

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

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

Complaint No. DC-25-90019

Before: Srinivasan, Chief Judge

ORDER

Upon consideration of the complaint herein, 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: April 1, 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 and her co-defendant pled guilty to one count of unlawfully entering and remaining in a restricted building or grounds (the United States Capitol) on January 6, 2021, in violation of 18 U.S.C. 1752(a)(1). The subject judge sentenced complainant to 20 days of incarceration followed by one year of supervised release, and the judge also imposed a special assessment in the amount of \$25 and restitution in the amount of \$500.

Two years after sentencing, the complainant filed a judicial misconduct complaint against the subject judge. The complainant asserts that the judge's statements at the plea and sentencing hearings "call[] into question his impartiality, fairness, and adherence to judicial ethics." As evidence of wrongdoing, the complainant refers to three statements allegedly made by the subject judge that improperly failed to consider the individual defendants' specific actions and intentions:

"I think everybody who was there contributed to what took place. Because it was a mob mentality that, I think, caused all of this to occur." . . . "I'm confident that if these individuals had been there by themselves, they wouldn't have done it." . . . "I think everybody who was there contributed to what took place."

The complainant also claims that the subject judge failed to "carefully consider

mitigating factors in sentencing rather than treating all defendants under a blanket assumption of similar culpability.”

To the extent the complainant contends that the subject judge acted in an impartial manner or failed to treat her fairly, that claim must be dismissed. The complainant fails to provide any evidence to support her claim of bias, relying instead only on her own characterization of the judge’s statements. As to the subject judge’s references to his view of the “mob mentality” that occurred on January 6th: “Because of the special need to protect judges’ independence in deciding what to say in an opinion or ruling,” if a judge’s “language [is] relevant to the case at hand – for example, a statement that a claim is legally or factually ‘frivolous’ – then the judge’s choice of language is presumptively merits-related and excluded, absent evidence apart from the ruling itself suggesting an improper motive.” JUD. CONF. U.S., RULES FOR JUDICIAL-CONDUCT AND JUDICIAL-DISABILITY PROCEEDINGS RULE 4 Commentary at ¶ 15. Here, because there is no evidence suggesting an improper motive, the subject judge’s characterization of the events on January 6th is “directly related to the merits” of the decision and thus does not constitute “cognizable misconduct.” JUDICIAL-CONDUCT PROCEEDINGS RULE 4(b)(1). As a result, the bias allegation “lack[s] sufficient evidence to raise an inference that misconduct has occurred.” JUDICIAL-CONDUCT PROCEEDINGS RULE 11(c)(1)(D); *see* 28 U.S.C. § 352(b)(1)(A)(iii).

To the extent the complainant is challenging the subject judge’s failure to take into account mitigating factors in her sentencing, that allegation is a direct challenge to the

merits of the judge’s sentencing order. “Any allegation that calls into question the correctness of an official decision or procedural ruling of a judge – without more – is merits-related.” JUDICIAL-CONDUCT 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.*

Accordingly, because the complaint is “directly related to the merits of a decision” and is “based on allegations lacking sufficient evidence to raise an inference that misconduct has occurred,” the complaint will be dismissed. JUDICIAL-CONDUCT 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).