

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

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

**Complaint No. DC-25-90041
No. DC-25-90042**

Before: Srinivasan, Chief Judge

ORDER

Upon consideration of the complaint herein, filed against two judges 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: July 17, 2026

No. DC-25-90041
No. DC-25-90042

MEMORANDUM

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

The complainant sued her employer in district court, initially bringing claims for race and disability discrimination and retaliation under Title VII of the Civil Rights Act. After twice amending her complaint, the complainant asserted claims for breach of contract, violation of due process, emotional distress, negligence, and defamation. The defendant moved to dismiss the second amended complaint. The case was then referred to a magistrate judge for full case management.

The complainant later moved in district court for appointment of counsel. Subject Judge I denied the motion without prejudice, explaining that the court considered factors including the complexity and potential merit of the action as well as the limited pro bono resources available, and determined that appointment of counsel was unwarranted at that time. The complainant sought reconsideration, which Subject Judge II denied without prejudice. The complainant then filed additional motions for appointment of counsel. She reiterated statements made in her earlier motions that “it is difficult to seek help and communicate with others, including the court” in light of her disability, and that none of the numerous law firms and legal organizations she contacted agreed to represent her. Subject Judge II denied those motions without prejudice on the ground that the

complainant had not offered any new basis to appoint counsel. The complainant timely appealed. The court of appeals granted the appellee's motion to dismiss, noting that "[t]he district court's denial of appellant's motion for appointment of counsel is neither a final decision nor an order that qualifies for immediate appeal under the collateral order doctrine." The complainant's underlying case is still proceeding before the district court.

The complainant has now filed a complaint of judicial misconduct against the two subject judges as it relates to their disposition of the motions for appointment of counsel. The complainant asserts that despite her repeated attempts to explain her need for counsel, the judges have "repeatedly denied my requests." She further alleges,

The prolonged and repeated denial of counsel, despite clear legal disparity and the judge's acknowledgment of my disadvantaged position, demonstrates disregard for fair access to justice. This has caused substantial prejudice and appears to reflect not a legal ruling, but a pattern of bias and failure to exercise discretion appropriately under 28 U.S.C. 1915(e)(1). I believe this conduct violates the Code of Conduct for United States Judges, particularly Canon 3: "A judge should perform the duties of the office fairly, impartially and diligently." This sustained pattern has undermined my ability to pursue justice and should be reviewed.

The complainant's allegations are a direct challenge to the merits of the judges' orders denying counsel. "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 unsubstantiated belief that the rulings somehow demonstrate "a pattern of bias" "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). Accordingly, the complaint will be dismissed. *See* JUDICIAL-CONDUCT PROCEEDINGS RULE 11(c)(1)(D); *see* 28 U.S.C. § 352(b)(1)(A)(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).