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ONE HUNDRED NINETEENTH CONGRESS

Congress of the United States
House of Representatives
COMMITTEE ON THE JUDICIARY
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October 22, 2026

The Honorable Robert J. Conrad, Jr.
Secretary of the Judicial Conference of the United States
Administrative Office of the United States Courts
One Columbus Circle N.E.
Washington, DC 20544

Dear Judge Conrad:

The Committee on the Judiciary is charged with oversight of federal courts and judges.[1] We write to you, as the Secretary of the Judicial Conference of the United States, regarding concerns about potential judicial misconduct by Judge Kathleen Williams of the U.S. District Court for the Southern District of Florida. In particular, there is evidence that Judge Williams abused her judicial authority and violated fundamental tenets of judicial impartiality in connection with an unusual and unsupported order that imposed sanctions after the plaintiffs voluntarily had dismissed the underlying action.[2] We respectfully request that the Judicial Conference review the facts outlined in this letter and examine this matter.

On July 13, 2026, Judge Williams ordered sanctions against the plaintiffs' attorneys in connection with a case brought by President Donald Trump in his personal capacity against the Internal Revenue Service (IRS) for leaking his tax returns.[3] The complaint sought at least $10 billion in damages over the disclosure of President Trump's tax return information by Charles Littlejohn, a former IRS contractor who pleaded guilty in 2023 and was sentenced in January 2024 to five years in prison.[4] Judge Williams's sanctions order concluded that the lawsuit was brought for an "improper purpose" in violation of Federal Rule of Civil Procedure 11 and that the lawsuit merited sanctions under the Court's inherent sanction authority.[5]

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[1] Rules of the House of Representatives, R. X, 119th Cong. (2026).
[2] Order, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106; *see also Trump v. Thirty-Five Former Fed. Judges*, No. 26-12692 (11th Cir.) (appeal from the same order).
[3] *See* Order, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106; Gary Grumbach & Dareh Gregorian, *Trump administration tried to 'manipulate the judicial process' with its IRS settlement, judge says*, NBC NEWS (July 13, 2026), https://www.nbcnews.com/politics/donald-trump/judge-says-trump-administration-attempted-manipulate-judicial-process-rcna587321.
[4] *See* Order at 3-4, 17, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106.
[5] *Id.* at 38.

From the public information available about this matter, Judge Williams's order appears to be an abuse of judicial authority and motivated by partisan animus. As an initial matter, rather than resolve a potential question about sanctions using the parties' submissions alone, Judge Williams entertained an unsolicited motion from nonparties who had no stake in the dispute, and ordered the plaintiffs to respond to it.[6] These nonparties were represented in part by an activist attorney with a documented bias against President Trump who is now affiliated with a partisan organization that brags about its voluminous legal actions against the Trump Administration.[7]

Second, although Judge Williams allowed these nonparties to make an unsolicited motion, her July 13 order did not actually address the relief that the nonparties raised.[8] The nonparties asked only that the court set aside the case's dismissal and reopen the litigation.[9] Judge Williams did not reopen the case. Instead, she issued sanctions and, in doing so, adopted the facts and characterization of events that the nonparties offered.[10] In effect, nonparties with no stake in the dispute supplied the rationale and reasoning for these sanctions, a relief they never sought and information that would not be on the record if not for Judge Williams's decision to accept their unsolicited motion. These facts raise questions about whether Judge Williams exceeded the scope of her authority and whether she conducted the proceedings fairly and impartially.

Third, the timing of Judge Williams's order is suspect. Judge Williams issued her July 13 order *after* the plaintiffs filed a notice of voluntary dismissal of the case, ending the dispute between the parties.[11] Although Judge Williams invoked the court's inherent authority to impose sanctions, the Committee is not aware of Eleventh Circuit precedent applying inherent sanctions authority after a plaintiff has voluntarily dismissed a case based on briefing by partisan nonparties on an unrelated question the court never decided.[12] A voluntary dismissal ordinarily indicates that a plaintiff no longer intends to proceed to trial or that the parties are exploring

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[6] *See* Order at 1-2, 52-54 & n.68, *Trump v. Internal Revenue Service,* No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106 (distinguishing the amici the Court appointed on April 29, 2026, to brief subject-matter jurisdiction, from the non-party movants who moved under Rule 60 to reopen the case).

[7] Mot. for Relief from J. or Order, or, in the Alternative, for Leave to Appear as Amici Curiae by Thirty-Five Former Federal Judges at 15, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. May 27, 2026), ECF No. 63 (signature block of Norman Eisen); Democracy Defenders Action, *About*, https://www.democracydefendersaction.org/who-we-are/about/ (co-founded by Mr. Eisen, Democracy Defenders Action claims to "outmaneuver enemies of democracy and defeat autocracy however it presents itself") (last visited Sept. 23, 2026).

[8] *See* Mot. for Relief from J. or Order, *supra* note 8, at 1, 4.

[9] *Id.* at 13 (asking the Court to "set aside the Notice and order of dismissal and reopen the case for further proceedings"); *id.* at 4 (stating that the Court "need not decide" whether a fraud occurred "now").

[10] *See* Order at 9-10, 38 n.59, 43, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106 (proceeding under Rule 11 as a matter collateral to the dismissed case, and adopting the non-party movants' summary of plaintiffs' conduct with the statement, "The Court agrees.") (citing Non-Party Movants' Reply at 12, ECF No. 94).

[11] *See* Order at 6, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106 (plaintiffs filed their notice of voluntary dismissal on May 18, 2026, three days before the deadline the Court had set for briefing on its jurisdiction).

[12] *See id.* at 47-48 (invoking the Court's inherent authority after acknowledging that Rule 11 limits monetary sanctions following a voluntary dismissal).

settlement; it does not establish a "fraud on the court" as the nonparties asserted.[13]

In addition, the nonparties filed their motion on May 27, 2026—nine days after the plaintiffs voluntarily dismissed the case—and completed their briefing on June 19.[14] Judge Williams issued her order on July 13, two days before then-Acting Attorney General Todd Blanche's confirmation hearing in the Senate.[15] Judge Williams unnecessarily maligned Attorney General Blanche in her order,[16] which partisan actors subsequently used against him during the confirmation hearing for political advantage.[17] Following her order, the Department of Justice asked the Eleventh Circuit to reassign the case to a different judge based on the appearance of Judge Williams's bias, stating that the "surrounding circumstances give the strong appearance" that order was "done for an improper political motivation."[18]

Finally, the sanctions imposed appear unusual. Judge Williams referred one attorney, Alejandro Brito, to the Florida Bar for potential disciplinary action and took the extraordinary step of barring another attorney, Daniel Epstein, from seeking admission *pro hac vice* in the entire Southern District of Florida for one year.[19] Judge Williams also directed the clerk of court to mail a copy of the order to the State Bar of New York, where Attorney General Blanche is a member, and to the District of Columbia Bar, where Associate Attorney General Stanley Woodward is a member, implying misconduct on their part.[20] In addition, Judge Williams invited amici who represented a partisan legal advocacy organization,[21] and the nonparties to seek reimbursement for their attorneys' fees from plaintiffs, a monetary sanction that Rule 11

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[13] *See id.* at 1 (describing the non-party movants' argument that the case was "a fraud on the Court"); *id.* at 49-50 (explaining that bad faith is present where "fraud has been practiced upon" the court) (citing *Chambers v. NASCO, Inc.,* 501 U.S. 32, 44 (1991)).
[14] *Id.* at 1-2, 6.
[15] *See infra* note 18; Order, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106.
[16] *See, e.g.*, *id.* at 29 n.38, 31-32, 33 n.48, 37.
[17] *See* "The Nomination of the Honorable Todd Blanche to be Attorney General of the United States": Hearing before the S. Comm. on the Judiciary, 119th Cong. (July 15, 2026) (statement of Sen. Dick Durbin, Ranking Member).
[18] Defs.' Resp. to Appellants' Time-Sensitive Mot. for Stay at 34, *Trump v. Thirty-Five Former Fed. Judges*, No. 26-12692 (11th Cir. Aug. 12, 2026), ECF No. 10.
[19] Order, *supra* note 16, at 46-47.
[20] *Id.* at 53-54. Attorney General Blanche previously served as President Trump's personal criminal defense attorney. *Id.* at 31-32. Associate Attorney General Woodward previously represented President Trump's co-defendant Walt Nauta and several January 6 defendants. *Id.* at 31. Mr. Woodward signed the settlement on behalf of the United States that concluded the litigation, and Mr. Blanche issued the accompanying order. *Id.* at 8, 30-32, 54; *Todd Blanche confirmed by the US Senate as Attorney General; Collins, Murkowski Vote No*, N.J. Monitor (Aug. 8, 2026), https://newjerseymonitor.com/2026/08/08/repub/todd-blanche-confirmed-attorney-general/.
[21] Br. of Amici Curiae Former Gov't Officials & Pub. Int. Orgs. at 17-18, *Trump v. Internal Revenue Service,* No. 1:26-cv-20609-KMW (S.D. Fla. June 22, 2026), ECF No. 95-1 (signature block identifying Democracy Forward Foundation as counsel for amici); s*ee also* Press Release, Democracy Forward, *On Anniversary of Trump's Second Inauguration, Democracy Forward Marks Record Litigation Wins, Commits to Continue Collaborative Work to Defeat Autocracy and Advance Democracy* (Jan. 26, 2026), https://democracyforward.org/news/press-releases/on-anniversary-of-trumps-second-inauguration-democracy-forward-marks-record-litigation-wins-commits-to-continue-collaborative-work-to-defeat-autocracy-and-advance-democracy/.

generally does not permit a court to impose on its own initiative after a voluntary dismissal.[22]

These circumstances are concerning not only because the sanctions were unusual, but also because they implicate the integrity and impartiality of the federal judiciary. Canon 2 of the Code of Conduct for United States Judges requires a judge to avoid impropriety and the appearance of impropriety in all activities.[23] Canon 3 requires a judge to perform the duties of office fairly, impartially, and diligently.[24] Canon 5 requires a judge to refrain from political activity.[25] The timing and posture of the July 13 order, the reliance on unsolicited information from politically motivated nonparties, and the direction that copies of the order be sent to the New York and D.C. bars raise questions whether Judge Williams complied with these ethical obligations.

Judge Williams's conduct risks undermining public confidence in the federal courts. Accordingly, we respectfully ask that the Judicial Conference review this matter, including whether it warrants referral to the Judicial Council of the Eleventh Circuit or other appropriate action, and that you inform the Committee of steps taken no later than 5:00 p.m. on November 5, 2026.

The Committee has jurisdiction over "[t]he judiciary and judicial proceedings" and "[f]ederal courts and judges," pursuant to the Rules of the House of Representatives.[26] If you have any questions, please contact Committee staff at (202) 225-6906. Thank you for your prompt attention to this matter.

Sincerely,

Jim Jordan
Chairman

Darrell Issa
Chairman
Subcommittee on Courts, Intellectual Property, Artificial Intelligence and the Internet

cc: The Honorable Jamie Raskin, Ranking Member

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[22] Fed. R. Civ. P. 11(c)(5)(B) (providing that a court "must not impose a monetary sanction . . . on its own, unless it issued the show-cause order under Rule 11(c)(3) before voluntary dismissal or settlement of the claims"); *see also* Order at 44-46, 53, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. July 13, 2026), ECF No. 106.

[23] Code of Conduct for United States Judges Canon 2 (Jud. Conf. of the U.S. 2019), https://www.uscourts.gov/administration-policies/judiciary-policies/ethics-policies/code-conduct-united-states-judges.

[24] *Id.* Canon 3.

[25] *Id.* Canon 5.

[26] Rules of the House of Representatives, R. X, 119th Cong. (2026).

The Honorable Hank Johnson, Ranking Member, Subcommittee on Courts, Intellectual Property, Artificial Intelligence, and the Internet