



**BEFORE THE STATE COMMISSION
ON JUDICIAL CONDUCT**

CJC No. 21-1294

PUBLIC ADMONITION

**HONORABLE BONNIE RANGEL
171ST DISTRICT COURT
EL PASO, EL PASO COUNTY, TEXAS**

During its meeting on August 9-11, 2022, the State Commission on Judicial Conduct concluded a review of the allegations against the Honorable Bonnie Rangel, 171st District Court, El Paso, El Paso County, Texas. Judge Rangel was advised by letter of the Commission's concerns and appeared and gave testimony before the Commission on August 11, 2022.

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

FINDINGS OF FACT

1. At all relevant times, the Honorable Bonnie Rangel was judge of the 171st District Court, El Paso, El Paso County, Texas.
2. Judge Rangel presided over *State of Texas v. Haley Marie Aboud* (the "Aboud Case")¹ in which Haley Aboud ("Aboud") was indicted for Possession of a Controlled Substance, Penalty Group 1, less than 1 gram.
3. On April 13, 2021, Ruben Nunez ("Nunez"), Aboud's attorney, filed a Motion to Recuse questioning Judge Rangel's impartiality because she stated to Aboud at a Status Hearing on March 19, 2021 that she was going to give her the maximum two years in a State Jail Facility to keep her away from the influence of her boyfriend and she was not going to give her jail credit for the time she spent in a Substance Abuse Punishment Facility.
4. Judge Rangel declined to recuse and sent the motion to the presiding judge.

¹ Case No. 20190D01232.

5. On May 14, 2021, Judge Rangel filed a Response to Defendants Motion to Recuse in which she explained her reasoning regarding Aboud's sentencing and not allowing jail credit.
6. On June 2, 2021, Judge Stephen Ables signed an order recusing Judge Rangel from the Aboud Case.

RELEVANT STANDARDS AND AUTHORITIES

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. Tex. R. Civ. Proc. 18a(f)(1) in part, provides, "the respondent judge, either three business days after the motion is filed, must either: (A) sign and file with the clerk an order of recusal or disqualification; or (B) sign and file with the clerk an order referring the motion to the regional presiding judge."
4. *Arnold v. State*, 853 S.W.2d 543, 544 (Tex. Crim. App. 1993): Although the Code of Criminal Procedure does not specifically address the procedure to follow in seeking disqualification of a judge, the Court of Criminal Appeals has held that Texas Rule of Civil Procedure 18a applies to criminal cases absent "any explicit or implicit legislative intent indicating otherwise."

CONCLUSION

Based upon the record before it and the factual findings recited above, the State Commission on Judicial Conduct has determined that the Honorable Bonnie Rangel, 171st District Court, El Paso, El Paso County, Texas, should be publicly admonished for failing to comply with the law nor maintaining professional competence in the law by filing a response to a motion the recuse in the Aboud Case, in violation of Canons 2A and 3B(2) of the Texas Code of Judicial Conduct.

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

Issued this the 22 day of August, 2022.



David Schenck
Chairman, State Commission on Judicial Conduct