

JUDICIAL COUNCIL
OF THE DISTRICT OF COLUMBIA CIRCUIT

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

Complaint No. DC-25-90053

Before: Srinivasan, Chief Judge

ORDER

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

The complainant was charged with four misdemeanors. The complainant and the government agreed to have the case referred to a magistrate judge for all purposes, and the district court judge assigned to the case directed that the “Magistrate Judge will be randomly assigned by the Clerk’s Office.” The case was assigned to the subject magistrate judge. A jury later found the complainant guilty of all four counts. The subject judge subsequently denied the complainant’s motion for acquittal and motion for a new trial.

Thereafter, the complainant received a presidential pardon. The complainant, then acting pro se, filed a motion under Rule 33 of the Federal Rules of Criminal Procedure seeking “relief from the judgment, vacating the conviction, or, in the alternative, a new trial,” claiming that one of the jurors was dishonest during voir dire. The subject judge denied the complainant’s motion to vacate her conviction, denied her motion to unseal the name of the presiding juror or to obtain an unredacted verdict form, granted her motion to file a bar complaint, and granted in part and denied in part her request to unseal documents. The complainant then noted an appeal, which remains pending.

Meanwhile, the complainant filed a judicial misconduct complaint against the subject judge. The complainant argues that the “cumulative record demonstrates a sustained departure from judicial neutrality and diligence. The Court’s pattern of denying defense motions, restricting voir dire, and overlooking discovery deficiencies appeared to undermine confidence in the fairness of the proceedings.” More specifically, the complainant alleges that the subject judge declined to hold a hearing on her motion to dismiss for selective prosecution and “set briefing deadlines but did not issue a written opinion.” She further claims that the judge improperly required the parties to file a joint voir dire proposal, curtailed defense questions during voir dire, improperly excluded time under the Speedy Trial Act, denied motions without written reasoning, overruled or ignored defense objections, and improperly denied her counsel’s request to communicate with the jurors post-verdict.

These allegations are direct challenges to the merits of the subject judge’s rulings. “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.* Additionally, the complainant errs in contending that the subject judge failed to issue a written opinion when denying her motion to dismiss. The judge issued both an order and a memorandum opinion addressing the motion. Moreover, other than her own assertions, the complainant

has failed to provide any evidence that any of the judge's actions were the result of judicial misconduct. Thus, these allegations "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).

The complainant also claims that several of the subject judge's remarks were improper. Specifically, the complainant challenges the judge's alleged statement that "you don't get to pick who represents you" and that she could get her own counsel "if you can afford it." She also challenges his alleged statement that he "would not have imposed incarceration' had the defendant shown remorse."

With respect to the subject judge's language, 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. Because there is no evidence here suggesting an improper motive, the subject judge's language is "directly related to the merits" of his decisions and does not constitute "cognizable misconduct." JUDICIAL-CONDUCT PROCEEDINGS RULE 4(b)(1).

The complainant also asserts that the subject judge's work on her case before it was formally assigned to a magistrate judge is "inconsistent with the later

characterization of his appointment as a ‘random assignment.’” The complainant, however, has failed to provide any evidence that the subject judge’s assignment as the magistrate judge to handle the trial was anything but random. Two other magistrate judges also handled pre-trial matters in the complainant’s case. Because there are only four magistrate judges in the District Court, it was likely that any magistrate judge who was ultimately assigned the case would have handled initial matters. Thus, this 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).

Finally, the complainant filed a supplement to her complaint, alleging new allegations of misconduct that arose after she filed her original complaint. In the supplement, she asserts that the transcript of an August 2025 hearing demonstrates that the subject judge improperly relied on extrajudicial information. She further claims that the transcript of her sentencing hearing shows that the subject judge again improperly relied on extrajudicial information and was biased against her.

As to the alleged extrajudicial materials referenced at the August 2025 hearing, the hearing itself was held to determine if the complainant violated the District Court’s Local Rule 24.1 by publicly disclosing the identity of a juror in the case in her social media posts. Thus, references to the complainant’s social media posts were specifically at issue in the hearing and are not extrajudicial in this context. As to alleged extrajudicial materials referenced in the sentencing hearing, the complainant has failed to provide any evidence of judicial misconduct. Contrary to the complainant’s assertion, the transcript

pages that she references do not mention the judge receiving extrajudicial materials.

Furthermore, the subject judge's statements that the complainant asserts are evidence of bias in fact were relevant to the case and suggest no improper motive.

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. 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).