## In the Indiana Supreme Court

In the Matter of the Honorable Charles D. Bridges, Judge of the Putnam Superior Court Supreme Court Case No. 24S-JD-393



## Published Order Approving Statement of Circumstances and Conditional Agreement for Discipline

We find that the Honorable Charles D. Bridges ("Respondent"), Judge of the Putnam Superior Court, engaged in judicial misconduct by (1) repeatedly ruling on motions without permitting the opposing party adequate time to respond, and (2) making injudicious comments about women who bring unjust enrichment claims against their former cohabitating partners.

This matter is before us on the Indiana Commission on Judicial Qualifications' "Notice of the Institution of Formal Proceedings and Statement of Charges" against Respondent. On December 13, 2024, the parties jointly tendered a "Statement of Circumstances and Conditional Agreement for Discipline" stipulating to the following facts.

On November 11, 2021, a woman ("M.S.") filed a complaint in Putnam Circuit Court against her former romantic partner, T.K. M.S. argued she was entitled to some of the proceeds from the sale of a home she and T.K. lived in together, which was titled in T.K.'s name, but which M.S. helped rehabilitate and maintain. M.S. alleged T.K. forced her to leave the home and then sold the home for a substantial gain without compensating her for her contributions. Also on November 11, M.S. petitioned for a temporary restraining order to prevent T.K. from spending the proceeds. The Putnam Circuit Court granted that petition. On November 30, T.K. moved for a change of judge and the parties selected Respondent to preside over the case. Respondent accepted the appointment as special judge on December 9.

On December 10, 2021, M.S. moved for the county clerk to hold the disputed sale proceeds while the lawsuit was pending. Two days later, T.K. filed several pleadings, including a motion to dismiss under Ind. Trial Rule 12(B)(6). Three days later—and before M.S. could respond—Respondent granted T.K.'s motion to dismiss.

On December 21, M.S. moved to correct error. The following day, Respondent granted M.S.'s motion—again without allowing T.K. adequate time to respond under T.R. 59(E)—and vacated the order granting T.K.'s motion to dismiss. M.S. filed a second motion for the clerk to hold the disputed proceeds, as Respondent had failed to rule on her first motion. Respondent granted that motion the same day.

T.K. then moved to correct error on January 19, 2022, arguing that Respondent should not have granted M.S.'s motion to correct error without allowing him a chance to respond. T.K.

also filed a motion asking for an order directing the clerk to return the proceeds it held. Respondent granted T.K.'s motion to correct error on January 21, once again without giving M.S. time to respond under T.R. 59(E). M.S. subsequently filed a response to T.K.'s motion for the proceeds and asked Respondent to set aside his order dismissing her cause of action. Respondent issued an order that gave T.K. fifteen days to respond to M.S.'s filing but also denied T.K.'s motion for proceeds.

Respondent held an in-chambers, attorneys-only pretrial conference on March 8. During that conference, he made the following statements:

- "If these folks aren't married and this woman's trying to get money out of him for a house that she lived in, and I can only—and I'm just—I have no idea, I don't know the people, I don't know what the facts of the case [are], I'm just saying my position is regardless of what everyone else's position is in Indianapolis, that's what the Court of Appeals [is] for, if she wasn't—if they weren't married and she lived there and had the benefit of living there and she wants to claim what everybody calls 'sweat equity,' bullshit, ain't no 'sweat equity' in this court."
- "I don't know why I get so many of these but I've had several of them, honestly, and it's so—so far it's always been the woman that moved in with a guy and then when things go south she wants half of his shit and they were never married and I don't give it to them."
- "I guess because I've done so many of these cases I see—I see women that kind of make a habit out of this and I'm—I'm just—I'm—I'm certainly not saying that your client is..., I don't know her, I don't know either one of these people, but I see women do this and it's horseshit, to coin a—to coin a phrase."

When M.S.'s counsel asked whether Respondent would "uphold a case" (meaning, we think, "grant relief") on the equitable theory of unjust enrichment or implied contract in a former cohabitation situation, Respondent replied, "I never have. I'm not saying that I won't or haven't, but I ... just am—it's not my—it just doesn't set well with me." Although Respondent stated to counsel that he was "open" to argument on the issue, he agrees that his remarks about women and his disfavor for M.S.'s cause of action gave the appearance that he lacked impartiality. Following the pretrial conference, M.S.'s counsel moved for Respondent's recusal; Respondent failed to rule on this motion.

Respondent set a trial date for September 2022. But T.K. moved to vacate that hearing, arguing that Respondent had most recently granted his motion to correct error, returning the case to its prior procedural posture—that is, dismissed under Trial Rule 12(B)(6). M.S. objected, but Respondent granted T.K.'s motion to vacate and subsequently released the proceeds back to T.K.

M.S. appealed Respondent's denial of her motion to correct error, and the Court of Appeals reversed and remanded. *Stout v. Knotts*, 214 N.E.3d 1036 (Ind. Ct. App. 2023), *trans. not sought*. The Court of Appeals found Respondent erred in dismissing M.S.'s complaint and granting T.K.'s motion to release the proceeds. The Court of Appeals also determined that M.S. was entitled to a new judge on remand, as Respondent "demonstrated his inability to be impartial." *Id.* at 1041. The Court of Appeals noted that Respondent's statements at the pretrial conference went "beyond merely expressing skepticism about M.S.'s claims in her complaint. [Respondent]

expressed disdain, not only for the type of relief M.S. was seeking, but for the gender he believed most often sought this type of relief." *Id.* at 1042. And Respondent "indicated he would not provide the relief [M.S. requested], regardless of whether the law allowed it or there was sufficient evidence to support the requested relief." *Id.* 

The Commission charges, and Respondent agrees, that his conduct violated three provisions of the Code of Judicial Conduct:

- 2.3(A), which requires a judge to perform his or her judicial duties, including administrative duties, without bias or prejudice;
- 2.3(B), which prohibits a judge from, by words or conduct, manifesting bias or prejudice or engaging in harassment in the performance of his or her judicial duties; and
- 2.5, which requires a judge to perform his or her judicial and administrative duties competently, diligently, and promptly.

The parties cite several sanction factors, including Respondent's two prior private cautions for violating Indiana Code of Judicial Conduct Rule 2.11(A) in 2015 and Rules 1.2 and 2.2 in 2019. The parties agree that a public reprimand is the appropriate sanction.

We accept the parties' agreement. "A public reprimand is a significant blemish on a sitting judge's reputation, adversely affecting the public's evaluation of the judge's performance in office." *In re Newman*, 858 N.E.2d 632, 635-36 (Ind. 2006). Respondent's failure to abide by the Rules of Trial Procedure caused the filing of multiple unnecessary pleadings in *Stout v. Knotts* and resulted in an appeal. And Respondent's statements necessitated a remand to a new judge.

Acts of judicial bias or prejudice "serve[] to erode the public's perception of the courts as dispensers of impartial justice." *In re Van Rider*, 715 N.E.2d 402, 404 (Ind. 1999). We have publicly reprimanded judges previously for bias or prejudicial conduct. *See Matter of Goodman*, 649 N.E.2d 115 (Ind. 1995); *Matter of Johanningsmeier*, 103 N.E.3d 633 (Ind. 2018); *Van Rider*, 715 N.E.2d at 404. Respondent's on-the-record statements about "women that kind of make a habit of" litigating unjust enrichment claims—claims he referred to as "bullshit", "regardless of what everyone else's position is in Indianapolis"—called into question his ability to preside impartially over the cases that come before him. These comments, particularly Respondent's statement that "that's what the Court of Appeals [is] for," further suggest a reluctance to uphold the rule of law in situations where the facts don't "[sit] well" with him.

Accordingly, Respondent Charles D. Bridges, Judge of the Putnam Superior Court, is hereby reprimanded for his judicial misconduct. This discipline terminates the disciplinary proceedings relating to the circumstances giving rise to this cause.

Done at Indianapolis, Indiana, on \_\_\_\_1/7/2025

Kouto A. Kuch

Loretta H. Rush Chief Justice of Indiana

All Justices concur.