

**FILED**

March 10, 2026

Lyle W. Cayce  
Clerk

# Judicial Council for the Fifth Circuit

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Complaint Number: 05-26-90073

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IN RE COMPLAINT OF JUDICIAL MISCONDUCT  
UNDER THE JUDICIAL IMPROVEMENTS ACT OF 2002.

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## ORDER

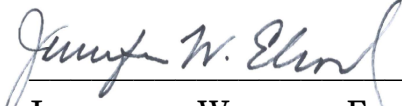
Complainant, a pro se bankruptcy debtor, has filed a complaint alleging misconduct by a United States Bankruptcy Judge in a bankruptcy proceeding and an adversary proceeding.

Complainant complains that over her written and oral objections, the judge improperly: held a hearing to consider Complainant's requests for the judge's disqualification; "switch[ed]" the requests to "recusal[s] instead"; and denied the motions. A review of the record reflects that the relevant orders were captioned "Order Denying Debtor's Requests for the Disqualification of the Judge" and referred to those requests as "Motions to Disqualify." It appears that Complainant is complaining, in part, about the related docket entries which referred to the decisions as "Order denying motion to recuse Judge."

Regardless, the complaint relates directly to the merits of decisions or procedural rulings and is therefore subject to dismissal under 28 U.S.C. § 352(b)(1)(A)(ii). The complaint procedures in 28 U.S.C. §§ 351-364 may not be used to challenge the correctness of a judge's ruling or decision. *See* Rule 4(b)(1) of the Rules for Judicial-Conduct and Judicial-Disability Proceedings. The terms disqualification and recusal can be and often are

used interchangeably. *Compare United States v. Page*, 161 F.4th 875, 886 (5th Cir. 2025) (“District judges must *recuse* themselves when their ‘impartiality might reasonably be questioned.’ 28 U.S.C. § 455(a).” (emphasis added)), *with* 28 U.S.C. § 455(a) (“Any justice, judge, or magistrate judge of the United States shall *disqualify* himself in any proceeding in which his impartiality might reasonably be questioned.” (emphasis added)); *see also In re Assadi*, No. 22-50452, 2022 WL 17819599, at \*2 (5th Cir. Dec. 20, 2022) (describing motion under Fed. R. Bankr. P. 5004(a), which incorporates Fed. R. Bankr. P. 5004(a), as motion to recuse).

The complaint is DISMISSED. An unredacted private order is entered simultaneously herewith.

  
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JENNIFER WALKER ELROD  
*Chief Judge*

**FILED**

June 12, 2026

Lyle W. Cayce  
Clerk

# Judicial Council for the Fifth Circuit

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Complaint Number: 05-26-90073

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IN RE COMPLAINT OF [REDACTED]  
AGAINST

[REDACTED]  
UNDER THE JUDICIAL IMPROVEMENTS ACT OF 2002.

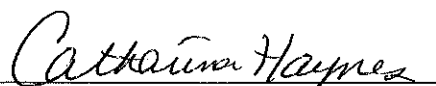
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## ORDER

An Appellate Review Panel of the Judicial Council for the Fifth Circuit has reviewed the above-captioned petition for review, and all the members of the Panel have voted to affirm the order of Chief Judge Jennifer Walker Elrod, filed March 10, 2026, dismissing the Complaint of [REDACTED]

[REDACTED] under the Judicial Improvements Act of 2002.

The order is therefore AFFIRMED.



Catharina Haynes  
United States Circuit Judge  
For the Judicial Council of the Fifth Circuit