

**STATE OF MICHIGAN
BEFORE THE JUDICIAL TENURE COMMISSION**

COMPLAINT AGAINST

Hon. Bradley S. Knoll
58th District Court
Holland, MI

Complaint No. 107

COMPLAINT

The Judicial Tenure Commission (“Commission”) has authorized this complaint against the Honorable Bradley S. Knoll (“respondent”), judge of the 58th District Court, and directed that it be filed. This action is taken pursuant to Article 6, Section 30 of the Michigan Constitution of 1963, as amended, and MCR 9.200 *et seq.*

1. Respondent has been a licensed lawyer and a member of the State Bar of Michigan since 1978.
2. Respondent is, and since January 2003 has been, a judge of the 58th District Court in the City of Holland, County of Ottawa, State of Michigan, elected to a six-year term that expires in December 2026.
3. As a judge, respondent has been, and still is, subject to the duties and responsibilities imposed on him by the Michigan Supreme Court, and is subject to the standards for discipline set forth in MCR 9.104 and 9.200 *et seq.*

COUNT ONE

ARREST FOR AND PLEA OF GUILTY TO DOMESTIC VIOLENCE

4. On December 13, 2023, respondent was arrested for domestic violence against his spouse, Shawn Knoll.
5. The incident resulting in respondent’s arrest occurred around 7:30 am on that day when Shawn’s grandson (Jace McConnell, then age 12) resisted getting ready for school.

6. Respondent yelled at Jace and grabbed his face, tilting it up at respondent. Jace began crying.
7. Shawn intervened. There was then physical contact between respondent and Shawn during which respondent hit or slapped Shawn's face or head.
8. Respondent was arrested and charged with misdemeanor domestic violence in 58th District Court Case No. GH 23-003712-SM.
9. On March 26, 2024, respondent pled guilty to misdemeanor domestic violence in Case No. GH 23-003712-SM under MCL 769.4a.
10. The following exchange between respondent and the sentencing judge occurred on the record at the March 26 plea hearing:

THE COURT: All right. So then as to the charge that on or about December 13th of '23 in the County of Ottawa, State of Michigan, that you did make an assault and battery upon Shawn Knoll, your spouse, contrary to MCL 750.81 how do you plead?"

[RESPONDENT]: Guilty.

THE COURT: Were you in Ottawa county on December 13 of 23?

[RESPONDENT]: Yes.

THE COURT: At that date and location did you make an assault or an assault and battery upon Shawn Knoll?

[RESPONDENT]: Yes.

THE COURT: Is Ms. Knoll your spouse?

[RESPONDENT]: Yes.

THE COURT: And what is it that you did that day that would be considered an assault or an assault and battery?

[RESPONDENT]: I struck her on the top of the head with a flat open hand.

THE COURT: All right. I find your plea then to be knowing, willing, and voluntary and enter a guilty plea to the charge.

11. Respondent's criminal plea of guilty and his conduct underlying his guilty plea violated:
 - a. Michigan Code of Judicial Conduct (MCJC) Canon 2(B) (requiring judges to observe the law).
 - b. MCR 9.104(5) (forbidding lawyers to commit conduct that violates a criminal law).
 - c. MCJC Canon 2(A) (forbidding irresponsible or improper conduct by judges and requiring that judges must avoid all impropriety and appearance of impropriety).
 - d. MCJC Canon 2(B) (requiring judges to avoid conduct that erodes public confidence in the integrity of the judiciary and to treat others with courtesy and respect).

COUNT TWO

DISRESPECT ON DAY OF ARREST

12. Police officers with Grand Haven Public Safety went to respondent's house on the morning of December 13, 2023 in response to a 911 call they received during the altercation between respondent and Shawn. After interviewing Shawn and Jace, police arrested and interviewed respondent at another location.
13. During that interview, respondent threatened Grand Haven Public Safety Police Officer Matthew Padding with potential repercussions for false arrest, saying that if respondent was not prosecuted after the officers arrested him, an officer's "ass would be in a sling for a false arrest."
14. At various times during the interview respondent treated the police with disrespect.
15. After the police completed their interview of respondent, respondent told Grand Haven Public Safety Detective Eric Rasch "fuck you" as he left the interview room.

16. Respondent's conduct described in paragraphs 13 through 15 violated:
- a. MCJC Canon 2(A) (forbidding irresponsible or improper conduct by judges and requiring that judges must avoid all impropriety and appearance of impropriety).
 - b. MCJC Canon 2(B) (requiring judges to avoid conduct that erodes public confidence in the integrity of the judiciary and to treat others with courtesy and respect).

Pursuant to MCR 9.230(B), an original verified answer to the foregoing complaint, and nine copies thereof, must be filed with the Commission within 14 days after service of the complaint upon respondent. Such answer must contain a full and fair disclosure of all facts and circumstances pertaining to the allegations. Willful concealment, misrepresentation, or failure to file an answer and disclosure are additional grounds for disciplinary action.

JUDICIAL TENURE COMMISSION
OF THE STATE OF MICHIGAN

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