

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

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

Complaint No. DC-25-90048

Before: Srinivasan, Chief Judge

ORDER

Upon consideration of the complaint herein, filed against a judge of the United States Bankruptcy 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 Bankruptcy Court for the District of Columbia. For the following reasons, the misconduct complaint will be dismissed.

The complainant filed a Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the District of Columbia. The filing of the Chapter 11 petition had the effect of automatically staying the lock-out scheduled for the complainant's residence. A creditor moved for relief from the stay, asserting that the property at issue was not part of the bankruptcy estate. Thus, the creditor sought to obtain possession and to proceed with the complainant's eviction from the property. After a hearing, the subject judge ordered that the automatic stay be terminated to allow the creditor to continue to take steps to obtain possession of the property. The U.S. Trustee then moved to convert the complaint to one under Chapter 7 or, in the alternative to dismiss the case because the complainant had failed to timely provide information or attend meetings requested by the U.S. Trustee. After a hearing on the motion, the subject judge granted the U.S. Trustee's motion to dismiss the case. The complainant then sought to reopen the Chapter 11 case, which the subject judge ultimately denied.

Meanwhile, before the case was dismissed, the complainant filed a judicial misconduct complaint against the subject judge, alleging that the subject judge improperly granted the motion for relief from the stay. The complainant argues that the

subject judge violated the Codes of Conduct by “abdicating federal authority under the Bankruptcy Code to the D.C. Superior Court and its foreclosure policy. . . , allowing a non-creditor with no standing to prevail in lifting a federal statutory stay. . . , [misapplying the stay provisions], disregarding the non-final status of the underlying judgment and inverting the statutory ‘status quo’. . . [and] denying review of the authority and standing of appearing counsel.” The complainant asserts that “[t]he Judge’s actions stripped Complainant of federal statutory protections enacted by Congress, deprived Complainant of due process in challenging the standing of adverse parties, and enabled the continuation of a systemic foreclosure practice that deprives residents of their property without just process or compensation.”

The complainant’s challenge to the subject judge’s order lifting of the stay is a direct challenge to the merits of the judge’s ruling. “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.* The complainant also fails to provide any support, apart from her own beliefs, for her allegations that the Canons of the Code of Conduct were violated. The allegations thus “lack[] 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).

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).