

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

**In the Matter of
A Complaint of Judicial
Misconduct or Disability**

Complaint No. DC-25-90008

Before: Srinivasan, Chief Judge

ORDER

Upon consideration of the complaint herein, and the supplements thereto, filed against a judge of the United States District Court for the District of Columbia, it is

ORDERED that the complaint be dismissed for the reasons stated in the attached Memorandum.

The Circuit Executive is directed to send copies of this Order and accompanying Memorandum to the complainant, the subject judge, and the Judicial Conference Committee on Judicial Conduct and Disability. *See* 28 U.S.C. § 352(b); JUD. CONF. U.S., RULES FOR JUDICIAL-CONDUCT AND JUDICIAL-DISABILITY PROCEEDINGS (2019), RULE 11(g)(2).



Sri Srinivasan, Chief Judge

Date: February 13, 2026

MEMORANDUM

The complainant has filed a complaint of judicial misconduct against a judge of the United States District Court for the District of Columbia. For the following reasons, the misconduct complaint will be dismissed.

The complainant filed an age discrimination, disability discrimination, and retaliation claim against a government agency. The subject judge granted the defendant agency's motion to dismiss the age discrimination and retaliation claims for failure to state a claim. The subject judge also denied leave to amend because the complainant did not indicate what other allegations she intended to make or include a draft amended complaint as required by the rules. The complainant then filed a motion to vacate the dismissal under Rule 60(b). The subject judge denied the motion to vacate, along with the complainant's motion to compel and her motion for sanctions.

The subject judge subsequently addressed three additional motions the complainant had filed. First, the court denied her motion to recuse for bias as merely disagreeing with his ruling. Second, the court denied a motion for a written explanation of its denial of her Rule 60(b) motion, explaining that he had explained his reasoning at the oral argument and she had access to the transcript. Finally, the judge dismissed as moot the complainant's motion to "reattain jurisdiction," noting that he continued to retain jurisdiction over the case.

The complainant then filed a motion to clarify the order denying her motion to recuse. The subject judge denied the motion, noting “Plaintiff’s argument that the Court failed to address several of the alleged grounds for recusal that she raised in her motion [to recuse] is belied by the text of the Court’s Order.”

Cross-motions for summary judgment are pending before the subject judge. One of the complainant’s three interlocutory appeals was dismissed and two remain pending before the court of appeals.

The complainant has now filed a complaint of judicial misconduct against the subject judge, arguing that “[a] consistent pattern of procedural bias, disparate treatment, and misapplication of legal standards has created a serious appearance of partiality.”

First, the complainant alleges that she has received “unequal procedural treatment” and that the subject judge accepted late and otherwise allegedly improper filings from the defendant but denied her procedural requests. The complainant’s allegations are direct challenges to the merits of the subject judge’s orders. “Any allegation that calls into question the correctness of an official decision or procedural ruling of a judge – without more – is merits-related.” JUD. CONF. RULES FOR JUDICIAL-CONDUCT AND JUDICIAL-DISABILITY PROCEEDINGS, Rule 4(b)(1) Commentary ¶ 12. Such an allegation does not constitute “[c]ognizable misconduct” under the Judicial-Conduct Proceedings Rules or the applicable statute. *Id.* In addition, the complainant’s own beliefs about the judge’s impartiality are unsupported by the record and thus “lack[] sufficient evidence to raise an inference that misconduct has occurred.” *See* JUDICIAL-CONDUCT PROCEEDINGS RULE

11(c)(1)(D); *see* 28 U.S.C. § 352(b)(1)(A)(iii).

Second, the complainant claims that she was “den[ie]d . . .] a fair opportunity to litigate” when the court denied her discovery requests “without explanation,” dismissed her motion for reconsideration, and denied her leave to amend her complaint. Those allegations, like the previous one, are challenges to the merits of the judge’s decisions and thus also must be dismissed.

Third, the complainant asserts that the subject judge’s “disparate enforcement of procedural rules” exhibits bias. The mere fact that the subject judge ruled in favor of one party is not itself evidence of bias. The complainant has failed to provide any evidence of judicial misconduct other than her own unsupported beliefs. Her allegation thus “lack[s] sufficient evidence to raise an inference that misconduct has occurred.” *See* JUDICIAL-CONDUCT PROCEEDINGS RULE 11(c)(1)(D); *see* 28 U.S.C. § 352(b)(1)(A)(iii).

The complainant also filed three supplements to her misconduct complaint, none of which indicates misconduct.

In the first supplement, the complainant argues that, at a hearing, the subject judge “interrupted me, spoke over my responses, and trivialized key facts relevant to my claim, despite my presenting clear onboarding documentation from [the organization] confirming my employment. He showed deference to defense counsel’s characterizations while requiring an unreasonable level of proof from me as a pro se litigant.” A review of the transcript fails to support the allegation that the subject judge treated the complainant “in a demonstrably egregious and hostile manner.” *See* JUDICIAL-CONDUCT

PROCEEDINGS RULE 4(a)(2)(B) (“Cognizable misconduct includes: treating litigants, attorneys, judicial employees, or others in a demonstrably egregious and hostile manner.”). The complainant also alleges that the subject judge improperly denied her motion to compel and her motion for sanctions. Those allegations, however, once again challenge the merits of the judge’s decisions and thus will be dismissed. Finally, the complainant contends that the subject judge engaged in disparate treatment by granting the defendant additional time to respond to her motion for summary judgment while allegedly denying the same treatment to her. But a review of the transcript shows that, rather than treating the parties in any disparate manner, the judge asked the complainant how much time she would like to respond to the defendant’s motion and advised her that her filing would also serve as a reply in support of her own motion.

In the complainant’s second supplement to the complaint, she alleges that the subject judge denied her Rule 60(b) motion without explanation, that she received no prior notice that the motion would be ruled upon at a hearing, and that she did not receive the minute order disposing of her motion. The judge, however, provided an explanation for his decision to deny the Rule 60(b) motion at a hearing. As for her allegation that she did not receive the order deciding her motion, the complainant elected to receive electronic notifications of all filings, and the District Court records indicate that the minute order was emailed to the complainant at her email address of record.

As for the complainant’s third supplement to the complaint, most of the allegations could have been raised in the earlier supplements and thus will not be

considered. *See* D.C. Circuit Rule 6(b) (“Supplements to the complaint are not permitted except to the extent the supplement corrects errors in the complaint or includes new allegations against the subject judge which occurred after the complaint was filed.”). The third supplement does contain one allegation related to an action taken by the subject judge after the prior supplements. Specifically, the complainant asserts that the judge’s denial of her motion for recusal “Minimized Factual Allegations,” “Misstated the Record,” “Violated Balistreri Principal”, and “Ignored Evidentiary Discrepancies.” As with many of the complainant’s allegations, these challenges directly relate to the merits of the judge’s denial of her recusal motion and thus must be dismissed.

Accordingly, because the complaint is “is based on allegations lacking sufficient evidence to raise an inference that misconduct has occurred,” it will be dismissed. JUD. CONF. U.S., RULES FOR JUDICIAL-CONDUCT AND JUDICIAL-DISABILITY PROCEEDINGS RULE 11(c)(1)(B) & (D); *see* 28 U.S.C. § 352(b)(1)(A)(ii) & (iii).¹

¹ Pursuant to 28 U.S.C. § 352(c) and JUDICIAL-CONDUCT PROCEEDINGS RULE 18(a), the complainant may file a petition for review by the Judicial Council of the District of Columbia Circuit. Any petition must be filed in the Office of the Circuit Executive for the D.C. Circuit within 42 days after the date of the dismissal order. JUDICIAL-CONDUCT PROCEEDINGS RULE 18(b).