IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

JUN 15 2026

KEVIN P. WEIMER, Clerk
By: [illegible] Deputy Clerk

UNITED STATES OF AMERICA )
)
V. ) Criminal Case No.
) 1:25-CR-221-ELR-CCB
IAN PATRICK JACKSON )
)
Defendant. )

MOTION FOR RECUSAL

COMES NOW, Ian-Patrick: Jackson, in propria persona, sui juris, with sound mind, body and the Spirit of God. I have attained the Age of Majority and am competent to handle my own affairs. As grounds for the filing of this Motion for Recusal, I do state:

Around the end of May, 2026, I was watching the Channel 2 Action News when suddenly a news report began about a federal judge being caught having "loud sex in the judge's chambers" according to the news anchor. To my shock and dismay, a picture of the Northern District Atlanta Division judge Eleanor Ross appeared on the screen. The news

reporter continued the story by stating the currently married judge was caught having an affair with a high-ranking Atlanta Police Department officer. This officer turned out to be none other than APD deputy chief Kelley Collier, who is also married. The reporter followed this information by stating the affair had alledgedly been going on for two years.

After hearing this information from the news reporter, I immediately called friends and family to have them conduct some research to confirm what I just heard. Sure enough, there were several articles on the internet confirming the news report. Online reports state the federal judge was said to be having sexual intercourse "during business hours within earshot of law clerks" making the chamber's workplace "extremely uncomfortable and troubling for clerks".

This comes as very troubling news as it demonstrates a blatant and willful violation of not only several codes of judicial conduct but sections of the Georgia Constitution, and official oath of office. GA. Code of Judicial Conduct Note, Canon 1 states: "Judges shall uphold the independence, integrity and impartiality of the judiciary and shall avoid impropriety and the appearance of the impropriety in all their activities."

GA. Constitution Art. 6, § 7, Para. 7 states: (a) "Any judge may be removed, suspended, or otherwise disciplined for willful misconduct in office..." "or for conduct prejudicial to the administration of justice which brings the judicial office into disrepute."

GA. Code of Judicial Conduct, Canon 1.2 states: (A) "Judges shall act at all times in a manner that promotes public confidence in the independence, integrity and impartiality of the judiciary." (B) "An independent and honorable judiciary is indespensable to justice in our society. Judges shall participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe such standards of conduct so that the independence, integrity and impartiality of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective."

I understand and agree that no one is perfect and we all make mistakes but the actions taken by judge Eleanor Ross were no mistakes. Based on the reports from the sources familiar with the events, these activities took place more than once over the course of a two-year affair between 2023 and 2025. She wanted to do these things. She enjoyed these activities. For that reason, she is exempt from the cloak of a "mistake".

On top of the reprimand for her sexual misconduct, other sources claim that this is not her first. There is another misconduct allegation stemming from a supposed "partisan political celebration" involving Fulton County District Attorney Fanni Willis which alleges judge Eleanor Ross was in attendance at the event. GA. Code of Judicial Conduct, Canon 4: Judges shall refrain from political activity inappropriate to their judicial office. Even though these allegation details are unclear, the mere existence of the allegations is enough to bring impropriety into question. Birt v. State, 256 Ga. 483, 350 S.E. 2d 241, 1986 GA. Lexis 925 (1986)" Questionable, rather than actual impropriety suffices." GA. Code of Conduct, Canon 2.4 states: (B)" Judges shall not permit family, social, political, financial or other interests or relationships to influence the judge's judicial conduct or judgement."

Although the act of having sexual intercourse at her workplace, which happens to be a federal courthouse, during work hours and being so loud as to the nearby employees and potentially jurors can clearly hear her isn't bad enough, but let us not forget that both her and deputy chief Collier are married. Not only is judge Edianor Ross married, but she is married to a Dekalb County judge. As we all know, when one gets married to another, they exchange vows in the presence of their family, peers,

typically a priest, pastor or chaplain, and most importantly, under God. If judge Eleanor Ross does not honor her oath to her husband and to God by repeatedly committing adultery with another married man, how can We the People expect her to honor her oath to the Constitution and the public?

With such egregious Bad Faith shown in such a public fashion, judge Eleanor Ross deserves a more severe punishment than just a private, or even public, reprimand. Judge Christina Peterson was removed from office because she "... acted in bad faith by requesting sheriff's deputies to work throughout the night so that she could have after-hours access to the courthouse and using the panic button to summon a deputy to escort her to court, and in so doing failed to demonstrate the decorum and temperment required of a judge." ★ In my opinion, the actions of judge Peterson pale in comparison to those of judge Ross. There is literally a video of the courtroom, where audio is also recorded, circulating the internet where you can hear judge Ross and deputy chief Collier engaging in sexual intercourse. ★ Inquiry concerning Judge Peterson, 319 Ga. 816, 903 S.E. 2d 645, 2024 GA. Lexis 148 (2024). Therefore, judge Ross should be removed from ~~as~~ office as well, at the very least.

Judges, especially federal district judges, are supposed to be the essence of upstanding citizens here in the United States of America. They are supposed to be near flawless in their demeanor, conduct, integrity and honor. The actions exhibited by judge Ross are not that. Not even close. She has shown blatant disrespect and disregard for her coworkers, peers, her husband, the judiciary and We the People. Her lack of tact and public demonstration of impulsive desire shows that her character does not contain the prestige necessary of a federal judge. Her actions have put a stain on the reputation of the judicial system and also disgraced her husband. For these selfish, inconsiderate, lustful, tasteless and dispicable reasons stated, I demand judge Eleanor Ross to recuse herself from this case. She is not fit to judge anyone. I also respectfully request that the Judicial Qualifications Commission remove her from office permanately. So be it.

Respectfully submitted,

By: Ian-Patrick: Jackson, sui juris
Executor / Master Benefriciary
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