

STATE OF MARYLAND

BEFORE THE COMMISSION ON JUDICIAL DISABILITIES

IN THE MATTER OF:

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CJD 2023-005

JUDGE APRIL T. ADEMILUYI

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JUDGE ADEMILUYI'S RESPONSE TO THE STATEMENT OF CHARGES

Judge April T. Ademiluyi, by undersigned counsel, hereby responds to the Statement of Charges filed by Investigative Counsel.

General Denial

This matter stems from personal interactions between Judge Ademiluyi and Judge [REDACTED], who is not the Complainant herein. It began with Judge [REDACTED] making sexual advances towards Judge Ademiluyi. After she rejected [REDACTED] advances, [REDACTED] became hostile towards her and her staff. Judge [REDACTED] is not the victim here. Judge [REDACTED] created the toxic workplace and then blamed Judge Ademiluyi, trivialized her rape, and challenged her mental state and motives. Such conduct violates all social and workplace norms and is meant to deter women from reporting misconduct.

By way of background, in 2012, Judge Ademiluyi was drugged and raped by colleagues at a National Bar Association Conference in Tampa Florida. She was drugged in the hotel room of the President of the National Bar Association. She reported the incident to the Tampa Police, where evidence in their custody was destroyed to cover up the rape. The male attorneys involved in drugging and raping her are well liked by many lawyers and Judges. Since her first day on the bench, she has been met with extreme hostility from her judicial colleagues because of her complaints against these men and speaking out about it in her campaign.

The Charges herein are rooted in the Court's disdain for Judge Ademiluyi's election to the bench. Her journey to the bench, including her campaign, caused her to experience discrimination, disdain, and hostility from her judicial colleagues from the first day of her judgeship. Judge Ademiluyi faced particularly hostile and antagonistic behavior from then-Administrative Judge

[REDACTED]

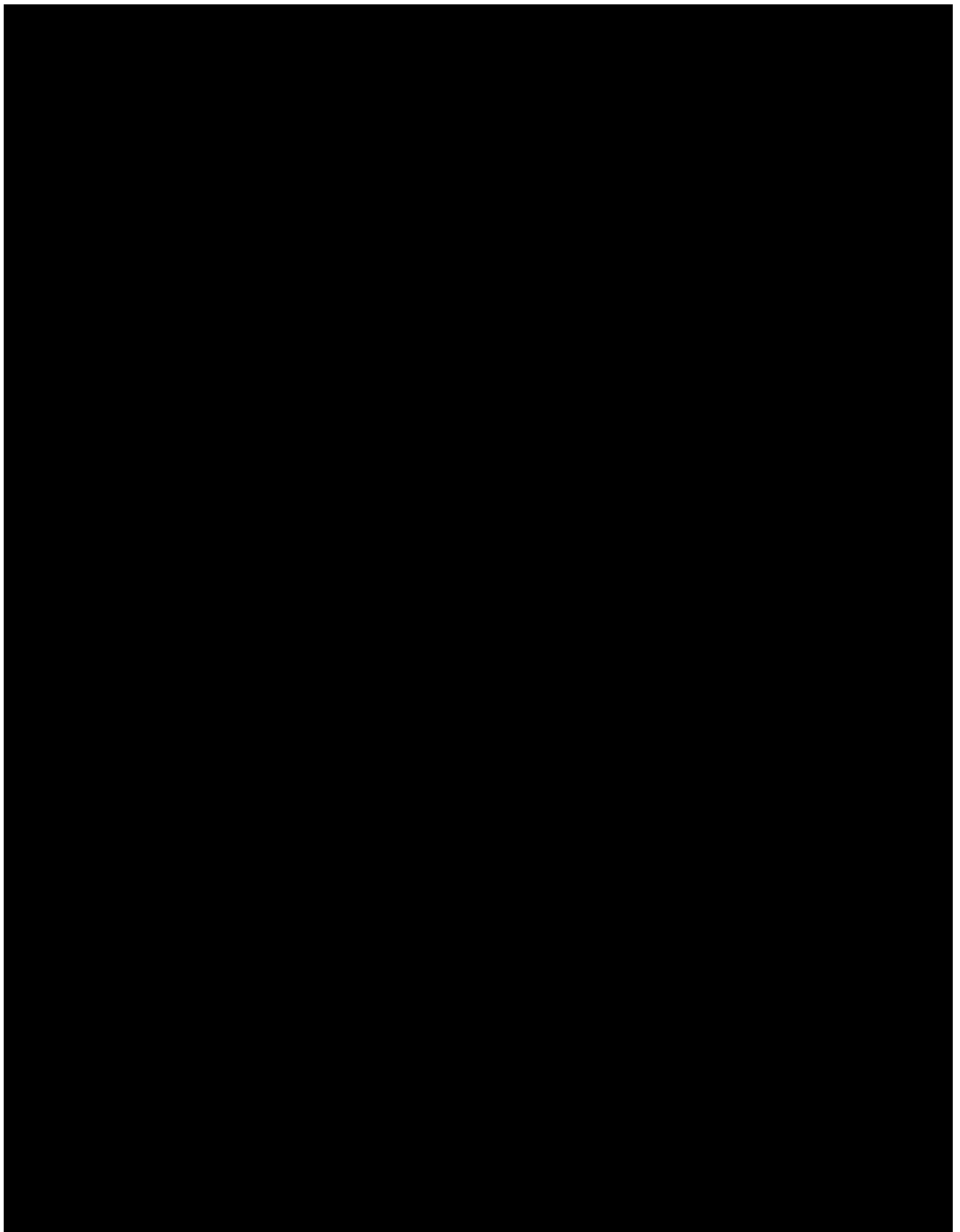
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Responses to the Specific Allegations in the Statement of Charges

1. Admit.

2. Based upon information and belief, Judge [REDACTED] provided information to Investigative Counsel that opened an investigation regarding Judge Ademiluyi's alleged conduct.

3. Judge Ademiluyi denies that she engaged in repeated, non-consensual, harassing communications with Judge [REDACTED], wrongfully disclosed any confidential information to Judge [REDACTED] or any other judicial colleague, or used threatening language in her communications with Judge [REDACTED]. Judge Ademiluyi admits that she believes Judge [REDACTED] made false statements to the Commission in retaliation for her rejecting [REDACTED] sexual advances. She further denies her conduct violated any of the rules: specifically, 18-101.1, 18-101.2, 18-102.3, 18-102.8(b), 18-102.16(b), and 18-103.1.

4. Judge Ademiluyi denies the allegations, as her messages are taken out of context, and it omits and mischaracterizes many interactions Judge Ademiluyi had with Judge [REDACTED].

Judge Ademiluyi's Factual Statement Regarding Her Interactions with Judge [REDACTED]

Judge [REDACTED] made sexual advances towards Judge Ademiluyi on more than one occasion. Judge Ademiluyi rejected [REDACTED] sexual advances, and [REDACTED] became hostile towards her and her staff. For example, after Judge Ademiluyi's staff informed Judge [REDACTED] that Judge Ademiluyi had difficulty logging onto Zoom for a hearing, Judge [REDACTED] after the hearing, sent an email, where [REDACTED] berated, belittled, and disrespected her in front of her colleagues simply because she rejected [REDACTED] sexual advances.

Judge [REDACTED] also sent Judge Ademiluyi an email stating the issue was brought to her attention. She did not believe Judge Ademiluyi had technical difficulties, calling them "alleged." She wrote that she would track when Judge Ademiluyi signed onto other hearings.

Judge [REDACTED] disrespectful and retaliatory behavior continued. [REDACTED] was hostile towards Judge Ademiluyi's female staff members. Judge Ademiluyi therefore avoided interacting with Judge [REDACTED] for many months, notwithstanding Judge [REDACTED] efforts to communicate with her.

Despite her concerns, Judge Ademiluyi recognized the benefit in trying to rebuild a positive, amicable relationship. She attempted to pacify the situation.

It was at this point that Judge Ademiluyi sent friendly text messages to Judge [REDACTED]. Her first message, dated September 25, 2022, read:

Hey [REDACTED]! Every time I see you or your name, all I think about is that long crazy email you sent. It was too long and emotional. It sounds like a [REDACTED] drafted that email. And now you act like you never sent it. Whenever you're ready to stop playing games, you can call me anytime.

I think you'll make a good juvenile judge.

Judge Ademiluyi clarified in her next message that she was not referring to [REDACTED]

[REDACTED] Rather, she was referring to Judge [REDACTED] who she suspected drafted the email. Judge Ademiluyi simply did not want to name Judge [REDACTED] in the text message.

Judge Ademiluyi's communications with Judge [REDACTED] were driven by her well-founded concerns that Judge [REDACTED] Judge [REDACTED] and the men who drugged and raped her working together to retaliate against her. Judge Ademiluyi feared that Judge [REDACTED] would assist because she rejected [REDACTED]. As it turned out, she was right.

Judge Ademiluyi confronted Judge [REDACTED] about [REDACTED] sexually harassing behavior in her email, writing:

"There was a time when you gave me a lot of attention and I gave you NO ATTENTION. Then you sent me this long nasty email that you find difficult to remember. You now go out of your way to show me you don't like me."

This email was followed by another email in which Judge Ademiluyi shared with Judge [REDACTED] that she was drugged and raped by men, and she is still being harassed by these men.

Judge Ademiluyi denies any improper contact with Judge [REDACTED]. Judge Ademiluyi feared the men who were involved in drugging and raping her would be near her chambers because of their close relationship with a newly appointed judge. The new judge was going to be placed in the office next to Judge Ademiluyi. A vacant judge's chambers was available next to Judge [REDACTED] chambers. Judge Ademiluyi reached out to other judges for assistance without success, and therefore had limited interactions with Judge [REDACTED] solely for assistance with moving her chambers to avoid interactions with men involved in drugging and raping her. Judge Ademiluyi's conduct is neither harassment nor sanctionable.

Judge [REDACTED] alleged fear that Judge Ademiluyi may file a rape complaint against [REDACTED] is not credible. Judge [REDACTED] actions are meant to intimidate a whistle-blower; demonstrate [REDACTED] insensitivity towards rape; and victim-blame Judge Ademiluyi for her extremely traumatic experience of being drugged and raped by [REDACTED]

Judge Ademiluyi did not insist on any personal interactions with Judge [REDACTED] Her intention was only to be able to move her chambers [REDACTED]

6. Judge Ademiluyi denies that she demanded Judge [REDACTED] personal time or made any other improper request. Judge Ademiluyi is somehow charged with unwanted communications with [REDACTED] where she is only seeking office space accommodations, [REDACTED]

7. Judge Ademiluyi denies that she engaged in behavior unbecoming of an officer of the court in direct contravention of a judge's responsibility to promote confidence in the Judiciary and to maintain the dignity of judicial office. She is the whistle blower. And with that, comes her first amendment right to petition her government for grievances and not be subjected to retaliation for doing so.

Judge Ademiluyi admits she disclosed the existence of a letter to Judge [REDACTED] that Investigative Counsel is investigating her, but it was not in violation of Article 4, Section 4B(a)(3) of the Maryland Constitution and Rule 18-407.

Judge Ademiluyi did not receive a complaint signed by Judge [REDACTED] alleging she was harassing, threatening, and intimidating [REDACTED]

8. Judge Ademiluyi denies that she engaged in any conduct that is prejudicial to the proper administration of justice in Maryland Courts, pursuant to the Maryland Constitution, Article IV, Section 4B(b)(1).

Respectfully submitted,

/s/

Craig S. Brodsky (AIS # 9512120087)
George S. Mahaffey, Jr.
Goodell, DeVries, Leech & Dann, LLP
One South Street, 20th Floor
Baltimore, Maryland 21202
410-783-4000
410-783-4040 (fax)
csb@gdldlaw.com
Attorneys for Judge Ademiluyi