minn. 2020)
- In re Eskola, 891 N.W.2d 294, 299-300 (Minn. 2017)
- In re Nickitas, 984 N.W.2d 232, 239 (Minn. 2023)
- In re Albrecht, 779 N.W.2d 530, 540-41 (Minn. 2010)

- In re Ulanowski, 800 N.W.2d 785, 801, 804 (Minn. 2011)
- In re Swanson, 967 N.W.2d 644, 655 (Minn. 2021)
- In re Coleman, 793 N.W.2d 296, 308 (Minn. 2011)
- In re Udeani, 945 N.W.2d 389, 397 (Minn. 2020)
- In re Lee, 3 N.W.3d 278, 284 (Minn. 2024)
- In re Quinn, 946 N.W.2d 583, 592 (Minn. 2020)
- In re Ruttger, 566 N.W.2d 327, 331 (Minn. 1997)
- In re Nathanson, 812 N.W.2d 70, 79 (Minn. 2012)
- In re Brost, 850 N.W.2d 699, 705 (Minn. 2010)
- In re Fett, 790 N.W.2d 840, 851 (Minn. 2010)
- In re Blomquist, 958 N.W.2d 904, 915 (Minn. 2021)
- In re Severson, 860 N.W.2d 658, 670 (Minn. 2015)
- In re Kalla, 811 N.W.2d 576, 583 (Minn. 2012)
- In re Aitken, 787 N.W.2d 152, 163 (Minn. 2010)
- In re Hulstrand, 910 N.W.2d 436, 442 (Minn. 2018)
- In re Nwaneri, 978 N.W.2d 878, 891 (Minn. 2022)
- In re McCloud, 955 N.W.2d 270, 279 (Minn. 2021)
- In re Ulanowski, 800 N.W.2d 785, 801 (Minn. 2011)
- In re Kennedy, 864 N.W.2d 349 (Minn. 2015)
- In re Voss, 830 N.W.2d 867, 874 (Minn. 2013)
- In re Tigue, 843 N.W.2d 583, 587-89 (Minn. 2014)
- In re Schulte, 869 N.W.2d 674, 677-80 (Minn. 2015)
- In re Charges of Unprofessional Conduct in Panel File 43372, 984 N.W.2d 542, 547 (Minn. 2022)
- In re Varriano, 755 N.W.2d 282, 288-90 (Minn. 2008)
- In re Olsen, 487 N.W.2d 871, 873 (Minn. 1992)
- In re Wareham, 413 N.W.2d 820 (Minn. 1987)
- In re Lieber, 939 N.W.2d 284, 294-95 (Minn. 2020)
- In re Majors, 973 N.W.2d 621, 632 (Minn. 2022) (Thissen, J., dissenting)
- In re Thao, 929 N.W.2d 443 (Minn. 2019) (order)