

State of Arizona
COMMISSION ON JUDICIAL CONDUCT

Disposition of Complaint 25-330

Judge:

Complainant:

ORDER

October 14, 2025

The Complainant alleged a superior court judge was biased and made improper rulings in a criminal case.

The role of the Commission on Judicial Conduct is to impartially determine whether a judicial officer has engaged in conduct that violates the Arizona Code of Judicial Conduct or Article 6.1 of the Arizona Constitution. There must be clear and convincing evidence of such a violation in order for the Commission to take disciplinary action against a judicial officer.

The Commission reviewed all relevant available information and concluded there was not clear and convincing evidence of ethical misconduct in this matter. The complaint is therefore dismissed pursuant to Commission Rules 16(a) and 23(a).

Commission members Colleen E. Concannon, Joseph C. Kreamer, and Regina L. Nassen did not participate in the consideration of this matter.

Copies of this order were distributed to all appropriate persons on October 14, 2025.

Comp
25-330

Arizona Commission on Judicial Conduct
1501 W. Washington Street, Suite 229
Phoenix, AZ 85007
Email: cjc@courts.az.gov

Date:

Subject: Formal Complaint Against Hon. Judge _____ County
Court, Case No.

To the Members of the Commission,

I, _____ hereby submit this formal complaint against the
Honorable Judge _____ of the _____ County _____ Court for repeated
and ongoing judicial misconduct in connection with my criminal case,

_____ . The conduct at issue reflects a troubling pattern of
constitutional indifference, prejudice, hostility toward pro se litigants, and
failure to perform basic judicial duties required under the Arizona Code of Judicial
Conduct and binding precedent.

This complaint is grounded in the following core concerns:

I. Systematic Failure to Evaluate Constitutional Claims

Judge _____ has shown a recurring pattern of disregarding well-supported constitutional arguments raised by the defense, either by issuing perfunctory denials without meaningful engagement or by mischaracterizing the record entirely. In my Motion to Suppress, I specifically argued that law enforcement initiated a warrantless stop and search without probable cause, in violation of the Fourth Amendment. The Court conducted an evidentiary hearing but issued a ruling that failed to engage with key facts, including body-worn camera footage belatedly disclosed by the State that contradicted the officer's testimony and reports, and which also demonstrated an absence of investigation prior to the seizure.

Despite my motion explicitly challenging the existence of probable cause (and citing the controlling precedent of *Delaware v. Prouse*, 440 U.S. 648 (1979), and *Arizona v. Gant*, 556 U.S. 332 (2009)), Judge _____ denied reconsideration by **falsely stating** that the issue had not been raised. This indicates either gross neglect of the record or intentional avoidance of the argument.

The Court is constitutionally obligated to scrutinize the legality of warrantless intrusions regardless of whether the defense presents the issue with

perfect legal phrasing. See *Ornelas v. United States*, 517 U.S. 690 (1996) (holding that determinations of probable cause require independent judicial review); *Katz v. United States*, 389 U.S. 347 (1967) (“Warrantless searches are per se unreasonable absent a specifically established exception.”). In failing to engage with this fundamental issue, Judge [redacted] abdicated her duty to act as a neutral arbiter of law.

II. Improper Denial of Motion to Disclose Confidential Informant

In another instance, the Court improperly denied my Motion to Disclose the Identity of the Confidential Informant, despite overwhelming evidence that the informant, identified through diligence and supplemental testimony as

[redacted] was not merely a tipster, but an active participant who directly handled and loaded the alleged contraband into my vehicle. The evidence submitted included still images, discovery records, and witness statements.

The Supreme Court in *Roviaro v. United States*, 353 U.S. 53 (1957), held that the identity of a confidential informant must be disclosed when that informant is a material witness or participant in the alleged offense. The Court in this case ignored that standard entirely, choosing instead to characterize my evidence as “mere argument,” despite it being supported by exhibits and citations. This refusal to consider the applicability of *Roviaro* and its progeny, including *State v. Tuell*,

112 Ariz. 340 (1975), is an abandonment of the judge's duty to apply clearly established law to the facts.

Moreover, the prosecution's claim that it " [redacted] " the identity of the CI, despite years of litigation, discovery references, and their own police witness testifying about the CI, should have been a red flag for the Court. Instead of questioning this implausible and suspicious claim, the Court shielded it from scrutiny. This failure to act raises serious questions about judicial impartiality and the willingness of the judge to condone prosecutorial evasion of Brady and Giglio obligations.

III. Forced Reappointment of Disqualified Counsel

After proceeding pro se for over a year, I filed a motion requesting the appointment of new counsel to assist in trial preparation. I made it clear I did not wish to be represented by standby counsel [redacted], with whom I had an irreparable conflict due to his refusal to advocate for me. [redacted] sent me a written message, submitted to the Court, stating, "

[redacted] " and " [redacted] ' These are not the words of an advocate; they are the words of someone who has prejudged the case and given up on the defense.

Rather than acknowledge this conflict or appoint substitute counsel, Judge [redacted] reappointed [redacted] against my wishes, effectively forcing me into trial with a lawyer who had openly discredited my defense and refused collaboration. This violated my Sixth Amendment right to meaningful assistance of counsel under *Strickland v. Washington*, 466 U.S. 668 (1984), and my right to be represented by counsel with whom I can communicate and trust, as recognized in *State v. Moody*, 208 Ariz. 424 (2004). This action alone represents a knowing and damaging infringement on my trial rights.

IV. Pattern of Dismissiveness, Bias, and Retaliatory Posture Toward Pro Se Litigant

Throughout these proceedings, Judge [redacted] has used language in her rulings that betrays hostility toward my pro se filings and a predisposition to defer to the prosecution, regardless of the strength or merit of the defense's claims. Her orders frequently describe my motions as "speculative" or "unsupported," even when they are backed by exhibits, citations, and direct evidence.

It is well established that pro se litigants are entitled to meaningful access to the courts and that their filings must be liberally construed. See *Haines v. Kerner*, 404 U.S. 519 (1972). By dismissing detailed motions as "mere argument," Judge [redacted] violated both the letter and the spirit of this principle. Her conduct suggests

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COMPLAINT ON ITS WEBSITE.**

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COMPLAINT IN THIS MATTER,
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IN WRITING TO THE
COMMISSION ON JUDICIAL
CONDUCT AND REFERENCE
THE COMMISSION CASE
NUMBER IN YOUR REQUEST.**