

# BEFORE THE STATE COMMISSION ON JUDICIAL CONDUCT

#### CJC Nos. 24-0224 & 24-0355

## **PUBLIC ADMONITION**

# HONORABLE AMBER GIVENS 282<sup>ND</sup> DISTRICT COURT DALLAS, DALLAS COUNTY, TEXAS

During its meeting on December 3-4, 2024, the State Commission on Judicial Conduct concluded a review of the allegations in the above-referenced complaints against the Honorable Amber Givens, judge of the 282<sup>nd</sup> Judicial District Court, in Dallas, Dallas County, Texas. Judge Givens was advised by letter of the Commission's concerns and provided a written response. Judge Givens appeared before on June 4, 2025 and gave testimony.

After considering the evidence before it, the Commission entered the following Findings and Conclusion:

#### FINDINGS OF FACT

1. At all times relevant hereto, the Honorable Amber Givens was the judge for the 282<sup>nd</sup> Judicial District Court, in Dallas, Dallas County, Texas.

#### CJC No. 24-0224

- 2. On July 7, 2022, a recusal motion was filed against Judge Givens in *State of Texas v. Ivan Dequalan Paris*, Case No. F21-52600 (the "Paris Case").
- 3. On August 17, 2022, Judge Ray Wheless, the presiding judge of the First Administrative Region, granted the motion and Judge Givens was recused from the Paris Case.
- 4. On December 17, 2022, Judge Wheless assigned the Paris Case to Judge Michael Snipes, sitting by assignment in the 282<sup>nd</sup> Judicial District Court.

- 5. In 2023, while on probation, Defendant Ivan Paris ("Paris") participated in an "empowerment program" in the 282<sup>nd</sup> Judicial District Court that allows for early termination of probation upon successful completion of the program (the "Empowerment Program").
- 6. On or about October or November of 2023, Judge Givens was informed by a Court Officer with the Dallas County Community Supervision and Corrections Department that Paris engaged in behavior the Court Officer considered disruptive during a session of the Empowerment Program.
- 7. On November 2, 2023, Judge Givens ordered Paris to appear before her in court to explain his behavior during the Empowerment Program session. Finding Paris' explanation unacceptable, Judge Givens signed a Jail Sanction which ordered him to serve 60 days in the Dallas County Jail as a condition of his probation.
- 8. Paris subsequently retained an attorney, who filed a motion asking Judge Snipes to withdraw the November 2, 2023 Jail Sanction Order issued by Judge Givens, who was recused from the Paris Case and lacked the jurisdiction to enter the order. Judge Snipes granted the motion on November 8, 2023.
- 9. Paris served six (6) days in the Dallas County Jail before Judge Snipes ordered his release.

### CJC No. 24-0355

- 10. On August 18, 2022, a recusal motion was filed against Judge Givens in *State of Texas v. Samuel Navaenriquez*, Case No. F20-61259 (the "Navaenriquez Case").
- 11. On August 22, 2022, Judge Givens granted the motion and voluntarily recused herself from the Navaenriquez Case.
- 12. On October 11, 2022, Judge Ray Wheless, the presiding judge of the First Administrative Region, assigned the Navaenriquez Case to Judge Michael Snipes, sitting by assignment in the 282<sup>nd</sup> Judicial District Court.
- On July 6, 2023, a setting in the Navaenriquez Case was scheduled with Judge Snipes presiding. On that date, the defendant's attorney conferred with the prosecutor and submitted a pass slip to the coordinator in Judge Snipe's court. Samuel Navaenriquez ("Navaenriquez") was not required to appear at the setting.
- 14. However, Judge Givens was under the impression the July 6, 2023 setting in the Navaenriquez Case was in her court. When neither the defendant nor his attorney appeared, Judge Givens issued an order holding Navaenriquez's bond insufficient and directing that he be taken into custody.
- 15. In both her written responses and her testimony before the Commission, Judge Givens acknowledged she ordered Paris and Navaenriquez jailed without the authority to do so but indicated it was because the electronic docketing system for the Dallas County Courts (the "Odyssey System") failed to accurately reflect her recusal from the matters.
- Regarding her efforts to address this situation, Judge Givens indicated that in July of 2023, she sent an email to the Dallas County District Clerk's Office (the "DCDCO") asking that the Odyssey System be updated to accurately reflect her recusal from cases and the judicial officer assigned to same. She maintains that DCDCO did not do as requested.

17. Additionally, Judge Givens indicated that in November of 2023, she discussed her concerns with a staff attorney for the Dallas County Criminal District Courts, who in turn communicated about the issue with Judge Wheless. Judge Givens provided documentation showing that on November 27, 2023, Judge Wheless entered an Order directing the DCDCO, in relevant part, to update the docketing system to reflect Judge Givens' recusal from cases and Judge Snipes' assignment thereto.

#### RELEVANT STANDARDS AND AUTHORITIES

- 1. Canon 2A of the Texas Code of Judicial Conduct provides, in relevant part, "A judge shall comply with the law ..."
- 2. Canon 3B(2) of the Texas Code of Judicial Conduct provides, in relevant part, "A judge ... shall maintain professional competence in [the law]."
- 3. Canon 3B(4) of the Texas Code of Judicial Conduct provides, in relevant part, "A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers and others with whom the judge deals in an official capacity, ..."
- 4. The Fourteenth Amendment of the United States Constitution provides, in relevant part, "...nor shall any State deprive any person of life, liberty, or property, without due process of law; ..."
- 5. Article I, Section 19 of the Texas Constitution provides, "No citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due course of the law of the land."

#### CONCLUSION

Based upon the record before it and the factual findings recited above, the Texas State Commission on Judicial Conduct has determined that the Honorable Amber Givens, judge of the 282<sup>nd</sup> Judicial District Court in Dallas, Dallas County, Texas, should be publicly admonished for: (1) failing to comply with and maintain professional competence in the law, namely the due process clauses of the United States and Texas Constitutions, when she: (a) ordered Paris jailed as a condition of his probation, and (b) ordered Navaenriquez arrested for insufficient bail, after she had been recused from their cases and lacked the legal authority to act in both cases; and for (2) failing to treat Paris with patience, dignity, and courtesy, in violation of Canons 2A, 3B(2) and 3B(4) of the Texas Code of Judicial Conduct.

The Commission has taken this action pursuant to the authority conferred it in Article V, Section 1-a(8) of the Texas Constitution in a continuing effort to promote confidence in and high standards for the judiciary.

Issued this the 23 day of June, 2025.

ary L. Steel

Chair, State Commission on Judicial Conduct