

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

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

Complaint No. DC-25-90047

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: July 17, 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 in district court a document which was construed as a civil complaint, and later filed two pleadings construed as amended complaints. The complaint appears to concern a bank's foreclosure on property, the complainant's eviction from the property, and the local D.C. court's decisions in litigation concerning those matters. In the third and seemingly-operative amended complaint against the local court, the complainant alleged that the foreclosure was fraudulent, the eviction was unlawful, and the local court's decisions were void ab initio. She sought immediate injunctive relief. The complainant subsequently moved for entry of a default against the property and for default judgments against the defendants. The defendant local court then moved to dismiss for lack of subject-matter jurisdiction, citing the *Rooker-Feldman* doctrine barring federal district courts from reviewing final judicial decisions of state and D.C. courts, as well as judicial immunity. The subject judge subsequently dismissed the complaint based on the *Rooker-Feldman* doctrine and on res judicata grounds.

The complainant appealed, and the court of appeals granted summary affirmance. The court of appeals determined that "[t]he district court properly dismissed appellant's complaint and civil action under the Rooker-Feldman doctrine, which provides that

‘federal district courts lack jurisdiction to review judicial decisions by state and District of Columbia court.’” The court of appeals further noted that “[b]ecause the district court properly dismissed on Rooker-Feldman grounds, we need not decide whether the matter was also barred by res judicata.” The complainant’s petition for rehearing en banc was denied.

The complainant has now filed a judicial misconduct complaint against the subject judge. The complainant alleges that subject judge

unlawfully and unconstitutionally recharacterized a properly styled Bill Quia Timet . . . as a statutory civil complaint. [The subject judge] further joined nonparty respondents as defendants without instruction, motion, notice, or explanation, distorted the nature of the claims with biased language and a snarky tone, relied on uncorroborated hearsay from counsel unauthorized to even appear in the matter, and ultimately dismissed the case for subject matter jurisdiction.

The complainant further asserts that “[t]he record reflects an intention rooted in bias to overlook” the duty to construe the pleadings liberally. She also argues that the subject judge “made clearly prejudicial statements describing Complainant’s claims to superior equitable title as ‘so-called’ and ‘purported’ despite the fact that Complainant’s claims were never challenged by any appearing party.” According to the complainant, the subject judge failed to “address the significant impact the court’s sua sponte determination to change the nature of the case and effect an unsolicited joinder of parties obviously had on the outcome and the processing of the case.”

To the extent the complainant is alleging that the subject judge improperly

characterized her complaint, joined nonparty respondents, relied on uncorroborated hearsay, and dismissed her complaint, those allegations are challenges to the merits of the subject judge’s procedural rulings and dismissal order. “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.*

To the extent the complainant is challenging the language the subject judge used in connection with her decisions and rulings, the Judicial Conference has explained that, “[b]ecause of the special need to protect judges’ independence in deciding what to say in an opinion or ruling,” if a judge’s “language was 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.” JUDICIAL-CONDUCT PROCEEDINGS RULE 4 Commentary at ¶ 15. As there is no evidence here suggesting an improper motive (other than the complainant’s conclusory characterization that the subject judge used “biased language and a snarky tone”), the subject judge’s word choice in characterizing the complainant’s suit was “directly related to the merits” of the subject judge’s dismissal order and does not constitute “cognizable misconduct.” JUDICIAL-CONDUCT PROCEEDINGS RULE 4(b)(1). The allegation of biased language and prejudicial

statements also “lack[s] sufficient evidence to raise an inference that misconduct has occurred.” JUDICIAL-CONDUCT PROCEEDINGS RULE 11(c)(1)(D).

Accordingly, because the complaint raises allegations that are “directly related to the merits” and “lack[] sufficient evidence to raise an inference that misconduct has occurred,” the complaint will be dismissed. *See* 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).