



AMOACHI & JOHNSON, PLLC  
ATTORNEYS AT LAW

March 3, 2020

Office of the Chief Immigration Judge  
attn.: IJ Conduct and Professionalism  
5107 Leesburg Pike, Suite 2500  
Falls Church, VA 22041  
[EOIR.IJConduct@usdoj.gov](mailto:EOIR.IJConduct@usdoj.gov)

RE: Complaint against Immigration Judge Charles Conroy for making false allegations of fact in referral to EOIR Disciplinary Counsel and for failing to act with minimum standards of diligence and competence in conducting a hearing

Dear Sir/Madam:

My name is Bryan S. Johnson. I am a co-founder and partner at Amoachi and Johnson, Attorneys at Law, PLLC and I write this complaint to ensure Immigration Judge Charles Conroy never again makes false allegations of fact in disciplinary complaints made against immigration attorneys who appear before him.

On February 12, 2019, Judge Conroy filed a disciplinary complaint with EOIR Disciplinary counsel against an associate attorney employed by my firm, Amoachi and Johnson, Attorneys at Law, PLLC.<sup>1</sup>

Judge Conroy falsely alleged that my associate "...claimed she no longer worked at the law firm of Amoachi and Johnson." My associate *never claimed she no longer worked at the law firm of Amoachi and Johnson.* (See audio of record of proceedings.)

Given this allegation is indisputably false, it is evident Judge Conroy *did not* review the record of proceedings before drafting his complaint to EOIR disciplinary counsel.

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<sup>1</sup> See attached formal response and additional documents in support of this complaint.

An Immigration Judge's complaint against an attorney can have serious adverse consequences, including damage or termination of that attorney's livelihood. At a minimum, a reasonably diligent and competent Immigration Judge would carefully review the record of proceedings to ensure they do not send a complaint that contains provably false allegations of fact.

Indeed, in the original complaint from Judge Conroy, he conceded he is not even sure about what happened on February 12, 2019:

"I don't know if she was confused, but whether or not she currently works for Amoachi and Johnson, she and her clients were on notice that they needed to appear today."

All three parties to the February 12, 2019--Judge Conroy, the Trial Attorney, and my Associate--were confused. Confusion happens, and can be addressed quickly and efficiently by an Immigration Judge acting with minimum standards of diligence and competence.

However, Judge Conroy's actions on that day show had no interest in exercising *any* diligence or minimum degree of competence in reaching his decision.

A reasonably competent and diligent Immigration Judge—when faced with an extraordinarily incredible conclusion of an attorney falsely representing to the court that she no longer works for Amoachi and Johnson while answering the Judge's phone call at the number of Amoachi and Johnson—would simply have asked: who is your current employer? When did you start working for your current employer? Who was your former employer?

Please review this complaint and ensure that Judge Conroy does not continue to make false allegations of fact in complaints filed with EOIR disciplinary counsel against attorneys that appear before him.

Finally, please instruct Judge Conroy to review the audio record of proceedings prior to making allegations of misconduct against attorneys who appear before him.

Thank you for your attention to this matter.

Very Truly Yours,

  
Bryan S. Johnson, Esq.