

State of Arizona
COMMISSION ON JUDICIAL CONDUCT

Disposition of Complaint 25-597

Judge:

Complainant:

ORDER

April 7, 2026

The Complainant alleged a municipal court judge allowed opposing counsel to introduce intimate photographs in a protective order 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).

Copies of this order were distributed to all appropriate persons on April 7, 2026.

2025-597

COMPLAINT AGAINST A JUDGE

Name: Judge's Name:

Instructions: Use this form or plain paper of the same size to file a complaint. Describe in your own words what you believe the judge did that constitutes judicial misconduct. Be specific and list all of the names, dates, times, and places that will help the commission understand your concerns. Additional pages may be attached along with copies (not originals) of relevant court documents. Please complete one side of the paper only, and keep a copy of the complaint for your records.

On _____, at _____, I appeared for an Order of Protection hearing before Judge _____ at the _____ Municipal Court (Case No. _____). I was the Respondent in the matter.

During the hearing, the Petitioner's attorney submitted a binder of evidence that included two intimate photos of me and one screenshot showing partial intimate content taken from a private recording. These images were personal, private, and unrelated to the legal issues being decided. They were not necessary to establish any element of the Petitioner's case, as the binder contained numerous other text message screenshots that did not involve intimate material.

Despite the extremely sensitive nature of these images, Judge _____ permitted them to be submitted, viewed, and discussed in open court. None of these images were blurred, redacted, or handled as sensitive evidence. I had no prior notice that these private images would be presented, and I was never given the opportunity to object before they were shown.

The Petitioner's attorney also referred to one of the photos as " _____," which increased my embarrassment. Judge _____ did not intervene, did not question the relevance of the intimate content, and did not take steps to protect my privacy or dignity in the courtroom. Court personnel were present, and I felt exposed and unprotected.

Allowing explicit or intimate images in the record — when not relevant and when other non-sensitive evidence was available — made me feel humiliated, exposed, and unprotected. Since the hearing, I have experienced significant emotional distress, including panic attacks, anxiety, and difficulty sleeping. Knowing that these images may now be retained in the case file has caused ongoing fear and humiliation. I feel that my dignity was not safeguarded during the hearing, and that deeply private content was handled without appropriate judicial oversight.

I believe Judge _____ failed to ensure that evidence was relevant and necessary, safeguard my privacy and dignity as a litigant, and manage the presentation of highly sensitive material in a way consistent with judicial decorum and professionalism.

For these reasons, I am submitting this complaint regarding Judge _____ conduct and her handling of sensitive evidence during my hearing.

CONFIDENTIAL

Arizona Commission on Judicial Conduct
1501 W. Washington Street, Suite 229
Phoenix, Arizona 85007

FOR OFFICE USE ONLY

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