

# BEFORE THE STATE COMMISSION ON JUDICIAL CONDUCT

# CJC No. 25-0202

# PUBLIC ADMONITION AND ORDER OF ADDITIONAL EDUCATION

# HONORABLE CRYSTAL DUKE ROXTON MUNICIPAL COURT ROXTON, LAMAR COUNTY, TEXAS

During its meeting on February 5, 2025, the State Commission on Judicial Conduct concluded a review of the allegations against the Honorable Crystal Duke, Roxton Municipal Court, in Roxton, Lamar County, Texas. Judge Duke was advised by letter of the Commission's concerns and provided a written response.

After considering the evidence before it, the Commission enters the following findings and conclusions:

# FINDINGS OF FACT

- 1. At all times relevant hereto, the Honorable Crystal Duke, was a judge of the Roxton Municipal Court, in Roxton, Lamar County, Texas.
- 2. On or about November 1, 2024, the Texas Municipal Court Education Center ("TMCEC") reported that Judge Duke obtained one (1) hour of the required sixteen (16) hours of judicial education for the 2023-2024 Academic Year.<sup>1</sup>
- 3. Judge Duke did not seek a waiver of the educational requirement.
- 4. In her written response to the Commission's inquiry, Judge Duke explained that she was scheduled to attend a Municipal Court Judge training in June 2024 however, she was able to attend because she learned that her mother-in-law needed to have around the clock care.

<sup>&</sup>lt;sup>1</sup> Academic Year is from September 1<sup>st</sup> – August 31<sup>st</sup>.

5. Judge Duke confirmed that she did not apply for a waiver of the judicial education requirement due to a "lack of internet service" at her mother-in-law's house.

### RELEVANT STANDARDS

- 1. Canon 2A of the Texas Code of Judicial Conduct provides that a judge shall comply with the law and should act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.
- 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. Article V, Section 1-a(6)A of the Texas Constitution provides, in relevant part, that a judge shall not engage in "willful or persistent conduct" that "is clearly inconsistent with the proper performance of his duties or casts public discredit upon the judiciary..."
- 4. Rule 5a(2) of Rules of Judicial Education provides, in relevant parts, "Each Municipal Court Judge will, as an official duty: in each fiscal year thereafter, complete a minimum of 16 hours of instruction from the Texas Municipal Courts Education Center in the performance of the duties of office."
- 5. Rule 9b of the Rule of Judicial Education provides: "After the end of each grant year, the Register will report to the applicable Education Committee the name of any judge or judicial officer who had not accumulated the minimum hours of education for that year, including such judges who are leaving office and do not plan to run for another term."
- Rule 10a of Rules of Judicial Education states: "Upon receipt of the reports required by Rule 9b, the applicable Education Committee will advise the named judges or judicial officers of the deficiency. Within 30 days of the receipt of such notice, the judge or judicial officer may submit a statement of the reasons that prevented compliance. Thereafter, unless the applicable Committee grants a waiver for good cause shown, it will report the name of the judge or judicial officer to the State Commission on Judicial Conduct by November 1."

#### CONCLUSION

Based on the record before it and the factual findings recited above, the Texas State Commission on Judicial Conduct has determined that the Honorable Crytal Duke, Judge of the Roxton Municipal Court, in Roxton, Lamar County, Texas, should be publicly admonished and ordered to obtain additional education for her failure to comply with the law and maintain professional competence in the law when she failed to complete her judicial education for the 2023-2024 Academic Year. Judge Duke's failure in these respects constituted willful or persistent conduct that is clearly inconsistent with the proper performance of her duties and cast public discredit upon the judiciary or the administration of justice, in violation of Canons 2A and 3B(2) of the Texas Code of Judicial Conduct and Article V, Section 1-a(6)A of the Texas Constitution.

Pursuant to this Order, Judge Duke must obtain **one (1) hour** of instruction with a mentor, in addition to her required annual judicial education for Fiscal Year 2025. In particular, the Commission desires that Judge Duke receive **one (1) hour** of this additional education in her duty to obtain the required judicial education as a municipal court judge. Pursuant to the authority contained in Section 33.036 of

the Texas Government Code, the Commission authorizes the disclosure of certain information relating to this matter to the Texas Municipal Court Education Center to the extent necessary to enable that entity to assign the appropriate mentor for Judge Duke.

Judge Duke shall complete the additional **one (1) hour** of instruction recited above within **60 days** from the date of written notification of the assignment of a mentor. Upon receiving such notice, it is Judge Duke's responsibility to contact the assigned mentor and schedule the additional education.

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 protect the public and promote public confidence in the judicial system.

Issued this the 3 day of 301

Ken Wise

Vice-Chair, State Commission on Judicial Conduct