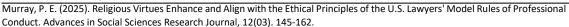
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## Religious Virtues Enhance and Align with the Ethical Principles of the U.S. Lawyers' Model Rules of Professional Conduct

## Peter E. Murray

Oak Brook College of Law, Fresno, California, United States

#### **ABSTRACT**

The enduring ethical dilemma of whether to prioritize one's duty to God or adherence to the rule of law remains a deeply philosophical and controversial issue. This study explores whether a U.S. lawyer's modern ethical responsibilities outlined in the Model Rules of Professional Conduct (MRPC) stem primarily from Christian biblical interpretations, or the principles of other major world religions, Judaism, Islam, Hinduism, and Buddhism, or secular theories of social jurisprudence, which posit that ethical duties are grounded in societal expectations. A systematic review of published legal cases identified recurring themes, with the most alleged ethical breaches: as money, discrimination, communication, competence. anti-harassment, responsibilities. confidentiality. retaliation, supervision, compliance, and candor (P<0.05). Furthermore, the five major world religions had similar proportions of cases alleging ethical violations to each other (P>0.05). The close alignment between the World's major religious virtues, secular jurisprudence, and MRPC ethical rules are likely due to the historical roots of law in religious traditions. This analysis has shown that lawyers should integrate their religious virtues, such as honesty, integrity and trustworthiness, whether derived from Christianity, Judaism, Islam, Hinduism, or Buddhism, into their professional ethical obligations, as these principles are inherently compatible with modern legal practice.

**Keywords:** Law Religion Virtues Ethics Morals Professional Conduct.

## **INTRODUCTION**

"In the nature of law practice, however, conflicting responsibilities are encountered. Virtually all difficult ethical problems arise from conflict between a lawyer's responsibilities to clients, to the legal system and to the lawyer's own interest in remaining an ethical person while earning a satisfactory living. The [Model] Rules of Professional Conduct [MRPC] often prescribe terms for resolving such conflicts. Within the framework of these Rules, however, many difficult issues of professional discretion can arise. Such issues must be resolved through the exercise of sensitive professional and moral judgment guided by the basic principles underlying the Rules" [1]. This highlights the need to explore areas of alignment and conflict between the MRPC's ethical framework and the moral principles of major religions, given that morality is often shaped by religious beliefs [2].

"A law is valuable not because it is law, but because there is right in it" [3]. This underscores the idea that the legitimacy and worth of laws and rules derive from their moral and ethical foundations rather than merely from their status as legal statutes. However, the moral and

ethical foundations of the MRPC remain open to interpretation, raising questions about their underlying philosophical or religious influences.

## ETHICAL DILEMMA OF THE DUTY TO GOD VERSES OBEDIENCE TO THE RULE OF LAW

The enduring ethical dilemma of whether to prioritize one's duty to God or adherence to the rule of law remains a deeply philosophical and controversial issue, largely because strict religious observance inherently prioritizes Gods divine authority [4]. Religious freedom, as a constitutional principle, only fully makes sense when grounded in the belief that God makes genuine demands on human loyalty and conduct, demands that are seen as preceding and holding a superior obligation to those of the State [5]. The essence of religious freedom is to protect the exercise of plausibly true understandings of God's commands from state interference, while also disabling the state from prescribing or proscribing religious practice [6]. In contrast, the secular Rule of Law is a construct of civil and criminal boundaries imposed by political lawmakers, designed to govern human behavior through enforceable norms [7]. While the Rule of Law is premised on the principle that no individual is above the law, it often comes into conflict with the deeply personal and absolute nature of religious convictions [8].

## **GUIDANCE FROM MORAL PHILOSOPHY**

Moral philosophy offers limited guidance in resolving conflicts between religious duties and respect for the rule of law [9]. It struggles to establish clear criteria for when religious obligations may justify disobedience to secular laws, and the diversity of moral perspectives makes it impractical to develop universal solutions for such disputes [10]. Consequently, the boundaries of lawful rule-breaking remain inherently ambiguous and highly dependent on context [11].

## RELIGIOUS MOTIVATION FOR DEFYING THE RULE OF LAW

The Rule of Law operates as a social convention prioritizing governance by rules rather than the whims of powerful individuals [12]. This principle emphasizes the importance of stability, predictability, and fairness in law. However, rule-breakers must generally anticipate punishment for their actions, reflecting the law's deterrent function, even though such deterrence is not always effective [13]. Religious motivations can drive individuals to defy legal authority, often rooted in a profound sense of duty or the politics of martyrdom, where self-sacrifice is viewed as a higher service to God [14]. This interplay of divine loyalty, moral philosophy, and secular legal structures highlights the complex and often contentious nature of navigating the intersection between religious conviction and the Rule of Law. It underscores the need for nuanced approaches that respect religious freedom while maintaining the integrity of secular governance.

### THE MAJOR RELIGIONS

Approximately 83% of the global population identifies with a religion, with the vast majority adhering to one of the world's major faith traditions. By percentage of the total population, these include Christianity (31%), Islam (24%), Hinduism (15%), and Buddhism (7%). The smaller religious groups include Judaism (0.2%), folk religions, such as African traditional religions, Chinese folk religions, Native American religions, and Australian Aboriginal religions, and other religions, each comprising less than 1% of the global population [11]. The major world religions each have distinct beliefs, practices, and historical origins, as well as unique perspectives on spirituality. They also differ in how they interpret and navigate their

responsibilities regarding divine law, adherence to secular law, and the potential conflicts between the two, as illustrated in Figure 1.

Religion	Duty to Obey Divine Law	Duty to Obey Secular Rule of Law	Reconciliation of Conflicts
Christianity	Christians emphasize obedience to God's commandments and the teachings of Jesus. e.g. "We must obey God rather than any human authority." Acts 5:29 (NLT)	Christianity teaches respect for governing authorities for maintaining order & justice. e.g. "Everyone must submit to governing authorities. For all authority comes from God, and those in positions of authority have been placed there by God." Romans 13:1 (NLT)	Christians are called to follow the law unless it directly contradicts God's will.  "But because the midwives feared God, they refused to obey the king's orders. They allowed the boys to live, too." Exodus 1:17 (NLT)
Islam	Islam calls for absolute obedience to Allah and His laws. e.g. "And whoever disobeys Allah and His Messenger has certainly strayed into clear error." Quran 33:36	Islam emphasizes adherence to the laws of the land, if they do not conflict with Islamic principles. e.g. "O you who have believed, obey Allah and obey the Messenger and those in authority among you."  Quran 4:59	Muslims should obey laws unless they are sinful. e.g. "It is obligatory upon a Muslim to listen to and obey the ruler except when he is ordered to commit a sinful act" Sahih Muslim 1839a
Hinduism	Hindu's have a duty to follow divine will. e.g. "By worship of Him, from whom all beings come and by whom the universe is pervaded, through the performance of one's own duty, a person attains perfection."  Bhagavad Gita 18.46	Dharma, or moral law, is the highest and most powerful force in the universe. "Dharma is the king of kings; nothing is mightier than law. By its power, the weak shall prevail over the strong."  Manusmriti 8.15	Hindus address conflicts with wisdom, compassion, and a focus on spiritual growth. e.g.  "An act that is not in harmony with righteousness (dharma) should not be followed"  Mahabharata, Shanti Parva 109.9
Buddhism	Buddhism is non-theistic, focusing on personal enlightenment and adherence to the Buddha's teachings. Spiritual practice emphasizes ethical conduct, and mental discipline. e.g. "You yourself must strive. The Buddhas only point the way." Dhammapada 276	The Buddha encouraged his followers to respect local rulers and laws, provided they do not interfere with spiritual practice. e.g. "Let one not follow the bad, let one follow the good, let one purify the mind. The wise who follow the good, their lives are peaceful."  Dhammapada 178	When civil laws conflict with Buddhist ethics, the focus shifts to peaceful resistance e.g. "The right way of acting is one that is rooted in peace and does not cause harm to any living being. Even in adverse situations, act in a manner that does not disturb the peace of others."  Bhagavad Gita 8.15



Jews are bound by the Torah's divine commandments. e.g. "You shall observe my statutes and keep my laws and perform them; I am the Lord."

Leviticus 19:37

Judaism encourages respect for secular authorities. e.g. "When a king commands something that is not against the Torah, one must obey, as the verse says, 'The law of the land is the law.'" Mishneh Torah, Laws of Kings and Wars 3:9

**Jewish tradition balances** adherence to secular laws with a steadfast commitment to divine law, prioritizing God's commandments in cases of conflict. e.g. "One must pay taxes to the government, as long as the tax is not used idolatry or transgression of Jewish law." Talmud, Nedarim 28a

Figure 1: Major world religions' perspectives on duty to god versus the secular rule of law.

#### NON-RELIGIOUS PEOPLE

About 16% of the global population is secular, because they have no religious affiliation. This group, often referred to as the *non-religious*, includes atheists, agnostics, and those people who may believe in a higher power or spiritual existence but do not identify with any specific religion [15]. The countries with the largest unaffiliated populations include China, Japan, and the United States [15]. In the U.S., the percentage of people who respond with *none* when asked about their religion has risen from 8% in 2000 to 21% in 2022 [15]. In several other countries, such as China, Japan, South Korea, North Korea, Czechia, and Estonia, most of the population identifies as unaffiliated with any religion [15].

## TENSION BETWEEN NON-RELIGIOUS PEOPLE AND LEGAL RELIGIOUS TRADITIONS

The growing number of non-religious individuals can create legal tensions, particularly in legal systems where religious traditions are deeply embedded. For example, atheists may be required to conform to religious practices, such as swearing an oath to God in courtrooms, which can conflict with their beliefs and raise concerns about religious neutrality in legal proceedings [16].

Among individuals, the tension between religious principles and secular laws reflects varying degrees of acceptance of both divine and secular authority. Deeply religious individuals generally uphold secular laws unless they directly contradict divine principles. In such instances, reconciliation is typically sought through peaceful means, such as nonviolent protest, rather than outright defiance of secular authority [17]. Notably, none of these major religions promote anarchy [18]. Instead, their shared virtues of peacemaking, mediation, and reconciliation likely play a pivotal role in their enduring influence and success [19].

### THE RELIGIOUS ORIGINS OF MORALITY

God, in whatever religion one believes, does not confer rights as understood in a political context but instead offers commands to humanity as models for harmonious living [20]. Within the Christian and Jewish tradition, the greatest command is encapsulated in the Golden Rule: 'Love your neighbor as yourself,' [21] or 'Do to others whatever you would like them to do to you' [22]. This principle is echoed across the world's major religions: Islam teaches, 'As you would have people do to you, do to them; and what you dislike to be done to you, don't do to them.'

Buddhism advises, 'Hurt not others in ways that you yourself would find hurtful' [22]. These shared teachings highlight religions universal moral emphasis on ethical reciprocity [23].

## THE CONTROVERSIAL INFLUENCE OF RELIGION ON JUSTICE AND THE LAW

Many lawyers, judges, and legal scholars argue that a judge's or lawyer's religious affiliation should not influence legal decision-making, as such influence could compromise the neutrality and integrity of the judicial process. Ideally, lawyering should remain impartial and apolitical [24]. However, it is widely recognized that religious beliefs often shape an individual's political values and personal perspectives [24]. While anecdotal evidence suggests that duties to both divine and secular laws can coexist, sometimes harmoniously [25], or sometimes in conflict [26], there is a lack of empirical research on whether secular ethics rules for lawyers are more likely to create religious conflicts for adherents of Christianity or other specific faiths.

Moreover, insufficient data exists to determine whether any specific ethics rules, such as those governing client funds or addressing discrimination in client selection or termination, are more prone to violation. These knowledge gaps underscore the need for further research in this area.

A central question in this inquiry is whether the religious virtues espoused by the world's five major religions align with and complement the ethical principles outlined in the MRPC [<sup>27</sup>]. Alternatively, secular theories of social jurisprudence suggest that ethical duties are rooted more deeply in societal expectations [<sup>28</sup>]. To explore these perspectives, a systematic review of publications in the Google Scholar database was conducted, examining key MRPC rules both within secular contexts (law without religion) and through the lens of religious traditions.

#### LAWYERS ETHICAL PRINCIPLES OF PROFESSIONAL CONDUCT

The American Bar Association (ABA) established the MRPC to set standards for ethical behavior among lawyers [29]. Adopted by the ABA House of Delegates in 1983 [29], the MRPC serve as the foundation for the ethics rules in whole or part, in all the U.S. jurisdictions. However, some critics have labeled the MRPC as the "ABA model rules of political correctness," arguing that they are excessively strict and influenced by political ideologies rather than grounded in fundamental Christian or religious principles [20]. The MRPC outlines essential responsibilities for lawyers, including maintaining confidentiality, demonstrating competence and diligence, adhering to the law, supervising legal and non-legal staff, clear and honest communication, fair billing practices, candor toward the tribunal, advancing only meritorious claims, and prohibiting discrimination, harassment, and retaliation. Furthermore, the rules emphasize the importance of avoiding conflicts of interest. These key duties are summarized in Figure 2.



Figure 2: Ethical principles governing lawyers' professional conduct.

#### CHRISTIAN VIRTUES AND LAWYERS ETHICAL PRINCIPLES

Instruction in the law is inherently undermined by secularization, as law, at its core, represents the delineation of right and wrong [30]. For legal instruction to be meaningful, it must be grounded in an authoritative divine source of true law [31]. During America's first century as a nation, this source was unmistakably and indisputably God's words, rooted in the Bible [32]. The moral and legal framework of the time drew heavily from biblical principles, reflecting a shared belief in divine authority as the ultimate foundation for justice.

In early America, law was typically taught by men who believed the Bible to be the Word of God as well as the foundation of the American legal system [33]. Joseph Story, Associate Justice of the Supreme Courtin the early nineteenth century believed that Christianity was the foundation of the common law [34]. Prior to beginning their legal studies most law professors would require students to read the Bible at the beginning of the course of legal study these men exerted Blackstone's thesis in his commentaries that man's law depended wholly upon God's law as revealed by his holy scriptures [33].

However, by the turn of the 20th century, a dramatic shift occurred in American legal education. Most law schools that had embraced secularization, turned away from divine origins of law in favor of the emerging theory of "social jurisprudence" [35]. This new approach posited that law should no longer be rooted in divine revelation but instead in the collective wisdom and experiences of human society, past and present. Social jurisprudence reframed law as a human construct, evolving to reflect societal needs, values, and progress rather than absolute moral truths. This transition marked a fundamental departure from the earlier understanding of

law, reshaping its instruction and interpretation in ways that continue to influence the legal profession today.

Given the modern majority secular trend of moving away from Christian virtues as the ethical foundation of American legal rules, and the MRPC's deliberate avoidance of citing scripture, it is essential to investigate whether the MRPC has become entirely secular or if its principles can still be traced back to their biblical origins. Moreover, to investigate whether Christian and other religious virtues enhance and align with the ethical principles of the Lawyers' duties under the Model Rules of Professional Conduct (MRPC). The MRPC key ethical responsibilities for lawyers, illustrated in Figure 2, were compared with the modern interpretation of scripture found in the New Living Translation (NLT). This analysis aimed to identify alignment with Christian virtues and evaluate whether the ethical principles of the MRPC could be further enriched by scriptural insights, as depicted in Figure 3.



Figure 3: Enhancing lawyers' ethical rules of professional conduct in alignment with Christian virtues.

The comparison revealed surprising and intuitively practical justifications for adhering to the MRPC's ethical rules, demonstrating that incorporating Christian virtues can make lawyers more productive, effective, and knowledgeable. The other key findings are that; Money should be paid to everyone what is owed to them. It is wrong to discriminate and show favoritism [without considering the evidence].

Lawyers communications should be good and helpful and not be foul or abusive. Responsibility should be to do good, and to share with those in [legal] need. Competence comes from qualifications [training, experience, and mentorship]. Lawyers should never harass, get angry or use evil behavior. Lawyers must be trusted by their clients to keep their confidences confidential. Lawyers must be diligent, work had and serve [justice] the lord, by avoiding laziness. Lawyers must ensure that punishments serve justice, match the injury, and are not pure retaliation. Lawyers have a duty to supervise others and to not allow anyone to plot evil deeds. Comply and obey the law to fight for justice against the wicked. Be good lawyers, by using candor to obtain justice for clients.

Christian virtues are vital for lawyers as they offer a moral and ethical foundation for navigating the complexities of legal practice [37]. Core Christian values such as honesty, integrity, justice, compassion, and respect for others can guide lawyers in making ethical decisions, ensuring fairness in upholding the law, and serving their clients and communities with empathy and care [38]. These values help lawyers maintain a strong sense of accountability and responsibility, aligning their actions with both legal and moral principles [39]. Moreover, Christian teachings on justice and mercy can shape a lawyer's approach to cases, particularly in advocacy, conflict resolution, and the pursuit of fairness. Above all, Christian values encourage lawyers to think creatively and consider alternative paths within the legal system to mediate resolutions to conflicts [40].

#### THE BURDEN OF OVERREGULATION WITH EXCESSIVE LAWS

The purpose of the Model Rules of Professional Conduct (MRPC) is to uphold the integrity of the legal profession. Illegal conduct, particularly offenses involving "moral turpitude" such as fraud, violence, dishonesty, breach of trust, or serious interference with the administration of justice, reflects adversely on a lawyer's fitness to practice law [41]. Lawyers are expressly prohibited from engaging in harmful verbal or physical conduct that demonstrates discrimination or from abusing the trust of their clients [32]. Lawyers are obligated to comply with all applicable laws and adhere to the fifty-eight professional conduct rules outlined in the MRPC as adopted in their jurisdiction [42]. In addition, they must navigate a complex web of overlapping and layered regulations, including state practice guidelines, formal opinions, business laws, and various jurisdiction-specific rules. This legal mosaic includes over 300,000 federal regulations, 5,000 federal statutes, countless state laws, and numerous local ordinances, many of which remain under-enforced or ambiguously defined [43]. Experts have described this phenomenon as "overregulation," "overcriminalization" and "overlegislation," highlighting the tyrannical creation of excessive laws often driven by political agendas [44], while outdated or redundant statutes remain in effect. Such an overabundance of legislation can burden society and create challenges for legal practitioners [45]. Despite this intricate and expansive regulatory framework, the legal profession demonstrates a strong commitment to ethical conduct. Only 1 in 432 practicing lawyers (0.23%) out of the 1.3 million lawyers in the United States face public disciplinary action for ethical misconduct annually [46]. This statistic underscores the profession's high ethical standards and the effectiveness of its regulatory systems.

## FREQUENCY OF CASES ALLEGING LAWYER ETHICAL VIOLATIONS

It remains unclear which specific MRPC rules are most frequently violated when ethical misconduct occurs, as regulators often fail to publish detailed information about such cases. To address this gap, an alternative method was employed, utilizing Google Scholar to search for

cases involving key terms related to "law" and the ethical duties or religious virtues outlined in Figures 2 and 3. The search terms included: "Money" (Fees), "Discrimination," "Communication," "Responsibility," "Competence," "Harassment," "Confidential," "Diligence," "Retaliation," "Supervise," "Comply," "Candor," and related derivatives. The search was limited to English-language articles.

To preserve the integrity of the raw data, no cases were excluded, even though some allegations may involve multiple violations or be entirely unfounded, which could potentially distort the results. Despite these limitations, the analysis provides valuable insights into the types of allegations most frequently made against lawyers.

The analysis identified recurring terms and ranked the most alleged ethical breaches by their proportion in the case law as: money (32%), discrimination (15%), communication (14.7%), responsibilities (13.6%), competence (8.6%), anti-harassment (4.3%), confidentiality (2.7%), diligence (2.4%), retaliation (2.4%), supervision (2%), compliance (1.4%), and candor (0.9%). These proportions were different to each other and statistically significant (Kruskal-Wallis  $X^2 = 73.44$ , df = 11, P<0.05) (JMP Statistical Discovery, Cary, NC, USA) (Figure 4).

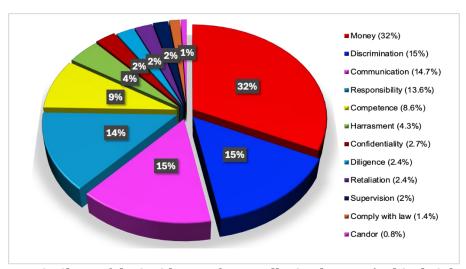


Figure 4: Pie Chart of the incidence of cases alleging lawyers' ethical violations.

The prominence of "money" in one-third (32%) in ethical allegations likely reflects the dual ethical obligations of ensuring fair compensation for plaintiffs and proper payment for legal services. Discrimination in one-sixth of allegations (15%) may stem from disputes related to declining or terminating attorney-client relationships. Allegations related to a lawyer's responsibilities (13.6%) and communication (14.7%) also constituted a significant portion of cases. The other alleged violations occurred with less frequency; violations of competence accounted for 8.6% of cases. Anti-harassment claims constituted 4.3%. Alleged breaches of confidentiality (2.7%), diligence (2.4%), retaliation (2.4%), supervision (2%), compliance (1.4%), and candor (0.9%) were less than 3% each, highlighting the relative rarity of these violations. This analysis sheds light on the areas of ethical responsibility most prone to allegations, offering valuable insights into where legal practitioners may face the greatest scrutiny.

#### INTEGRATING RELIGIOUS VIRTUES AND ETHICAL PRINCIPLES IN LEGAL PRACTICE

"Moral character is formed by one's actions. The habits, actions, and emotional responses of the person of good character all are united and directed toward the moral and the good. In order to be of good character, one must know the good, act in morally good ways, and be disposed and inclined toward the good through the development of virtues" [47].

"A virtue is a habitual and firm disposition to do the good. It allows the person not only to perform good acts, but to give the best of himself" [ $^{48}$ ]. "A virtue is a cultivated excellence in the way we think, act, interact, and believe. The more we practice the virtues, the more they transform us for the better; the more they transform us for the better, the happier we are" [ $^{49}$ ]. Merely to do the right thing out of self-interest, is not to live up to a standard of virtue [ $^{50}$ ].

"There are four main categories of virtue. The way we think is improved by the intellectual virtues. The way we act is improved by the moral virtues. The way we interact is improved by the civic virtues. And the way we believe is improved by the spiritual virtues" [51]. Religious virtues serve as guiding principles to cultivate a life of moral excellence, spiritual growth, and harmonious relationships with others. They reflect the values and priorities of a faith tradition and inspire individuals to live in accordance with divine will and ethical principles [52].

Each of the Ten Commandments forbids certain sins, because they are treacherous for the soul and legal ethics [53]. Each sin also highlights the opposing virtues that can guide us away from wrongdoing [54]. Virtues such as generosity, poverty of spirit, gentleness, purity of heart, temperance, and fortitude assist us in overcoming and avoiding what are called the seven deadly sins; pride, avarice, envy, anger, lust, gluttony, and sloth, which are those sins which engender the commission of other sins [55].

Law by its very nature is intended to cultivate virtues among its citizens [<sup>56</sup>]. Aristotle argued that the purpose of law is not merely to prevent harm but to help individuals achieve a virtuous and flourishing life within a well-ordered society [<sup>57</sup>]. Aquinas added that law reflects divine or natural law, guiding individuals toward moral good and away from sin [<sup>58</sup>]. A cynical secular view of the law is that its primary purpose, is not to promote virtue but to maintain social order and protect individual rights, by establishing boundaries for acceptable behavior rather than prescribing an ideal moral character [<sup>59</sup>]. This is true for laws that serve as deterrents of theft, fraud and violence, because they harm others, and are unethical behavior. Nevertheless, the virtues of fairness, honesty, and respect for others, are necessary to promote justice, for a functioning legal and social system [<sup>60</sup>].

# DOES A U.S. LAWYER'S ETHICAL RESPONSIBILITIES ORIGINATE FROM CHRISTIAN WISDOM OR ANOTHER RELIGIOUS TRADITION?

The enduring ethical dilemma of whether to prioritize one's duty to God or adherence to the rule of law remains a deeply philosophical and controversial issue [61]. This study explores whether a lawyer's modern ethical responsibilities stem primarily from Christian biblical interpretations, or the principles of other major world religions; Judaism, Islam, Hinduism, and Buddhism, or secular theories of social jurisprudence, which posit that ethical duties are grounded in societal expectations. Laws, public opinions, and even religious practices evolve over time, and adherence to religious principles can change as well. Today, for example, many Christians, Jews, Muslims and others, do not strictly follow religious law [62].

Central to this inquiry is the question of whether the Christian, or the religious virtues of the world's other four major religions align with and complement the ethical principles outlined in the MRPC. To address this, a systematic review of cases in the Google Scholar database was conducted, focusing on key terms within the MRPC rules in both secular contexts (law without religion) and through the lens of the major religious traditions.

The Google Scholar search included titles, abstracts, and keywords for "law," without religion (no religion), and generic "religion" "religion," or the World's top five religions: "Christian" (and "Christianity"), "Jewish" (and "Judaism"), "Islam," (and "Islamic") "Hindu," (and "Hinduism") and Buddhist (and "Buddhism"). In addition to combing the search with the religious virtues (duties) imposed on a lawyer by the MRPC of the key words used in Figures 2, 3, and 4 of "Money" (Fees), "Discrimination," "Communication," "Responsibility," "Competence," "Harassment," "Confidential," "Diligence," "Retaliation," "Supervise," "Comply," and "Candor," and derivatives of these terms. We limited our search to English-language articles.

To preserve the integrity of the raw data, no cases were excluded, even though some allegations may involve multiple violations or be entirely unfounded, which could potentially distort the results. Despite these limitations, the analysis provides valuable insights into the types of allegations most frequently made against lawyers.

The analysis identified recurring terms and ranked the most alleged ethical breaches by their proportion in case law across the five major religions. The results revealed that violations related to ethical principles such as financial practices, discrimination, communication, responsibilities, competence, anti-harassment, confidentiality, diligence, retaliation, supervision, compliance, and candor occurred in similar proportions. These had similar proportions of alleging ethical violations to each other and were not statistically significant (Kruskal-Wallis  $\chi^2 = 6$ , df = 6, P > 0.05) (JMP Statistical Discovery, Cary, NC, USA) (Figure 5).

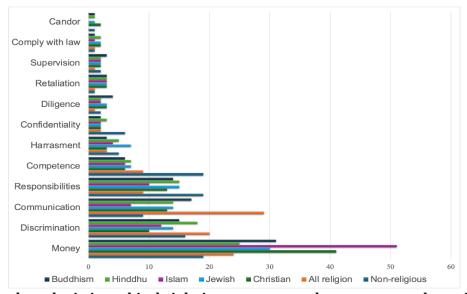


Figure 5: Bar chart depicting ethical violation cases among lawyers across the major religions.

The close alignment between Christian and religious virtues, secular jurisprudence, and MRPC ethical rules is unsurprising, given the historical roots of law in religious traditions. However,

the proportions of ethical rule breaches suggests that practical disputes, particularly those involving financial issues, discrimination, communication, and responsibilities, dominate in three-quarters of all the client-lawyer published case disputes.

## HOW CAN RELIGIOUS ETHICS BENEFIT THE PRACTICE OF LAW?

Religious ethics can promote honesty, integrity, and fairness, strengthening a lawyer's commitment to ethical practice. Many religious traditions emphasize justice, equity, and compassion, guiding lawyers toward fair and moral decision-making. These principles instill a strong sense of accountability, encouraging lawyers to act responsibly toward clients, courts, and society. Additionally, religious values often highlight the importance of reconciliation and peaceful conflict resolution, enhancing a lawyer's ability to mediate disputes effectively.

Lawyers who adhere to ethical principles rooted in religious values may foster greater trust and confidence among clients and the public. These religious ethics provide a moral framework for navigating complex legal and ethical dilemmas, helping lawyers maintain professional integrity. Many religious traditions emphasize serving others, inspiring lawyers to engage in pro bono work and advocate for social justice.

Practicing law with a strong ethical foundation can also help lawyers find deeper meaning in their work, reducing burnout and promoting personal fulfillment. The unique ethical perspectives shaped by different religious traditions, which can influence legal practice, are illustrated in Figure 6.

Religion	Key Ethical Principles	Legal Influence	Examples
Christianity	Justice, honesty, humility, compassion, and peacemaking [63].	Christian ethics, rooted in biblical teachings, emphasize truthfulness, fairness, and a commitment to serving others.	Samaritan, e.g. <i>Luke</i>
Islam	Justice (Adl), honesty (Sidq), integrity, and the duty to uphold contracts and fairness [64].	Islamic law (Sharia) upholds ethical conduct, truthfulness, and the protection of rights. The Quran and Hadith guide lawyers to serve as moral agents committed to justice and fairness.	1
Hinduism	Dharma (duty/righteousness), truth (Satya), non-harming (Ahimsa), and justice [65].	Hindu legal philosophy emphasizes duty and moral responsibility, with the concept of Dharma guiding lawyers in making ethical decisions that uphold justice.	The concept of Karma reinforces accountability, urging lawyers to act with integrity, recognizing that their actions have lasting consequences.

Buddhism	Non-harming (Ahimsa),	Buddhist ethics	Buddhist-inspired
	compassion (Karuna),	emphasize fairness,	mediation techniques
	wisdom (Prajna), and	mindfulness, and non-	are increasingly utilized
	ethical conduct (Sila) [66].	adversarial conflict	1
		resolution, principles that	
		align well with mediation	-
		and restorative justice	
133300		practices.	adversarial litigation.
Judaism	Justice (Tzedek), truth	Jewish law (Halakha)	The concept of 'Tikkun
<b>€</b> S	(Emet), kindness	emphasizes fairness,	Olam' (repairing the
	(Chesed), and a strong	ethical business practices,	, , ,
	sense of responsibility to	and the duty to pursue	to contribute to societal
XUX	the community [67].	justice. The Talmudic	<del>-</del>
TV V		tradition of debate and	000
		legal reasoning continues	, ,
		to influence contemporary	justice.
		legal thought.	

Figure 6: Major world religions' offer unique ethical perspectives that can shape legal practice.

Ultimately, this study affirms that a lawyer's duty to God and adherence to religious virtues, whether rooted in Christianity, Judaism, Islam, Hinduism, or Buddhism, can coexist harmoniously with professional ethical standards. This analysis dispels any perceived conflict between religious obligations and professional responsibilities, demonstrating their compatibility within modern legal practice.

Religious ethics serve as a valuable guide for legal practitioners, reinforcing integrity, accountability, and a strong sense of justice. While the law itself remains secular, religious moral frameworks provide an additional ethical compass, helping lawyers navigate complex legal and moral dilemmas.

Furthermore, this study highlights the enduring struggle between good and evil within the legal profession, framing the battle as one between ethical responsibility and religious virtue on one side, and ethical violations and unlawful behavior on the other, as illustrated in Figure 7.



Figure 7: The eternal struggle pits good, represented by lawyers' ethical responsibilities and religious virtues, against evil, embodied by ethical violations and lawbreaking.

#### CONCLUSION

For thousands of years, Jewish, Christian, and classical pagan thinkers regarded law as the manifestation of God's will [68]. In modern times, we are faced with a choice: liberty within the framework of God's law or tyranny under the oppression of man's law. This, ultimately, is the choice God offers us, and our decision largely depends on whether we adopt a creationist or evolutionary worldview [69]. The close alignment between Christian and other religions virtues, secular jurisprudence, and professional ethical standards is unsurprising, given the historical foundations of law in religious traditions. However, the proportions of ethical rule breaches indicates that practical disputes; particularly those involving financial matters, discrimination, communication, and professional responsibilities, dominate in three-quarters of published client-lawyer disputes.

This analysis has shown that lawyers should integrate their religious virtues; such as honesty, integrity and trustworthiness, whether derived from Christianity, Judaism, Islam, Hinduism, or Buddhism, into their professional ethical obligations, as these principles are inherently compatible with modern legal practice.

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