

STATE OF CALIFORNIA  
BEFORE THE COMMISSION ON JUDICIAL PERFORMANCE

IN THE MATTER CONCERNING  
JUDGE ROBIN L. WOLFE

DECISION AND ORDER IMPOSING  
PUBLIC ADMONISHMENT

This disciplinary matter concerns Judge Robin L. Wolfe, a judge of the Tulare County Superior Court since 2017. Her current term began in 2025. Pursuant to rule 114 of the Rules of the Commission on Judicial Performance, Judge Wolfe and her attorney, Kathleen M. Ewins, appeared before the commission on December 4, 2025, to contest the imposition of a tentative public admonishment issued on September 2, 2025. Judge Wolfe waived her right to formal proceedings under rule 118 and to review by the Supreme Court. Having considered the written and oral objections and argument submitted by Judge Wolfe and her counsel, and good cause appearing, the Commission on Judicial Performance issues this public admonishment pursuant to article VI, section 18(d) of the California Constitution, based upon the statement of facts and reasons set forth below.

**STATEMENT OF FACTS AND REASONS**

**1. Ordering Personal Appearance by Family Court Services Director and Threatening Monetary Sanctions**

On December 20, 2023, Judge Wolfe presided over a review hearing regarding child custody and visitation in *Navarro v. Ramos* (No. VFL297823), a family law matter. After calling the case, Judge Wolfe determined that Family Court Services (FCS) had not completed a limited investigation report, previously ordered by the court. In addition to ordering the report be completed no later than January 12, 2024, Judge Wolfe issued an Order to Show Cause (OSC) as to why sanctions, including monetary sanctions to be determined by the court,

should not be imposed for the failure of the FCS Director, Angela Rodd-Terry, to complete the limited investigation report on time. Judge Wolfe ordered Ms. Rodd-Terry to personally appear at a hearing on the OSC for sanctions.

After receiving the OSC, Ms. Rodd-Terry completed the limited investigation report. On January 17, 2024, Ms. Rodd-Terry appeared before Judge Wolfe, as ordered. Judge Wolfe asked her to meet in chambers and told Ms. Rodd-Terry that, when she makes such orders (e.g., OSCs and personal appearances) for law enforcement, child welfare services, or other agencies, they know they do not need to appear if the requested information is provided by the court date. Ms. Rodd-Terry told Judge Wolfe it was not standard practice for the FCS Director to be ordered to appear for sanctions, and that she, accordingly, complied with the judge's order. Judge Wolfe responded that, in the future, she would add language to the effect that the ordered party need not appear if a report was subsequently filed.

The commission determined that Judge Wolfe abused her authority by ordering a court employee, who was neither counsel in, nor a party to, an action pending before the judge, to personally appear, and threatening to impose monetary sanctions. The commission found that Judge Wolfe's conduct constituted a violation of canons 2A (respect and comply with the law and act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary); 3 (perform the duties of judicial office impartially, competently, and diligently); 3B(2) (be faithful to the law and maintain professional competence in the law); 3B(4) (be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and require similar conduct of all court personnel under the judge's direction and control); 3B(8) (dispose of all judicial matters fairly, promptly, and efficiently, and manage the courtroom in a manner that provides all litigants with the opportunity to have their matters fairly adjudicated in

accordance with the law); and 3C(2) (cooperate with other judges and court officials in the administration of court business).

## **2. Summoning Child Custody Recommending Counselor to Court**

Judge Wolfe presided over *Rodriguez v. Mendoza* (No. VFL270638), a family law matter. One of the issues pending before the judge related to a move-away request filed by the mother. Judge Wolfe ordered the mother, Olga Mendoza, and the father, Jose Rodriguez, to attend a remote mediation session with FCS Child Custody Recommending Counselor (CCRC) Irene Rodriguez on July 30, 2024. On July 31, 2024, Ms. Rodriguez provided the court with a memo indicating that, the prior day, she had called the phone number provided by the mother, but Ms. Mendoza was not available, and the appointment was canceled.

On August 29, 2024, Judge Wolfe presided over a review hearing in the case. The father and mother both appeared, represented, respectively, by attorneys Jamil Nushwat and Jared Ramirez (Mr. Ramirez appeared remotely). Both parties were also assisted by a Spanish-language interpreter.

Upon calling the case, Judge Wolfe said she was “very dismayed” because she received a memo from FCS indicating that the mother failed to keep the mediation appointment. (Rough draft R.T. 2:2-3.) Judge Wolfe asked why she should not dismiss the mother’s move-away request, since she had failed to keep the appointment.

Mr. Ramirez addressed Judge Wolfe’s question. He said the mother had been available for the appointment, and called his office “within, I want to say 10 to 15 minutes of the start time,” indicating that she had not been called by FCS. (Rough draft R.T. 2:14-15.) Mr. Ramirez said his secretary then called FCS, and FCS “confirmed the number that they have on file” for the mother “did not match the number that was provided to the Court.” (Rough draft R.T. 2:17-19.) Mr. Ramirez stated the mother had not willfully failed to appear, and that FCS had erred by calling an old number rather than “the new number that was given at the last hearing.” (Rough draft R.T. 2:23.)

Judge Wolfe said, "So then let me get Ms. Rodriguez down here, because the memo that she signed does not indicate any of that, and if that's true[,] the Court is extremely disturbed that Ms. Rodriguez would not give us that information. The information she filed with the Court is that mother was contacted. Mother was not available. Not that they had a wrong number and called it an [sic] error." (Rough draft R.T. 3:9-16.)

Judge Wolfe's clerk, Marcella Hernandez, sent an email to the FCS clerks, cc'ing Ms. Rodriguez, labeled "High" importance, in which she wrote that Judge Wolfe wanted Ms. Rodriguez in court "right now." Michelle MacElvaine, FCS Supervisor, responded and indicated that Ms. Rodriguez was on her way. Judge Wolfe trailed the matter.

Ms. Rodriguez and Ms. MacElvaine immediately went to Judge Wolfe's courtroom and sat at the back of the gallery. After the bailiff alerted the judge to Ms. Rodriguez's presence, Judge Wolfe instructed Ms. Rodriguez to take a seat in the witness chair because it was "more convenient." (Rough draft R.T. 4:3.) Judge Wolfe recalled the case and went back on the record.

Judge Wolfe addressed Ms. Rodriguez, saying she had "a concern" because she had just "lectured" the mother for failing to keep the mediation appointment. (Rough draft R.T. 4:9-10.) Judge Wolfe said that, despite receiving a memo from FCS stating the mother had been unavailable for the appointment, the mother's attorney, Mr. Ramirez, indicated to the judge that he had called FCS because the mother had not received a call. Judge Wolfe said Mr. Ramirez then contacted the clerk with that information, and the clerk relayed it to FCS. Judge Wolfe said, in summary, that apparently FCS had used an incorrect phone number rather than the phone number provided by the parties and the clerk.

Judge Wolfe then said, "My question to you, ma'am, is then [sic] why knowing that -- and my understanding is the appointment could not be rescheduled, but why would you not send a memo to the Court explaining what

happened[,] so I didn't sanction [the mother] and dismiss the request?" (Rough draft R.T. 5:3-7.)

Ms. Rodriguez explained that she did not remember what had happened. Judge Wolfe continued, saying that FCS would have been on notice of the error with the phone number prior to the memo being filed, and that her issue was that she had "just terrified" the mother because she told her that she would dismiss the move-away request. (Rough draft R.T. 5:16.)

Judge Wolfe said, "So, I think on behalf of Family Services she needs to hear an apology, because I would have expected the Court to be noticed that there was an error by Family Services [*sic*] not her error, and then the Court could of [*sic*] reset the matter." (Rough draft R.T. 5:18-22.)

Ms. Rodriguez looked at Ms. Mendoza and apologized in Spanish. Judge Wolfe instructed Ms. Rodriguez to repeat her apology in English, because the judge could not understand it. Ms. Rodriguez complied. After hearing Ms. Rodriguez's apology, Judge Wolfe said that, "again," her problem was that Ms. Rodriguez filed her memo one day after the clerk had personally notified her that the phone number was an error. (Rough draft R.T. 6:12.)

Judge Wolfe continued to admonish Ms. Rodriguez for the fact that neither she nor "anybody" at FCS provided the judge with a follow-up memo. Judge Wolfe reiterated that she had "brought [Ms. Rodriguez] in to explain to [the mother] what had occurred and to offer the apology on behalf of the agency." (Rough draft R.T. 6:26, 7:7-9.)

Judge Wolfe dismissed Ms. Rodriguez and then rescheduled the mediation date for the parties.

Later that afternoon, Judge Wolfe called FCS Director Angela Rodd-Terry. Judge Wolfe told Ms. Rodd-Terry that she wanted to make sure Ms. Rodriguez did not think she was in trouble. Ms. Rodd-Terry said the judge had directed Ms. Rodriguez to apologize for something of which she was not aware and for which she had not prepared. Judge Wolfe apologized to Ms. Rodd-Terry and

said it was not fair to FCS to not have had time to prepare for the case or know why the judge had summoned FCS.

In her response to the commission's preliminary investigation, Judge Wolfe stated that she did not consider her request to be an "order" that Ms. Rodriguez come to the courtroom and, similarly, that she did not "order" Ms. Rodriguez to apologize to the mother, but recognized in hindsight that her conduct could have been interpreted as an order. The judge conceded that she could have continued the matter, reset the mediation appointment, and later addressed the error in Ms. Rodriguez's report with FCS.

The commission found that, before demanding Ms. Rodriguez appear in her courtroom, Judge Wolfe was already on notice that the mother's failure to appear at mediation was the result of an error, and did not involve malice. By summoning Ms. Rodriguez to the courtroom, and directing her to apologize to a litigant, Judge Wolfe abused her authority. Further, Judge Wolfe's treatment of Ms. Rodriguez once she appeared in court was discourteous and gratuitous, and gave the appearance of bias. The judge repeatedly admonished Ms. Rodriguez in open court, though Ms. Rodriguez had indicated she was unprepared to address the judge's questions and Judge Wolfe had been apprised of the cause of the error.

The commission concluded that Judge Wolfe abused her authority and engaged in poor demeanor, in violation of canons 2A, 3, 3B(2), 3B(4), 3B(8), and 3C(2).

### **3. Improperly Confiscating Cell Phone, Accusing Litigant of "Game Playing," and Threatening Foster Care**

On the morning of November 16, 2022, Judge Wolfe presided over a hearing on the petitioner's ex parte request for an order for custody and visitation in *Hettick v. Hettick* (No. VFL290043). Petitioner Chad Hettick appeared, representing himself; respondent Brittany Hettick also appeared, represented by attorney Eric Hamilton.

During proceedings, Ms. Hettick's cell phone rang, and Judge Wolfe instructed her bailiff to confiscate Ms. Hettick's cell phone.

After hearing testimony, Judge Wolfe briefly questioned Mr. Hamilton about whether his client would object to a court order requiring her to permit authorities inside her home any time Ms. Hettick's romantic partner was believed to be present, in violation of an order prohibiting his contact with the Hetticks' child. Judge Wolfe indicated she was close to ordering sole legal and physical custody to the petitioner based on her assessment of the best interest of the parties' child. Mr. Hamilton acknowledged that his client had previously "misbehaved in front of [the] court," but expressed his concern that such an order would give Mr. Hettick a free license to provoke Ms. Hettick. (Rough draft R.T. 21:14.)

Judge Wolfe responded that Ms. Hettick "has a habit of playing games with the Court's orders." (Rough draft R.T. 21:24-25.) After making certain orders, Judge Wolfe said, "And I want it understood I don't want any more game playing on this." (Rough draft R.T. 24:3-4.) She instructed the parties to return for a contested hearing, and added, "If we come back on another ex parte, quite frankly and the Court has continued concerns with both of you, the Court would have no choice, but perhaps to do a SCARs<sup>1</sup> report, and I would hate to see that child put in foster care, but if I cannot trust either one of you to look after his best interest that's exactly what's going to happen." (Rough draft R.T. 24:6-12.)

At the conclusion of the hearing, Mr. Hamilton asked to have Ms. Hettick's phone returned. Judge Wolfe replied, "No. She can pick that up at 4:30." (Rough draft R.T. 25:3-4.) When Mr. Hamilton asked whether Ms. Hettick should go to the second floor to retrieve her phone, Judge Wolfe said, "She can come

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<sup>1</sup> Penal Code section 11166 provides that mandated child abuse reporters who know or reasonably suspect that a child has been the victim of abuse or neglect should complete a Suspected Child Abuse Report (SCAR), to be submitted to the police or sheriff's department.

right here, and she can explain to the Court why she violated the orders, and why she should get her phone back.” (Rough draft R.T. 25:9-11.)

Ms. Hettick returned at 4:30 p.m., as Judge Wolfe had instructed. Judge Wolfe called the matter and indicated her “sole purpose” in doing so was to return Ms. Hettick’s cell phone to her. (Rough draft [afternoon session] R.T. 3:7.) Judge Wolfe said she wanted to “make sure” the record was clear that the judge confiscated Ms. Hettick’s cell phone “because she violated the Court’s orders.” (Rough draft [afternoon session] R.T. 3:9-12.) The judge indicated that Ms. Hettick’s cell phone had gone off, “interrupting the Court proceedings,” and said it had happened on more than one occasion. (Rough draft [afternoon session] R.T. 3:23-25.) Judge Wolfe said she chose to take Ms. Hettick’s cell phone rather than impose sanctions for direct contempt. Judge Wolfe returned Ms. Hettick’s phone and admonished her to either keep her phone off in the future or not bring it to court.

The commission found that confiscating a litigant’s cell phone and ordering the litigant to return to court to retrieve her personal property at the end of the court day, rather than returning the cell phone at the conclusion of the hearing, constituted an abuse of judicial authority. The commission found that Judge Wolfe’s conduct in denying counsel’s request to have his client’s phone returned after the hearing ended, and saying Ms. Hettick had to return to the courtroom to explain to the judge why she should get her phone back, also gave the appearance of pique and embroilment.

Judge Wolfe’s remarks that Ms. Hettick had “a habit of playing games” with court orders and that she did not want “any more game playing on this” were improper and reflected poor demeanor.

Judge Wolfe’s comments that, if the parties returned on another ex parte application and the judge had continued concerns, she “would have no choice, but perhaps do a SCARs report,” and that she “would hate to see that child put in foster care” but if she could not trust either one of the parents “to look after his



best interest that's exactly what's going to happen," were similarly improper. A judge may not summarily initiate dependency proceedings or order a child into foster care as a repercussion for a parent's failure to abide by a family court order. The commission observed that Judge Wolfe was not simply invoking the possibility of a referral to law enforcement should she later develop a reasonable suspicion that the Hetticks' child was the victim of abuse. Rather, Judge Wolfe said that if she could not trust the parents to look after the child's "best interest," then he would be "put in foster care." The commission concluded that Judge Wolfe's remarks were coercive and misrepresented the extent of the family court's jurisdiction.

The commission concluded that Judge Wolfe's conduct violated canons 2A, 3, 3B(2), 3B(4), and 3B(8).

#### **4. Policy Prohibiting Cell Phones**

Beginning in June 2023, Judge Wolfe adopted a standard practice of requiring litigants to place their cell phones in canvas bags, similar to banker bags, and place the bags at the end of the tables while their matters were being heard. At the end of the hearing, Judge Wolfe permitted each party to retrieve their bag and take their cell phone with them before exiting the courtroom.

In May 2024, Judge Wolfe revised her practice to prohibit persons from bringing their cellphones into her courtroom at all, unless the court granted an exemption. Judge Wolfe made an exception for court staff and attorneys to keep their phones, but not for litigants, witnesses, audience members, or others. Judge Wolfe's policy was in place until June 26, 2024.

The court's local rules prohibit the use of an electronic device, including a cell phone, while court is in session, unless a party is granted leave to do so by the court. Barring permission to use an electronic device, the local rules provide that all devices must be silenced or turned off while court is in session. The commission found that Judge Wolfe's policies regarding cell phones, which went well beyond merely requiring that phones be silenced or turned off during court

proceedings, reflected an abuse of authority and violated canons 2A, 3, 3B(2), 3B(4), and 3B(8).

### **5. Closing the Courtroom and Poor Demeanor in *Magee v. Magee***

On the morning of June 4, 2024, Judge Wolfe presided over a family law calendar.

At approximately 8:45 a.m., Wayne Girard, attending domestic violence restraining order proceedings in *Magee v. Magee* (No. VFL308855) as a support person, entered Judge Wolfe's courtroom in advance of her 9:00 a.m. calendar. (Both parties in *Magee* represented themselves.) The bailiff directed Mr. Girard to sit outside. Mr. Girard questioned the bailiff why he was not permitted to stay in the courtroom, and the bailiff and Mr. Girard engaged in a verbal confrontation. The bailiff told Mr. Girard he would not be permitted to return to the courtroom.

Judge Wolfe called *Magee* at approximately 9:00 a.m., and Mr. Girard entered the courtroom with Ms. Magee at that time. Judge Wolfe said she was going to start out by explaining her procedures "to the parties as well as audience members." (R.T. 3:6-7.) Judge Wolfe said, "This Court has a calendar that goes by the hour. I have an 8:00, 9:00, and 10:00. I do my 8:00 first, obviously, then 9:00. Parties may, if they're court watchers, for a [*sic*] lack of a better word, come into the courtroom to watch. I exclude parties if the matters are confidential, if we started proceedings. I also don't allow interruptions in between. So[,] if parties come to watch, they can come in at 8:00, 9:00, 10:00, but I don't allow parties just to meander in because it's disruptive to this Court." (R.T. 3:9-18.)

Judge Wolfe continued, saying her understanding was that "a gentleman" wanted to come in for the *Magee* matter. She said, "It was the 8:00 calendar. This Court did not allow him in. The Court deemed him to be disruptive at the time because it caused a disturbance during the case in which I was handling. That person is here now. That person is more than welcome to sit in this courtroom[,] as long as that person behaves as well as other audience members.

I do not allow talking in here no matter what in the audience. If you're caught talking, I do exclude the parties. And I do not allow cell phones for any reason. If you have cell phones, you will not be allowed in. I do make exceptions on occasion for the parties, not for the audience members." (R.T. 3:20, 3:21-4:6.)

Judge Wolfe then proceeded to hear the substantive matter before her.

The commission observed that section 124 of the Code of Civil Procedure provides that, with limited exceptions, "the sittings of every court shall be public." Also, under section 214 of the Family Code, family law proceedings are presumptively public. "Except as otherwise provided in this code or by court rule, the court may, when it considers it necessary in the interests of justice and the persons involved, direct the trial of any issue of fact joined in a proceeding under this code to be private, and may exclude all persons except the officers of the court, the parties, their witnesses, and counsel." (Fam. Code, § 214.)

The commission determined that Judge Wolfe's remarks that she did not "allow interruptions in between" calling her 8:00, 9:00, or 10:00 calendar, and that parties who wanted to watch proceedings could "come in at 8:00, 9:00, 10:00, but" that the judge did not "allow parties just to meander in because it's disruptive to this Court," conveyed, at the very least, the appearance that her courtroom was not open to the public, unless it was 8:00 a.m., 9:00 a.m., or 10:00 a.m., in contravention of the law. Judge Wolfe's comments gave the appearance of impropriety, in violation of canons 2A, 3, 3B(2), 3B(4), and 3B(8).

#### **6. Misrepresentation to Supervising Judge About Prohibiting Cell Phones**

Wayne Girard subsequently complained to the court about Judge Wolfe's conduct. On June 25, 2024, Supervising Judge Tara James advised Judge Wolfe of Mr. Girard's complaint. Judge Wolfe responded in a memo addressed to Judge James, dated June 28, 2024. In her memo, Judge Wolfe stated, in part, that, "[f]or the last couple of weeks, [her] policy had been to exclude cellphones from the courtroom unless the court granted an exception," due to three incidents

that involved parties recording confidential proceedings. She stated she had never denied a request for an exemption, and she had no knowledge of anyone being denied entry to her courtroom because she or he had a cellphone in their possession. Judge Wolfe said court staff and attorneys were exempt from her policy.

Judge Wolfe stated that, prior to the preceding month (e.g., before June 2024), she “allowed individuals into the courtroom with cellphones upon a showing that the cellphone was turned off.” The judge said “[p]arties were provided with a phone bag to place the cellphone in, so the cellphone was kept in their possession the entire time they were in the courtroom and the court was assured the phone could not be reactivated.” Judge Wolfe stated she had now instructed her bailiff that cellphones were permitted in her courtroom “upon a showing that the cellphone has been powered off and [her] bailiff will continue to offer the phone bags if the parties wish to utilize them.”

In her response to the commission, Judge Wolfe conceded that her statement to Supervising Judge James understated the length of time her cell phone exclusion was in place.

Judge Wolfe’s statements gave the impression she had only prohibited cell phones from her courtroom for approximately two weeks, rather than approximately six weeks. The commission determined that Judge Wolfe’s statement to her supervising judge regarding the length of time her policy was in place was misleading and/or inaccurate, in violation of canons 2A and 3C(2).

#### **7. Excluding Domestic Violence Support Persons from Counsel Table**

Judge Wolfe abused her authority, acted in contravention of the law, disregarded fundamental rights, and conveyed the appearance of bias by, beginning in or around November 2022, prohibiting a domestic violence advocate from sitting at counsel table, and by usually not allowing certain categories of support persons to sit at counsel table.

In an email to Supervising Judge James, dated December 5, 2023, Judge Wolfe wrote: “I do not allow [Central California Legal Services domestic violence advocate] Ms. [Lana] French to sit at counsel table in my court room [*sic*] as she was assisting DV [domestic violence] litigants with responses and they were relying on her to respond on her [*sic*] behalf. I have her sit behind them; or she can sit to the side of the table. I noticed that Ms. French will now sit in the back of the courtroom when she appears which is rare and he[r] choice of seating arrangements doesn’t bother me in the least.” Judge Wolfe also stated, “I usually don’t let family members or ‘non-professional advocates’ sit at counsel table, but have also made exceptions and allowed it, because I felt the petitioner needed someone there for their emotional wellbeing, etc.”

Section 6303 of the Family Code provides that a support person may accompany a party to court in matters where there are allegations or threats of domestic violence; if the party is unrepresented, the support person may sit at the table generally reserved for the party and counsel. Section 6303, subdivision (a), expressly provides that a domestic violence victim “may select any individual to act as a support person,” and “[n]o certification, training, or other special qualification is required for an individual to act as a support person.”

The commission determined that Judge Wolfe’s conduct, in generally prohibiting Ms. French from sitting at counsel table, and by, more broadly, “usually” not allowing certain categories of support persons to sit at counsel table, violated canons 3B(5) (judge shall perform judicial duties without bias or prejudice, and shall not engage in conduct that would reasonably be perceived as bias or prejudice), 2A, 3, 3B(2), 3B(4), and 3B(8).

#### **8. Mishandling Reasonable Accommodation Request**

Judge Wolfe presided over proceedings in *Longoria v. Longoria* (No. VFL282236), a family law matter. In an email dated February 20, 2025, Rebecca Barney, a court human resources specialist, advised Judge Wolfe:

The Court received a request for accommodation from respondent, Melissa Longoria in case #VFL282236 who suffers from CPTSD (Complex post-traumatic stress disorder). This case is scheduled for Review of Reports Hearing on Thursday, February 27, 2025 at 10:00 am in your department.

Ms. Longoria is requesting to have a support person with her at the council [sic] table. She has a difficult time understanding and processing information in stressful situations. She is also requesting for you to speak slowly and give her enough time to answer any questions. Can this request be granted? Please let me know.

If you have any questions or would like to discuss this accommodation request further, do not hesitate to contact me. Thank you.

Approximately thirty minutes later, Judge Wolfe emailed Ms. Barney in response:

Ms. Longoria may have a support person in the court room [sic], but I will not commit to allowing the support person at counsel table at this time. Ms. Longoria has a long history of appearing in court on this case without any prior issues. If it becomes apparent, [sic] she needs her support person at counsel table, the court would be inclined to allow it. The court will make every effort to make her comfortable and ensure she understands the proceedings.

On February 27, 2025, Judge Wolfe presided over the Review of Reports Hearing in *Longoria*, as scheduled. Ms. Longoria and the petitioner, Joseph Longoria, both appeared, representing themselves. Ms. Longoria's support person, Tammy Harris, was present in the audience but not permitted to join her at counsel table.

As the hearing progressed, Ms. Longoria became increasingly agitated. The bailiff instructed her to stop interrupting. When Ms. Longoria continued

attempting to speak over the judge, Judge Wolfe said, “It’s up to you, Bailiff.” (R.T. 15:21.) The bailiff then escorted Ms. Longoria from the courtroom. Ms. Harris also exited.

The judge later recalled the matter. She remarked that Ms. Longoria’s support person was now seated at the counsel table, and said, “The support person was sitting in the audience previously, as there didn’t seem to be a need for her to be present at the table. Ms. Longoria was doing quite fine by herself up until the Court told her I was going to set it for a contested hearing.” (R.T. 16:24-17:3.) Judge Wolfe continued, saying that when Ms. Longoria became upset, the support person had “walked out” to assist her. (R.T. 17:8.) Ms. Harris interjected that she had requested to be seated with Ms. Longoria, but the bailiff denied her request. Judge Wolfe replied:

Okay. And so I did not hear that. At that time my bailiff was in charge with regards to the court proceeding. Ms. Longoria was acting out, for lack of a better word -- that’s what we call it -- and my bailiff has discretion with regards to how he runs the courtroom. ... So he had her removed from the courtroom, and we trailed the matter. When she calmed down, I asked my bailiff to see if she was ready to come in. My bailiff indicated that she was calm, so I had her come back in, and the Court deemed it best that you sit at counsel table as long as you don’t participate in this discussion, so to speak. Is that agreeable, ma’am?

(R.T. 17:12-18:1.)

The hearing proceeded without further issues with Ms. Harris at counsel table.

A litigant’s request for an accommodation under the Americans with Disabilities Act (ADA) is governed by California Rules of Court, rule 1.100, which notes that the policy of California’s courts is to “ensure that persons with disabilities have equal and full access to the judicial system.” (Cal. Rules of Court, rule 1.100, subd. (b).) A person with a disability (e.g., a physical or mental

impairment that limits a major life activity) may request an accommodation, ex parte, by describing the accommodation sought and the medical condition necessitating the accommodation. The court may only deny a request for accommodation when one of the following is true: “(1) [t]he applicant has failed to satisfy the requirements of [rule 1.100]; (2) [t]he requested accommodation would create an undue financial or administrative burden on the court; or (3) [t]he requested accommodation would fundamentally alter the nature of the service, program, or activity.” (*Id.* at subd. (f); see *In re Marriage of James & Christine C.* (2008) 158 Cal.App.4th 1261 [reversing a trial court’s denial of a trial continuance, and observing that a court may only deny an accommodation for one of the three reasons listed in subdivision (f) of rule 1.100].)

In her response to the commission’s preliminary investigation, Judge Wolfe stated she deferred making a decision on Ms. Longoria’s request for accommodation, which she conceded she should not have done and which she said reflected her ignorance of the requirements of the Rules of Court.

The commission observed that there was no evidence Ms. Longoria failed to satisfy the requirements of rule 1.100, or that the requested accommodation would have been unduly burdensome or result in a fundamental alteration of court services. The commission found that, by, in her email of February 20, 2025, indicating she would not commit to granting the requested accommodation, Judge Wolfe abused her authority and demonstrated embroilment. The commission further determined that, when the support person advised Judge Wolfe that the bailiff had denied her request to be seated with Ms. Longoria, and the judge replied, “And so I did not hear that. At that time my bailiff was in charge with regards to the court proceeding,” the judge improperly conveyed the impression it was her bailiff, not she, who determined whether to grant Ms. Longoria’s request for accommodation. Judge Wolfe’s conduct violated canons 2 (judge shall respect and comply with the law and act at all times in a manner that



promotes public confidence in the integrity and impartiality of the judiciary), 3, 3B(2), 3B(5), 3B(8), and 2A.

The judge's conduct, as described in sections one through eight, above, at a minimum, was improper action.

In determining to issue this public admonishment, the commission considered that, while some of Judge Wolfe's misconduct involving the abuse of her authority appears to have been based, not in malice, bias, or indifference, but an attempt to ensure litigants were treated fairly (see Policy Declarations of Com. on Jud. Performance, policy 7.1(1)(g) [whether the judge was motivated by a desire to satisfy a personal or venal interest, vindictiveness, or an interest in justice, or compassion]), her misconduct was nevertheless serious. Without authority, she ordered a court employee to personally appear before her and threatened to impose monetary sanctions against the employee; summoned a court employee to her courtroom to admonish her and directed her to apologize to a litigant; implemented blanket policies regarding cell phone possession; improperly confiscated a litigant's cell phone until the end of the court day; excluded domestic violence support persons from counsel table; and refused a reasonable ADA accommodation request from a litigant. (See Policy Declarations of Com. on Jud. Performance, policies 7.1(1)(a) [the number of acts of misconduct] and 7.1(1)(b) [the nature and seriousness of the misconduct].) As Rothman notes: "[a]busive judicial behavior and the abuse of judicial power are probably the most serious threats to the Central Principle of Being a Judge ...." (Rothman et al., Cal. Judicial Conduct Handbook (4th ed. 2017) § 3:1, p. 127.)

In further aggravation, the commission found that Judge Wolfe's misconduct had a detrimental effect on both professional relationships with family court services staff and court administration, and on litigants. (See Policy Declarations of Com. on Jud. Performance, policy 7.1(1)(f) [nature and extent to which the misconduct has been injurious to other persons].)

The commission acknowledged that, in her response to the commission's investigation, and in her appearance before the commission, Judge Wolfe generally admitted her mistakes. (See Policy Declarations of Com. on Jud. Performance, policy 7.1(2)(a) [whether the judge has acknowledged the acts occurred and has shown an appreciation of the impropriety of his or her acts].)

Commission members Hon. Lisa B. Lench; Mani Sheik, Esq.; Ms. Leisa Biggers; Ms. Kay Cooperman Jue; Hon. Julia C. Kelety; Hon. Kimberly Merrifield; Mr. Gerald C. Shelton; and Ms. Beatriz E. Tapia voted to impose the public admonishment. Commission member Rickey Ivie, Esq. voted against the public admonishment and would have issued a private admonishment. Commission members Mr. Alton L. Garrett, Jr. and Mr. Richard A. Long did not participate.

Date: December 16, 2025



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Hon. Lisa B. Lench  
Chairperson