

State of Arizona
COMMISSION ON JUDICIAL CONDUCT

Disposition of Complaint 25-535

Judge:

Complainant:

ORDER

February 11, 2026

The Complainant alleged a superior court commissioner made improper rulings, ruled without jurisdiction, and unequally allotted time at a hearing.

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 does not have jurisdiction to overturn, amend, or remand a judicial officer's legal rulings. 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 and Regina L. Nassen did not participate in the consideration of this matter.

Copies of this order were distributed to all appropriate persons on February 11, 2026.

ARIZONA COMMISSION ON JUDICIAL CONDUCT

Comp
25-535

Judicial Misconduct Complaint

I. Respondent Information

Judge: Hon.

Court: Court of Arizona, County

Division: Family Court

Case Number: ()

II. Complainant Information

Name:

Address:

Email:

III. Introduction and Background

I am the Respondent in the above-captioned case, a post-decree family matter involving parenting-time and enforcement issues. The minor child has resided in continuously for more than years, and jurisdiction was later challenged under the Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA).

This complaint is submitted because the Hon. engaged in a series of procedural and jurisdictional violations that deprived me of due process and undermined confidence in the impartiality of the court.

IV. Alleged Judicial Misconduct and Procedural Violations

1. Issuing Orders After Reassignment and Loss of Authority

- On , an Administrative Order reassigned Judge from the Family Division.

- Despite that reassignment, on _____, he issued **Final Orders** in this case— _____ days after losing authority and approximately _____ **hours after** Respondent filed a **Notice of No Ruling** and a **Motion to Dismiss for Lack of Jurisdiction**.
 - Those filings placed the Court on formal notice that jurisdiction was disputed and that multiple motions remained pending.
 - Issuing final rulings after reassignment and within hours of receiving jurisdiction-related filings exceeded his lawful authority and violated procedural rules governing reassigned cases.
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2. Failure to Rule on Pending Motions Before Issuing Final Orders

- Several substantive motions were filed and served before the _____ and _____ trial dates, including:
 - **Motion in Limine** (_____);
 - **Combined Motion to Dismiss Petition to Enforce, Motion for Protective Order, and Motion for Sanctions** (_____);
 - **Motion to Quash Subpoenas** (_____).
 - Following trial, Respondent filed a **Motion to Dismiss for Lack of Jurisdiction** on _____, formally placing jurisdiction at issue.
 - None of these motions were ruled upon prior to issuance of the **Final Orders** on _____.
 - Proceeding to issue rulings while these motions remained pending violated **Rule 35(b)(2)** and **Rule 76(A)**, *Arizona Rules of Family Law Procedure*, depriving Respondent of the right to have jurisdictional and evidentiary issues addressed before final adjudication.
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3. Ruling Without Jurisdiction or Authority

- The _____ **Motion to Dismiss** raised objections under **A.R.S. § 25-1032**, noting that the child has lived in _____ since _____ and that Arizona no longer qualified as the child's "home state."
 - Judge _____, despite being on notice of the jurisdictional challenge and after reassignment, issued contempt and enforcement orders on _____ without making any UCCJEA findings.
 - Ruling after reassignment and without jurisdiction violates **Judicial Conduct Rules 1.1 (Compliance with the Law)** and **2.2 (Impartiality and Fairness)**.
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4. Failure to Address Procedural Objections and Provide Adequate Notice

- On _____, Respondent filed a **Motion to Dismiss the Petition to Enforce/Contempt**, expressly objecting to **improper service** of the underlying petition.
 - Despite that filing, Judge _____ **denied the motion without addressing the service defect** and proceeded with the **Resolution Management Conference (RMC)** on _____ as though proper service had been established.
 - Later, on _____, Respondent filed a **Motion to Dismiss the Petition to Modify**, again objecting to procedural deficiencies and advising the Court that Respondent had only **_____ days to prepare** for the _____.
 - Judge _____ **ignored both procedural objections**, declined to rule on either motion before the corresponding hearings, and required Respondent to proceed without adequate notice or opportunity to prepare.
 - These actions denied Respondent fundamental due-process protections, contravened **Rule 47(b)** and **Rule 76**, *Arizona Rules of Family Law Procedure*, and violated **Judicial Conduct Rules 1.1, 2.2, and 2.6**.
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V. Additional Due-Process Concerns and Ignored Evidence

5. Failure to Consider Critical Child-Related Evidence

- At the _____ and _____ trial, Respondent presented evidence from the child's treating therapist, _____, including **therapy session notes, progress summaries, and professional correspondence** describing the child's emotional health and stability in _____.
 - These materials were properly disclosed, marked, and admitted under **Rule 76**, *Arizona Rules of Family Law Procedure*.
 - The Court's final orders **failed to acknowledge or reference** any of this professional evidence, despite its direct relevance to **A.R.S. § 25-403(A)** best-interest factors.
 - Disregarding admitted professional testimony central to the child's welfare violated **Judicial Conduct Rules 1.2, 2.2, and 2.6**.
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VI. Improper Handling of Witness Testimony and Evidence

6. Failure to Rule on Motions to Exclude or Strike Evidence; Allowing Improper Witness Testimony

- Respondent's **Motion in Limine** (_____) and **Combined Motion** (_____) sought to strike improperly disclosed evidence and preclude untimely witnesses.
- Despite those pending motions, the Court permitted multiple procedural irregularities during trial, including:
 - Allowing a witness to **testify virtually** without any prior motion, stipulation, or authorization;

- Permitting that witness's **spouse to answer a question on his behalf** while under oath; and
 - Allowing another witness to **testify virtually on [redacted] while sitting beside her husband (the prior witness) and after observing the entire hearing**, in direct violation of **Rule 615, Arizona Rules of Evidence**.
 - These actions disregarded the exclusion rule, compromised the integrity of witness testimony, and violated **Rule 43(e), Arizona Rules of Family Law Procedure**.
 - Collectively, these deviations showed disregard for fair process and impartial adjudication, violating **Judicial Conduct Rules 1.1, 2.2, and 2.5**.
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VII. Unequal Allotment of Hearing Time and Denial of Fair Opportunity to Present Evidence

- During trial proceedings, Judge [redacted] **allowed Petitioner substantially more time to present testimony and evidence while denying Respondent the same or comparable allotment of time**, despite Respondent's request for equal presentation time.
 - No explanation or findings were made on the record to justify the disparity.
 - This conduct demonstrated unequal treatment of the parties, impaired Respondent's ability to present his case, and violated **Rule 22, Arizona Rules of Family Law Procedure**, as well as **Judicial Conduct Rules 2.2 and 2.6**.
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VIII. Improper Fee and Cost Allocations Demonstrating Bias

- Respondent's [redacted] **Motion to Dismiss and Rule 76 Pretrial Statement** both documented that Petitioner has failed to pay her court-ordered share of medical, dental, and vision support since [redacted], totaling more than [redacted] years of nonpayment in direct violation of the [redacted] **Decree**.
- Despite these documented and undisputed arrears, Judge [redacted] **Final Orders** compelled Respondent to:
 1. Pay Petitioner's filing fees of [redacted];
 2. Pay the entire cost of the child's **round-trip travel** between [redacted] and Arizona for winter break; and
 3. Pay or contribute toward the cost of the **court-appointed Best Interest Attorney (BIA)**.
- These rulings were entered **without findings** regarding Petitioner's continuing noncompliance, **without consideration** of the financial disparity between the parties, and in **direct contravention** of **A.R.S. § 25-324**(fees and cost allocation) and **A.R.S. § 25-403(A)** (best interests).

- This demonstrates a clear pattern of **judicial bias, arbitrary decision-making, and unequal application of the law**, consistent with the conduct described throughout this complaint.
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IX. Ethical Standards Implicated

- **Rule 1.1 – Compliance with the Law**
 - **Rule 1.2 – Promoting Confidence in the Judiciary**
 - **Rule 2.2 – Impartiality and Fairness**
 - **Rule 2.5 – Competence, Diligence, and Promptness**
 - **Rule 2.6 – Ensuring the Right to Be Heard**
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X. Relief Requested

I respectfully request that the Commission:

1. Investigate whether Judge _____ acted beyond his authority after reassignment;
 2. Determine whether his disregard of pending motions, evidentiary procedure, and admitted professional evidence constitutes misconduct or neglect of duty; and
 3. Take corrective or disciplinary action to preserve public confidence in the Arizona judiciary.
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XI. Supporting Exhibits

(Available upon request or attached)

- Administrative Order of Reassignment (_____)
 - Minute Entries and Orders (_____)
 - Filed Motions (_____)
 - Therapist letters and session notes from _____
 - **Trial transcripts (requested and pending availability from the _____ County Clerk of Court)**
 - Certificates of Service and docket history
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Respectfully submitted,

**THE COMMISSION'S POLICY IS
TO POST ONLY THE FIRST FIVE
PAGES OF ANY DISMISSED
COMPLAINT ON ITS WEBSITE.**

**FOR ACCESS TO THE
REMAINDER OF THE
COMPLAINT IN THIS MATTER,
PLEASE MAKE YOUR REQUEST
IN WRITING TO THE
COMMISSION ON JUDICIAL
CONDUCT AND REFERENCE
THE COMMISSION CASE
NUMBER IN YOUR REQUEST.**