State of Michigan

Judicial Tenure Commission

Annual Report 2025

Judicial Tenure Commission
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HON. THOMAS C. CAMERON
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HON. BRIAN R. SULLIVAN
SECRETARY

HON. MONTE J. BURMEISTER
DR. MAXINE HANKINS CAIN
HON. PABLO CORTES
SIHAM AWADA JAAFAR
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Judicial Tenure Commission

June 30, 2026

Honorable Justices of the Michigan Supreme Court
Honorable Gretchen Whitmer, Governor
Honorable Members of the Michigan Legislature
Honorable Judges

I am pleased to present the Commission's 2025 Annual Report. This report informs the public and all branches of state government about the Commission's duties, operations, and actions.

The Michigan Judicial Tenure Commission thanks the Legislature, Governor Whitmer and the Supreme Court for continuing to provide the Commission with resources it needs to ensure the judiciary is working for the people of the state. The Commission used those resources to continue to reduce the backlog of investigations that had accumulated during years when the Commission's workload exceeded the capacity of staff.

The Commission remains committed to fulfilling its responsibilities to the people of the State of Michigan. It thanks its staff for their hard work. We hope the vigilant and dedicated work of the Commission will promote the public's confidence in the integrity, independence, and fairness of the Michigan judiciary.

Very truly yours,

Thomas J. Ryan, Esq.
Chairperson
For the Commission

TABLE OF CONTENTS

2025 COMMISSIONERS iv

COMMISSIONER BIOGRAPHIES vi

I. COMMISSION COMPOSITION & SCOPE OF AUTHORITY 1

A. COMPOSITION OF THE COMMISSION 1

B. LEGAL AUTHORITY 1

1. Michigan Constitution 1

2. Michigan Court Rules 1

3. Code of Judicial Conduct 2

C. PERSONS WITHIN COMMISSION JURISDICTION 2

D. WHAT THE COMMISSION CANNOT DO 2

E. WHAT THE COMMISSION CAN DO 2

II. OVERVIEW OF THE COMPLAINT PROCESS 3

A. HOW MATTERS COME BEFORE THE COMMISSION 3

B. COMMISSION REVIEW OF REQUESTS FOR INVESTIGATION 3

C. ACTION THE COMMISSION CAN TAKE 4

1. Confidential Dispositions 4

2. Public Dispositions 4

a. The Complaint 4

b. Hearing 5

c. Proceedings Following Hearing by Neutral 5

d. Disposition by Commission 6

e. Supreme Court Review 6

D. CONFIDENTIALITY OF COMMISSION PROCEEDINGS 6

III. 2025 FACTS & FIGURES 7

A. COMPLAINTS RECEIVED AND INVESTIGATED 7

B. GRIEVANCE DISPOSITIONS 8

1. Closed without Action 8

2. Closed with Private Action 8

3. Public Action 8

C. ANALYSIS OF GRIEVANCES CONSIDERED IN 2025 10

1. Sources of Requests for Investigation 10

2. Subject Matter of Grievances 11

3. Nature of Underlying Litigation 12

4. Positions of Respondents 13

5. Summary of Resolutions 14

IV. RACIAL EQUITY ANALYSIS 15

V. CASE SUMMARIES 16

A. PUBLIC PROCEEDINGS AND RESOLUTIONS 16

FC No. 105, Hon. Demetria Brue – 36th District Court (Detroit) 16
FC No. 106, Hon. Debra Nance – 46th District Court (Southfield) 16
FC No. 107, Hon. Bradley Knoll – 58th District Court (Holland) 17
FC No. 108, Hon. Jospeh Slaven -- 23rd District Court (Taylor) 17
FC No. 109, Hon. Kirsten Nielsen Hartig – 52-4 District Court (Troy) 18
FC No. 110, Hon. Thomas J. Wilson – 4th Circuit Court (Jackson) 18
FC No. 111, Hon. Kenneth King – 36th District Court (Detroit) 19
B. NON-PUBLIC PROCEEDINGS 20
1. Conduct on the Bench 20
a. Failure to be Faithful to the Law & Demeanor **20**
b. Appearance of bias **21**
c. Ex parte communication **21**
d. Delay **21**
e. Administrative issues resulting in delay **22**
f. Conflict of interest **23**
g. Appearance of impropriety **23**
2. Conduct off the Bench 23
a. Failing to observe the law **23**
b. Lack of courtesy and respect **24**
c. Campaign violations **24**
e. Other **24**
VI. COMMISSION ORGANIZATION, STAFF AND BUDGET 25
A. COMMISSION ORGANIZATION AND STAFF 25
B. BUDGET 26
VII. CONCLUSION 26

2025 COMMISSIONERS

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Elected by State Bar membership

Hon. Thomas C. Cameron
Vice-Chair
Court of Appeals
3020 W. Grand Blvd. Suite 14-300
Term expires 12/31/27
Elected by Court of Appeals judges

Hon. Brian R. Sullivan, Secretary
Third Circuit Court
2 Woodward Avenue, Room 1101
Detroit, MI 48226
Term expires 12/31/27
Elected by State Bar membership

Hon. Monte J. Burmeister
Crawford County Probate Court
200 W. Michigan Avenue
Grayling, MI 49738
Term expires 12/31/26
Elected by Probate judges

Dr. Maxine Hankins Cain
3034 W. Grand Blvd., Suite 8-350
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Term expires 12/31/26
Appointed by Governor Gretchen Whitmer

Hon. Pablo Cortes
62A District Court
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Grand Rapids, MI 49509
Term expires 12/31/28
Elected by District Court judges

Dawn N. Ison, Esq.
-As of July 21, 2025
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Siham Awada Jaafar
3034 W Grand Blvd Suite 8-350
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Appointed by Governor Gretchen Whitmer

Hon. Qiana Denise Lillard
Third Circuit Court
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Elected by Circuit Court judges

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Through May 6, 2025
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Elected by State Bar membership

JUDICIAL TENURE COMMISSION 2025



LEFT TO RIGHT: Hon. Monte J. Burmeister; Hon. Brian R. Sullivan, Secretary; Hon. Qiana Lillard; Interim Director Glenn Page; Siham Awada Jaafar; Hon. Thomas C. Cameron, Vice-Chairperson; Thomas J. Ryan, Esq., Chairperson; Maxine Hankins Cain; Dawn Ison, Esq. Hon. Pablo Cortes

NOTE: The photograph above was taken in 2026 and does not include former Executive Director Lynn Helland and Deputy Director Kevin Hirsch. Glenn Page, who is pictured above, was named Interim Executive Director in February 2026. The Commissioners above are the same as of December 2025.

2025 COMMISSIONER BIOGRAPHIES

James W. Burdick, Esq., specializes in complex criminal litigation and health care licensing, discipline and reinstatement. In addition to his practice, he has been appointed by the federal court to chair, and to be a member of, federal panels evaluating applicants for the position of United States Magistrate Judge, and for sitting Magistrate Judges applying for renewal of their tenure. He has chaired an Attorney Grievance panel since the 1980s, hearing and deciding a multitude of complaints. He has represented clients throughout state and federal courts. Upon earning his Juris Doctorate at University of Michigan Law School, he was recruited by the Wayne County Prosecutor's Office, where he tried dozens of felony cases of all types. During his career in private practice, he has represented hundreds of individuals in criminal investigations, prosecutions and health care licensing discipline matters. For seven years he was an active member of the Michigan Board of Medicine.

Commissioner Burdick resigned from the Commission effective May 6, 2025. The Commission thanks Mr. Burdick for over seven years of diligent service, including as Vice-Chairperson.

Hon. Monte J. Burmeister is the probate judge for Crawford County, Michigan. He was elected to the probate bench in 2006 and was reelected in 2012, 2018, and 2024. Judge Burmeister was in private practice prior to taking the bench and operated his own law firm from 1999 through 2006. He graduated with a Bachelor of Arts from James Madison College at Michigan State University, with honors, in 1990, and received his Juris Doctor from Wayne State University Law School in 1993. Judge Burmeister is the past President of the Michigan Probate Judges Association. He began his tenure with the Commission in 2013. In 2018 Judge Burmeister served as the Commission's Vice-Chairperson and in 2019 and 2020 he served as the Commission's Chairperson.

Hon. Thomas C. Cameron was appointed to the Michigan Court of Appeals in 2017 and previously served as a judge on the Wayne County Circuit Court bench from 2014 until his appointment to the Court of Appeals.

Previously, Judge Cameron worked for the Michigan Department of Attorney General, where he managed several large civil and criminal divisions for the Attorney General, including the Civil Rights Division, Corrections Division, Criminal Division, Alcohol and Gambling Division, and several other divisions. Before serving as a senior manager, he litigated high-profile public corruption and cold case homicides for the Attorney General's Office.

Judge Cameron serves on several commissions, boards, and associations, including the Michigan Judicial Tenure Commission, the Michigan Judges Association, and the Michigan Chapter of the Federalist Society. He is a former board member of the Michigan Domestic and Sexual Violence Prevention and Treatment Board and the former

Chairman of the Michigan Commission on Law Enforcement Standards. He also serves as an adjunct professor and teaches constitutional law and criminal law and procedure.

Judge Cameron is currently the Vice Chairperson of the Commission.

Dr. Maxine Hankins Cain is the child of former sharecroppers who stressed the importance of education and being of service to the community.

Maxine received her undergraduate degree in elementary education from Norfolk State University in 1968; a master's degree in reading from the University of Michigan in 1977; administrative certification courses from Michigan State University in 1993; and her doctoral degree in in K-12 Educational Administration from Union Institute and University in 2011.

Maxine began her professional career in 1968 as a primary teacher with the Detroit Public Schools. She has since served as an educational resource specialist; a principal in Lansing and Detroit; the Director of Elementary Education for the Lansing District; and the Superintendent of Sankofa Shule Public School Academy in Lansing.

Maxine has often spoken to local and national business and educational organizations about strategies that strengthen self-esteem, diversity and inclusion, empowering people to improve, and teaching our youth and adults.

Maxine is the recipient of the Sojourner Truth Award (Greater Lansing Area Negro Business and Professional Women's Club, Inc.), Multi-Cultural Award (Michigan Education Association), NAACP Membership Award (Lansing Chapter), Chairperson Awards (YMCA), the Whitney Young Award (Boy Scouts of America), and the Sister Cities International Volunteer of the Year Award (2018), to mention a few.

Maxine is the President of the Lansing Regional Sister Cities Commission, a very active volunteer with AARP, a Diamond member of the NAACP, a member of Delta Sigma Theta Sorority, the National and Detroit Chapters of the Association of Black Storytellers (portraying Harried Taubman and Fannie Lou Hamer), and a Certified Laughter facilitator with World Laughter, Inc. She uses these platforms to emphasize the importance of education, the power of one to make a difference, and the importance of giving back to the community.

Hon. Pablo Cortes is chief district court judge in the city of Wyoming, Kent County. He was appointed to his seat in 2005 and subsequently elected in 2006, 2008, 2014, and 2020. From 1995 until taking the bench, Judge Cortes served as an assistant prosecuting attorney for Kent County. Judge Cortes graduated from the University of Michigan in Ann Arbor with honors in 1989 and from Wayne State University Law School in Detroit in 1995. He was elected to the Commission in 2010. Aside from his service on the Commission and various community groups, Judge Cortes serves on the board of the

Michigan District Court Judges Association and its legislative committee. He has served as an adjunct professor at the Grand Rapids Community College Police Academy and as an adjunct professor at the Thomas M. Cooley Law School in Grand Rapids. Judge Cortes served as the Commission's Secretary in 2013 and 2014. He served as the Commission's Vice-Chairperson in 2015 and 2016, and the Commission's Chairperson in 2017 and 2018.

Dawn N. Ison is a results-driven, forward thinking, strategic leader whose vision and execution have resulted in significant positive outcomes for the Eastern District of Michigan community. She is also an experienced, highly skilled litigator with extensive defense and prosecution trial experience and over 30 years of litigation experience at the federal, state, and local level. Ms. Ison is a daughter of Detroit; a product of Detroit Public Schools; and a proud graduate of Spelman College and Wayne State University Law School.

Early in her career, Ms. Ison spent 12 years as a criminal defense attorney. For 19 years, she served with pride as an Assistant United States Attorney at the U.S. Attorney's for the Eastern District of Michigan. She was assigned to the Public Corruption Unit where she directed investigations and prosecuted public corruption by public officials. Before joining the Public Corruption Unit, Ms. Ison prosecuted drug trafficking offenses at the highest level in the office's Drug Task Force Unit. Ms. Ison formerly served as the Chief of that unit, which is the largest unit in the U.S. Attorney's Office. While an Assistant United States Attorney, Ms. Ison also served as the U.S. Attorney's Office's District Election Officer for 7 years and represented the office in the federal court's alternative to prison program.

On November 12, 2021, Ms. Ison was nominated by President Joseph R. Biden to serve as United States Attorney for the Eastern District of Michigan, and she was confirmed by the Senate on December 14, 2021. Ms. Ison was sworn in as the chief federal law enforcement officer for the District on December 21, 2021, and served as the U.S. Attorney until January 19, 2025. Over the course of her career, Ms. Ison's leadership skills have been further recognized with her past elections as President of the Recorder's Court Bar Association; Vice President of the Women Lawyers Association, Wayne region, and Vice Chair of the National Conference of Black Lawyers, respectively. Ms. Ison has also received numerous awards and her work has been recognized by many, including but not limited to, the following:

- Spirit of Detroit Award: 2025 recipient of Spirit of Detroit Award for historic accomplishments, unwavering commitment, and dedication to the city, region, and nation.

- City of Detroit Proclamation: 2025 recipient of City of Detroit proclamation recognizing service to community, the City of Detroit and the Eastern District of Michigan.

- County of Wayne Resolution: 2025 recipient of Wayne County Proclamation for outstanding service and leadership, dedication to justice and public service, and relentless efforts to create safer and more equitable community for all.

- Leadership in Inclusion Award: 2024 recipient of America's Community Council's Leadership in Inclusion Award.

- Trailblazers Award: 2024 recipient of D. Augustus Straker Bar Association's Trailblazers Award.

- Power 50 Leaders in Southeastern Michigan: Recognized as Michigan Chronicle's 2024 Power 50 Leaders.

- Women Who Lead Award: 2022 Honoree of WJR's Women Who Lead Award.

- 2022 Newsmaker of the Year: Recognized as one of Crain's Newsmakers of the year.

- Presidential Leadership Award: 2022 recipient of National Organization of Black Law Enforcement Executives (NOBLE) Presidential Leadership Award.

- Vanguard Award: 2022 recipient of Michigan Chronicle's Women of Excellence Vanguard Award.

- U.S. Attorney Award: 2019 recipient of U.S. Attorney's Outstanding Service Award.

- U.S. Department of Homeland Security Award: 2018 recipient of Inspector General Award for Excellence.

- U.S. Attorney's Award: 2016 recipient of U.S. Attorney's Superior Performance by a Litigation Team Award.

- U.S. Attorney's Award: 2010 recipient of U.S. Attorney's Outstanding Service Award.

- U.S. Department of Justice Award: 2009 recipient of National Organized Crime and Drug Task Force (OCDETF) Outstanding Investigation Operation Award.

- U.S. Department of Justice Award: 2007 recipient of National Organized Crime and Drug Task Force (OCDETF) Outstanding Asset Forfeiture Case Award.

Siham Awada Jaafar is a nationally recognized diversity and inclusion leader, mediator, and public relations specialist. She currently serves on the Michigan Judicial Tenure Commission, having been appointed by Governor Gretchen Whitmer in 2020 and reappointed in 2026, and also serves on the Michigan Supreme Court's Commission for

Fairness and Trust in the Judiciary. In 2025, she was appointed to the Wayne County Board of Ethics Commission by Wayne County Prosecutor Kym Worthy.

Ms. Jaafar served as a board member of the Wayne County Dispute Resolution Center for 14 years and its President for 8 years. As President and CEO of 3D Consulting and Communications, Ms. Jaafar delivers customized cultural competency and equity training for corporations, government agencies, law enforcement, healthcare organizations, and educational institutions. She is the founder and producer of the nationally acclaimed *Images and Perceptions Diversity Conference*, established in 2002, with events held in Detroit and Chicago with a focus on equity and fairness.

Ms. Jaafar has served on numerous civic and nonprofit boards and has been recognized by various organizations including NAWBO, Corp Magazine, HOUR Magazine as "Detroit's Bridge Builder of the Year", the Bernstein Foundation, City of Dearborn Heights, Wayne County Commission, and the State of Illinois. Deeply committed to bridge-building, mentorship, and equity, she has spent decades advancing dialogue, leadership, and opportunity across diverse communities.

Hon. Qiana Denise Lillard was born and raised in the city of Detroit and was appointed by Governor Snyder to the 3rd Circuit court in 2013. She began her tenure in the Family-Juvenile Division, then spent 8 years in the Criminal Division and currently serves in the Civil Division.

A 1994 graduate of the Roeper School, Judge Lillard attended the University of Notre Dame where she earned a BA in English in 1998 and a Juris Doctorate in 2001. After law school, she began her career in the legal department of Detroit Edison and also worked as in-house counsel for Michigan Basic Property Insurance Association and AAA. Judge Lillard served as a specially assigned Wayne County Assistant Prosecuting Attorney in the areas of elder abuse, child abuse, domestic violence and the sexual assault team. She handled high-profile cases involving serial rapists, child homicides and police sexual misconduct.

Judge Lillard is a lifelong member of Fort Street Presbyterian Church in Detroit where she serves as an elder. She is a member of the Wolverine Bar Association, Chair of the Association of Black Judges of Michigan Ethics Committee, Secretary of the Michigan Judges Association and President of the Roeper Institute.

Thomas J. Ryan, Esq., is a member of the State Bar of Michigan, Oakland County Bar Association, and the American Bar Association. Mr. Ryan is a past president of the State Bar of Michigan, serving as its 66th president from September 2000 to September 2001. Mr. Ryan served on the Oakland County Bar Association's board of directors and was its president from 1993 to 1994. He received his undergraduate degree from the University of Notre Dame and his law degree from the University of Detroit Mercy. Mr. Ryan has

been in the private practice of law since January 1977, and is the attorney for the Village of Beverly Hills and the City of the Village of Clarkston. Mr. Ryan has previously served as the Commission's Vice Chairperson and Chairperson, and became its chairperson again in October 2024.

Hon. Brian R. Sullivan was elected to the Wayne County Circuit Court in 1998. He served as presiding judge of the criminal division in 2004 and as the presiding judge of the Wayne County Business Court for about 7 years. Judge Sullivan was a member of the Criminal Jury Instruction Committee for about 12 years and the Model Civil Jury Instruction committee for eleven years (each at the appointment of the Michigan Supreme Court).

Judge Sullivan was an adjunct law school instructor for 10 years. He is a member of the Michigan Board of Law Examiners. Before taking the bench, Judge Sullivan was an assistant prosecuting attorney and in private practice for about 15 years. He also ran a free legal clinic in downtown Detroit at Most Holy Trinity Church for 20 years. Judge Sullivan was elected to the Judicial Tenure Commission beginning January 1, 2019. Judge Sullivan serves as the Secretary of the Commission.

I. COMMISSION COMPOSITION & SCOPE OF AUTHORITY

The Judicial Tenure Commission is an independent, constitutionally created, state agency. Its purpose is to enforce high standards of ethical conduct for judges.[1] The Commission recognizes that judges must be free to act independently and in good faith to fairly resolve the merits of each case over which they preside. At the same time, an effective disciplinary system must hold judges accountable for misconduct.

The judicial discipline system simultaneously protects the public from unethical judicial conduct, preserves the institutional integrity of the judiciary, and prevents unsubstantiated complaints from interfering with the important work judges do. To those ends, the Commission investigates allegations of judicial misconduct and disability, conducts hearings as appropriate, recommends sanctions to the Michigan Supreme Court, and otherwise works to enhance the integrity of the judiciary.

A. Composition of the Commission

The Commission consists of five judges, two attorneys, and two lay persons. All commissioners serve three-year terms, staggered such that three positions are filled each year. The lay commissioners are appointed by the governor. The lawyers are elected by the members of the State Bar of Michigan. Four of the judges are elected by the court on which they serve (Probate, District Court, Circuit Court, Court of Appeals), while one judge is elected at large by the members of the State Bar of Michigan.

B. Legal Authority

1. Michigan Constitution

The Judicial Tenure Commission was established by a 1968 amendment to the Michigan Constitution. The Commission's authority is set forth in Article 6, section 30 of the Constitution, which is on the Commission's website (jtc.courts.mi.gov).

2. Michigan Court Rules

The Constitution instructs the Michigan Supreme Court to make rules to govern judicial discipline. The Court created Chapter 9.200 of the Michigan Court Rules pursuant to that directive. The current rules are on the Commission's website (jtc.courts.mi.gov).

[1] In this report, a "judge" is any judicial officer within the Commission's jurisdiction, including active judges, retired judges who are available to sit by assignment, magistrates, and referees.

3. Code of Judicial Conduct

In 1974 the Michigan Supreme Court adopted the Michigan Code of Judicial Conduct to establish ethical standards for judges. The Commission enforces the Code, often referred to as the "canons." The current canons are on the Commission's website (jtc.courts.mi.gov).

C. Persons within Commission Jurisdiction

The Commission has jurisdiction over all state "judges" as defined in footnote 1. In 2025 there were 1,241 active judges in Michigan.[2]

The Commission does not have jurisdiction over judicial candidates before they are elected; federal judges; or administrative law hearing officers such as workers compensation magistrates, department of corrections hearing officials, and the like. The Commission obtains jurisdiction over the conduct of judicial candidates if and when those candidates become judges.

D. What the Commission Cannot Do

The Commission is not an appellate court. The Commission cannot change a judge's decision. If a court makes an incorrect decision or misapplies the law, that ruling can be changed only in court, typically through the appellate process.

The Commission also cannot remove a judge from a case or have a matter transferred to another judge. Nor can the Commission provide legal assistance to individuals or intervene in litigation on behalf of a party.

E. What the Commission Can Do

The Commission's authority is limited to investigating alleged judicial disability or ethical misconduct, and, if warranted, recommending that the Michigan Supreme Court impose discipline. Judicial misconduct usually involves conduct in conflict with the Code of Judicial Conduct. Examples of judicial misconduct include inappropriate demeanor (such as bullying or disrespect); improper communication with fewer than all of the parties in a case; failure to disqualify in cases in which the judge has or appears to have a financial or personal interest in the outcome; delay or dereliction in performing judicial duties; and flagrant failure to follow the law. Judicial misconduct may also involve improper off-the-bench activities, including committing a crime (such as driving under the influence or misappropriating public money) or making false statements. The public discipline the Commission can recommend includes public censure, suspension with or without pay, and removal. When appropriate, the Commission can also address judicial misconduct privately, through a letter of caution or admonition.

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[2] The Commission also has jurisdiction over former judges, if a request for investigation is filed while that judge is still in office or relates to the former judge's tenure. However, the Michigan Constitution does not authorize any sanction, other than public censure, that is applicable to a judge who is no longer active. For that reason, the Commission generally will not investigate retired judges who are not sitting as visiting judges.

II. OVERVIEW OF THE COMPLAINT PROCESS

A. How Matters Come Before the Commission

The Commission usually begins an investigation based on a "request for investigation" (or "grievance"). Anyone may use the Commission's complaint form to file a grievance against a judge. The form is on the Commission's website (jtc.courts.mi.gov) or may be obtained in hard copy by contacting the Commission office. The court rules require that the person filing the grievance ("the grievant") get his or her signature notarized to establish that he or she has sworn that the statements made in the grievance are true.

The Commission may also begin an investigation on its own. For example, though the Commission rarely considers complaints made anonymously, it may do so in its discretion. It may also open a file into matters it learns of in other ways, such as news articles or information received in the course of another Commission investigation. The Commission may also begin an investigation at the request of the State Court Administrator or the chief justice of the Michigan Supreme Court.

B. Commission Review of Requests for Investigation

Each properly signed and notarized grievance about a Michigan judge is carefully reviewed by the staff. To do its initial review the staff may review the court file to the extent it is available online. The staff requests from the grievant or grievant's attorney any additional information needed to do a preliminary evaluation of the grievance. The staff may not investigate beyond that unless the Commission so authorizes.

After assessing the initial information, the staff prepares a report for the Commission that recommends a course of action. For every grievance, the Commission determines either a) the information provided by the grievant and obtained by the staff does not suggest the judge committed misconduct, and therefore the grievance should not be pursued, or b) there is sufficient evidence of misconduct to warrant further investigation.

If the initial investigation shows the judge did not commit misconduct, the Commission closes the grievance without contacting the judge. The judge is given a copy of the grievance when the Commission closes the case, unless the Commission determines otherwise for good cause.

When the Commission determines that a grievance warrants further investigation, it directs the staff to investigate and also approves the scope of the investigation. Commission investigations may include interviewing witnesses; obtaining court records and other documents; obtaining transcripts, audio, and video of court proceedings; obtaining a physical or mental examination of a judge; and such other investigation as needed. The staff reports to the Commission at the conclusion of the investigation.

If the investigation will be aided by obtaining the judge's comments, the Commission asks for comment on some or all of the evidence developed. The Commission then considers the judge's response together with all other information developed during the investigation.

C. Action the Commission Can Take

1. Confidential Dispositions

The Commission has several options after an investigation. If the allegations are found to be untrue or unprovable the Commission will usually close the case without action, though if the Commission determines that certain actions of the judge were problematic but fall short of misconduct, the Commission may dismiss with a letter explaining that to the judge.

Action the Commission Can Take

- Dismiss
- Dismiss with Explanation
- Dismiss with Caution
- Dismiss with Admonition
- Recommend Private/Public Censure, Suspension, or Removal to Supreme Court

If the Commission determines that improper conduct occurred but was relatively minor, the Commission may dismiss with a private letter of caution. A letter of caution advises the judge of the ethical concerns raised by the conduct and warns that the judge should not repeat it.

When the investigation reveals misconduct that is more clearly established or more serious but does not rise to the level that public sanction is appropriate, the Commission may dismiss with a private admonition. An admonition summarizes the Commission's findings about the improper conduct and admonishes the judge not to repeat it.

Explanations, cautions, and admonitions are letters of guidance or reproach that the Commission only sends after the judge has been asked to explain his or her position. These letters inform the judge so the conduct will not escalate or be repeated. Summaries of conduct that resulted in such letters issued in 2025 are contained in Section V.

Letters of explanation, caution, and admonition are confidential. The Commission informs grievants when a grievance has been dismissed, and in cases in which the dismissal includes some private action the Commission informs the grievant that action was taken, in a letter that cannot provide details (under the Michigan Court Rules). The strict confidentiality rules that govern judicial misconduct investigations ordinarily preclude the Commission and its staff from advising anyone, even the person who lodged the grievance, of the precise way the Commission resolved a grievance.

2. Public Dispositions

a. The Complaint

When misconduct is serious enough to warrant a public resolution, the Commission must send the judge what is known as a "28-day" letter pursuant to MCR 9.222 as a precursor to any formal action. The confidential 28-day letter informs the judge

of the charges the Commission anticipates bringing and gives the judge an opportunity to answer those charges. Unless the judge's answer persuades the Commission that public resolution is unwarranted, the Commission then issues a public complaint, which becomes the first public document in the investigation.

The complaint, the judge's answer to it, and all subsequent case filings are public documents. To the extent practicable, they are placed on the Commission's website (jtc.courts.mi.gov). All of the scheduled dates that follow are established by the Michigan Court Rules, but may be extended by the Commission at the request of parties.

After the Commission files the complaint, the judge is entitled to all documentary evidence in the Commission's possession that is to be introduced at the hearing on the complaint. The Commission must also give the judge the name and address of any person to be called as a witness and make available to the judge all exculpatory material in its possession.

The Commission may petition the Supreme Court for an interim order suspending a judge pending resolution of a complaint when interim suspension is necessary for the proper administration of justice. In extraordinary circumstances the Commission may make this request before a complaint is issued.

b. Hearing by Neutral[3]

After the Commission files a complaint, it petitions the Supreme Court to appoint a Neutral to conduct a hearing to take evidence concerning the complaint. Neutrals are typically, though not necessarily, retired Michigan judges. In recent cases, the Supreme Court, in the order naming the Neutral, also sets a period within which the hearing (but not post-hearing events) must be completed.

The judge against whom the Commission filed the complaint may be represented by counsel at the hearing and all related proceedings. The evidence in support of the charges is presented by "disciplinary counsel." "Disciplinary counsel" is typically one or more Commission staff attorneys. The Michigan Rules of Evidence apply to the hearing, which is conducted like a civil bench trial. The standard of proof in Commission proceedings is by a preponderance of the evidence.

c. Proceedings Following Hearing by Neutral

After the hearing concludes, the Neutral files a report with the Commission. The report includes a statement of the proceedings and the Neutral's findings of fact and conclusions of law with respect to the charges in the complaint and the judge's answer. Both the judge and disciplinary counsel may ask the Commission to accept or reject the Neutral's report in part or in whole and may have oral argument before the Commission.

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[3] The Michigan Supreme Court revised the Michigan Court Rules, effective January 1, 2026, to adopt the term "Neutral" in place of "Master." This report uses "Neutral" as it reflects the term adopted at this time.

d. Disposition by Commission

If the Commission determines there is insufficient evidence of misconduct to sustain the charges, it dismisses them. If, after receiving the Neutral's report and any written or oral argument, the Commission determines that one or more charges in the complaint have been proven, it typically issues a decision and recommendation to the Supreme Court. That decision and recommendation may recommend that the Supreme Court sanction the judge. The discipline the Commission may recommend is public censure, a suspension of any duration, involuntary retirement, or removal from office. The Commission has no authority to sanction a judge itself; the Michigan Constitution reserves that role for the Supreme Court.

e. Supreme Court Review

Within 21 days after issuing its decision and recommendation the Commission files the original record in the Supreme Court and serves a copy on the judge. Within 28 days after that the judge may file a petition in the Supreme Court to modify or reject the Commission's decision and recommendation. The Commission has 21 days to respond. Even if the judge does not file a petition, the Supreme Court independently reviews the Commission's decision and recommendation.

The judge and Commission both have an opportunity to present oral arguments to the Court. The Court reviews the evidence, then issues an opinion accepting, rejecting, or modifying the Commission's decision and recommendation. If the Court finds the judge committed misconduct, it sanctions the judge through censure, suspension, involuntary retirement, removal, or in the case of a consent sanction, such other disciplinary action to which the parties have agreed. The judge may file a motion for rehearing before the Court unless the Court directs otherwise in its opinion.

D. Confidentiality of Commission Proceedings

The Michigan Constitution directs the Supreme Court to provide for the confidentiality of complaints to, and investigations by, the Commission. Pursuant to this directive, Michigan Court Rule 9.261 provides that grievances and investigations are strictly confidential, subject to certain limited exceptions, unless and until the Commission issues a public complaint against the judge. Although confidential for most purposes, the grievance is typically provided to the judge during the course of the investigation. Further, as a practical matter, once the Commission begins to obtain documents or interview witnesses the fact of the investigation may become known even though the Commission treats it as confidential.

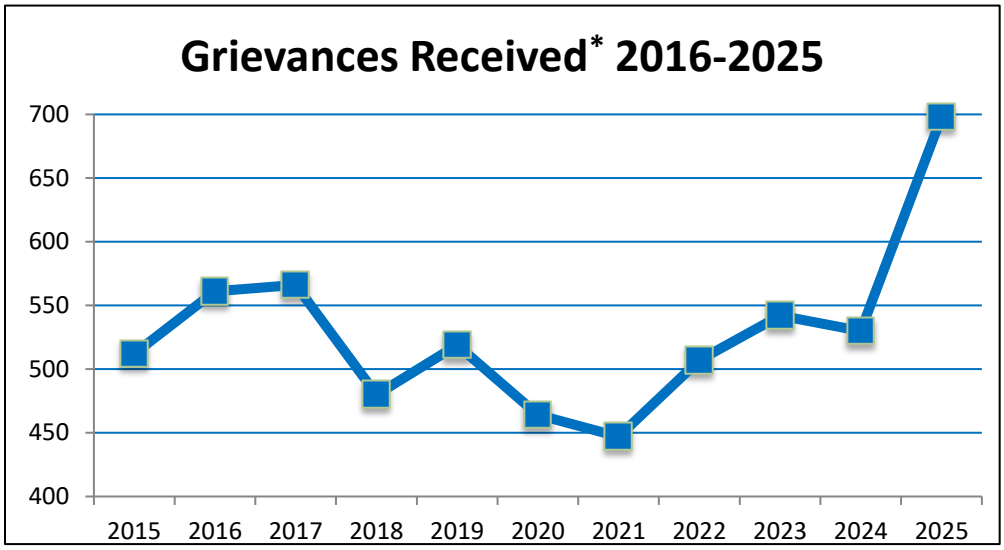
Once public proceedings are instituted, the complaint, answer, and all subsequent pleadings and proceedings are open to the public. The court rules also permit the Commission publicly to acknowledge an investigation before a complaint is issued if a majority of Commissioners determine it is in the public interest to do so. Even in such a case, the Commission's statement is limited to either (1) there is an investigation pending, or (2) the investigation is complete and there is insufficient evidence for the

Commission to file a complaint. The Commission very rarely determines that it is in the public interest to acknowledge an investigation prior to issuing a public complaint.

III. 2025 FACTS & FIGURES

A. Complaints Received and Investigated[4]

In 2025 there were 698 requests for investigation filed that complained about actions by a total of 401 judges.[5]



* "Grievances received" is the total number of complaints against judges, not the number of requests for investigation. For example, if a request for investigation alleges that two judges committed misconduct, this report counts that as two complaints against judges, since each complaint must be investigated separately.

The Commission received fewer grievances in 2020 and 2021 than it had in previous years; the drop may have been due in part to the pandemic. The number of grievances remained steady from 2022 through 2024, until a significant increase in 2025.[6] Though this period the number of grievances with merit (resulting in more extensive investigations) also increased.

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[4] The numbers below for filed cases, resolved cases, and other figures, may sometimes appear inconsistent for several reasons: a single request for investigation can name multiple judges or rest on multiple types of alleged misconduct; the Commission sometimes opens an investigation on its own, with no request for investigation having been filed; the Commission often addresses multiple requests for investigation regarding a judge in one public complaint, admonition, or other resolution; and based on the confidentiality restrictions relating to the Commission's investigations, some information relating to cases may not be disclosed.

[5] Some judges were named in multiple requests for investigation.

[6] Although the Commission has no definitive explanation for the large increase in grievance filings in 2025, it could be based on the comparatively large number of public complaints that were pending or initiated (totaling seven in 2025). The publicity associated with public proceedings often raises awareness of the Commission and its role of investigating judicial misconduct.

The grievances alleged a wide array of claims. A substantial percentage alleged legal error or expressed dissatisfaction with a judge's discretionary handling of judicial duties, neither of which is misconduct that is within the authority of the Commission.

The Commission also received grievances concerning individuals who did not come under the Commission's jurisdiction, such as federal judges, former judges, workers' compensation judges, other government officials and miscellaneous individuals. Commission staff responded to each of these complaints and, when appropriate, made referrals to the proper authority. Grievances concerning whom the Commission has no jurisdiction are not included in the total of grievances received.

B. Grievance Dispositions

In 2025 the Commission resolved 556 requests for investigation concerning 180 judges.

2025 CASELOAD	
Grievances pending on 1/1/2025	235
New grievances received in 2025	698
Grievances concluded in 2025	556
Grievances pending on 12/31/2025	354

1. Closed without Action

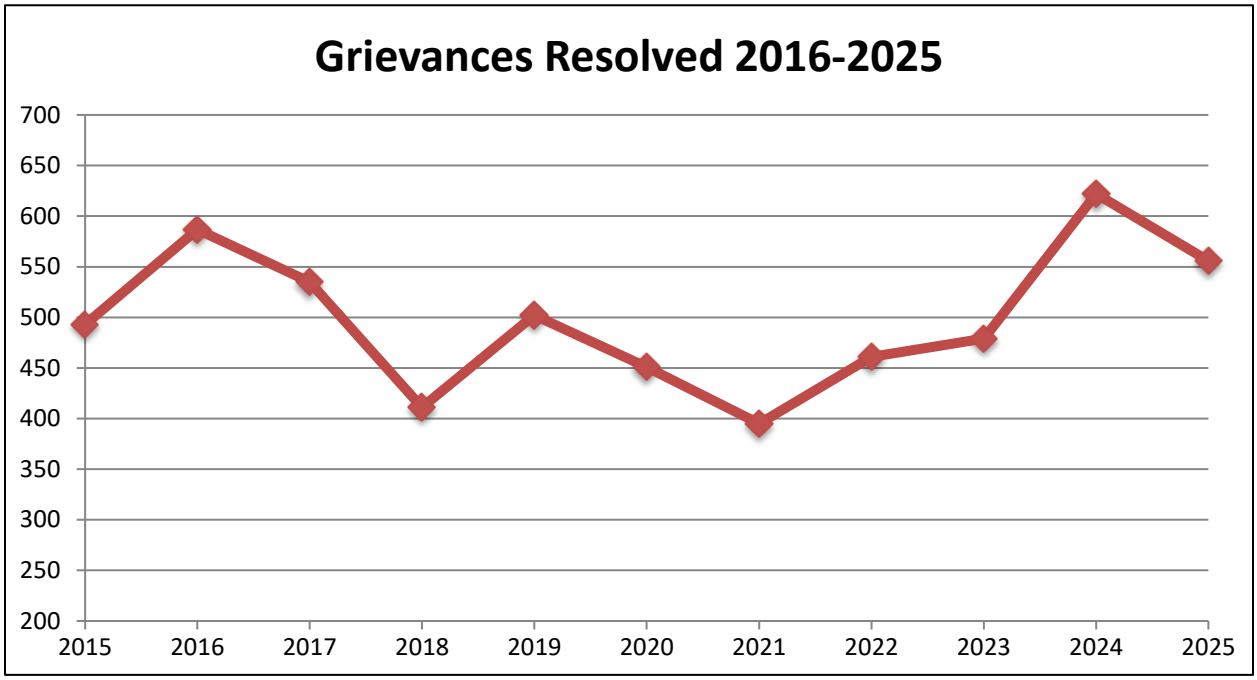
In 540 of the 556 grievances resolved in 2025, the evidence did not demonstrate misconduct after the information necessary to evaluate the grievance was obtained and reviewed. In other words, either these files alleged facts that would not constitute misconduct even if true, or investigation showed the allegations were unfounded or unprovable, or the judge gave an adequate explanation of the situation. In five of those dismissed grievances the judge either left office during the investigation, or the Commission addressed issues with the judge while dismissing the allegations (a "special dismissal").

2. Closed with Private Action

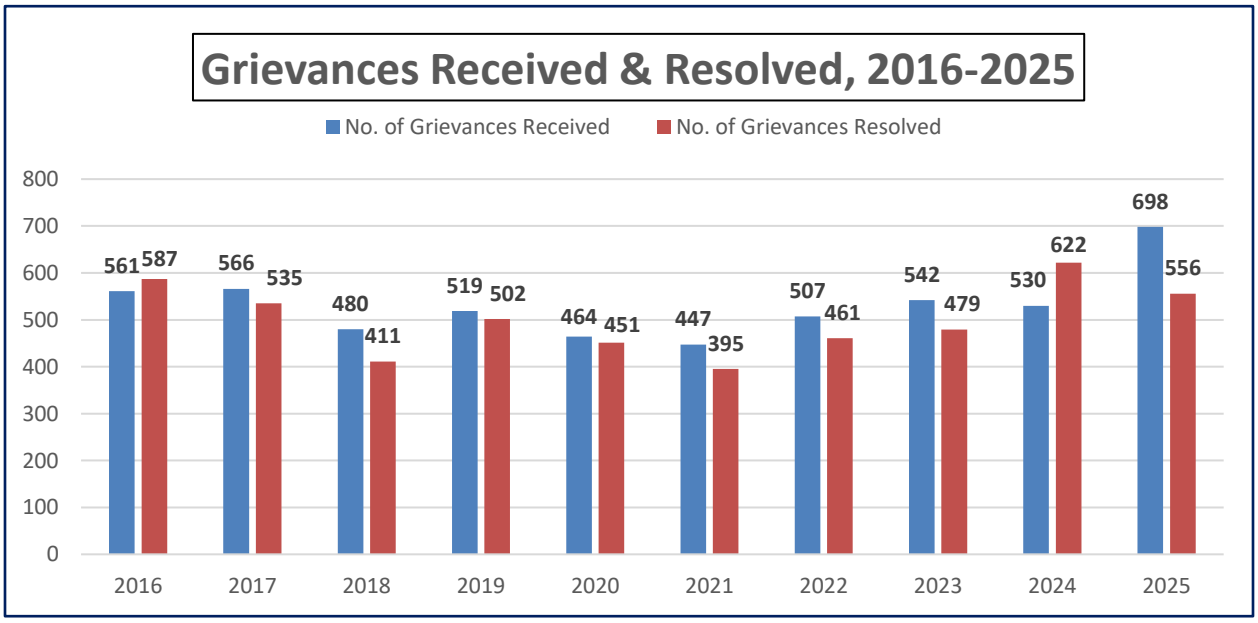
The Commission issued two admonitions, seven cautions, and five explanatory letters in 2025 that resolved a total of 14 requests for investigation. In addition, two other judges retired during investigations when it appeared there would be some resolution other than a straight dismissal of the allegations. These resolutions are summarized in Section V.

3. Public Action

The Commission filed five public complaints in 2025. There were two pending public complaints at the close of 2025 that were filed before 2023 but remained active. The public proceedings are summarized in Section V.



The number of grievances received by the Commission was fairly constant for more than the last decade, with the exception of drops in 2018 and 2021 and the significant increase in grievances filed in 2025. The number of grievances resolved has been impacted by an unexplained increase in the number of extensive investigations that began in 2017 and continues. That increase, coupled with limited staff resources, appreciably slowed the resolution of investigations from 2018 through 2025 and resulted in a backlog. In the last three budget sessions the legislature provided the Commission with funding to hire staff to reduce that backlog, which the Commission has done, and the staff continues to work on reducing the backlog of grievances.

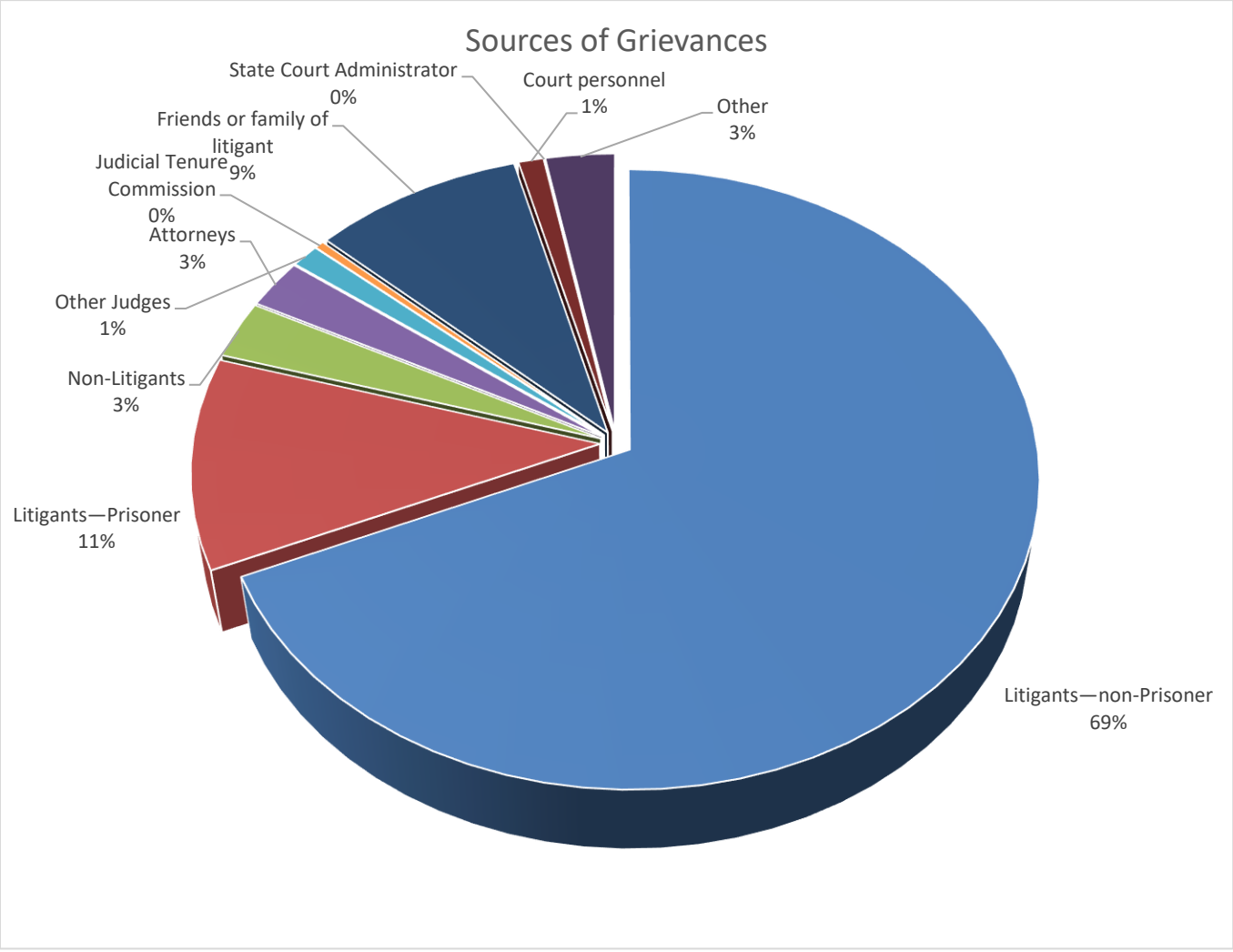


C. Analysis of Grievances Considered in 2025

The grievances received and resolved by the Commission derived from the following sources, covered the following subject matters, were lodged against the following types of judges, and were resolved as follows. The totals may not equal 698 grievances received (section IIIA) or 556 resolved (section IIIB), because some grievances allege more than one type of misconduct and some resolutions concern more than one grievance.

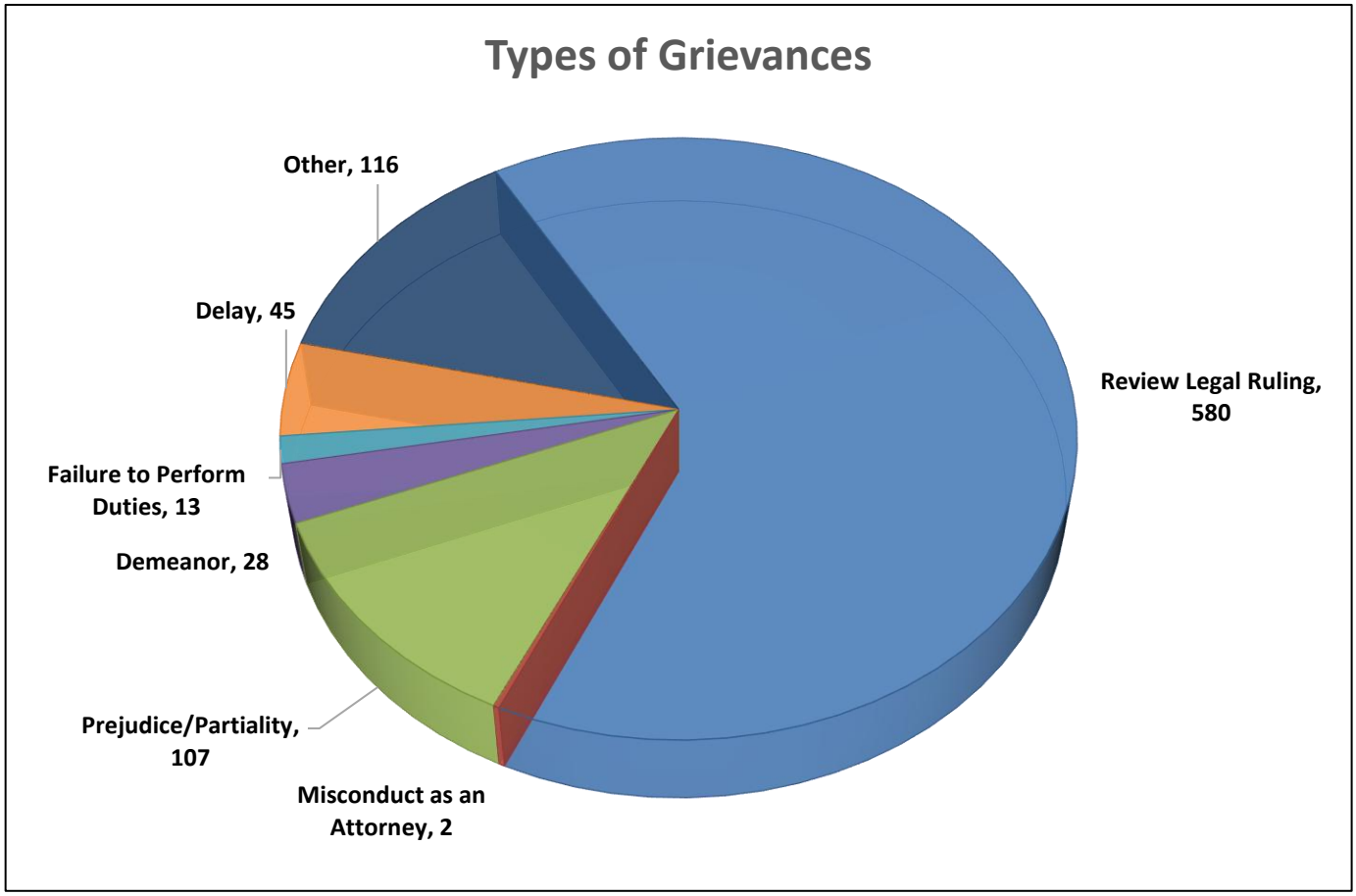
1. Sources of Requests for Investigation

Litigants, including prisoners, and acquaintances of litigants filed 91% of the total requests for investigation.



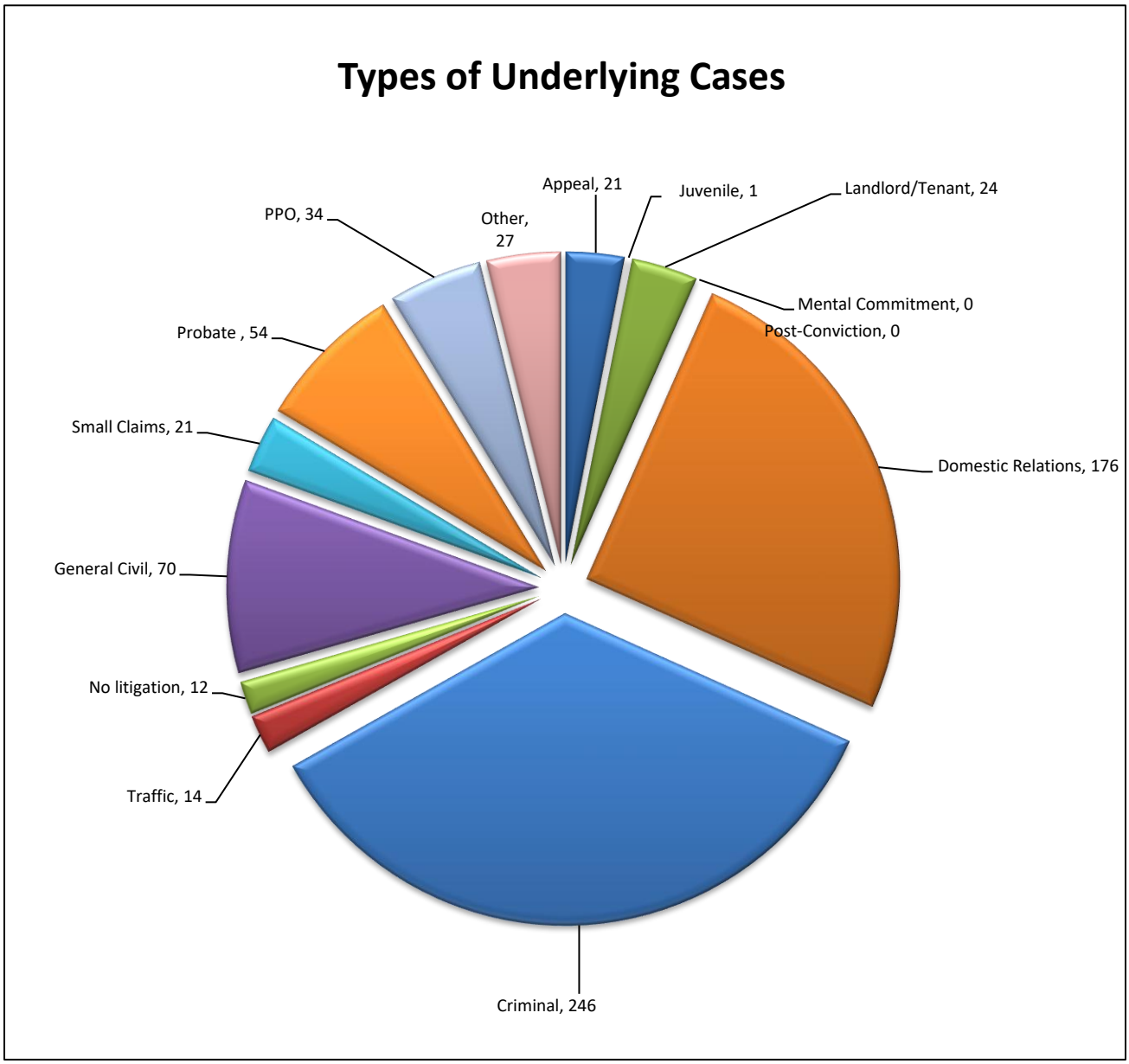
2. Subject Matter of Grievances

Over 80% of the 2025 requests for investigation sought to have the Commission review the merits of the underlying case. Since the Commission has no authority to act as an appellate court, those matters were dismissed unless they also included evidence of judicial misconduct. Another 16% alleged that the judge was biased, though often the only evidence of bias was that the grievants disagreed with the judge's rulings.



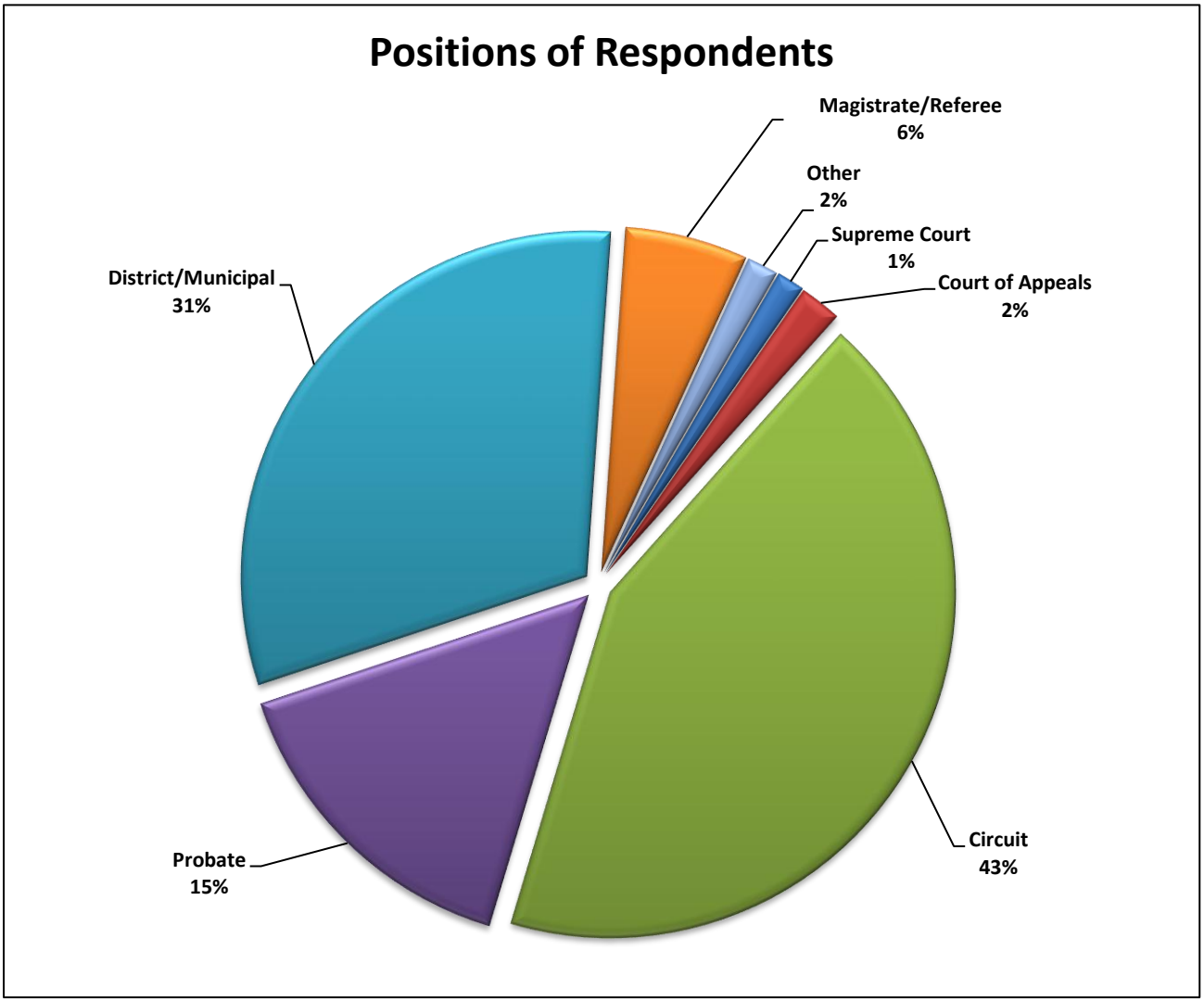
3. Nature of Underlying Litigation

Criminal cases, domestic relations matters, and general civil cases most commonly resulted in grievances in 2025. Those cases combined made up 70% of the 2025 requests for investigation. Probate cases resulted in another 8% of requests for investigation.



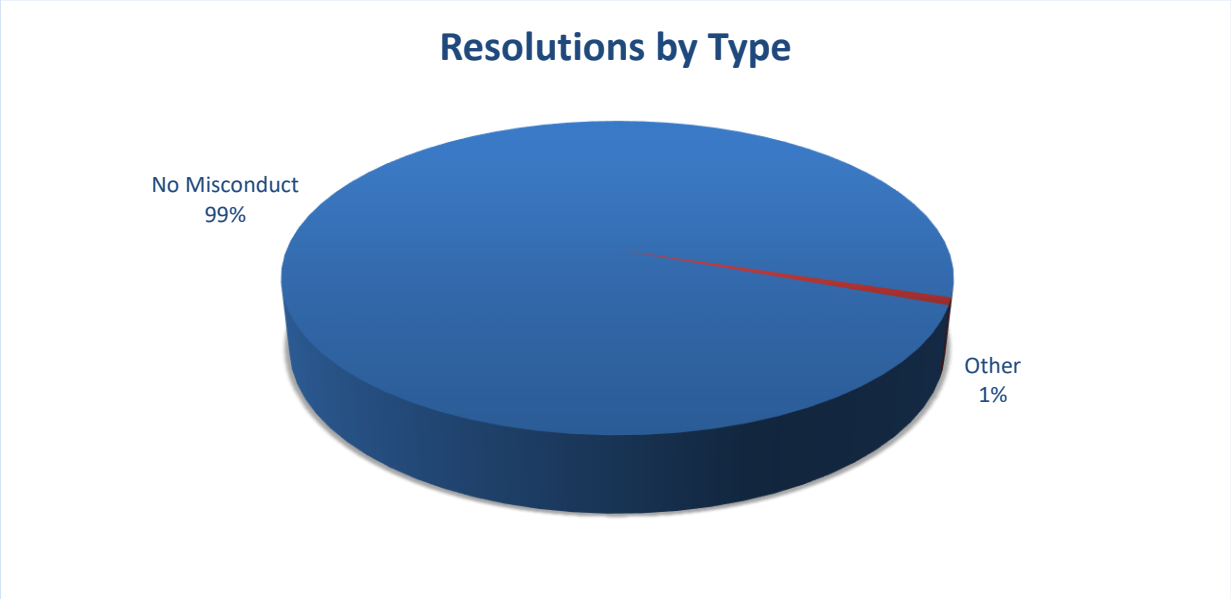
4. Positions of Respondents

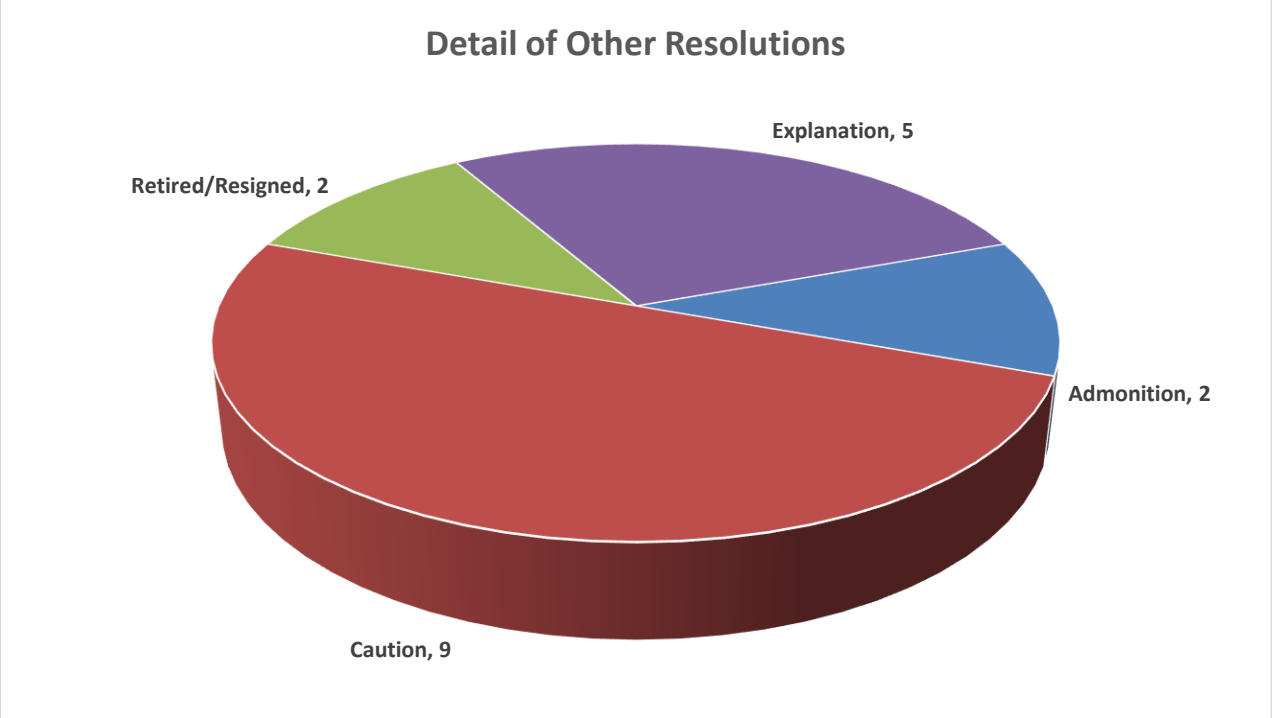
Circuit court judges, who comprise less than a fifth of the judiciary, were the subject of 43% of the grievances filed in 2025. This is most likely due to circuit judges handling so much of the criminal and domestic relations dockets, which together generated about 60% of the grievances. District court judges, who comprise about another fifth of the judiciary, were the subject of about 31% of the grievances filed. The category "Other" includes retired judges from all courts.



5. Summary of Resolutions

The Commission filed five public complaints in 2025, each of which remained pending at the end of 2025. The Commission resolved another 14 investigations (16 RFIs) through letters of explanation, caution or admonition in 2025. The remaining grievances were resolved by dismissal, including those against judges who resigned or retired while under investigation.





IV. RACIAL EQUITY ANALYSIS

In 2023 the Commission announced that it was seeking an independent review of the racial composition of the judges about whom the Commission receives complaints, and the Commission's disposition of those complaints, for the period 2008-2022. The Commission's decision was prompted by concerns raised by the Association of Black Judges of Michigan based on the racial composition of the public complaints issued by the Commission.

In early 2024, the National Center for State Courts (NCSC) contracted with the State Court Administrative Office and the Commission to perform a racial equity analysis of the Commission's process. The first phase of the assessment (Phase I) consisted of a statistical review of key decision points and outcomes in the grievance process to identify whether statistically significant racial disparities existed in the judicial discipline process.

The Commission released the NCSC's interim report in August 2024. The interim report found statistically significant racial disparities in three parts of the process. The interim report only identified the disparities; it did not determine their causes. The Commission announced that the NCSC would conduct a second phase (Phase II) to try to explain the possible causes of the disparities.

The NCSC issued Phase II of its analysis in August 2025. It included a quantitative analysis of JTC data as well as interviews of staff, Commissioners, judicial ethics practitioners, and a small number of judges who were involved in JTC investigations. The Phase II review included consideration of factors not evident in the raw data reported in Phase I. For instance, it considered whether some judges chose to retire during investigations rather than proceed to a public outcome if the judge had not left their position. The NCSC did not find a racial difference in public outcomes. Specifically, the NCSC found that grievances against Black respondents were more likely to end in a public outcome than a dismissal when compared to grievances against White respondents. This statistically significant disparity ceased to exist when the NCSC also considered the number of White judges who resigned their position before receiving an expected public sanction. In other words, the analysis revealed that when considering judges who retired during investigations, race was not significantly associated with the outcomes of investigations.

Phase II also identified one possible, unexplained statistically significant racial disparity depending on how one defines opening a "full investigation." The NCSC found that when a "full investigation" is defined broadly to include situations where the only Commission action is to request a court transcript, a statistically significant racial disparity was found. However, the report indicated that this statistically significant racial disparity ceased to exist when a "full investigation" did not include situations

where the Commission's sole act was ordering a court transcript to assess the grievant's allegation.[7]

Phase III of the of the analysis is underway and involves NCSC conducting a comprehensive analysis of judicial disciplinary processes to examine potential racial disparities in how Requests for Investigation are filed, processed, and resolved against Black judges compared to their White counterparts.

V. CASE SUMMARIES

A. Public Proceedings and Resolutions

FC No. 105, Hon. Demetria Brue – 36th District Court (Detroit)

The Commission issued a public complaint against Hon. Demetria Brue on November 23, 2022. The complaint alleges that while interacting with the proprietor of a bicycle rental business on Mackinac Island, Judge Brue abused her judicial position, falsely told the police that the proprietor assaulted her, did not answer questions raised by the Commission, and made false statements to the Commission about the incident and her actions. Judge Brue answered the complaint on December 21, 2022. FC 106, as to Judge Debra Nance as addressed below arises out of the same incident that led to the Commission authorizing this complaint.

In March 2023, the Michigan Supreme Court (MSC) appointed Hon. Alexander Lipsey to serve as Neutral.[8] The hearing took place over eight days between June 9 and July 1, 2025. The Neutral eventually issued a report to the Commission finding Judge Brue did not engage in misconduct. Disciplinary counsel filed objections to the report in December, and at the end of 2025 Judge Brue's reply to the Commission was pending.

FC No. 106, Hon. Debra Nance – 46th District Court (Southfield)

The Commission issued a public complaint against Hon. Debra Nance on December 14, 2022. The complaint alleges that Judge Nance accompanied Hon. Demetria Brue at the Mackinac Island bicycle rental business described in the summary of FC 105, and when questioned about the events at that business by the Commission Judge Nance knowingly made several false statements while under oath.

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[7] The Commission routinely authorizes obtaining a transcript or video recording when a grievant alleges that a judge exhibited poor demeanor. Those cases are often dismissed after the transcript or video is reviewed, without further investigation, because the allegations of poor demeanor are unfounded.

[8] The Michigan Supreme Court revised the Michigan Court Rules to replace the term "Neutral" with "neutral," effective January 1, 2026. Based on the effective date of the revision, this report uses the term "Neutral."

In March 2023, the Supreme Court appointed Hon. Alexander Lipsey to serve as Neutral. The hearing took place over six days between June 16 and July 1, 2025. The Neutral eventually issued a report to the Commission dated finding Judge Nance did not engage in misconduct. The matter was pending before the Commission at the end of 2025.

FC No. 107, Hon. Bradley Knoll – 58th District Court (Holland)

The Commission filed a public complaint against Hon. Bradley Knoll in April 2025 after Judge Knoll was charged with domestic violence arising out of an incident involving his spouse and grandson that occurred in December 2023. Judge Knoll entered a guilty plea to a charge of misdemeanor domestic assault under MCL 769.4a. After he successfully completed his probation, the trial court dismissed the charges without entry of a conviction under that statute. In addition to the domestic violence issue, the public complaint issued by the Commission charged Judge Knoll with disrespect to the police when he was arrested in relation to the incident.

The Michigan Supreme Court appointed Hon. Louise Alderson as the Neutral to hear the formal complaint. Judge Knoll filed an answer and a motion to seal the file. The public proceeding remained pending at the end of 2025.

FC No. 108, Hon. Jospeh Slaven -- 23rd District Court (Taylor)

The Commission filed a public complaint against Hon. Jospeh Slaven on May 28, 2025. In the complaint the Commission alleged that Judge Slaven:

- Made false statements to the local chief judge
- Improperly used his judicial position to support a candidate for judicial office
- Engaged in inappropriate demeanor and disrespect
- Sent disrespectful emails to local court officials
- Disregarded the law with respect to his obligation to wear a robe while presiding over cases
- Improperly concealed his face during Zoom court proceedings, contrary to court practices and the chief judge's order
- Engaged in disrespectful behavior toward a court security camera, where anyone monitoring the camera would be the recipient of Judge Slaven's disrespectful actions
- Interfered with the court staff's performance of their duties in accordance with Zoom proceedings
- Knowingly violated the law by driving with expired and obliterated license plates
- Made false statements to the Commission in the course of its investigation

Judge Slaven filed an answer denying most of the allegations and raising affirmative defenses. The Michigan Supreme Court appointed Hon. James Fisher as the Neutral to preside over the public proceedings. Over the course of the next few months, disciplinary counsel amended the complaint (to add counts that Judge Slaven made false statements regarding his judicial liability insurance and engaging in additional acts of disrespect to the chief judge and state court administrator).Neutral Judge Slaven resigned from judicial office the day before his public hearing, and he did not appear at the hearing. The Neutral, in accordance with MCR 9.233(B)(1), issued a report in December 2025, finding that Judge Slaven engaged in conduct in violation of the Code of Judicial Conduct.[9] Disciplinary counsel filed a brief in support of the Neutrals' report in mid-December, and as of the end of 2025 the public proceedings remained pending before the Commission.

FC No. 109, Hon. Kirsten Nielsen Hartig – 52-4 District Court (Troy)

The Commission filed a public complaint against Judge Hartig in June 2025. The complaint alleges that Judge Hartig:

- Improperly refused to provide her psychological evaluation, obtained at the request of the Commission, to the Commission
- Made false statements to the Commission during the course of its investigation
- Engaged in the mistreatment and abuse of court employees and other, thus interfering with the administration of the court
- Improperly dismissed criminal cases

The Michigan Supreme Court appointed Judge Jennifer Mazzuchi as the Neutral to preside over the formal proceedings. Judge Hartig filed an answer to the complaint denying the allegations. While the matter was pending before the Neutral, disciplinary counsel moved to amend the complaint to add a count based allegations that respondent was suffering from a mental disability that interferes with her ability to serve as a judge. The public proceedings remained pending at the end of 2025.

FC No. 110, Hon. Thomas J. Wilson – 4th Circuit Court (Jackson)

The Commission filed a public complaint against Judge Wilson on September 11, 2025. The complaint alleges that Judge Wilson:

- Engaged in the abuse of alcohol (including public intoxication) from between 2013 and 2015 through 2020 or 2021
- Failed to obtain a substance abuse assessment as asked by the Commission
- Engaged in sexual harassment of female employees

[9] As Judge Slaven did not agree to any conditions regarding his resignation, the public case is proceeding as he currently is eligible to run for judicial office in the future.

- Failed to disclose conflicts of interest with seven local attorneys who appeared before him after representing Judge Wilson and members of his family or maintaining business relationship with the judge
- Accepted the prohibited gift of legal services from attorneys
- Improperly interfered in four court cases including three involving himself or his relatives
- Engaged in the delay of decisions in court cases, including multiple cases involving personal protection orders
- Obstructed the reporting of delay to SCAO by ordering his staff not to code cases as taken under advisement in the court's computer system

The Michigan Supreme Court appointed Judge Peter Houk to preside over the public proceedings. Judge Wilson filed an answer where he admitted to a significant number of the allegations. As of the end of 2025 the public proceedings remained pending.

FC No. 111, Hon. Kenneth King – 36th District Court (Detroit)

The Commission filed a public complaint against Judge King in November 2025. Judge King filed an answer denying that he engaged in misconduct. The Michigan Supreme Court appointed a Neutral to preside over the public proceedings in December.

The complaint alleges misconduct based on Judge King's detaining and handcuffing a teenager who fell asleep in his courtroom while attending a school field trip in August 2024. In addition, the complaint addresses Judge King's holding a mock hearing regarding the teenager's conduct where the issue of whether she would be jailed for her conduct was put to a vote by her classmates. Judge King held the teenager in contempt, ordered her to wear a "prisoner" uniform and to be handcuffed, and threatened to jail her overnight. The complaint alleges Judge King committed misconduct as he was not faithful to the law on contempt, did not treat the teenager with patience, dignity, courtesy, and respect, and engaged in conduct that was prejudicial to the administration of justice and exposed the legal profession or the court to censure and reproach.

The complaint also alleges a second incident where Judge King improperly detained and handcuffed an attorney who disagreed with Judge King's assessment of the attorney's actions. Judge King did not make any findings on the record to support his actions. The attorney was held in custody for several hours before being released. Judge King never made a finding that the attorney was in contempt and therefore failed to be faithful to the law and was not patient and courteous to the attorney during the proceeding. The public proceedings remained pending at the end of 2025.

B. NON-PUBLIC PROCEEDINGS

1. Conduct on the Bench[10]

a. Failure to be Faithful to the Law

The Commission admonished a judge for a failure to follow the law on contempt (as well as other Code violations). The judge held a show cause hearing even though the motion for a show cause was not supported by an affidavit, did not inform the individual of the nature of the contempt charges that he faced, did not apply the rules of evidence during the hearing, and misrepresented the law regarding the judge's authority to change custody. The judge also did not adequately allow the individual to present a defense as they had less than four minutes to speak, during which the judge interrupted him four times and never allowed them an opportunity to explain the failure to comply with the underlying order. The Commission determined that the judge violated Canon 3(A)(1) for failing to be faithful to the law.

The Commission issued an explanation to a judge who held an attorney in contempt during a sentencing hearing and had the attorney removed from the courtroom. The attorney's client was therefore not represented during their allocution. The U.S. Constitution guarantees the right to counsel during sentencing and the defendant had not waived their right to counsel. The judge corrected the error by appointing house counsel to represent the defendant after the allocution and for the remainder of the hearing. The Commission concluded that the judge did not willfully violate the defendant's right to counsel (and Canon 3(A)(1)) and therefore resolved the grievance with an explanation, reminding the judge of a defendant's right to counsel is so fundamental it should not be interrupted, even for a short time, during a criminal case.

A judge determined that a defendant, who was homeless, had not had an opportunity to consult with his court-appointed attorney. The defendant inexplicably reacted by directing a series of expletives at the judge, who held the defending in contempt and imposed six consecutive sentences of 93 days, totaling 558 days of incarceration. The laws relating to contempt do not permit imprisonment for more than 93 days and does not allow consecutive sentences. The Commission determined that the judge violated Canon 3(A)(1), as they were not faithful to the law, and eroded public confidence in the judiciary as the judge's sentence was widely reported in the media.

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[10] In 2025 the Michigan Supreme Court amended Canon 3(A), effective September 1, 2025, to add new subparagraph 3(A)(4), requiring judicial officers to make reasonable efforts, within the law, to facilitate the ability of all litigants, including self-represented litigants, to be fairly heard. Subparagraphs (A)(4) through (A)(14) that existed prior to the amendment were renumbered subparagraphs (A)(5) through (A)(15). To avoid confusion, this report refers to the numbering as it currently exists.

In the Commission's caution to the judge, it noted that the judge corrected the error after the defendant had served only 15 days in jail. The caution also recognized that after the judge expressed a continued lack of understanding of the contempt authority during their comments to the Commission, the judge subsequently worked to gain a better understanding of contempt powers and shared those insights with the local bar.

The Commission issued a letter of explanation to a judge regarding the judge's recusal and post-judgment transfer of a case to another county that was done because the parties were employed by the county where the judge sat. Before ordering the transfer, the judge granted an emergency ex-parte motion that resulted in a temporary suspension of the mother's parenting time. The judge's recusal took place after the mother filed an objection to the ex parte order, but before a hearing on the objection took place. The Commission determined that the judge violated MCR 3.212 as they transferred the case when there was a pending motion, which the rule expressly prohibits, but that the violation was isolated and inadvertent with no improper intent. The Commission acknowledged the judge's admission of a court rule violation.

b. Appearance of bias

The Commission cautioned a referee concerning language used in a report recommending one parent be awarded custody of a teenage child. The referee's recommendation was guided, in part, by its assessment that one of the parents negatively imposed religious beliefs on the child. The referee later explained that its recommendation was based on statements of the teenager in an interview where the teen expressed discomfort with the religious practices, and that the report was written to reflect the child's perspective without revealing confidential details. The Commission stated in its letter that the wording in the report could create the impression that a parent's religious beliefs were being held against them, which was a potential bias issue under Canon 3(A)(15). The Commission emphasized to the referee that judicial decisions had to avoid even the appearance of impropriety.

c. Ex parte communications

A judge's adult daughter was the victim of a crime. The judge sent a letter to the judicial officer presiding over the criminal case to provide additional information to influence the defendant's bond. The judge did not send the letter to the defendant's attorney or the prosecutor. As the judge sent the letter only to the judicial officer, and not to the attorneys involved in the case, it was a communication about the underlying case that did not involve all parties in the action. The Commission cautioned the judge that this letter was an improper ex parte communication in violation of Canon 3(A)(5)(e).

d. Delay

A judge presided over a child protective proceeding where the judge did not make a final disposition for about 3½ years. The judge failed to follow MCR 3.976(E)(3), which creates an obligation to order an agency to terminate parental rights under conditions present in the case, and does not allow cases to be prolonged indefinitely to allow for

reunification. Although there were reasonable circumstances contributing to the delay, it cautioned the judge as it determined there was a violation of Canon 3(A)(6), by the judge's not promptly disposing of the matter as required by the court rule.

A judge took 14 months to decide an appeal of a zoning board decision, 20 months to resolve an agency appeal, and 11 months it decide a motion for summary disposition. Although there were some reasonable circumstances contributing to the delay, the judge's failure to prioritize the cases also contributed to the delays. The Commission cautioned the judge for the three violations of Canon 3(A)(6) as failures to promptly dispose of the business of the court.

A judge had 15 cases involving post-conviction criminal motions that were pending for at least 100 days without a judicial decision being made. The response from the judge led the Commission to conclude that the delays at issue appeared to be due to the limited resources rather than neglect on the judge's part. The Commission dismissed the grievance with an explanation that the requirement of Canon 3(A)(6) to resolve matters expeditiously is important to litigants and to the public's faith in the judiciary.

A judge had three cases where decisions on post-conviction criminal motions were pending between nine and 14 months. The judge acknowledged the delays but noted that the court as a whole has struggled to overcome the pandemic-era backlog of cases, and that the judge's delays in resolving post-conviction motions were not unusual for that court.

The response from the judge led the Commission to conclude that the delays in these matters appeared to be due to the limited resources available more than to neglect on the judge's part. The Commission dismissed with an explanation that the requirement of Canon 3(A)(6) to resolve matters expeditiously is important to litigants and to the public's faith in the judiciary.

A judge held a bench trial in a case in May 2021 but did not issue a judgement in the proceeding until January 2025. In different case, the judge allowed a motion to suppress to remain unresolved for about two years until the judge decided the matter. The response from the judge led the Commission to conclude that the judge the conduct violated Canon 3(A)(6) for failure to promptly dispose of the business of the court. The Commission cautioned the judge to promptly dispose of matters taken under advisement.

e. Administrative issues resulting in delay

A judge, in several proceedings, displayed a lack of diligence in processing cases, failed to properly hold hearings and complete orders, and failed to timely or adequately notify the friend of the court of his rulings. The judge's lack of diligence impacted litigants and the cases, and increased expenditures of court time and resources to correct the

judge's negligence. The Commission admonished the judge for a violation of Canon 3(B)(1), Canon 3(A)(6), and other issues not related to delay.

The conduct at issue included a failure to advise the friend of the court of the termination of a party's obligation to pay child support, resulting in the improper issuance of a bench warrant regarding the party; a failure to hold timely hearings and issue decisions under applicable court rules and also failed to issue executed written orders regarding the decisions; the signing two conflicting referral orders that requested two distinct actions for different purposes; signing a "notice" of dismissal instead of an "order" of dismissal, and then later signing an order granting a motion to determine paternity, while simultaneously closing the case; issuing orders that failed to provide instructions to FOC; and signing two form orders that failed to make any findings and in effect ordered nothing.

The Commission found the judge's action in these cases reflect a lack of attention that resulted in caused unnecessary confusion or delay.

f. Conflict of interest

A judge, while a practicing attorney, had represented a defendant in a case, and later presided over that case as a judicial officer for six years. The judge did not disqualify from the case until they learned of the Commission's investigation, and at that point acknowledged the impropriety. The judge mistakenly believed that it could preside over the case under the wrong court rule. The applicable court prohibits a judge from presiding over matters where they had represented a party. MCR 2.003(C)(1)(d) The Commission noted the judge's candid acknowledgement of the error and cautioned the judge to raise the issue of disqualification under Canon 3(C) if a similar circumstances arose in the future.

g. Appearance of impropriety

A judge denied an attorney's motion to withdraw three days before a trial. With counsel's consent, the judge spoke to the defendant directly. The defendant was unaware that defense counsel was present during the conversation. The defendant plead guilty several days later. The Commission concluded the judge did not engage in coercion or improper pressure of the defendant and therefore did not violate any canon. However, in its explanation to the judge, the Commission emphasized that to avoid the perception of impropriety that the communication with the defendant was without counsel, which can appear as coercive, the judge should have disclosed to the defendant that his attorney was present and consented to the call.

2. Conduct off the Bench

a. Failing to observe the law

A retired judge was arrested and charged with operating a motor vehicle while intoxicated. The judge pled guilty to misdemeanor Operating While Visibly Impaired, with a sentence of the two days he already spent in jail when arrested, plus costs and fines which he paid. Respondent agreed to not serve as a visiting judge. Accordingly,

the Commission dismissed the RFI noting the judge's acknowledgement of the impropriety of his actions and agreement not to seek or accept any assignments.

b. Lack of courtesy and respect

The Commission admonished a judge for their treatment of a court administrator (the individual later resigned from the position in part due to the judge's treatment). The judge interfered with the court administrator's performance of their duties and treated the individual with discourtesy and disrespect. The Commission determined that the judge's treatment of the court administrator violated Canons 2(B), 3(A)(3), and 3(A)(15) and admonished the judge to respect the limits of their judicial authority.

The Commission admonished a judge for several violations of the Code, including three incidents where the judge engaged in inappropriate and disrespectful conduct around court staff. The Commission concluded that the judge violated Canons 2(A), 3(A)(3), and 3(A)(14) which required judges to promote public confidence in the judiciary, to avoid impropriety, and to treat others with courtesy and respect.

The Commission also found that the judge violated Canons 3(A)(3) and 3(A)(14) and exposed the judiciary and legal profession to reproach in violation of MCR 9.104(2), when they made derogatory comments to an employee. The Commission required the judge to complete training on respect to others in the workplace within 60 days of the admonition.

c. Campaign violations

The Commission found that the judge violated Canon 7(B) when the judge served on its own campaign committee and contracted and directed payment for campaign advertising after the campaign committed was established. The Commission also concluded that the judge violated Canon 7(B)(2)(b) (holding a judicial candidate responsible for selecting people who will conduct a judge's campaign in accordance with the law) The Commission admonished the judge for this, and other violations of the Code not related to campaigns.

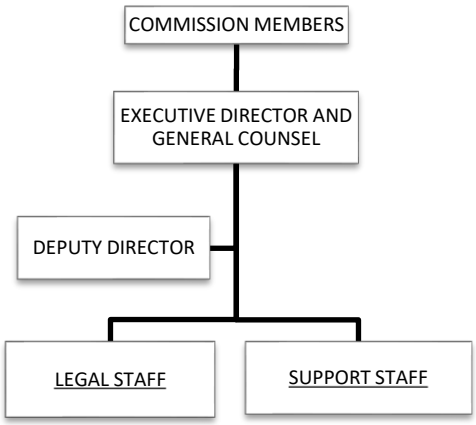
d. Other

The Commission determined to hold an investigation in abeyance based on a judge's retirement from judicial office. The grievance involved allegations that the judge refused to assist in cases when the judge's bench mate died, made unfair, discourteous, and disrespectful accusations against another judge in an email, and refused to schedule any cases during the "fifth week" of any month that had one. The Commission issued a request for the judge's comments which remained pending when the judge retired. The Commission relied on the State Court Administrator's representation that the judge would not be eligible for any judicial assignments and noted that the investigation would be reopened if the judge was ever assigned to hear cases.

VI. COMMISSION ORGANIZATION, STAFF AND BUDGET

A. Commission Organization and Staff

The Commission had twelve full-time staff positions at the end of 2025, which included the executive director, deputy director, administrative counsel, seven full-time staff attorneys, an office manager, and an administrative assistant. These staff members are state employees.



The executive director is hired by, and reports directly to, the Commission. The executive director oversees the investigation of grievances and is the disciplinary counsel handling public proceedings. The executive director is also the primary liaison between the Commission and the judiciary, the public, and the media. The Commission hired Lynn Helland as executive director and general counsel in February 2017.

Kevin Hirsch became the deputy director in October 2024. The deputy director oversees litigation in public proceedings, stands in for the executive director, investigates cases, and otherwise assists in the operation of the office.

Casimir J. Swastek is administrative counsel. Mr. Swastek serves as the intermediary between the Commission and counsel during public proceedings; provides training to, and is as the institutional resource for, the other attorneys on staff; assists in reviewing inquiries from judges and the public; and conducts investigations of judges.

The staff attorneys are Margaret N.S. Rynier, Dina Dajani, Melissa Johnson, Nichollette Hoard, Rebecca Jurva-Brinn, Kavita Uppal, and Molly Kettler. The Commission's legal staff is responsible for analyzing and investigating grievances and providing the Commission with the information it needs to act on grievances. In addition, the attorneys serve as co-disciplinary counsel during public proceedings.

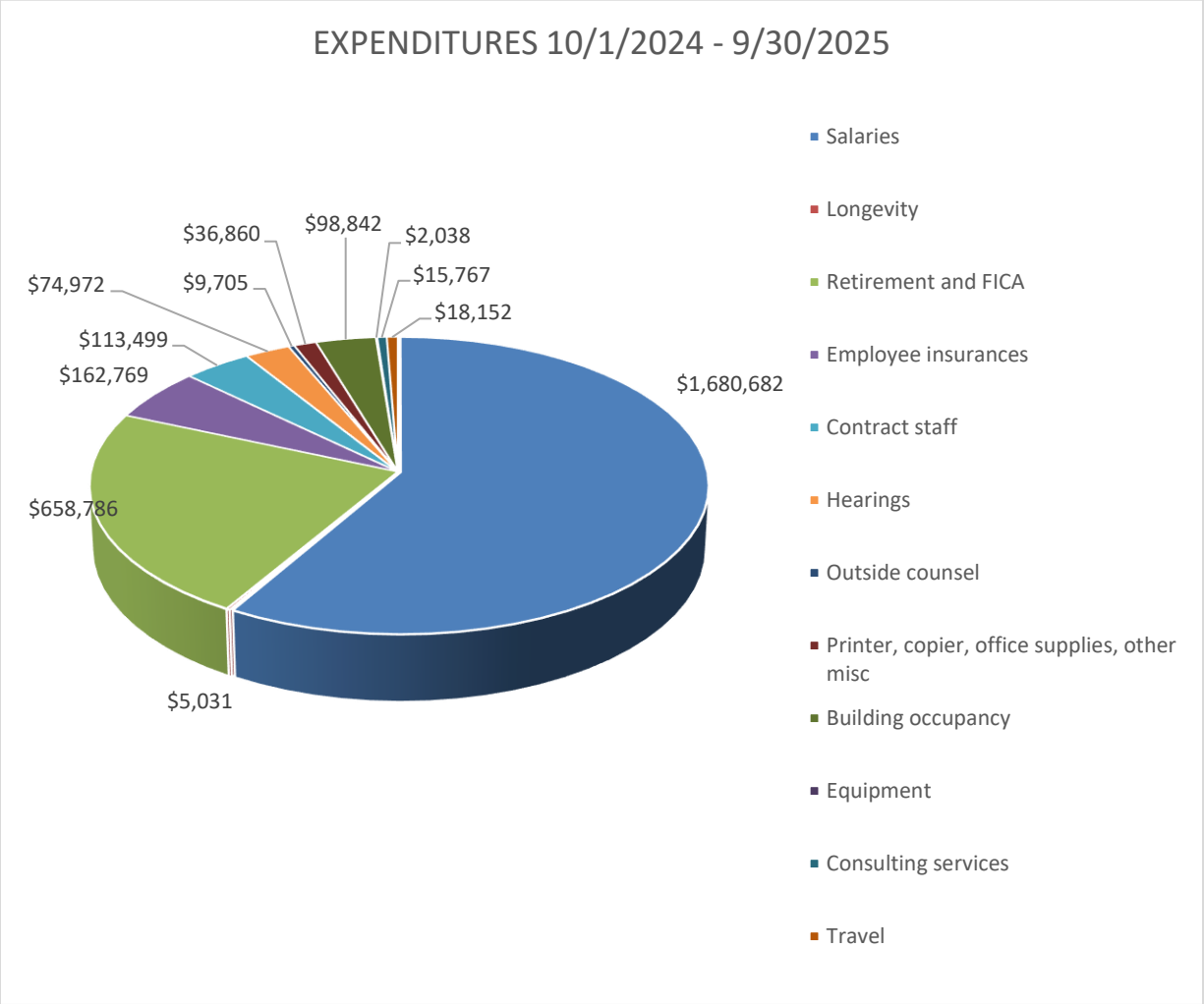
In addition to the permanent attorneys, since late 2018 the Commission has had contract attorneys assist with its backlog of cases.

The Commission also benefited greatly in 2025 from the continued volunteer assistance of Robert Kalec. Mr. Kalec had retired after a very successful legal career, but recognizing the importance of the Commission's work and that the work be timely, he has generously volunteered his time and talent to help address the Commission's backlog.

As of the end of 2025 the Commission's support staff was comprised of Office Manager Camellalynette Corbin and Administrative Assistant Jason Flowers.

B. Budget

The Commission's budget is established by the Michigan legislature. For the 2025 fiscal year (October 1, 2024 – September 30, 2025) the Commission's appropriation was $2,907,900, with actual expenditures of $2,877,103. The Commission is grateful to the legislature for its support.



VII. CONCLUSION

The Commission's service to the public improved again during 2025, thanks to additional staff made possible by the Michigan legislature. The Commission remains committed to fairly promoting the integrity, independence, and justness of Michigan's judiciary while promoting the public's confidence that the Michigan judiciary possesses those qualities and doing so as timely as resources permit.