[redacted]

April 22, 2026

Office of Disciplinary Counsel
District of Columbia Court of Appeals
Building A, Room 117
515 Fifth Street NW
Washington, DC 20001

Re: Formal Disciplinary Complaint Against John G. Roberts Jr., DC Bar Member

Dear Disciplinary Counsel:

Enclosed please find a formal disciplinary complaint filed under DC Bar Rule XI, Section 6(a)(2), against John G. Roberts Jr., a member of the District of Columbia Bar admitted in August 1981.

The complaint alleges that Mr. Roberts violated DC Rule of Professional Conduct 8.4(c) and 8.4(b) through a sixteen-year pattern of mischaracterizing his spouse's commission income as "salary" on annual federal financial disclosure forms required under the Ethics in Government Act, 5 U.S.C. §§ 13101 et seq., and through a three-year omission of his spouse's material equity interest in her employer from the same forms. The complaint is supported by Mr. Roberts's own subsequent admission of error, by contemporaneous reporting in *Business Insider*, *The New York Times*, and *Politico*, by the legal memorandum of Professor Bennett L. Gershman of Pace Law School submitted with the Price whistleblower complaint of December 2022, and by the public statements of Richard W. Painter, the chief White House ethics lawyer under President George W. Bush.

I file this complaint as a member of the public, in good faith, based entirely on documentary evidence in the public record. I have no personal relationship with Mr. Roberts, no pecuniary interest in any matter before the Supreme Court, and no involvement in any litigation in which Mr. Roberts has participated. I file because the conduct alleged falls squarely within established DC Bar disciplinary precedent and because the Rules of Professional Conduct require equal application to every member of the Bar.

The enclosed complaint includes a verification under penalty of perjury, citation to controlling DC Court of Appeals authority, and supporting exhibits. I respectfully request that this Office open a formal investigation under DC Bar Rule XI, Section 6, and request a written response from Mr. Roberts under Section 8. If this Office determines not to pursue formal proceedings, I respectfully request a written

explanation of that determination.

I am available to provide additional documentation or to clarify any aspect of the enclosed complaint. I thank this Office for its attention to this matter.

Respectfully,

[redacted]

Enclosures: Formal Disciplinary Complaint with Exhibits A–F

DISCIPLINARY COMPLAINT

TO: Office of Disciplinary Counsel
District of Columbia Court of Appeals
Building A, Room 117
515 Fifth Street NW
Washington, DC 20001

FROM: [redacted]

DATE: April 22, 2026

RE: Formal Disciplinary Complaint Against John G. Roberts Jr., DC Bar Member

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I. STANDING

I am a member of the public. I file this complaint under DC Bar Rule XI, Section 6(a)(2), which imposes on this Office the duty to investigate alleged attorney misconduct from any source. No standing requirement applies, and I assert none beyond my interest as a citizen in the integrity of the District of Columbia Bar and of the federal judiciary.

II. JURISDICTION

John G. Roberts Jr. is a member of the District of Columbia Bar, admitted in August 1981. DC Bar Rule XI, Section 1(a) provides:

> "All members of the District of Columbia Bar, all persons appearing or participating pro hac vice in any proceeding in accordance with Rule 49(c)(1) of the General Rules of this Court, all persons licensed by this Court as Special Legal Consultants under Rule 46(c)(4), all new and visiting clinical professors providing services pursuant to Rule 48(c)(4), and all persons who have been suspended or disbarred by this Court are subject to the disciplinary jurisdiction of this Court and its Board on Professional Responsibility."

The text draws no distinction between active, judicial, inactive, or retired members. Mr. Roberts, whether classified as active or judicial under DC Bar Rule II, is a "member of the District of Columbia Bar" and is therefore subject to the disciplinary jurisdiction of this Court and its Board on Professional Responsibility.

The conduct at issue is not a judicial decision, a ruling from the bench, or any act of adjudication. The conduct at issue is Mr. Roberts's execution of sixteen consecutive sworn federal financial disclosure forms required of him under the Ethics in Government Act, 5 U.S.C. §§ 13101 to 13111. These are personal administrative filings made by Mr. Roberts in his individual capacity. The duty to file them attaches to him as a federal officer subject to the Ethics in Government Act, not as a judge adjudicating any matter, and the attorney conduct rules apply to the execution of sworn statements to the federal government regardless of the filer's professional station.

This Court has consistently exercised jurisdiction over members for false statements on personal sworn filings to government bodies. *In re Slattery*, 767 A.2d 203 (D.C. 2001), establishes that this Court disciplines federal judicial officers for off-bench dishonesty. *In re Clark*, Bd. Docket No. 22-BD-0891F (D.C. Bd. on Prof'l Resp. 2025), recently rejected senior-federal-officer immunity arguments as "absurd." DC Bar Ethics Opinion 323 expressly affirms that Rule 8.4(c) "applies to attorneys in whatever capacity they are acting" and is "not limited to conduct occurring during the representation of a client."

III. RESPONDENT

John G. Roberts Jr., a member of the District of Columbia Bar since August 1981, serves as Chief Justice of the United States. He has served on the Supreme Court since September 29, 2005. His professional address is 1 First Street NE, Washington, DC 20543.

IV. STATEMENT OF FACTS

The following facts are drawn from public sources, principally Business Insider's investigative reporting of April 28, 2023, the Price whistleblower complaint filed with Congress and the Department of Justice in December 2022, the legal memorandum of Professor Bennett L. Gershman submitted with that complaint, the public statements of Richard W. Painter, and Mr. Roberts's own federal financial disclosure forms on file with the Administrative Office of the United States Courts.

A. Jane Sullivan Roberts's commission income, 2007–2014

From 2007 through 2014, Jane Sullivan Roberts, Mr. Roberts's wife, worked as a legal recruiter at Major, Lindsey & Africa ("MLA"). Her compensation was paid by commission, with payments originating from the law firms that hired candidates she placed.

Internal MLA spreadsheets published by Business Insider on April 28, 2023, document that Ms. Roberts received $10,323,842.70 in commissions on $13,309,433 in attributed firm revenue during this seven-year period. A former MLA managing partner, Mark Jungers, told Politico on September 29, 2022, that the firm hired Ms. Roberts hoping it would benefit from her being the Chief Justice's wife. The Price whistleblower complaint identifies Ms. Roberts as the highest earning recruiter in the entire company by a wide margin.

Documented placements, as reported by The New York Times on January 31, 2023, include: Robert Bennett to Hogan Lovells (2009); former United States Attorney Neil MacBride to Davis Polk (2013);

former Interior Secretary Kenneth Salazar to WilmerHale (2013); and New York Federal Reserve general counsel Michael Held to WilmerHale (2022). Each of these law firms appears regularly before the Supreme Court of the United States. Hogan Lovells argued eight Supreme Court cases in 2024 and has represented nearly ten percent of the Court's entire docket in recent terms. WilmerHale had eighteen cases before the Court in the single term of 2016.

Ms. Roberts testified under oath in 2015 arbitration proceedings that she placed senior government lawyers at salaries ranging up to $3 million and that her business is largely driven by referrals because, as she stated, "Successful people have successful friends."

The arrangement created a household financial interest in the success of the law firms paying Ms. Roberts's commissions. Recruiter commissions are calculated as a percentage of the placed partner's first-year compensation, and partner compensation at the firms paying Ms. Roberts is itself a function of firm profitability, which is materially affected by the firms' success rates before the courts in which they appear, including the Supreme Court of the United States. Future placement business between Ms. Roberts and any given firm is also a function of that firm's ongoing prestige and demand for senior partners. Professor Gershman addressed this directly in his memorandum, concluding that Ms. Roberts had "an interest, whether measured as past compensation, ongoing business relationship, or future commissions, that could be substantially affected" by Mr. Roberts's rulings in cases the firms argued. The mischaracterization of this commission income as "salary" concealed from public scrutiny the existence and magnitude of the household's financial interest in the firms appearing before the Court. The materiality of the disclosure failure is established by the materiality of the conflict the failure concealed.

B. The sixteen-year pattern of "salary" characterization, 2007–2021

From calendar year 2007 through calendar year 2021, Mr. Roberts signed annual federal financial disclosure forms required of every Article III judge under the Ethics in Government Act. On each of those fifteen forms, in Part III-B (Spouse's Non-Investment Income), he characterized the compensation from MLA, and from 2019 forward Macrae Inc., as "salary." Business Insider, which reviewed the disclosure forms directly, reported on April 28, 2023, that Mr. Roberts's filings listed Ms. Roberts's $10.3 million in commissions as "salary."

The characterization was contradicted by the underlying employment records. Ms. Roberts's compensation was commission-based, paid by the transaction, with the ultimate sources of payment being third-party law firms hiring her candidates. "Salary" and "commission" are legally distinct categories of compensation. They are taxed differently, reported differently, and treated differently under the conflict-of-interest rules that apply to federal judges under 28 U.S.C. § 455.

Professor Bennett L. Gershman of the Elisabeth Haub School of Law at Pace University, in a legal memorandum filed with the Price whistleblower complaint, concluded:

> "Characterizing Mrs. Roberts' commissions as 'salary' is not merely factually incorrect; it is incorrect as a matter of law. The legal distinction between these terms is clear, undisputed, and legally material. If the Chief Justice's inaccurate financial disclosures were

> inadvertent, presumably he should file corrected and amended disclosures."

Richard W. Painter, the chief White House ethics lawyer under President George W. Bush from 2005 to 2007 and the attorney who prepared Mr. Roberts for his 2005 Senate confirmation hearings, wrote in MSNBC on May 3, 2023:

> "Chief Justice John Roberts' wife, Jane, has made millions in commissions as a legal recruiter for law firms — including firms that argue cases before the court. But the chief justice fudged the details in his annual disclosure, misleadingly describing his wife's earnings as 'salary.'"

C. The 2022 form and admission of correction

Mr. Roberts's financial disclosure report for calendar year 2022, dated May 15, 2023, and released by the Administrative Office of the United States Courts in June 2023, for the first time described Ms. Roberts's compensation accurately. The form states, verbatim, in Part III-B, Line 1:

> "Macrae, Inc. -- Attorney Search Consultants -- recoverable base salary and commission (see Part VIII)"

In Part VIII of the same form, Mr. Roberts provides the following explanatory statement, verbatim:

> "Part III-B., line 1. Spousal non-investment income type clarified over prior year reports."

The change in characterization, after sixteen consecutive years of identical "salary" treatment, followed Business Insider's publication of the MLA commission spreadsheets on April 28, 2023, by approximately seventeen days.

D. The three-year omission of the Macrae equity interest, 2019–2021

Ms. Roberts acquired an equity interest in Macrae Inc., valued between $100,001 and $250,000, in 2019, at the commencement of her employment with that firm. The interest was material and reportable under the Ethics in Government Act on Part VII (Investments and Trusts) of the annual disclosure form.

Mr. Roberts's disclosure reports for calendar years 2019, 2020, and 2021 omitted the Macrae equity interest from Part VII entirely. The interest first appeared on the calendar year 2022 form, filed May 15, 2023. The 2019, 2020, and 2021 reports were formally amended in 2023 to add the equity asset.

In Part VIII of the 2022 form, Mr. Roberts states, verbatim:

> "Part VII., line 114. Reports from 2019 through 2021 disclosed spousal non-investment income from Mlegal Group, Inc. / Macrae, Inc. in Part III-B., but inadvertently omitted from Part VII a non-income-generating equity holding obtained incident to commencement of employment. Reports from 2019 to 2021 have been amended to reflect this asset."

This is Mr. Roberts's own admission that a material financial interest was omitted from three consecutive annual sworn filings. He attributes the omission to inadvertence. The correction followed Business Insider's publication of April 28, 2023, by approximately seventeen days, rather than any

internal audit or routine review.

V. ALLEGED VIOLATIONS

A. Rule 8.4(c): Conduct involving dishonesty and misrepresentation

DC Rule of Professional Conduct 8.4(c) provides that it is professional misconduct for a lawyer to "engage in conduct involving dishonesty, fraud, deceit, or misrepresentation."

The sixteen-year pattern of characterizing Ms. Roberts's commission income as "salary" on sworn federal disclosure forms constitutes conduct involving dishonesty and misrepresentation within the meaning of Rule 8.4(c). The characterization was factually incorrect and, as Professor Gershman concluded, incorrect as a matter of law.

This Court has held that Rule 8.4(c) requires intentional conduct, but recklessness suffices for material misrepresentation. *In re Rosen*, 570 A.2d 728 (D.C. 1989). The pattern at issue satisfies that standard. A single inadvertent mischaracterization on one form might be negligence. Sixteen consecutive identical mischaracterizations across sixteen separate annual filings, made under oath and corrected only after public exposure by a journalistic investigation, cannot be negligence under any reasonable reading. The consistency of the error across more than a decade and a half, the material legal distinction the error concealed, and the timing of the correction establish the knowing and intentional character of the conduct.

The three-year omission of the Macrae equity interest from filings in 2019, 2020, and 2021 constitutes additional conduct involving dishonesty and misrepresentation under Rule 8.4(c). The claim of inadvertence fails for the same reason. Inadvertence describes a single oversight, not a three-year pattern corrected only after public exposure.

B. Rule 8.4(b): Criminal act reflecting adversely on honesty and fitness

DC Rule of Professional Conduct 8.4(b) provides that it is professional misconduct for a lawyer to "commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects."

Two federal statutes establish the underlying predicate criminal conduct.

5 U.S.C. § 13106(a) makes willful falsification of required EIGA disclosure information subject to civil penalties up to $50,000 per violation. Subsection (b) imposes a mandatory referral duty: the head of each agency or, in the case of the federal judiciary, the Judicial Conference, "shall refer to the Attorney General the name of any individual which such official or committee has reasonable cause to believe has willfully failed to file a report or has willfully falsified or willfully failed to file information required to be reported."

18 U.S.C. § 1001(a) makes it a federal crime, punishable by up to five years imprisonment, to knowingly and willfully falsify, conceal, or cover up a material fact, or to make any materially false, fictitious, or fraudulent statement or representation, in any matter within the jurisdiction of the

executive, legislative, or judicial branch of the United States.

Mr. Roberts's sixteen-year pattern of submitting financial disclosure forms to the Administrative Office of the United States Courts that mischaracterized the nature of his wife's compensation, and his three-year omission of a reportable equity interest, constitute knowing and willful false statements in matters within federal jurisdiction. The Comment to Rule 8.4 specifically identifies "willful failure to file an income tax return" as a category of criminal conduct reflecting adversely on fitness to practice. Willful submission of false federal financial disclosure forms is analytically identical and is more directly connected to fitness to practice, because the disclosure regime exists to prevent conflicts of interest in the administration of justice.

VI. PRECEDENT

The conduct alleged in this complaint falls squarely within established disciplinary precedent. Multiple cases from this Court and from analogous jurisdictions address each material element of the misconduct. Each case resulted in suspension or disbarment.

A. Multi-year false sworn filings to federal authorities

In re Tun, Bd. Docket No. 19-BD-019 (D.C. Bd. on Prof'l Resp. 2020). A DC Bar member filed six annual federal-court bar renewal applications under penalty of perjury, falsely answering "no" to disciplinary-history questions across all six. The respondent argued the misrepresentations were inadvertent and that he held a good-faith interpretation of the question. The Board rejected both defenses. The Board characterized the inadvertence claim as "deploying mental gymnastics to convince himself that his dishonesty when completing his renewal applications is permitted." The Board found the multi-year pattern made the case "more comparable to those cases resulting in disbarment, than those imposing a lesser sanction." Six false sworn federal forms drew disbarment-level discipline.

In re Howes, 39 A.3d 1 (D.C. 2012). The Court of Appeals disbarred a federal Assistant United States Attorney for protracted dishonest conduct on official forms, rejecting a Board recommendation of suspension as too lenient. The Court held that the misconduct was "significantly compounded by the protracted and extensive nature of the dishonesty involved." The Court rejected mitigation arguments based on cooperation and lack of personal financial gain. The duration of the pattern, standing alone, was sufficient to convert a suspension case into a disbarment case.

In re Shorter, 570 A.2d 760 (D.C. 1990). Disbarment for a twelve-year pattern of false sworn federal tax filings. The Court denounced "a pattern of dishonest dealing" and emphasized that the duration and consistency of the misrepresentations established the intentional character of the conduct.

B. Mischaracterization of the nature of income on sworn financial forms

In re Kennedy, 542 A.2d 1225 (D.C. 1988). An attorney misstated the amount and character of his compensation on a financial form filed with a third party. The Court suspended him under Rule 8.4(c) and held that "[r]eliance is not essential to a finding of dishonesty," that "[t]he misrepresentation here was admittedly material and dishonest," and that misconduct on financial forms unrelated to the practice of law still triggers the dishonesty rule.

In re Cerroni, 683 A.2d 150 (D.C. 1996). One-year suspension for false statements on federal HUD forms. The Court treated false statements on personal sworn filings to a federal agency as a serious Rule 8.4(c) violation regardless of the underlying purpose of the filing.

In re Casalino, 916 A.2d 932 (D.C. 2007). Three-year pattern of willful concealment on sworn filings. Reciprocal discipline imposed following Maryland disbarment.

C. Inadvertence and post-exposure correction

In re Rosen, 570 A.2d 728 (D.C. 1989). An attorney signed a sworn oath denying disqualifying changes in his disciplinary status when in fact he was defending pending misconduct complaints. He argued the misstatement was unintentional. The Court rejected the defense and held: "Since this case involves a material misrepresentation rather than a mere nondisclosure, 'deliberateness' is not required. Recklessness suffices." The Court characterized the respondent's "casual treatment of the oath" as "an obvious and culpable contempt for an attorney's duty to be candid."

In re Schneider, 553 A.2d 206 (D.C. 1989). Knowing submission of a false document is a Rule 8.4(c) violation even without intent to deceive a specific party.

D. Multi-year inaccurate annual financial disclosure forms by judges

Matter of Joseph S. Alessandro, 13 N.Y.3d 238 (N.Y. 2009). The New York Court of Appeals upheld removal of a judge who, over a multi-year period, omitted material financial information from his mandatory financial disclosure statements. The Court rejected the argument that the omissions were attributable to carelessness: "[Respondent] engaged in a prolonged course of deliberately deceptive behavior in that he intentionally withheld information about the loan from his campaign manager on his mandatory financial disclosure statement. Like the Commission, we therefore reject Joseph's argument that these omissions should be attributed to mere carelessness."

Matter of Alessandro, 95 A.D.3d 6 (N.Y. App. Div. 2d Dep't 2012). The Appellate Division separately disbarred Alessandro as an attorney based on the same conduct, applying the judicial-conduct findings under collateral estoppel.

Matter of Miller, 35 N.Y.3d 484 (N.Y. 2020). The New York Court of Appeals removed a judge for years-long delays in filing mandatory financial disclosure forms and for amending tax returns and financial disclosures only after investigation began. The Court held: "[P]etitioner's years-long delay in filing required local financial disclosure forms, together with his failure to amend both his tax returns and 2015 FDF until he was under investigation, impedes the purpose of these disclosure forms, which

is, in part, to enable lawyers and litigants to determine whether to request a judge's recusal. The pattern goes beyond mere carelessness and points to a pattern of disregard for his ethical obligations."

The New York Commission on Judicial Conduct's published policy statement frames the principle: "Material omissions that were intentional or grossly negligent would be especially egregious and, if proven, lead to serious disciplinary consequences. Even inadvertent omissions may thwart the intended purpose of the reporting requirement by concealing information about conflicts that might have prompted a litigant or lawyer to request a new judge in a case."

E. False federal financial disclosure forms by federal judges

The Porteous record. Federal District Judge G. Thomas Porteous Jr. was impeached and removed from office in December 2010 on a record that included, as a freestanding lead allegation, false annual federal financial disclosure forms filed under the Ethics in Government Act. The Judicial Conference of the United States found "substantial evidence that Judge Porteous repeatedly committed perjury by signing false financial disclosure forms under oath in violation of law, concealing the cash and things of value he solicited and received from lawyers appearing in litigation before him." The Senate convicted on all four articles. Louisiana granted permanent resignation in lieu of disciplinary proceedings on January 12, 2011, the functional equivalent of disbarment.

F. The doctrinal spine

Synthesizing the foregoing, the controlling principles are:

One. Mischaracterizing the nature of compensation on a sworn financial form is per se dishonest under Rule 8.4(c) (*Kennedy*).

Two. Recklessness, not deliberateness, suffices for a material misrepresentation (*Rosen*).

Three. A multi-year pattern of identical sworn misrepresentations converts a suspension case into a disbarment case (*Howes*, *Shorter*, *Tun*).

Four. Post-exposure correction is aggravating, not mitigating (*Tun*, *Miller*, *Howes*).

Five. Multi-year inaccurate annual financial disclosure forms by attorney-judges, corrected only after investigation, produce disbarment when committed by attorney-judges (*Alessandro*).

Six. False federal financial disclosure forms by federal judges concealing financial relationships with attorneys appearing before them produce removal and disbarment-equivalent consequences (*Porteous*).

Each principle is established by direct authority. Each principle applies to the conduct alleged here. The conduct alleged exceeds the conduct in every cited precedent in scale, duration, or both.

VII. ANTICIPATED DEFENSES

A. DC Bar Ethics Opinion 323

Mr. Roberts may invoke DC Bar Ethics Opinion No. 323 (2004), which held that government lawyers acting in a non-representational official capacity do not violate Rule 8.4 if they make misrepresentations they reasonably believe are authorized by law. Opinion 323 does not apply for three independent reasons.

First, Opinion 323 addresses authorized cover statements by intelligence officers in the performance of national security duties. Its premise is that the misrepresentation is affirmatively authorized by law for the conduct of official duties. No law authorizes a federal judge to mischaracterize spousal income on a personal financial disclosure form. The Ethics in Government Act requires accurate disclosure. Nothing in that statute authorizes its own falsification.

Second, Opinion 323 applies only to conduct "reasonably intended to further the conduct of official duties." Mis-labeling a spouse's commission income as "salary" does not further any official judicial duty. Its only practical effect is to conceal from public and oversight scrutiny the identities of the third-party law firms paying the judge's household.

Third, Opinion 323 expressly reaffirms that Rule 8.4(c) "applies to attorneys in whatever capacity they are acting" and "is not limited to conduct occurring during the representation of a client." Its narrow exception for authorized intelligence cover cannot be extended to cover sworn federal disclosures that the disclosure statute affirmatively requires be accurate.

B. Inadvertence

Mr. Roberts has publicly attributed the three-year equity interest omission to inadvertence. The defense fails. A three-year pattern, corrected only after journalistic exposure of the underlying records, is incompatible with the ordinary meaning of inadvertence. Inadvertence is unavailable as to the sixteen-year "salary" characterization for the further reason that the same misrepresentation was repeated in fifteen consecutive annual filings (with the sixteenth correcting the prior fifteen). Under *In re Rosen*, 570 A.2d 728 (D.C. 1989), recklessness suffices for a Rule 8.4(c) violation. A pattern of identical misrepresentations across fifteen consecutive sworn filings is, at minimum, reckless.

C. Reliance on Administrative Office guidance

If Mr. Roberts asserts that the "salary" characterization reflected guidance from Administrative Office staff, the defense fails. A judge's disclosure obligation under the Ethics in Government Act is personal. Reliance on staff advice does not transfer responsibility for sworn filings. No AO guidance could authorize a characterization that conflicts with the plain requirements of the disclosure statute. Mr. Roberts's own 2022 correction to "recoverable base salary and commission," accompanied by his contemporaneous statement that the income "type" required "clarification," constitutes an admission that the prior characterization was incomplete.

D. Materiality

If Mr. Roberts asserts that the distinction between "salary" and "commission" is not material to the statutory purposes of the disclosure regime, the defense fails. The Ethics in Government Act requires disclosure of spousal income precisely to enable public identification of the third-party sources of payments that might create conflicts of interest for the reporting judge. A "salary" designation implies a single employer as the source. A "commission" designation flags third-party payors. Concealing that distinction defeats the statutory purpose. Professor Gershman expressly addresses this: the distinction is "clear, undisputed, and legally material." Mr. Roberts's own 2023 correction, accompanied by his acknowledgment that the income "type" required "clarification," independently demonstrates materiality.

E. Jurisdiction

If this Office considers declining the complaint based on the practice statement that it does not investigate complaints against "judges acting in a judicial capacity," that practice does not apply here. The conduct alleged is not a judicial decision, ruling, or adjudicative act. It is the personal execution of sworn federal financial disclosure forms in Mr. Roberts's individual capacity. *In re Slattery*, 767 A.2d 203 (D.C. 2001), establishes that this Court disciplines federal judicial officers for off-bench dishonesty. *In re Clark* recently rejected senior-federal-officer immunity arguments as "absurd."

VIII. WHY DISCIPLINE IS NECESSARY

This Court's precedents establish that the conduct alleged here warrants the most severe sanction available. If Mr. Tun drew disbarment-level discipline for six false sworn federal forms, Mr. Roberts's sixteen filings warrant at least the same. If Mr. Shorter drew disbarment for a twelve-year pattern of false sworn federal filings, Mr. Roberts's sixteen-year pattern warrants at least the same. If Mr. Kennedy drew suspension for one mischaracterization of the nature of income, Mr. Roberts's fifteen consecutive identical mischaracterizations warrant substantially more. If Mr. Rosen drew suspension for reckless treatment of one sworn oath, Mr. Roberts's pattern of identical reckless treatment across fifteen oaths warrants substantially more. If Judge Alessandro drew judicial removal and separate disbarment for multi-year inaccurate annual financial disclosure forms corrected only after investigation, Mr. Roberts's identical pattern warrants the same. If Judge Porteous drew impeachment, removal, and de facto disbarment for false EIGA disclosures concealing financial relationships with attorneys appearing before him, Mr. Roberts's documented pattern of false EIGA disclosures concerning $10.3 million in commission income from such attorneys warrants at least equivalent attorney discipline.

The aggravating factors enumerated in the ABA Standards for Imposing Lawyer Sanctions are present in unusual concentration: dishonest motive; pattern of misconduct (sixteen consecutive years); multiple offenses (sixteen filings, plus three filings of equity omission); refusal to acknowledge wrongful nature of conduct (continued public defense of the salary characterization); substantial experience in the practice of law (the highest possible). Mitigators are correspondingly thin: no prior record, partial post-exposure correction, character and reputation. Under the Standards, the presumptive sanction for

an attorney committing this conduct is disbarment.

The principle underlying this Court's disciplinary jurisdiction, reaffirmed across more than three decades of decisions, is that the Rules of Professional Conduct apply equally to every member of the Bar regardless of professional station. To impose less than the precedents require would be to apply the Rules unequally, in violation of the foundational principle this Court's disciplinary authority exists to vindicate.

IX. RELIEF REQUESTED

I respectfully request the following.

First, that this Office open a formal investigation under DC Bar Rule XI, Section 6.

Second, that this Office request a written response from Mr. Roberts under DC Bar Rule XI, Section 8.

Third, that upon completion of investigation, this Office make findings of fact regarding the sixteen-year pattern of "salary" mischaracterization and the three-year omission of the Macrae equity interest.

Fourth, that this Office recommend sanctions appropriate to the conduct, consistent with this Court's precedents in *In re Tun*, *In re Howes*, *In re Shorter*, *In re Kennedy*, *In re Rosen*, *In re Cerroni*, *In re Casalino*, *Matter of Alessandro*, and *Matter of Miller*.

Fifth, that if this Office determines not to pursue formal proceedings, it issue a written explanation of that determination sufficient to inform the public interest.

X. CLOSING

This complaint does not ask this Office to review any decision Mr. Roberts has made as a judge. It does not ask this Office to review any judicial act. It asks this Office to apply the Rules of Professional Conduct to the personal sworn filings of a member of the District of Columbia Bar who, for sixteen consecutive years, submitted materially false information to a federal agency concerning the financial interests of his household.

If the rules do not apply here, the rules do not apply anywhere. If this conduct is permitted because of who the respondent is, the next attorney called before this Office will reasonably ask why he or she should be held to a standard the Chief Justice was not.

I thank this Office for its attention to this matter and welcome any request for additional documentation.

I file this complaint in good faith, as a member of the public, based entirely on documentary evidence in the public record.

Respectfully submitted,

[redacted]

April 22, 2026

EXHIBITS ATTACHED

Exhibit A. Roberts, John G. Jr., Financial Disclosure Report for Calendar Year 2022, dated May 15, 2023, released by the Administrative Office of the United States Courts, June 2023.

Exhibit B. Schwartz, Mattathias, "Jane Roberts, who is married to Chief Justice John Roberts, made $10.3 million in commissions from elite law firms, whistleblower documents show," *Business Insider*, April 28, 2023.

Exhibit C. Gershman, Bennett L., Memorandum Submitted in Support of Whistleblower Complaint of Kendal B. Price, December 2022.

Exhibit D. Painter, Richard W., "How the Supreme Court can finally get its house in order," *MSNBC Opinion*, May 3, 2023.

Exhibit E. Becker, Jo, and Tate, Julie, "At the Supreme Court, Ethics Questions Over a Spouse's Business Ties," *The New York Times*, January 31, 2023.

Exhibit F. Fuchs, Hailey, Gerstein, Josh, and Canellos, Peter S., "Justices shield spouses' work from potential conflict of interest disclosures," *Politico*, September 29, 2022.