



UTAH JUDICIAL CONDUCT COMMISSION ANNUAL REPORT FY 2026

1385 S. State St., Suite 401
Salt Lake City, Utah 84115
Telephone: (801) 468-0021
www.jcc.utah.gov

Creation and Authority of the Judicial Conduct Commission

Although it existed previously as a legislatively created body, Utah's Judicial Conduct Commission ("JCC") was constitutionally established in 1984. Constitution of Utah, Article VIII, Section 13. The constitution authorizes the Legislature to statutorily establish the composition and procedures of the JCC. Those provisions are found in Utah Code Ann., Title 78A, Chapter 11.

The JCC is empowered to investigate and conduct confidential hearings regarding complaints against state, county and municipal judges throughout the state. The JCC may recommend the reprimand, censure, suspension, removal, or involuntary retirement of a judge for any of the following reasons:

- action which constitutes willful misconduct in office;
- final conviction of a crime punishable as a felony under state or federal law;
- willful and persistent failure to perform judicial duties;
- disability that seriously interferes with the performance of judicial duties; or
- conduct prejudicial to the administration of justice which brings a judicial office into disrepute.

Prior to the implementation of any such JCC recommendation, the Utah Supreme Court reviews the JCC's proceedings as to both law and fact. The Supreme Court then issues an order implementing, rejecting, or modifying the JCC's recommendation.

Number of FY26 Complaints

Of the **221** FY26 complaints received, **176** were resolved and **45** are pending. **1** FY25 complaints are pending.

Complaints Received in FY 26			
Judge Type	Number of Judges	Number of Complaints Received	Number of Judges Named in Complaints*
Appellate Courts	12	7	7
District	78	172	81
Juvenile	33	12	10
Justice Court	70	42	27
Pro Tempore	43	6	6
Active Senior	35	1	1
Total	273	218	109

(*Starting in FY19 and going forward, the JCC counts each judge once even though they may have been named in multiple complaints.)

Confidentiality of JCC Records and Proceedings

Except in certain limited circumstances specified by statute, all complaints, papers and testimony received or maintained by the JCC, and the record of any confidential hearings conducted by the JCC, are confidential, and cannot be disclosed.

Sanctions and Other Resolutions

Sanctions Implemented by the Utah Supreme Court

On 23 April 2026, the Supreme Court issued an Order of Reprimand against Judge Jed Labrum for violations of Rules 1.2, 2.1, and 2.12(B) for improperly delegating judicial duties to court staff. Specifically, on multiple occasions Judge Labrum engaged in personal activities that prevented him from being able to fulfill his duties as the on-call judge. As a result, he tasked court staff to complete judicial work on his behalf. This required him to give court staff inappropriate access to court computer systems, required court staff to work during off hours, and resulted in court staff acting on documents that should only be done by a judge. Judge Labrum engaged in conduct prejudicial to the administration of justice which brings a judicial office into disrepute. He accepted responsibility for his actions and expressed remorse for any harm his actions may have caused.

On 10 June 2026, the Supreme Court issued an Order of Censure against Judge William Kendall. He engaged in conduct prejudicial to the administration of justice which brings a judicial office into disrepute. Judge Kendall accepted responsibility for his actions, expressed remorse for any harm his actions may have caused and agreed to never seek judicial office again.

On 10 June 2026, the Supreme Court issued an Order of Censure against Judge Kevin Christensen for violations of Rules 1.1, 1.2, and 3.1(C) after he pled guilty to three (3) separate third degree felonies (one count of enticing a minor using the internet and two counts of dealing in materials harmful to a minor). He engaged in conduct prejudicial to the administration of justice which brings a judicial office into disrepute. He resigned prior to removal and agreed to never seek any judicial office again.

Dismissals with Warnings Issued by the Judicial Conduct Commission ("Commission")

On 1 July 2025, the Judicial Conduct Commission dismissed a complaint against a district court judge for violation of Rules 1.2, 2.3(A), 2.4(A), 2.8(B), 2.10(A), 2.11(A)(1). The judge made a statement during a court hearing. The statement made by the judge undermined the judge's impartiality, could reasonably be perceived as bias, was discourteous, and was evidence that the judge felt pressured. Also, if there was perceived bias, the judge should have disqualified themselves earlier in the proceedings. Also, in their disqualification order, the judge wrote explanatory comments. Utah Judicial Ethics Advisory Opinion 04-01 states that "judges should generally avoid commenting when granting a motion for disqualification. Comments in such an order serve no purpose in litigation." The judge accepted responsibility and explained that the misconduct was not intentional. The Commission found the behavior and misconduct were troubling but relatively minor for which no public sanction was warranted.

On 5 August 2025, the Judicial Conduct Commission dismissed various complaints against a district court judge for violation of Rule 1.2. During a sentencing explanation, the judge made certain statements describing a defendant that undermined the confidence and impartiality of the judiciary giving an appearance of impropriety. The judge accepted responsibility and was apologetic. The Commission found the behavior and misconduct were troubling but relatively minor for which no public sanction was warranted.

Sanctions and Other Resolutions

Dismissals with Warnings continued...

On December 2, 2025, the Judicial Conduct Commission dismissed a complaint against a justice court judge for violation of Rules 1.1, 1.3, 2.1, 2.8(B), and 2.12(B) of the Code of Judicial Conduct. The judge told a story to court staff which was sexual in nature and served no benefit to the operation of the court. The judge communicated with court staff in a disrespectful manner, including raising their voice or delivering instructions in a derogatory tone. The judge denied a court employee's request for medical leave unless the employee provided details on the reason for the appointment. The

Dismissals with Warnings continued...

judge also pressured a court employee to work at the judge's private law practice during a normal business day for the court. The work exposed the employee to privileged attorney-client information that included information on individuals personally known to the employee. The judge accepted responsibility and was apologetic. They have completed remediation training to further prevent repeating the misconduct described above. The Commission found the behavior and misconduct were troubling but relatively minor for which no public sanction was warranted.

Administrative Affairs

Meetings

The JCC meets on the first Tuesday of each month at the offices of the JCC. The JCC met eleven (11) times during FY26.

Administrative Rules

The JCC's administrative rules are available on-line at www.rules.utah.gov.

FY26 JCC Commissioners

Mark Raymond, Public Member (term ended)
Linda Dunn, Public Member (new)
Georgia Beth Thompson, Public Member
Stephen Studdert, Public Member
Cheyllynn Hayman, Attorney Member
Michele Ballantyne, Attorney Member
Rep. Grant Miller
Rep. Jordan Teuscher
Sen. Jen Plumb
Sen. Brady Brammer
Hon. Ryan Harris
Hon. Michael Edwards

JCC Statute

The statute governing the JCC is located in Utah Code Ann., Title 78A, Chapter 11.

Website

The JCC's website, www.jcc.utah.gov, contains in-depth information, links to related sites, annual reports, copies of public discipline documents, downloadable complaint forms and an online complaint portal.

Budget

Most of the JCC's budget is appropriated annually by the Legislature. For FY26, the legislative appropriation was \$ 646,000. The JCC had non-lapsing savings from FY25 in the amount of \$350,000. In FY26, the JCC had total available funds of \$996,000. The JCC expenses for FY25 were \$605,233; leaving a balance of \$390,767. The JCC will reserve \$350,000 in non-lapsing savings for FY27. The JCC will lapse \$40,767 back to the General Fund.

JCC Staff

Alex G. Peterson, Executive Director
Aimee Thoman, Investigative Counsel
Joe McGivern, Judicial Investigator
Cindie Cowles, Administrative Assistant

UTAH JUDICIAL CONDUCT COMMISSION – COMPLAINT RESOLUTION PROCESS

INITIAL SCREENING	PRELIMINARY INVESTIGATION	FULL INVESTIGATION	FORMAL PROCEEDINGS	SUPREME COURT
Executive Director reviews each “complaint” to determine whether it is a complaint within the JCC’s jurisdiction. Staff returns non-JCC complaints (i.e., complaints against bar members or court employees) to complainant with appropriate instructions. For JCC complaints, staff prepares electronic and hard-copy files, sends acknowledgment letter to complainant, and returns hard-copy file to Executive Director. Executive Director assigns investigator. <i>Note: Anonymous complaints are submitted directly to JCC members, who review and discuss the complaint and vote to either take no action or to have staff conduct a preliminary investigation.</i>	Investigator conducts preliminary investigation, writes preliminary investigation report, and recommends whether to dismiss or to proceed to full investigation as to some or all allegations. Executive Director reviews preliminary investigation report and recommendation, and may revise either. Staff distributes preliminary investigation report and recommendation, along with pertinent materials, to JCC members. JCC meets, reviews and discusses preliminary investigation report and votes to dismiss, to have staff conduct additional preliminary investigation, or to proceed to full investigation as to some or all allegations.	Staff provides judge with copy of complaint and other pertinent materials and asks judge to respond in writing to identified allegations. Investigator conducts additional investigation, if necessary, as to issues raised in judge’s response. Investigator may write supplemental investigation report and may make recommendation whether to dismiss or to proceed to formal proceedings. Staff distributes judge’s response and any supplemental investigation report and recommendation, along with pertinent materials, to JCC members. JCC meets, reviews and discusses judge’s response and any supplemental investigation report and votes to dismiss, to have staff conduct additional investigation, or to proceed to formal proceedings as to some or all allegations.	Staff prepares formal complaint and serves same upon judge via certified mail. Judge may file written response. Matter may be resolved by dismissal, stipulated resolution or confidential hearing. A stipulated resolution may recommend: Reprimand Censure Suspension Removal from Office Involuntary Retirement After a confidential hearing, the JCC may dismiss the matter or may recommend: Reprimand Censure Suspension Removal from Office Involuntary Retirement	Staff files JCC’s findings of fact, recommendation and other statutorily required materials with Supreme Court. JCC’s recommendation becomes public upon filing. All other materials become public only upon Supreme Court order. Supreme Court reviews JCC’s proceedings as to both law and fact, and implements, modifies or rejects JCC’s recommendation. <i>Note: JCC dismissals are not reviewed by the Supreme Court.</i>