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In the
Supreme Court of Georgia

No. S26Y0945

In the Matter of Mandi Deyerle McDonough

Decided: August 11, 2026

PER CURIAM.

This disciplinary matter is currently before the Court on the report and recommendation of Special Master Natalie Woodward, filed pursuant to Bar Rule 4-214, who recommends that respondent Mandi Deyerle McDonough (State Bar No. 386443), be disbarred for her violations of Rules 1.2(a), 1.3, 1.4(a), 1.5(a), 1.16(d), 3.2, 5.3, and 9.3 of the Georgia Rules of Professional Conduct ("GRPC" or "Rules") found in Bar Rule 4-102(d), in connection with five client matters. The maximum penalty for a violation of Rules 1.2(a), 1.3, and 5.3 is disbarment, and the maximum penalty for a violation of Rules 1.4(a), 1.5(a), 1.16(d), 3.2, and 9.3 is a public reprimand. On June 11, 2024, this Court granted McDonough's voluntary petition for emergency suspension, pending the resolution of her health issues and the resolution of other, already-pending disciplinary matters. McDonough, who is in default as to the underlying charges in the formal complaints at issue in this case, has not filed any exceptions to the Special Master's report and recommendation, and the time has run for her to do so. See Bar Rule 4-218. Having reviewed the record before us, we agree that disbarment is appropriate under the facts of this case.

In May and August 2024, the State Bar filed a total of five formal complaints against McDonough in connection with State

Disciplinary Board Docket (“SDBD”) Nos. 7875, 7876, 7877, 7909, and 7910. McDonough failed to timely respond to the formal complaints and on January 29, 2025, the Special Master entered an order granting the State Bar’s motion for default in all five matters. On August 8, 2025, the Special Master held an aggravation and mitigation hearing, which McDonough attended. Following the hearing, the Special Master issued her report and recommendation. As deemed admitted based on McDonough’s default, see State Bar Rule 4-212, the Special Master made the following findings of fact and conclusions of law with regard to each disciplinary case.

SDBD No. 7875: The client retained McDonough in January 2020 to file a petition for modification of custody and a citation for contempt against his former spouse. The client paid McDonough a total of \$3,095. McDonough filed the initial petition but thereafter failed to meaningfully advance the case. Service was not perfected until September 2020, and McDonough took no substantive action for more than two years. During that period, McDonough filed 14 leaves of absence and no substantive pleadings. After the client’s former spouse died in December 2022, the client notified McDonough and requested a refund of unearned fees. McDonough did not respond, despite more than 50 attempts by the client to contact her. The client testified that McDonough’s inaction interfered with his ability to see his daughters and caused a prolonged breakdown in his relationship with them. McDonough has not refunded any portion of the fees paid.

Based on McDonough’s default, the Special Master

concluded that McDonough admitted to violating Rules 1.2(a),¹ 1.3,² 1.4(a),³ 1.5(a),⁴ 1.16(d)⁵ and 3.2.⁶

SBDB No. 7876: The client hired McDonough in November 2021 for an uncontested divorce and paid a total of \$3,096. McDonough did not provide a written fee agreement or billing records. Over the course of approximately one year, McDonough failed to file a divorce action, failed to provide draft pleadings, and failed to respond to at least 20 communications from the client requesting status updates and documentation of fees. The client testified that McDonough repeatedly offered explanations for the lack of progress but took no action. The client ultimately retained new counsel, who completed the divorce within approximately four months. McDonough did not refund any fees. The client also

¹ Rule 1.2(a) provides, in relevant part, that “a lawyer shall abide by a client’s decisions concerning the scope and objectives of representation and, as required by Rule 1.4, shall consult with the client as to the means by which they are to be pursued.”

² Rule 1.3 provides, in relevant part, that “[a] lawyer shall act with reasonable diligence and promptness in representing a client.”

³ Rule 1.4 provides, in relevant part, that “[a] lawyer shall: (1) promptly inform the client of any decision or circumstance with respect to which the client’s informed consent ... is required[]; (2) reasonably consult with the client about the means by which the client’s objectives are to be accomplished; (3) keep the client reasonably informed about the status of the matter; [and] (4) promptly comply with reasonable requests for information.”

⁴ Rule 1.5(a) provides, in relevant part, that “[a] lawyer shall not make an agreement for, charge, or collect an unreasonable fee or an unreasonable amount for expenses.”

⁵ Rule 1.16(d) provides, in relevant part, that “[u]pon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client’s interests, such as ... refunding any advance payment of fee that has not been earned.”

⁶ Rule 3.2 provides that “[a] lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.”

testified that McDonough's failure to act caused significant emotional distress and delayed resolution of her marriage. And although it was not mentioned in the Special Master's findings of fact, the admitted allegations in the formal complaint and the client's testimony showed that McDonough's assistant at the time stole that client's funds.

Based on McDonough's default, the Special Master concluded that McDonough admitted to violating Rules 1.2(a), 1.3, 1.4(a), 1.5(a), 1.16(d) and 5.3.⁷

SDBD No. 7877: The client hired McDonough in April 2022 to pursue custody modification and paid \$4,500. McDonough never filed a custody action on his behalf. For approximately 11 months, McDonough took no action, provided no filings, and failed to meaningfully communicate with the client. The client terminated McDonough's representation in March 2023 and requested a refund, which McDonough refused to provide. The client testified that McDonough's inaction contributed to his inability to litigate custody and that he incurred approximately \$56,000 in legal debt.

Based on McDonough's default, the Special Master concluded that McDonough admitted to violating Rules 1.2(a), 1.3, 1.4(a), 1.5(a), and 1.16(d).

SDBD No. 7909: The client retained McDonough in July 2022 to seek a reduction in child support after one of his children reached the age of majority. The client paid more than \$6,000 in fees and costs, financed through a loan. McDonough delayed filing for approximately nine months, then filed the action in April 2023

⁷ Rule 5.3 provides, in relevant part, that "a lawyer shall be responsible for conduct of [a nonlawyer under his employment] that would be a violation of the [GRPC] if engaged in by a lawyer."

and took no further action. McDonough failed to comply with court-ordered status reporting and mediation requirements. As of the hearing, the client's case remained unresolved, and he continued paying child support at a level applicable to two minor children despite one child being an adult. McDonough has not refunded any fees. Further, although it is not mentioned in the Special Master's findings of fact, the admitted allegations in the formal complaint show that McDonough failed to respond to the client's communication requests and did not respond to the State Bar's Notice of Investigation in this matter.

Based on McDonough's default, the Special Master concluded that McDonough admitted to violating Rules 1.2(a), 1.3, 1.4(a), 1.5(a), 3.2, and 9.3.⁸

SDBD No. 7910: The client retained McDonough in June 2021 to defend against a custody modification and contempt action and paid a \$5,000 flat fee. McDonough appeared in the case but failed to attend multiple hearings and a mediation, which caused delays in resolution and required opposing counsel to seek court intervention. McDonough did not withdraw promptly after the client terminated her representation and failed to refund any portion of the fee. The client testified that McDonough's conduct caused severe anxiety and fear of losing custody of his child. His matter was resolved only after McDonough was removed as counsel. Further, although it is not mentioned in the Special Master's findings of fact, the admitted allegations in the formal complaint show that McDonough failed to properly communicate with her client and did not respond to the State Bar's Notice of

⁸ Rule 9.3 provides that "[d]uring the investigation of a matter pursuant to these Rules, the lawyer complained against shall respond to disciplinary authorities in accordance with State Bar Rules."

Investigation in this matter.

Based on McDonough's default, the Special Master concluded that McDonough admitted to violating Rules 1.2(a), 1.3, 1.4(a), 1.5(a), 3.2, and 9.3.

Next, the Special Master looked to the ABA Standards for Imposing Lawyer Sanctions for determining the appropriate level of discipline, see *In the Matter of Morse*, 266 Ga. 652, 653 (1996), and considered the duty violated, McDonough's mental state, the potential or actual injury caused by her misconduct, and the existence of aggravating and mitigating factors. See ABA Standard 3.0. Regarding the first three considerations, the Special Master determined that McDonough violated her duty of diligence, duty of communication, and the duties owed upon termination; that she knowingly violated the Rules charged; and that she caused actual and potential injury to her clients. The Special Master then noted that under ABA Standard 4.41, disbarment is generally appropriate for knowing abandonment and patterns of neglect.

As for aggravating factors, the Special Master determined that McDonough displayed a pattern of misconduct, committed multiple offenses, had vulnerable victims given that they were involved in domestic relations matters, had substantial experience in the practice of law, and showed an indifference to making restitution. See ABA Standard 9.22(c), (d), (h), (i), and (j). Regarding mitigating factors, the Special Master noted that at the evidentiary hearing, McDonough testified about several personal difficulties and medical issues she was experiencing. ABA Standard 9.32(c) and (h). However, the Special Master determined that such mitigating factors should be given "limited weight" due to McDonough's failure to provide any corroborating evidence, despite being instructed to provide such evidence within

30 days of the evidentiary hearing. See *In the Matter of Melnick*, 319 Ga. 730, 738 (2024) (agreeing with the Special Master that personal and emotional problems should only be given some weight in mitigation where attorney failed to offer any corroborating evidence).

Based on the admitted misconduct, applicable ABA Standards, aggravating and mitigating factors, and comparable case law, the Special Master concluded that disbarment was appropriate and that, as a condition for reinstatement, McDonough must provide full restitution to all affected clients. See *In the Matter of Haklin*, 321 Ga. 530, 532 (2025) (disbarring attorney, who was in default, for violations of Rules 1.2(a), 1.3, 1.4(a), and 1.5); *In the Matter of Jackson*, 321 Ga. 256, 258 (2025) (disbarring attorney, who was in default, for violations of Rules 1.2(a), 1.3, and 1.4(a)). See also *In the Matter of Patel*, 321 Ga. 523, 526 (2025) (“No readmission will be considered without full restitution having been made by [attorney].”).

Upon our review of the record, we agree with the Special Master that McDonough violated Rules 1.2(a), 1.3, 1.4(a), 1.5(a), 1.16(d), 3.2, 5.3, and 9.3 and that disbarment is warranted with the condition that if McDonough ever seeks readmission, restitution must be made, and proof of that restitution must be offered to the Court before this Court will consider her readmission.

Accordingly, it is ordered that the name Mandi Deyerle McDonough be removed from the rolls of persons authorized to practice law in the State of Georgia.⁹ McDonough is reminded of

⁹ To the extent any other pending disciplinary matters involving McDonough are filed in this Court, they will be placed on the Court’s inactive

her duties under Bar Rule 4-219(b).

Disbarred. All the Justices concur, except Land, J., not participating.

docket and held, pending any application by McDonough for reinstatement to the practice of law in the State of Georgia.