



Western Connecticut Behavioral Health, LLC

CHILD CUSTODY EVALUATION

Docket: FBT FA 19-6088163 S

Dates of Evaluation: 11/04/2019, 11/08/2019, 11/14/2019, 11/22/2019, 12/27/2019, 01/03/2020,
01/07/2020

Date of Report: 03/19/2020

Guardian ad Litem: Jocelyn Hurwitz, Esq. Evaluator:
Jessica Biren Caverly, Ph.D.

Father: Christopher Ambrose
Date of Birth: 05/15/1962 Age:
57 years

Mother: Karen Riordan Date
of Birth: 09/22/1966 Age: 53
years

Minor Child: Mia Ambrose
Date of Birth: 02/28/2007
Age: 12 years

Minor Child: Matthew Ambrose Date
of Birth: 02/20 /2007
Age: 12 years

Minor Child: Sawyer Ambrose
Date of Birth: 07/06/2010 Age: 9
years

I. Purpose and Process of Evaluation

A. Reason for Referral

The current evaluation was court ordered on 10/03/2019 by mutual agreement of the parties in regards to an ongoing child custody matter between Christopher Ambrose and Karen Riordan. Mr. Ambrose and Ms. Riordan are in the process of divorcing, and they are engaged in a custody dispute over their children, Mia, Matthew, and Sawyer Ambrose. The Court requested the current evaluation due to concerns about the parents' individual psychological functioning while in a parenting role with the children. There have been ongoing difficulties with the parents being unable to co-parent and concerns about parenting time. The current evaluation assessed Mr.

Ambrose and Ms. Riordan's parenting abilities, as well as each party's psychological functioning. In addition, the parents completed interactional appointments with the children. The children completed interviews and psychological testing to assess their feelings about the current situation as well as their current psychological functioning and areas of need for the purpose of making service recommendations.

B. Method of Evaluation

Interviews:

Interview and testing with Mr. Ambrose, 11/04/2019, 11/14/2019, 11/22/2019

Interview and testing with Ms. Riordan, 11/08/2019, 01/07/2020

Interview and testing with Mia Ambrose, 12/27/2019, 01/03/2020 Interview and

testing with Matthew Ambrose, 12/27/2019, 01/03/2020 Interview and testing with

Sawyer Ambrose, 12/27/2019, 01/03/2020

Interactional with Ms. Riordan, Mia, Matthew, and Sawyer, 12/27/2019
Interactional with Mr. Ambrose, Mia, Matthew, and Sawyer 01/03/2020

Collateral Contacts:

- Jonathan Sollinger, M.D., Willows Pediatrics (01/14/2020 - 15 minutes)
- Beth Coyne, Assistant Head of School, The Country School (01/15/2020 - 45 minutes; 01/16 / 2020 - 15 minutes)
- Matthew Horn, Ph.D. (01/15/2020 - 55 minutes)
- Robert Horwitz, Ph.D. (01/15/2020 - 15 minutes; 03/10/2020 - 25 minutes)
- Tracy Pennoyer, Ph.D. (01/16/2020 - 15 minutes)
- Amy Wrobel (01/16/2020 - 25 minutes)
- Allison Kravitz, LCSW (01/21/2020 - 35 minutes)
- Dorothy Stubbe, M.D., Yale Child Study Center (01/24/2020 - 30 minutes)
- Charles and Pat Riordan (01/24/2020 - 35 minutes)
- Neil Ambrose (01/24/2020 - 70 minutes)
- Hallie Buckingham, Ed.D., Southport School (01/28/2020 - 30 minutes)
- Donna Eno, D. Eno Forensics (01/28/2020 - 90 minutes)
- Tamela Amiri, M.D. (02/11/2020 - 40 minutes)
- Rich McKeon, Cyfortec Group (02/28/2020 - 50 minutes)
- Melissa Yetso and Karen Mooney, Adams Middle School (03/11/2020 - 20 minutes)
- Margaret Coffey, M.D. (03/13/2020 - 30 minutes)

Attempted:

- Richard Singer, M.D. (fax 01/27/2020, phone calls 01/21/2020 and 01/27/2020)
- Cornelia Gallo, M.D. (fax 01/27/2020, phone call 01/27/2020)
- Irene Kitzman, M.D. (no longer has records, see section III)
- Mary Lou DiBella, Ph.D., Kings Highway Elementary School (see section III, school records received)
- Guilford Police Department (records received)
- Madison Police Department (records received)
- Westport Police Department (records received)
- DCF (records received)

Assessment Tools for Mr. Ambrose:

Child Abuse Potential Inventory (CAPI)
Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III) Mini-Mental State Examination (MMSE)
Minnesota Multiphasic Personality Inventory-2 -Restructured Form (MMPI-2-RF) Parenting Stress Inventory, Fourth Edition (PSI-4)
Paulhus Deception Scale (PDS)
Stress Index for Parents of Adolescents (SIPA)
Substance Abuse Subtle Screening Inventory, Fourth Edition (SASSI-4) Trauma Symptom Inventory, Second Edition (TSI-2)

Assessment Tools for Ms. Riordan :

Child Abuse Potential Inventory (CAPI), Attempted

Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III)
Mini-Mental State Examination (MMSE)
Minnesota Multiphasic Personality Inventory-2-Restructured Form (MMPI-2-RF) Parenting
Stress Inventory, Fourth Edition (PSJ-4)
Paulhus Deception Scale (PDS)
Substance Abuse Subtle Screening Inventory, Fourth Edition (SASSI-4)
Trauma Symptoms Inventory, Second Edition (TSI-2)

Assessment Tools for Mia Ambrose:

- Behavioral Assessment System for Children, Third Edition (BASC-3) Parent Rating Form
- Behavioral Assessment System for Children, Third Edition (BASC-3) Self-Report of Personality
- Millon Pre-Adolescent Clinical Inventory (M-PACI)
Sentence Completion Series, Adolescent Form (SCS)

Assessment Tools for Matthew Ambrose:

- Behavioral Assessment System for Children, Third Edition (BASC-3) Parent Rating Form
- Behavioral Assessment System for Children, Third Edition (BASC-3) Self-Report of Personality
- Conners Continuous Performance Test, Third Edition (CPT-3)
- Millon Pre-Adolescent Clinical Inventory (M-PACI)
Sentence Completion Series, Adolescent Form (SCS)

Assessment Tools for Sawyer Ambrose:

- Behavioral Assessment System for Children, Third Edition (BASC-3) Parent Rating Form
- Behavioral Assessment System for Children, Third Edition (BASC-3) Self-Report of Personality
- Conners Continuous Performance Test, Third Edition (CPT-3)
- Millon Pre-Adolescent Clinical Inventory (M-PACI) Sentence Completion Series, Child Form (SCS)

Documents Reviewed Provided by Mr. Ambrose:

Journal entries written by Mr. Ambrose dated December 2017 through September 2019

Description of journal entries dated 01/21/2020

Emails from Mr. Ambrose to Attorney Aldrich dated 08/22/2019 and 09/02/2019 Printed email summary of the following documents dated 02/04/2020:

- Email from Stacy Blau to Ms. Riordan dated 06/04/2019
- Email correspondence between Ms. Riordan, various school employees, and Mr. Ambrose dated 02/10/2017, 04/17/2017, 04/25/2017, 05/15/2017, 05/22/2017, 09/02/2017, 05/04/2017, 05/28/2017, 05/30/2017, 06/05/2017, 06/17/2017, 02/16/2018, 03/09/2018, 03/12/2018, 03/19/2018, 04/23/2018, 04/27/2018,

- 04/30/2018, 05/01/2018, 05/10/2018, 05/18/2018, 06/07/2018, 06/29/2018, 08/23/2018, 12/10/2018, 03/25/2019, 06/11/2019
- Westport Now article titled "Parent: Complaint to State Led to KHS Leaves of Absences," dated 02/05/2019
 - Westport Now article titled "KHS Principal, Staffers Back at Work," dated 03/25/2019
 - Madison Public Schools Individual Services Plan for Mia dated 11/04/2019
 - Madison Public Schools Individualized Education Program for Mia dated 11/04/2019
 - Eleven screenshots of text messages between Mr. Ambrose and Ms. Riordan, undated
 - Neuropsychological evaluation of Mia, conducted by Dr. Alex Stone, dated 04/06/2016 and 04/15/2016
 - Guardian ad Litem's Proposed Orders dated 12/12/2019
 - PDF copy of "The Domestic Violence of Parental Alienation: The Narcissistic Personality in High-Conflict Divorce" by C.A. Childress, Psy.D. (2016)
 - Two photos of Mia's attendance history for The Country School, Grade 7
 - Four photos of The Country School homework/assignments website
 - Seven images of financial documents
 - Email from Ms. Butler to Matt, subject: Work, dated 11/13/2019
 - Emails from Mr. Ambrose to Ms. Riordan dated 05/08/2019, 06/02/2019, and 07/17/2019
 - Emails between Mr. Ambrose and The Country School dated 12/04/2019 and 12/11/2019
 - Emails to Dr. Biren Caverly:
 - Subject: Ambrose - Fwd: Oct. 25 to Oct 27 Visit, dated 11/07/2019
 - Subject: Ambrose Fwd: Oct. 25 to Oct 27 Visit, dated 11/07/2019
 - Subject: Ambrose Fwd: Oct **18** to Oct 19, dated 11/07/2019
 - Subject: Ambrose Fwd: Oct 10 to Oct 13 Visit, dated 11/07/2019
 - Subject: Fwd: Oct 4-6 Visit, dated 11/07/2019
 - Subject: Ambrose Fwd: Sept 27 to Sept 29, dated 11/07/2019
 - Subject: Ambrose Fwd: Sept **11** and 13 Visits, dated 11/07/2019
 - Subject: Ambrose Fwd: First visits - pre -Sept 10, dated 11/07/2019
 - Subject: Ambrose - GAL - Contact List, dated 11/07/2019
 - Subject: Ambrose - November 8 to 10 visit, dated 11/12/2019
 - Subject: Ambrose - Update visits, dated 11/13/2019
 - Subject: Fwd: Ambrose, dated 11/13/2019
 - Subject: Ambrose/ Update - on this weeks visits, school issues and secrets, dated 11/18/2019
 - Subject: Ambrose Visits of Nov 20-21 and Nov 22-24, dated 11/26/2019
 - Subject: Update, dated 11/27/2019
 - Subject: Ambrose / texts, dated 12/08/2019
 - Subject: Ambrose - Disturbing incident; Dec. 4 and Dec. 6 visits, dated 12/08/2019
 - Subject: Mia Ambrose / Neuropsych, dated 12/10/2019
 - Subject: Ambrose, dated 12/15/2019
 - Subject: upcoming schedule, dated 12/15/2019
 - Subject: meeting at TCS, holiday schedule, switching schools, counselors, phones, dated 12/18/2019

- Subject: Mia's appendicitis scare; Dec 11 and December 13-15 visits, dated 12/19/2019
- Subject: School attendance/ Mia transferring, dated 12/26/2019
- Subject: Wed Dec 18 visit - Madison Police are called again, dated 12/26/2019
- Subject: Friday December 20 visit., dated 12/26/2019
- Subject: Christmas Eve /Christmas Day Visit, dated 12/27/2019
- Subject: Friday, Dec 27 / Sat, Dec 28, dated 12/29/2019
- Subject: Ambrose, dated 12/30/2019
- Subject: Ambrose, dated 01/02/2020
- Subject: Visit - Wed Jan 1 to Sat., Jan 4 - important, dated 01/06/2020
- Subject: Mia Ambrose/ attendance, dated 01/06/2020
- Subject: Mia Ambrose - possible school transfer, dated 01/09/2020
- Subject: Ambrose Wed Jan 7 visit, dated 01/09/2020
- Subject: Mia - school situation, dated 01/12/2020
- Subject: Matthew Ambrose / school performance., dated 01/12/2020
- Subject: Fri , Jan 10 to Sun, Jan 12 Visit, 01/13/2020
- Subject: Mia Ambrose, dated 01/15/2020
- Subject: Fwd: possible phone call, 01/17/2020
- Subject: checking in, dated 01/17/2020
- Subject: Mia Ambrose, dated 01/20/2020
- Subject: Friday / Sat Jan 17-18 Visit, dated 01/22/2020
- Subject: Ambrose - any missing material?, dated 01/22/2020
- Subject: Ambrose - "Control" over lavish spending, etc., dated 01/24/2020
- Subject: email re excessive spending, dated 01/24/2020
- Subject: Excessive spending, dated 01/24/2020
- Subject: one more quick thing, dated 01/24/2020
- Subject: Financial docs, dated 01/24/2020
- Subject: Fwd: second financial docs, dated 01/24/2020
- Subject: Computers, dated 01/28/2020
- Subject: Jan 24-26 visit and Jan 29 visit, dated 01/31/2020
- Subject: Jan 22 Visit summary, dated 01/31/2020
- Subject: Ambrose, dated 02/05/2020
- Subject: Ambrose, dated 02/05/2020
- Subject: AMBROSE Visits Jan 31(Fri) and Feb 5 (Wed), dated 02/09/2020
- No subject, dated 02/11/2020
- Subject: Visits Feb 9-11; Feb 12-13, dated 02/14/2020
- Subject: "Visit" Feb 14, dated 02/18/2020
- Subject: Wed Feb 19 "Visit," dated 02/21/2020
- Subject: Computer forensics, dated 02/21/2020
- Subject: IMPORTANT- Friday/Feb 21 "Visit," dated 02/23/2020
- Subject: summary, dated 02/26/2020
- Subject: Feb 26 "Visit," dated 02/27/2020
- Subject: Visits Feb 28 and March 4, dated 03/07/2020
- Subject: March 6 to March 8 "visit," dated 03/11/2020
- Subject: Wed March 11 "Visit," dated 03/13/2020

Documents Reviewed Provided by Ms. Riordan:

- USB drive containing three copies of 79 audio recordings, dates unknown
- Note/medical records from Yale New Haven Hospital Pediatric Emergency Department dated 12/09/2019
Screenshot of ynhh.org
- Word document containing emails between Ms. Riordan, Mr. Ambrose, and Attorneys Hurwitz, Callahan, and Brown, dated 01/06/2020
Word document containing emails between Ms. Riordan, Mr. Ambrose, and Attorneys Hurwitz, Callahan, and Brown, dated 02/14/2020
Word document titled "Stalking Incident following TCS meeting scheduled 7/31 from 8-9am"
Word document titled "Ratio nale for transferring from TCS to Elisabeth Adams Middle School, Guilford, CT/Attendance Inaccuracies and Misrepresentations also included." Word document titled "# I Warnings of Disability"
Word document titled "#2 Transition to KHS K-1 st" Word document titled "#3 KDG Data: I-Sense Fitting"
- PDF document titled "Febnary 12, 2014: Westport Public Schools Multidisciplinary Evaluation Report for Students Suspected of Having a Specific Learning Disability" Word document titled "3rd grade data assessmentfor 9_29_17 PPT"
- PDF document titled "Mia 2018 v 2019 comparison"
ERB score report for Mia dated Fall 2019
- The Southport School Student Test Profile for Miadated May 2018
- Madison Public Schools Educational Evaluation for Mia dated 11/04/2019
- Madison Public Schools Psychoeducational Evaluation for Mia dated 11/04/2019
- Madison Public Schools/Cheshire Fitness Zone Occupational Therapy Evaluation for Mia dated 10/11/2019 and 10/25/2019
Screenshot of article search results about Janis Spring
Screenshots of text messages between Ms. Riordan and Mr. Ambrose Screenshots of text messages with annotations
Screenshots of articles about "webhooks"
- Five images of a cell phone screen
- Neuropsychological evaluation of Mia, conducted by Dr. Alex Stone, dated 04/06/2016 and 04/15/2016
Letter written by Dr. Stone regarding Mia, dated 08/23/2016
Confidential Psychoeducational Assessment of Sawyer, conducted by Dr. Terry D'Elisa, dated July 2, 9, and 24, 2018
Central Auditory Processing Evaluation for Sawyer, conducted by CRM Audiology, dated 08/30/2018
Westport Public Schools educational documents for Mia
Letter written to Dr. Horwitz by Ms. Riordan, undated
- Picture of card from Mr. Ambrose to Ms. Riordan, dated 05/08/2016
Two images of handwritten lists
- Image of a parking lot atnight
- Voicemail recording dated 02/14/2020
- Image of a house with annotation

- Screenshot of outgoing call record dated 02/14/2020
- 30 screenshots of search results and websites regarding topics including international banking, affairs, and social networks
- 15 screenshots of various websites
- 5 screenshots of Google search results/websites
- Image of letter written by Mia to Dr. Phil, dated 02/19/2020
- Audio recording labeled "Mia (convo-w dad)"
- Letter to Dr. Biren Caverly from Ms. Riordan, undated Word document titled "Offers to Provide Parenting Time"
- Note on letterhead from Dr. Margaret Coffey, dated 03/06/2020
- PDF document titled "Adult Porn Known DF 5290-3-INT_DATA_Adult PDF document titled "DF 11 PAGES HIGHLIGHT"
- PDF document titled "Cookies--highlighted"
- Screenshot of PDF file with highlighting Word document titled "LIES 41 and counting"
- PDF document titled "annotated messages (29 Jan 2020 - 07 Mar 2020)"
- Video of Ms. Riordan
- Audio file titled "New Recording 14" (sent twice)
- Video file titled "[MG 2543"
- Audio file titled "New Recording 4"
- Audio file titled "Bayberry Ln 4"
- Audio file titled "Bayberry Ln"
- Word document titled "Promoting Relationship between Chris and the kids" (unable to be opened due to file size)
- Letter written by Jamie Bencivenga, undated
- Letter written by Michelle Pawlina, dated 02/05/2020
- Letter written by JamiDeSantis, dated 03/02/2020
- Six images of text messages between Mr. Ambrose and Mia, undated
- One image of the children
- Three audio files of voicemails from Ms. Kravitz
- Word document titled "Alison Kravitz_counseling log" (multiple copies)
- Audio file titled "voicemail-381"
- Word document titled "TCS Matthew (Autosaved)"
- Images of text messages between Mr. Ambrose and Ms. Riordan, undated
- Image file titled "0-4"
- Word document titled "Mia educational timeline"
- Word document titled "CA Laying groundwork for case" Word document titled "OFW Communications 1:8-1:13"
- Word document titled "Nov. 8th Guilford Green - manipulation"
- PDF document titled "Domestic Abuse History"
- Letter written by Denise Fonseca, undated
- Word document titled "Bill Horn (Autosaved) copy"
- Word document titled "Bill Horn:IP:Denial of info." (sent twice) PDF document titled "Annotated courtroom testimony 8-22-2019"

- Word document titled "Claims of parental alienation invalid_resistance to therapists invalid"
- Attached email document from Ms. Riordan to Linda Smith and Attorneys Brown and Callahan, dated February 10 (no year), containing an attached word document titled "Background and July documentation"
 - Word document titled "Hitting Incidents (1)"
 - Word document titled "7:31 Stalking Incident"
 - Images of text message between Matthew and Mr. Ambrose, undated
 - Word document titled "OUR COMPUTERS-- email evidence"
 - Word document titled "Karen's Proposal & Rationale for Mia's Educational"
- Audio file titled "New Recording 15"
 - Court transcript dated 08/22/2019
 - Audio file titled "New Recording 16"
 - Image of Sawyer's face swollen from allergies
 - Image of clothes on the floor
 - Word document titled "Chris appears to be laying out his case"
 - Word document titled "CA Refused Horwitz info & I encouraged visits" Word document titled "STUBBE: important correspondence re school" Images of text messages between Matthew and Ms. Riordan
 - Word document titled "amazon" Word document titled "108StoryDoc"
 - Images of text messages between Sawyer and Ms. Riordan, dated 01/14/2019 and undated
 - Images of text messages between Sawyer and Mr. Ambrose, undated
 - Word document titled "Parental Alienation Allegations 3-18-20" Word document titled "The calculated actions I could never foresee" PDF document titled "Colin text messages"
 - Attached email document from Ms. Riordan to Linda Smith and Attorneys Brown and Callahan dated March 18 (no year), containing attached word document titled "sept 16-19 Chris response to FB and weekend"
 - Image of OFW messages dated 03/17/2020
 - Word document titled "August 17th-- demonstrated not missing in action as Chris alleged"
 - Word document titled "Chris ' always lied" '
 - Word document titled "CONTROLLING BEHAVIORS"
 - Word document titled "DID NOT bring to westport-requests made" Word document titled "Costly/reckless choices-Final"
 - 18 attached email files of correspondence between Ms. Riordan and Dr. Hom PDF document titled "Controlling Behaviors 3-18-20"
 - PDF document titled "Chris Ambrose Messages"
 - Emails to Dr. Biren Caverly:
 - Subject: **Mia**, dated 12/10/2019
 - Subject: Ambrose Christmas Update, dated 12/26/2019
 - Subject: Fwd: Misrepresentation, dated 01/07/2020 Subject: Open secrets marriage counselor, dated 01/07/2020

- Subject: Christmas and visitation, dated 01/08/2020
- Subject: So what?, dated 01/08/2020
- Subject: Please read, dated 01/16/2020
- Subject: Fwd: Full document--please read and consider, dated 01/17/2020
- Subject: Mia Ambrose--educational assessment information--part 1, dated 01/22/2020
- Subject: Mia Assessments Part U, dated 01/22/2020
- Subject: computer info, dated 01/23/2020
- Subject: Latino boys blog/young hot Latinos, dated 01/23/2020
- Subject: Computer documents., dated 01/23/2020
- Subject: Mia's evaluations 10/2019, dated 01/23/2020
- Subject: fyi Re: today's parenting time with sawyer, dated 01/25/2020
- Subject: Fwd: Webhooks, dated 01/28/2020
- Subject: Evals for Sawyer Ambrose/Final copy of Dr. Stone's letter-Mia, dated 02/03/2020
- Subject: Fwd: Ambrose children, dated 02/05/2020
- Subject: Fwd: Truth, dated 02/05/2020
- Subject: Fwd: My list, dated 02/05/2020
- Subject: Fwd: Matthews list shared with us, dated 02/05/2020
- Subject: Fwd: Controlling and punitive for children., dated 02/05/2020
- Subject: Fwd: Stalking/harassing, dated 02/05/2020
- Subject: Fwd: 9/8 Abusive texts--Accuses me of 2 texts #3 @7:42, dated 02/15/2020
- Subject: Voicemail 2/14, dated 02/16/2020
- Subject: Please read--I know it's a lot :(2/14 & 2/15. I'm forwarding voicemail separately, dated 02/16/2020
- Subject: Money Laundering and illegal activity, dated 02/18/2020
- Subject: Photos of info, dated 02/18/2020
- Subject: More pics, dated 02/18/2020
- Subject: Photos to explain info, dated 02/18/2020
- Subject: Final pics, dated 02/18/2020
- Subject: Re: Money Laundering and illegal activity, dated 02/20/2020
- Subject: Fwd: Can you read and edit? Thanks, dated 02/20/2020
- Subject: disk/ recorder/usb, dated 02/20/2020
- Subject: computer info, dated 02/21/2020
- Subject: Fwd: Can you read and edit? Thanks, dated 02/24/2020
- Subject: Please confirm receipt of email, dated 02/27/2020
- Subject: Follow up, dated 02/28/2020
- Subject: Ambrose--incident 11/8/2019, dated 03/07/2020
- Subject: Follow-up to concerns/topics covered in last session., dated 03/07/2020
- Subject: Mia (convo/w dad, dated 03/07/2020
- Subject: Re: Audio Recorders.m4a, dated 03/13/2020
- Subject: annotated messages, dated 03/13/2020
- Subject: Family reunion night, dated 03/13/2020
- Subject: New Recording 14, dated 03/13/2020

- Subject: IMG_2543.mov, dated 03/13/2020
- Subject: New Recording 4, dated 03/13/2020
- Subject: This is brutal., dated 03/13/2020
- Subject: This is when he was in Mia's room and boys now in there, dated 03/13/2020
- Subject: Vet, dated 03/13/2020
- Subject: Promoting relationships with the kids, dated 03/13/2020
- Subject: Letters, dated 03/13/2020
- Subject: Fwd: Not at Grammy, dated 03/13/2020
- Subject: Fwd: Mia scared, dated 03/13/2020
- Subject: Fwd:, dated 03/13/2020
- Subject: Fwd: Farmhouse, dated 03/13/2020
- Subject: Fwd: Madison police, dated 03/13/2020
- Subject: COUNSELING HISTORY, dated 03/13/2020
- Subject: THIS IS WHO HE IS, dated 03/13/2020
- Subject: Fwd: Referencing you to intimidate, dated 03/13/2020
- Subject: Fwd: 1/30 /19 Bill-- undermines and detrimental to his therapeutic relationship--which is w hy he shouldn't be seeing him and Matthew., dated 03/13/2020
- Subject: Fwd: Matthew Ambrose--history/info, dated 03/13/2020
- Subject: Fwd: I ignore nothing, dated 03/13/2020
- Subject: Fwd:, dated 03/13/2020
- Subject: Accessing my email, Chris lays out case through emails, Mia educational info, dated 03/13/2020
- Subject: History and letter, dated 03/13/2020
- Subject: Fwd: 9/8 Abusive texts--Accuses me of 2 rents #3 @7:42, dated 03/14/2020
- Subject: furniture/puppies, dated 03/14/2020
- Subject: Annotated courtroom testimony 8/22/19/ Bill Hom, dated 03/14/2020
- Subject: Fwd: 3/2019-- Looking for alienation? Fwd: Vacation, dated 03/14/2020
- Subject: Email I mentioned that Dr Horwitz forwarded to me., dated 03/14/2020
- Subject: Previously sent texts, dated 03/14/2020
- Subject: Claims of parental alienation Alison Kravitz/Documentation, dated 03/15/2020
- Subject: Farmhouse texted annotated- Provokes and feigns ignorance, dated 03/15/2020
- Subject: THIS is Chris. And no one sees it., dated 03/15/2020
- Subject: Fwd: Request and update, dated 03/15/2020
- Subject: Fwd: Stalking incident document-- August 31st/ Hitting "Incidents", dated 03/15/2020
- Subject: Fwd: Forgot to include killing Cody and lies and blame., dated 03/15/2020
- Subject: Fwd: OUR COMPUTERS email evidence to support the truth, dated 03/15/2020
- Subject: Fwd: Mia School Options, dated 03/15/2020

- Subject: Fwd: Recording 15/morning after Yale/"my living room", dated 03/15/2020
- Subject: Fwd: meeting with children, dated 03/15/2020
- Subject: Fwd: New Recording 16, dated 03/15/2020
- Subject: "Alienate...oops there's that word again", dated 03/15/2020
- No subject, dated 03/15/2020
- Subject: texts, '818 Westport no problem", dated 03/15/2020
- Subject: Fwd:, dated 03/16/2020
- Subject: Ambrose Went back and responded to my old aol emails, dated 03/16/2020
- Subject: Fwd: "The work of a true sociopath, a far more dangerous creature", dated 03/16/2020
- Subject: Fwd: *** July 17th--agenda clear--files 7/19. I had surgery 7/22/19, dated 03/16/2020
- Subject: original copies no highlights, dated 03/16/2020
- Subject: Fwd: history, dated 03/16/2020
- Subject: MAJOR MANIPULATION--Ambrose, dated 03/16/2020
- Subject: Texts re: home alone, dated 03/17/2020
- Subject: Guitar--lying about scheduling on his time., dated 03/17/2020
- Subject: Fwd: New: sawyer, dated 03/18/2020
- Subject: Thank you-- Attorney server down. Getting all to you by 7, dated 03/18/2020
- Subject: Fwd: Sawyer calls Chris penis - Chris reinforces, dated 03/18/2020
- Subject: Fwd: New: admitted on ofw, dated 03/18/2020
- Subject: Fwd: Not missing in action email to Bill , dated 03/18/2020
- No subject, dated 03/18/2020
- Subject: Re: 1/2019 re: Mia and Matthew Fwd: Correspondence with Bill Hom--Chris's therapist, dated 03/18/2020
- Subject: Counseling log with highlights, dated 03/18/2020
- Subject: funds, dated 03/18/2020
- Subject: Chris's parental intake re: Matthew, dated 03/18/2020
- Subject: Costly/reckless choices , dated 03/18/2020
- Subject: examples of concerns, dated 03/18/2020
- Subject: Fwd: Requested emails Mar 1/2018---April 30 /2018, dated 03/18/2020
- Subject: Fwd: February 2018 Email Correspondence , dated 03/18/2020
- Subject: Fwd: Controlling behaviors, dated 03/18/2020
- Subject: ALL TEXTS NO ANNOTATIONS, dated 03/19/2020

Documents Reviewed Provided by Third Parties:

- Police reports from Guilford Police Department dated 12/27/2019, 01/17/2020, and 01/23/2020
- Police report from Madison Police Department dated 01/19/2020
- Police reports from Westport Police Department dated 04/22/2019 and 11/02/2019
- Department of Children and Families Family Assessment Protocol for case number 405913

- Educational records from Westport Public Schools/Kings Highway School for Mia, Matthew and Sawyer
Our Family Wizard messages
- Emails to the evaluator from Mia Ambrose:
 - Subject: Yale-New Haven Shoreline Medical Center, dated 01/06/2020 (one audio file attached)
 - Subject: Dad, dated 01/06 /2020 (two images attached)
 - Subject: Dads house - from Mia Ambrose, dated 01/06 /2020
 - Subject: Dad, dated 01/08/2020
- Emails to the evaluator from Matthew Ambrose:
 - Subject: Text to dad, dated 01/23/2020
 - Subject: Dad, dated 02/04/2020
 - Subject: Dad, dated 02/15/2020 Subject: Dad lies, dated 03/13/2020

C. Legal and Ethical Protections for Examinees

Prior to beginning the evaluation, each parent met with the evaluator who reviewed the limits of confidentiality form. Both Mr. Ambrose and Ms. Riordan signed the consent for forensic services form, and parts of this form were subsequently reviewed orally by the evaluator. The consent form outlined the limits of confidentiality for specialized evaluations. The consent form indicated that the evaluator will be writing a report based on all information obtained or received during the evaluation. Mr. Ambrose and Ms. Riordan were informed that he/she had the right to refuse to answer specific questions during the evaluation, but that it may be noted by the evaluator. Both Mr. Ambrose and Ms. Riordan were informed that the evaluation was not confidential in that a copy of the report would be given directly to the referral source, Attorney Jocelyn Hurwitz. In addition, they were both informed that any and all information obtained during the evaluation will be shared with the referral source. Mr. Ambrose and Ms. Riordan were told that the evaluator may need to testify regarding the results of the evaluation. Both were informed that the evaluator is a mandated reporter who would be required to report any suspected instances of child abuse or neglect, elder abuse, or abuse of a handicapped person.

Both were told that substance abuse information would be included in the report and that the evaluator may ask about his/her HIV/AIDS status. Both Mr. Ambrose and Ms. Riordan signed that they understood that if they no longer wanted to participate in the evaluation that they would have to revoke consent in writing. Mr. Ambrose and Ms. Riordan agreed in writing to participate in the evaluation, and they agreed to waive confidentiality and privilege so that the report could be released directly to the referral source. Mr. Ambrose stated that the limits of confidentiality included "what we walked through. I assumed what we covered. Based on everything Nancy said to me." The evaluator reviewed with Mr. Ambrose who gets a copy of the report, and he stated "the GAL who disseminates to attorneys, they share to us, then to the Judge. What we tell you is confidential to a point, including Karen and me. I won't be able to retain a copy." Ms. Riordan stated that the limits of confidentiality included "you went over the rules and your role. What will go into the report, what won't. If we stop, everything before that goes in the report. Everything we do goes in the report. Give to each attorney, attorneys will show to us. Could go to Judge, Family Services. You might be called to testify. You are a mandated reporter."

II. Clinical Information Obtained

A. Mr. Christopher Ambrose

Mr. Ambrose's History

Marital History

Mr. Ambrose shared that it is a "weird story" how he met Ms. Riordan, sharing that her dad's brother is married to his mother's sister. He noted that there is no blood shared but that the "families have known each other forever," sharing that "I was at her parents' wedding" when he was two years old. Mr. Ambrose discussed that they never dated growing up and that once they were adults and already living on their own, they saw each other over the holidays, began a correspondence, and started dating. He noted that he was living in California when they first started communicating, but he moved to New York to write for a show that "crashed and burned" and stayed in New York, commenting that it was "partly because of Karen." Mr. Ambrose

discussed that Ms. Riordan moved in with him prior to them getting engaged within a year of dating.

Mr. Ambrose recalled that on the night they went to share their engagement with Ms. Riordan's parents, he wrote an order of protection on behalf of Ms. Riordan's sister against her husband. He described that she had reported that the husband had raped her. He discussed that the parents never liked the sister's husband because he had not gone to college. Mr. Ambrose stated that when they divorced, it was "nasty." He reported that Ms. Riordan wanted to get back at her sister's husband, so she created a fake profile on match.com, sharing that she corresponded with him for a month before sending printouts of the conversation to the husband's parents and siblings. Mr. Ambrose stated that it "gave me pause," but he continued the relationship because he was "totally into her and in love."

Mr. Ambrose explained that Ms. Riordan "put me on a pedestal" and told him on their first date "what are we going to do with the fact that I'm in love with you." He noted that "I am insecure as a person, always worried if I'm saying the right thing" and that at the beginning of the relationship, Ms. Riordan "gave me real confidence I didn't know before." Mr. Ambrose described that there were "momentary blips" in which he was concerned that Ms. Riordan was "more outspoken than I would have preferred."

Mr. Ambrose discussed that they were engaged at Christmas and that her mother was diagnosed with lung cancer in January and died in early February, noting that it was a "really fast demise." He noted that Ms. Riordan had been planning the wedding with her mother and that after her death, "Karen didn't handle it well." Mr. Ambrose stated that Ms. Riordan and her mother wanted the wedding to be in Narragansett at The Towers but that the location was only available for one weekend; this was the same time as his brother's financial planning exam, so he missed the wedding ceremony and only came to the reception. Mr. Ambrose described that Ms. Riordan initially took two weeks off from work after her mother's death, and then she extended it by a week. He recalled that they were living together already in New York City, and she would call into the substitute line saying that she was sick. He noted that the principal had offered that she take an extended leave and he would save her job, but Ms. Riordan did not agree. However, he stated that she continued to only work sporadically. Mr. Ambrose shared that he suggested that

they postpone the wedding, but Ms. Riordan did not agree because her mother had helped her plan. He discussed being between shows at the time, and therefore he was interviewing for positions in Los Angeles, where he says "96% of production" occurs. Mr. Ambrose reported that he was offered to write for Judging Amy the day before the wedding. He stated that "rather than be happy, Karen was furious, said she wouldn't move to L.A." Mr. Ambrose expressed frustration that Ms. Riordan did not consider that he would need to move to L.A. after the interviews and that she offered to work and support them, which he thought would not work since he made considerably more money than her. Mr. Ambrose stated that the night of the rehearsal dinner, he discussed the issues with his brother Neil, and Neil had suggested that he not go forward with the wedding. He recalled that there was some dissension between them in regards to having children at the wedding, and ultimately their mutual aunt and uncle did not attend the wedding. Mr. Ambrose stated that the wedding continued as planned, and he moved one or two days after the wedding. He discussed that the original plan was for Ms. Riordan to move in two weeks, but then it became a month and ultimately was six weeks before she moved in August. He noted that Ms. Riordan agreed to move but stated that she was not going to work, which Mr. Ambrose thought "was punitive" and "felt an odd decision on her part. She could have gone out and looked for work."

Mr. Ambrose stated that they were in California for four years and "in spite of everything, I was really happy." He recalled that Ms. Riordan was spending money on her sister, but he did not know until afterwards. He stated that they lived close to work and that they would walk to dinner together every night, stating that they "got along so well." Mr. Ambrose stated that one night, Ms. Riordan suggested that they adopt, and he agreed. During the second year they were in California, Ms. Riordan worked as a tutor for a child being home schooled. Mr. Ambrose discussed that they worked with one adoption agency that "fleeced us," and he had to litigate to get their money back. Ms. Riordan did an application with another agency, and they were matched with Mia and Matthew, who are a few weeks apart. He noted that they were able to get Mia when she was five months old and Matthew when he was six months old. Mr. Ambrose stated that the adoption agency had suggested that they have the children at a hotel for four to six weeks in Guatemala, but Ms. Riordan refused to go without him. Mr. Ambrose commented that "Karen deserves credit" because Matthew was delayed in his development and Ms. Riordan helped him reach his milestones. Mr. Ambrose recalled that before they were going to get Mia, Ms. Riordan had said to him on two separate occasions "promise me you'll still love me after we get them," and he thought that it was weird. Mr. Ambrose stated that he thought the family unit was "good" but that Ms. Riordan told him that "I stopped paying her as much attention."

Mr. Ambrose stated that they moved back east when he got a writing position on Law and Order, and they bought their home in Westport, Connecticut. He noted that he worked on the show for three and a half years, commuting into the city daily. Mr. Ambrose shared that when it ended, Ms. Riordan told him that she was not going to leave Westport and move to L.A. He noted that he then worked on Harry's Law for one and a half seasons, commuting back and forth between CT and L.A. Mr. Ambrose stated that "it was brutal, hard on us" and that when he would come home on the weekends, Ms. Riordan would give him the babies to watch. He shared that the children went to preschool and his parents would help once a week, but they did not have a nanny. Mr. Ambrose shared that he wanted another child, and they decided to do it quickly since

he was already 48 years old. He recalled being in L.A. when Ms. Riordan informed him that they had matched to a child who was about to be born in Utah. Mr. Ambrose felt that he would quit the show when they got Sawyer, but he felt that deal" and did not think he had ever agreed to that. He reported that bastard, you tricked me again." He explained that they all went to L took the older children to New York to his parents and returned to L

Mr. Ambrose stated that he did not understand Ms. Riordan's position, since his job was the only source of income and the children commented that the second year he was in L.A., he believes that Ms. Riordan had an affair but "she's denied it. I cannot prove it." Mr. Ambrose indicated that there was one night that she went out late, which he thought was odd, and that there were times when she had "some big, elaborate story" which he thought was unusual. He stated that there was a weekend he had to stay in L.A. and work, and Ms. Riordan told him that she had plans for a facial and to meet her college best friend, Michelle, for dinner. Mr. Ambrose stated that he felt bad, so he called the spa and asked to add a massage to her appointment, but he learned that there was no facial scheduled and that the spa would be closed before the time she had stated for the appointment. He noted that he was curious, so he called Michelle at work and learned she was there. Mr. Ambrose hung up, knowing that she was not out with Ms. Riordan. Mr. Ambrose stated that he felt that Ms. Riordan was "lying about something big." The next day, Ms. Riordan reported that everything was good and she had seen Michelle; he confronted her, and she hung up and then called him back later with "some big explanation." Mr. Ambrose reported that the story was that Ms. Riordan had attended a sexual assault support group on Saturday night in Stamford. He stated that he called the group and spoke to someone who informed him that she ran the only such group in the area and that there was no group that evening. Mr. Ambrose noted that Ms. Riordan told him that she had been raped by her cousin Louie, but he felt that it did not make sense since they had left Mia with him. Mr. Ambrose reported that when he came home next, Ms. Riordan refused to talk about it, threatening "if you bring it up, I'm divorcing you." Mr. Ambrose stated that things started to "sour" at that time.

Mr. Ambrose stated that after the show was canceled, they decided to do major construction on the home. The family moved out of the home for nine months during construction. Mr. Ambrose indicated that "Karen [was] angry at me a lot," and he felt that the "anger was not proportional." He reported that he began not telling Ms. Riordan about his work because she was not supportive, and "I didn't want to give fodder to criticize me." Mr. Ambrose shared that his agent warned him that if he was not willing to move to L.A., his "career will stagnate" and "I had anger about that. I [was] blaming Karen." He reported "I don't think I handled things well in terms of communication. I should have told her my resentment. I bottle up. She will attack instead of saying what's wrong." He added "I felt under attack from her. Not a good season in the relationship."

Mr. Ambrose discussed that he found that Matthew was struggling in third grade, so he helped him with his homework but found Matthew to be easily distracted. He stated that at the time, Ms. Riordan was focused on working with Mia, who struggled more to learn concepts that came more easily for Matthew. Mr. Ambrose shared that when he was in LA working on Harry's Law,

Mia lost her hearing in the right ear without a known reason. During her kindergarten year, Mia had surgery to get a cochlear implant. However, they later learned that Mia was not hearing correctly with the implant.

Mr. Ambrose added that they felt that Mia's teacher was not a good fit for her and that there were some emails from Ms. Riordan that he felt were "a little aggressive." He noted that Ms. Riordan would not go to conferences because she did not like the teacher, even though she was a special education teacher. Mr. Ambrose stated that Mia was tested and found to

have Dysgraphia, Dyslexia, and an Auditory Processing Disorder. Mr. Ambrose stated that Ms. Riordan made a video of her showing pages of work Mia did not complete and saying negative things about the teacher. He noted that Ms. Riordan did not like how the PPTs were going, saying that they were "always acrimonious." Mr. Ambrose clarified that "I don't think Karen was wrong, but way she handled it was not helpful." Mr. Ambrose stated that they hired a lawyer, pulled Mia from public school, and placed her at Eagle Hill in Southport. He stated that the Kings Highway Elementary School had repeatedly stated that Mia was "on target" but that her scores showed she was behind. Mr. Ambrose stated that the school eventually shared Mia's testing and it proved that she had not been given the appropriate accommodations, so they began negotiating with the school board to get the public school district to pay for the private school.

Mr. Ambrose reported that the school ultimately agreed to pay them \$148,000, the cost of two years of school and tutoring. However, he stated that Ms. Riordan did not want to take the deal because she did not want to be forced to sign a non-disclosure agreement (NDA). Mr. Ambrose stated that it went on for a year and Ms. Riordan wanted to litigate, but multiple attorneys advised them to take the deal.

Mr. Ambrose stated that the summer after fourth grade, Matthew was diagnosed with Social Anxiety and Attention Deficit Hyperactivity Disorder (ADHD) and prescribed medication. He stated that Ms. Riordan had issues with Sawyer's kindergarten teacher, stating that she was a free spirit and Sawyer had attention issues and trouble focusing. Mr. Ambrose stated that Sawyer started first grade, but they moved him to a Montessori school in Wilton after a few days. Mr.

Ambrose indicated that Sawyer was refusing to go to school, so he had called Ms. Riordan's friend Jennifer, a principal in Greenwich, and she advised that he take Sawyer to school anyway. They then pulled Sawyer out of the school and home schooled him with a tutor. When the evaluator asked why Ms. Riordan did not homeschool him herself since she had previously acted in this capacity, Mr. Ambrose stated "I have often wondered but haven't had the courage to ask her."

Mr. Ambrose stated that the older children entered fifth grade without a signed contract for Mia. They decided that Matthew was going to remain at Kings Highway. He noted that the school district's lawyer stated that everyday that Ms. Riordan did not sign the agreement, they were reducing the agreement by 10%. Mr. Ambrose stated that their attorney told him that he had to get Ms. Riordan to sign, and they had "massive fights." He recalled that Ms. Riordan "called me a pussy" and told him that you "care more about money than me." Mr. Ambrose stated that after fighting, Ms. Riordan had told him that "if you want to sign it, you can" and that she left her computer and email open, so he replied that she agreed to sign the agreement. He reported that "she found out and went ballistic." He reported that she questioned "you didn't think I meant it," but he thought she had meant it. Mr. Ambrose stated that night, Ms. Riordan "hacked into my computer." He expressed that "I learned early in my marriage not to share anything with Karen."

Mr. Ambrose stated that when Ms. Riordan found an email from the attorney, she came upstairs at 1am and "hit me with stuff." He noted that they lost \$14,000, the equivalent of attorney fees, because Ms. Riordan would not sign the first day or two. Mr. Ambrose indicated that they began having yelling arguments in front of the children. He stated that Ms. Riordan would "belittle me in front of the kids." He reported that "she's a public fighter." Mr. Ambrose reported that she would throw things, clear the table top, and break picture frames during fights.

Mr. Ambrose shared that Ms. Riordan has always "fought with every school." He discussed that while they initially loved Southport, Ms. Riordan then had a fight with the language arts teacher, forcing the school to disrupt everything to accommodate the family. He stated that Ms. Riordan was constantly arguing with Hallie Buckingham from the school. Mr. Ambrose noted that he was informed that Mia's social issues were made worse by Ms. Riordan and that "she burns every bridge." He stated that the school felt that Mia did not academically require the support of the school. During that time, Matthew was having a bad school year, and there were daily fights to get him to school; he began seeing William Hom, Ph.D. for therapy. Mr. Ambrose stated that they began looking at different schools. He noted that the parents were "not communicating properly with each other," and there was confusion about schools. Mr. Ambrose stated that the children had gone to "visiting day" at Unquag, but Mia did not want to attend, and they lost a large deposit. Mr. Ambrose stated that Ms. Riordan felt that she had done the legwork and "I dismissed it," so she told him "this is on you now" and took the children with her to Rhode Island for the summer to stay at her aunt's apartment. Mr. Ambrose discussed that their relationship was "very contentious." He stated that they were still sleeping in the same bedroom but not having sexual relations. He commented "I was stupidly holding onto the idea that we can make it work."

Mr. Ambrose stated that when he is home "I do everything. I do housework, laundry, grocery shopping, dinners, lunches." He noted that Ms. Riordan does not eat with them because she has a history of bulimia. He stated that she often waits to eat until late at night and that she would often drop the children at school and then nap from 10am until 2pm, getting up to meet the school bus.

Mr. Ambrose stated that in 2017, Ms. Riordan "took off that summer" and that she was "sending me these brutal texts, emails, all hours of the night." He stated that she would repeatedly state that he was a "terrible father, selfish, not caring about kids." Mr. Ambrose stated that during that summer, Ms. Riordan left in the middle of the night, telling him she was leaving by throwing a roll of toilet paper at his head. He reported that Ms. Riordan would not tell him where she was going, and therefore he had to call in sick the next day and watch the children. Mr. Ambrose reported that there was another time she said she went to a friend's house, and once she said that she was at a hotel, but a bill never appeared on the credit card statement. Mr. Ambrose stated that Ms. Riordan left again during February 2018, and he contacted marriage therapists. He stated that they began to see Amy Wrobel, but he felt uncomfortable talking during the session, noting that he was "afraid to say things in front of her."

Mr. Ambrose shared that one night Ms. Riordan went out, he was watching the children, and Matthew knocked Sawyer down off a balance bike. He recounted that he told Matthew to stop, but he continued to do it. Mr. Ambrose explained that he went "to yank Matt off the bike." Mr.

Ambrose explained that he did not hurt Matthew "beyond startling" but that as soon as Ms. Riordan returned home, Matthew told her. He noted that Ms. Riordan texted him later to say that she had reported the incident to Dr. Horn, and he had called the Department of Children and Families (DCF). Mr. Ambrose stated that "I liked his way" and Dr. Horn became his therapist, too. Mr. Ambrose shared that Dr. Horn recommended that they do co-parent counseling but that Ms. Riordan refused and terminated Matthew's therapy in January 2019.

Mr. Ambrose stated that the older children began sixth grade at The Country School in Madison. He noted that the children were not accepted at Greenwich Catholic School after taking the placement test. Mr. Ambrose shared that he had again communicated with Ms. Riordan's friend Jennifer to discuss schools. He explained that at a wedding, Jennifer shared that they had spoken with Ms. Riordan. He reported that Ms. Riordan told him that "I cannot trust you, I want a divorce." Mr. Ambrose stated that he was supposed to go to Rhode Island the next day, but she told him "I don't want you here." He stated that he drove to Rhode Island anyway, and she told him to stay at a hotel. Mr. Ambrose noted that Dr. Horn had texted him that he had gotten an angry message from Ms. Riordan but that he was not responding. He stated that they all stayed in the aunt's apartment that night, and Ms. Riordan asked him to edit a "scathing email" she had written to the head of special education at the Westport School District. The evaluator confirmed that none of their children were enrolled in the district at that point. He stated that Ms. Riordan did not like his edits and that when she went to work on the letter the next day, he heard his phone ping with messages. His phone then "comes flying through the door," and she stormed out of the room telling him to leave or else she would call the police. Mr. Ambrose stated that Matthew was present for the exchange. He reported that when he went into the bedroom to get his wallet and keys, "she smacks me over the head with my own laptop." He stated that she screamed out to Matthew "mommy didn't hit daddy." Mr. Ambrose explained that the texts about which Ms. Riordan became upset were his conversation with his brother Neil about how "marriage sucks." Mr. Ambrose noted that they had conflicting methods for dealing with their problems. He stated that her method is "attack" and his method is "avoid," noting "both are wrong. Between the two of us, no healthy sense of how to communicate." Mr. Ambrose stated that Ms. Riordan repeatedly would not include him in things, such as buying tickets to see shows and not including him or telling the children that "daddy doesn't need to come."

Mr. Ambrose stated that the children all started at The Country School in the fall. He noted that they waited to sign the school contracts until the second week of school. He stated that Sawyer had a good first year at school. Mr. Ambrose noted that Mia was having trouble with math shortly into the school year. He explained that Ms. Riordan was "really displeased" with the math teacher who told her "you have to listen better, Mia"; Ms. Riordan took offense because of Mia's hearing deficits. He remarked that Ms. Riordan responded by sending an email to Beth Coyne, the Dean of Students, and Ms. Coyne set up a meeting with herself, Ms. Riordan, and the teacher. Mr. Ambrose shared that Ms. Riordan came home from the meeting and told him that she made the teacher cry twice during the meeting. Ms. Riordan then became upset that Ms. Coyne had not shared all of Mia's disabilities with the school, so she sent an email to John Fixx, Ms. Coyne's boss. They all then attended a meeting to "smooth things out." He remarked that Ms. Riordan continued to send "nasty" emails to the school about issues Mia was having. Mr. Ambrose stated that Mr. Fixx "called her out" before a meeting, and therefore she refused to

attend. He reported that Matthew did well at school academically and experienced less anxiety.

Mr. Ambrose shared that there was an issue at school in which Mia was receiving notes in her locker. He stated that the last note said "I want to have sex with you" and that Matthew and his friends took the note to Ms. Coyne. He explained that he typically picked the children up from school and that Ms. Riordan drove them to school. On that day, Matthew prompted Mia to tell him what happened. He reportedly told Ms. Riordan about the issue that night, and she became upset that she had not received a call about it. Mr. Ambrose explained that "Mia seems okay, not distressed, I thought she handled it appropriately." However, Ms. Riordan sent an email to Ms. Coyne and was upset that Ms. Coyne had waited a few periods to get Mia; Ms. Coyne explained that she was at a meeting. Ms. Coyne reportedly asked for the weekend to respond but that Ms. Riordan "cannot resist" and sent another email listing all the issues thus far at school. Mr.

Ambrose explained that he and Ms. Riordan decided to talk to the children together that night, but on his drive home with the children, Ms. Riordan texted that she wanted to talk to Mia herself and call him in after. He stated that he spoke to Mia but that Ms. Riordan kept interrupting to state that "daddy embellishing." Mr. Ambrose stated that after Christmas, there was more bullying of Mia at school. He noted that the "school handling was hands off" and that "I understand the school's rationale." Mr. Ambrose shared that the bullying got worse in May, and they had another meeting. He remarked that Ms. Riordan had complained that he did not defend her at meetings, so he tried to support her, noting that "I felt I was performing." He noted that he felt that since the boys had a good year, they should send them back, but Ms. Riordan disagreed. Mr. Ambrose shared that he spoke with Dr. Hom, who felt the boys should return.

Mr. Ambrose commented that "I skipped huge things" from the fall of 2018. He stated that a week before Thanksgiving, Ms. Riordan announced that she was going to spend it at her sister's house in Rhode Island. He stated that they traditionally spent Christmas Eve and Easter with her parents. Mr. Ambrose stated that the night before they were supposed to leave, Ms. Riordan told him that she did not want him to go. He stated that he told her that he was going, and they had packed her minivan to go. However, when he went into the house to turn down the heat, Ms. Riordan left with the children, leaving his bags in the driveway. Mr. Ambrose stated that he then drove up himself, stating that "I didn't think that was fair." He commented that he was there for the holiday and at night, Ms. Riordan asked when he was leaving to go to the hotel, telling everyone present that he found her sister's home to be "crowded and cramped." Mr. Ambrose stated that Ms. Riordan instructed him to "take the boys and go," so he did. He noted that Matthew texted Ms. Riordan that night that he was hungry, and she showed up with food "looking like the hero." Mr. Ambrose stated that the next day, they all went to her sister's house and played a game together. He indicated that he went to go to the bedroom at night, and Ms.

Riordan told him "oh no, you are not sleeping here. I'm not dealing with you, get out of here." He stated that he left and took the children to a movie the next day, and upon his return, she asked when he was leaving. Mr. Ambrose stated that Ms. Riordan instructed him to take the two older children home on Saturday night so they could do homework and said that she would bring Sawyer home the next day. He explained that the children were upset, and Ms. Riordan asked "do you ever have a backbone, do you stand up for yourself?" Mr. Ambrose indicated that he got Mia into the car and she started crying, so he brought Mia back into the house and left. He shared that Ms. Riordan did not return until 9pm on Sunday and wrote excuse notes for the children

missing their homework.

Mr. Ambrose stated that Mia was in counseling with Allison Kravitz in the fall and winter of 2018, noting that they had seen her previously, too. He stated that in February 2019, Ms. Kravitz called both parents in. He explained that he had met privately with Ms. Kravitz, who had commented that Ms. Riordan was telling her different things. Mr. Ambrose noted that Mia had told Ms. Kravitz that "she's emotionally unsafe" with her father. He explained being hurt because she was "always daddy's girl, little princess" but that their relationship had "fallen apart" over the last two years. During the parents' meeting, Ms. Kravitz reportedly stated that she was "hearing things that sound like alienation," and Ms. Riordan got upset and left the room for ten minutes. When Ms. Riordan returned, she reportedly informed everyone that Mia would not be returning to therapy, but Mr. Ambrose did not agree because Mia had good rapport with Ms.

Kravitz. Mr. Ambrose stated that after the meeting, Ms. Riordan wrote an email to Ms. Kravitz stating that "I'm a con man and have everyone fooled." He shared that Ms. Riordan read the email to her friend over the phone, and he heard the conversation.

Mr. Ambrose indicated that over the summer of 2019, "we were not in a happy place clearly" and that "Karen was saying horrible things about me to people." Mr. Ambrose shared that he had spoken to a lawyer about filing. He noted that he heard Ms. Riordan tell people that he was physically abusive to Matthew, remarking "I was beaten as a kid, I don't do it." Mr. Ambrose shared that he had spoken to his lawyer about being afraid that if Ms. Riordan left the state with the children, she may not come back, and his lawyer advised him not to allow her to leave the state with the children. He noted that Ms. Riordan started taping their conversations and tried to provoke a fight. Mr. Ambrose shared that Ms. Riordan has "always read my emails" when he would leave his computer on. He noted that his brother Colin had shared emails about his ex-wife and that Ms. Riordan shared the email chain with her, violating a non-disparagement clause from their divorce.

Mr. Ambrose stated that he filed for divorce in July 2019. He explained that since Ms. Riordan's nephew was going to be in the home over the weekend, he texted her to read an email he sent explaining that he had filed for divorce. He noted that Ms. Riordan sent the children out with her nephew, and she spoke on her phone loudly. Mr. Ambrose stated that Ms. Riordan asked him to consider an intensive counseling weekend in upstate New York, but he did not think it was legitimate. He noted that they both remained in the home, sharing that his brother and ex-wife cohabitated for a year while the divorce finalized; he shared hoping they could do the same thing.

Mr. Ambrose stated that soon after, Mia was sleeping at a friend's house, and the boys had not returned home. Ms. Riordan was not home, so he texted her to ask if he had to get the boys, and she did not respond. He reported that at 8pm the dogs started barking, and three Westport police officers were there saying they were escorting Ms. Riordan to get her things. He recalled asking that Ms. Riordan not take the children's items, but the police instructed him that she could. Mr. Ambrose stated that he asked the police to find out where she was going, but Ms. Riordan never responded. He reported texting the children and Ms. Riordan, but she did not respond. Mr.

Ambrose stated that he contacted Mia's friend's mother and she said that Ms. Riordan and the

children had slept over the night before and were going to Rhode Island. Mr. Ambrose stated that he paid the retainer for Ms. Riordan's attorney, and then she switched to a rental home after "she drained the bank accounts." He noted that he learned that Ms. Riordan had taken the children to the phone store, bought everyone new phones, and changed all of their phone numbers.

Mr. Ambrose shared that they had a number of meetings over the summer with The Country School to decide where to send the children this fall. He stated that Ms. Riordan wanted the children to return to TCS because "they came to the table with everything we wanted." Mr. Ambrose explained that Ms. Riordan wanted to take two cars to the meeting, and after the meeting he decided to follow her to see if she went to Westport or Rhode Island. He noted that Ms. Riordan went to their aunt and uncle's home, and so "I turn around and leave." Mr. Ambrose noted that after returning home, Ms. Riordan was saying weird things about his friends and then was insulting him, saying that their aunt and uncle agreed.

Mr. Ambrose stated that the next day, his brother Neil called and shared that he had gotten an upsetting phone call from their uncle, Charles Riordan. He stated that Ms. Riordan had accused him of stalking her and stated that she felt physically afraid and that he was abusive of Matthew. He stated that their uncle said he did not think what Ms. Riordan said was true and that "she seemed troubled." Mr. Ambrose stated that he contacted their uncle and reported that he said "I love you, but if I thought you put a hand on a kid, I'd report you in a heartbeat."

Mr. Ambrose stated that Ms. Riordan was keeping the children in Rhode Island and that when he asked to have them for a weekend, she refused and only agreed once lawyers were involved. He stated that in front of the children, she told him that she was not comfortable with him having the children for two nights. Mr. Ambrose noted that Mia was crying, so he took the boys only to the Mystic Aquarium. He stated that the boys expressed that they wanted to stay with him, so they spent two nights in the hotel, and then he drove them back. He reported that Ms. Riordan was supposed to return with the children on 08/18/2019, but she did not return until the next evening with the older children, leaving Sawyer in Rhode Island. Mr. Ambrose explained that he had the older children for dinner that night and when they got home, he went in the house and Mia instructed Matthew to go to Ms. Riordan's car. He noted that he later learned that Ms. Riordan had texted Mia to go in her car and "don't tell dad." Mr. Ambrose stated that they went to Court on 08/23/2019, and the Judge ordered Ms. Riordan to return by 08/29/2019. He stated that he had a day visit and took the children shopping. He noted that Mia wanted a \$90 sweatshirt, and when he said he was not getting it, Ms. Riordan texted him to buy the sweatshirt and "I'll reimburse you."

Mr. Ambrose stated that at Court, Ms. Riordan asked for exclusive possession of the home and sole physical custody. His attorney presented a 50/50 plan and that he was not asking for possession. He stated that Ms. Riordan's attorney "starts ripping into me" about incidents in which he supposedly hit Matthew and Mia. Mr. Ambrose stated that Ms. Riordan got on the stand and stated that she wanted to move to Guilford, which he did not know about since she had asked for possession of the home. He noted that Ms. Riordan "painted a beautiful picture." After the testimony, he was given exclusive possession of the house and Ms. Riordan was given her visitation request. He noted that Ms. Riordan "set it up" so that during his time on Wednesday

and Saturday, he has to take Mia to gymnastics and Matthew to guitar. He stated that his attorney recommended that he find a place in Madison, which he stated he did that weekend, leaving the Westport home empty.

At Mr. Ambrose's second interview date, the evaluator asked him why Ms. Riordan reports that the former contractor is Mr. Ambrose's gay lover. Mr. Ambrose explained that he does not believe that the contractor is gay and stated that Ms. Riordan has been telling people that he is gay. Mr. Ambrose expressed "I've never been with a man, wanted to be with a man." He explained that it is a "way for her to shame me."

Mr. Ambrose was questioned about Ms. Riordan's discussion of his work at a real estate company. He explained that it was brief, and then he got the job writing for Instinct in Brooklyn, New York. He noted that from June to March, he was going into Brooklyn daily. Mr. Ambrose stated that "I did a stupid thing." He explained that he had written some episodes of Bones that were "shelved," and he believed they were never used. Mr. Ambrose stated that he combined two episodes for Instinct using the Bones scripts as a template for the new episode of Instinct, stating "I didn't think anything of it." After the show aired, fans noticed the similarity with episodes of Bones. He explained that it was "shameful" and "hugely embarrassing." Mr. Ambrose stated that there were articles written about him plagiarizing, but there was "no blowback." He noted that he had not told Ms. Riordan when it happened because "I felt totally bullied, completely a battered spouse, emotionally abused." He shared that Ms. Riordan found out and told their friends and the children's friends' parents.

Mr. Ambrose stated that at their first court ordered visitation, Ms. Riordan was late bringing the children. He explained that the children did not want to go with him, so he called his attorney for advice. He stated that Mia confronted him and said "you do dangerous things to us, subject us to risk." Mr. Ambrose indicated that Mia talked about Mr. Ambrose putting Matthew in the trunk of his car and allowing him to ride there. He stated that Matthew had asked to go in the trunk, and Mia informed him that Ms. Riordan had taken the children to the police station to report the incident. Mr. Ambrose stated that he went in the car, and Matthew acknowledged that they were taken to the police station by Ms. Riordan. Mr. Ambrose explained that this fall, Mia has been very resistant about coming to visits and has only slept over a few times. He stated that he has worked with Dr. Horn on different things he can say, but they have been unsuccessful. Mr. Ambrose stated that Mia will tell him that he is mean and that he lies.

Mr. Ambrose stated that on his parenting time, Ms. Riordan showed up with one of the dogs at the school. He stated that Sawyer gets out of school 20 minutes before the older children and plays on the playground. He reported that Ms. Riordan walked up to Sawyer, and he told her that the lawyers had advised her not to go to the school during his pick up. Mr. Ambrose stated that when Mia got out of school, she informed Sawyer that he did not have to go with him. He shared that Matthew texted him that he was at the car waiting, so he went to let Matthew in; when he went back for the other children, he saw that Karen had left with Mia and Sawyer. She then did not answer his calls. Mr. Ambrose stated that Ms. Riordan texted him back later to say that she had Sawyer call Ms. Coyne to say he felt uncomfortable going with his father.

Mr. Ambrose reported that Ms. Riordan had Sawyer call DCF a few weeks after this incident to report that he tucks Sawyer into bed and that they both lay on the bed fully clothed. He commented that "Karen's implication is that I'm a gay pedophile," yet he questioned why she would allow just one boy to go on overnight visits.

Mr. Ambrose commented that the children use their phones often to call Ms. Riordan. He explained that when he asks the children to do homework, Matthew typically complies, but Mia complains loudly and calls Ms. Riordan. He reported that Mia will use her phone and not do her homework. Mr. Ambrose stated that on October 3, 2019, the GAL, Attorney Jocelyn Hurwitz, had the parents agree that while the children are in the custody of one parent, the other parent will not call the children and that notably, when there is conflict, the children cannot call their mother.

Mr. Ambrose discussed that in the fall, for three weeks in a row, Mia forgot to bring her gymnastics leotard. He stated that on the first week, they stopped on the way to gymnastics at Ms. Riordan's house and Mia then refused to come out; Ms. Riordan reportedly instructed Mia to "tell him why you hate him," and Mia replied that "I can't remember." He stated that at Ms.

Riordan then reminded Mia why she did not like her father. He noted that they were planning to go to the Durham Fair later that day, and Ms. Riordan wanted him to compromise and just take Mia to the fair and not gymnastics. He stated that he went home and hung out with the boys, and then they got Mia to go to the fair. Mr. Ambrose stated that when they were about to leave the fair, Mia learned that her friend was coming and Ms. Riordan texted him to let her stay because it was important to her socially. He remarked that they stayed for almost another two hours, noting that "Karen was totally interfering" and that she is "planning things for times I have with kids." Mr. Ambrose stated that the following weekend when Mia forgot her leotard, he asked Mia to text Ms. Riordan to leave the leotard in the mailbox. He stated that Mia got out of the car to go to the side porch, and he told her not to go in the house, but she did. Mr. Ambrose noted that when he went to the door, Ms. Riordan did not open it, so he left with Matthew. Mia did not return his texts. Of note, Mr. Ambrose reported that Ms. Riordan did not take Mia to gymnastics that day. Mr. Ambrose stated that on the third weekend Mia forgot her leotard, he took her to Target to buy a new leotard. He stated that he had told the children they could not buy toys but could get a book, and everyone agreed. Mr. Ambrose stated that while they looked at leotards, Mia was engaging with him, sharing things about boys at school. He commented that he agreed to buy Mia two expensive things because "I didn't want to spoil it." Mr. Ambrose stated that Sawyer had asked for nerf guns that cost \$5.99, so he agreed. He stated that Mia took her bag of clothes and dropped it on the floor, saying she did not want them. Mr. Ambrose commented that Mia walked away and called Ms. Riordan. Mr. Ambrose stated that later that night, Mia texted that she wanted to go to her mother's home, but he said no, and she said "I hate you. I'm not your daughter." He reported that at 10 or 11pm, the doorbell rang, and it was two Madison police officers stating that a child had called and reported that she felt in danger. Mr. Ambrose reported that the police notified him that Mia was not in danger, but she was mad that he did not buy her something. While there, Ms. Riordan reportedly called the police and requested that the police drive Mia to her home. Mr. Ambrose stated that the police said Ms. Riordan had not instructed Mia to call the police, but had texted "I can't help you, maybe the police can." He noted that the next day he tried to wake her for gymnastics, but her phone was off and she did not wake up.

early. He stated when she crune down, she asked for waffles and they had a " lovely day." Mr. Ambrose stated that later that day, Mia informed him that Ms. Riordan was coming over. He reportedly texted Ms. Riordan and told her to leave whatever she was bringing at the door or mailbox but not to come to the house. He stated that "Karen comes up to the front porch and says ' oh daddy doesn' t want me in the house. I'll stay here. Sawyer give mommy a hug.'" Of note, Mr. Ambrose stated that Ms. Riordan reported she brought feminine products, but he knew that was not accurate since he had taken Mia two weeks ago to buy supplies.

Mr. Ambrose discussed that Ms. Riordan is refusing to sell the house but has agreed to rent the house. He shared that the realtor wants them to declutte r and to get new locks for the doors. He commented that Ms. Riordan wanted to go in the house alone and that he was " initially okay with it." However, Mr. Ambrose shared that Ms. Riordan took two of his laptop computers from the closet. Mr. Ambrose explained that "I didn t think about it," but then Ms. Riordan showed a teacher at The Country School a screenshot that she claimed came from his computer. He noted that his lawyer has asked the Judge to get his computer returned and that Ms. Riordan's lawyer stated that nothing illegal was found on the computers, stating "as an adult, allowed to look at pom." Mr. Ambrose stated that Ms. Riordan had showed the teacher a website called Latino Boiz, which he stated does not include children. He remarked that the Judge spoke to the attorneys and madesure "nothing actionable on it."

Mr. Ambrose stated that Ms. Riordan has broken the J0/03/ 2019 agreement by not notifying him when making or cancelling doctor appointments and by continuing to contact the children while in his ca re. He rep o rted that Ms. Riordan has two credit cards in her possession, and while she reports that she does not have them, she has not reported either card stolen. Mr. Ambrose addressed that when Ms. Riordan's mother died, they received two checks that totalled \$50,000, but "I don' t know what happened to Karen's share." He noted that Ms. Riordan continues to ask about her inheritance. He explai ned that Ms. Riordan does not buy cheap items and that she often buys expensive gifts for her nieces and nephews. Mr. Ambrose provided an example of Sawyer liking a new toy and instead of having him earn the items or collect them over time, she bought him the entire collection. He commented that "I don' t begrudge Sawyer, but don't get everything you want initially." He noted "she thinks I' m cheap, I think responsible." Mr . Ambrose stated that he has asked her to let him know if she spends over \$500, noting that "she asks for forgive ness, not permission." Mr. Ambrose discussed the recent example in which Ms. Riordan said she was buying groceries wit h the children but then told them that she did not have money and paid by check, and then canceled her appointment with the evaluator the next day, stating that she did not have money for gas.

Custody Goals

Mr. Ambrose stated that the current court ordered parenting time is ev ery Wednesday overnight to Thursday before school, every other weekend Friday after school until Sunday at 5pm, and every other weekend Friday after school until Saturday at noon. Therefore, he is supposed to always have the children overnight on Friday, with a second overnight on alternating weeks. Mr. Ambrose explained that Matthew has begun limiting his time. Of note, over the course of the evaluation, the children reduced their time with their father. By the conclusion of the evaluation, none of the children were doing any overnights, and they typically were refusing any contact or

engaging in contact for a limited time.

Mr. Ambrose was asked about his ideal custody arrangement. He replied that prior to filing, he thought that it was in the children's best interest to have 50/50 shared custody, to "have the exact same amount of time." However, he stated that "Karen has convinced the two older ones that she's a far superior parent. She convinces them I'm dangerous, unstable. Have to call police because I won't let them leave." Mr. Ambrose stated that after speaking with his therapist, attorney, and "others," he believes that "Karen has taken a turn in her mental health and maybe needs to get back to middle ground. Maybe I need more time if she unstable." He shared that if he had the children more time or full time, it would be "hard on me and them."

Mr. Ambrose stated that Ms. Riordan "vibrates with anger no matter what I say. Way she is with everyone, so reactive, so vengeful." He provided an example of a former teacher that Ms. Riordan wanted to be fired and to be unable to get another job in another school district. Mr. Ambrose stated that it is "bad enough our marriage didn't work. Instead of moving on, she's going to destroy me with everyone I know." Mr. Ambrose stated that "I want alienation to stop. Only way to do that is if the kids are with me." He stated that "I don't want to trash talk Karen to them, but they need to know how I've been portrayed isn't good or fair." He stated that "I'm loath to say I want full custody. Don't know if best in long run, but maybe right in short term."

The evaluator questioned Mr. Ambrose about their ability to make decisions together. He stated that "it hasn't worked well. It's always been contentious." He stated that "no matter who is up against, she's right, we're wrong." Mr. Ambrose stated that "she deemed herself a superior parent." Mr. Ambrose was asked about their ability to make educational decisions together. He stated that Mia did not want to return to The Country School after winter break and that Ms. Riordan wanted her to go to Adams Middle School (Guilford School District). He noted that he had discussed with Mia going to Polson Middle School (Madison School District) because he felt they had better accommodations available. Of note, by the time of the report, Mia had not returned to The Country School and enrolled at Guilford Public Schools. Mr. Ambrose stated that he has heard about parenting coordination and that it "sounds appealing" because they may "need someone to ultimately break a tie."

Mr. Ambrose stated that they have been able to make most medical decisions together, noting that there have not been any emergency situations. He stated that Ms. Riordan was aggressive about getting Mia a cochlear implant while the experts felt it was not necessary since Mia had hearing on the other side. He noted that "Karen tends to be more proactive, aggressive, too impulsive. I tend to be the other way." Mr. Ambrose stated that Ms. Riordan initially was discussing not vaccinating the children but noted that they are all vaccinated. He discussed that Ms. Riordan has some resistance to getting Sawyer ADHD medications. However, at the time of report, the parents were again discussing having Sawyer evaluated for ADHD medication.

In regards to religion, Mr. Ambrose reported that they were both raised Catholic but "both fallen away." He noted that religion has not been an issue and that the children were baptized for his mother's sake.

Family History

Mr. Ambrose discussed that he was raised by his married parents and that he has two brothers, Neil and Colin. He noted that his parents are currently in assisted living due to medical and cognitive issues. Mr. Ambrose stated that his brothers do not like Ms. Riordan and that they do not like that "J capitulated" at holidays and always spent time with her family in Rhode Island, commenting "I had no choice." Mr. Ambrose stated that his parents are both alcoholics but noted that they did not start drinking until the children were out of the home. He stated that Colin had issues during college, went on Klonopin, and took a semester off of school, indicating that he was able to finish school and become successful. Mr. Ambrose reported that all of the nephews and nieces "are accomplished."

Medical History

Mr. Ambrose stated that he receives medical care from Dr. Richard Singer. He stated that he had an issue with erectile dysfunction due to leakage in the renal vein. He explained that surgery was expensive and Viagra was unsuccessful. Mr. Ambrose indicated that the problem started before he met Ms. Riordan, but it "became a bigger issue" later in the relationship, noting that it "seemed more a weapon she used against me." He discussed that he had surgery to have his tonsils removed when he was five years old and that he had a skin graft on his feet a few years ago. Mr. Ambrose denied any broken bones, and he denied any current prescribed medication for a medical condition.

Mental Health History

Mr. Ambrose was asked about his mental health diagnoses, and he stated that he did not know a specific diagnosis and that "95% of therapy has been me coming in and talking about the week with Karen and how it informed me and the kids or me with work." He identified that William Horn, Ph.D., his therapist, is "helping me get a better sense of myself." Mr. Ambrose denied that he is currently prescribed medication for psychiatric symptoms. He discussed that during the last few months of the marriage, he was prescribed antihistamine by his primary care doctor for anxiety, but he was unsure of the name. Mr. Ambrose denied that he has ever been hospitalized for a mental health condition. He denied that he has ever experienced thoughts of wanting to harm himself or others.

Trauma History

Mr. Ambrose indicated that he experienced verbal abuse by Ms. Riordan, emotional abuse by Ms. Riordan and his father, and physical abuse by his father.

Legal History

Mr. Ambrose denied any legal history.

Substance Use History

Mr. Ambrose denied that he ever tried cigarettes. He reported that he first tried alcohol when he was in the seventh grade. He stated that his period of heaviest alcohol use was in college and the beginning of law school, noting that as he got more responsibility at work, he drank less often. Mr. Ambrose stated that he was drinking more during the end of the relationship, stating that he would drink three or four glasses of wine over the course of a few hours. He noted that "since not

with Karen, I don't have a need to chill out at the end of a regular day." He discussed that he currently consumes alcohol two nights a week, drinking one to two glasses of wine at a sitting. Mr. Ambrose stated that he last consumed alcohol when he had two glasses of wine over dinner. He stated that he tried marijuana in high school and college and that college was his last use. Mr. Ambrose shared that he tried cocaine a few times in college, stating that was his last use. He denied all other illicit substance use. Mr. Ambrose reported that Ms. Riordan had given him Ambien a couple of times to help him sleep, and he denied all other prescription abuse.

Relationship History

Mr. Ambrose stated that he had his first serious relationship in college and that he dated someone "on and off" for two years in graduate school. He shared that he had a relationship for three years right before Ms. Riordan. He noted that they lived separately as she was also a writer and traveled often for work. Mr. Ambrose added that she did not know if she wanted children, and he knew that he wanted children. He denied any relationship since the end of the marriage or affairs during the marriage.

Employment History

Mr. Ambrose stated that after law school, he worked for six years as a corporate finance attorney. He noted that he worked with one firm for three years, and then he was the director of a nonprofit for three years. Mr. Ambrose stated that during his work at the organization, he decided to become a writer, got an agent, and moved to Hollywood. He noted that during his first ten years as a writer, he had few gaps in his employment, sharing that he worked on Law and Order, Harry's Law, NCIS, Bones, and Instinct. Mr. Ambrose stated that in April 2019, the entire Writer's Guild of America decided to fire their agents, so he no longer has an agent. He shared that there was an issue while he was writing for Instinct in which he combined two scripts he had written for Bones that he thought were never used and then was accused of plagiarism. Mr.

Ambrose stated that Ms. Riordan has made this a big issue but noted that it was not an issue professionally. He reported that he is not currently employed but stated that he has been working on scripts.

Educational History

Mr. Ambrose stated that he has a law degree from NYU School of Law. He denied any complications while in school or ever being retained.

Presentation and Mental Status

Mr. Ambrose arrived on time for his appointments. He was observed to wear work casual attire, including sweaters and slacks. His attire was appropriate to the weather and situation. He came prepared for the interaction at appointment with activities and snacks as recommended by the evaluator. During the interviews, Mr. Ambrose was observed to be excessively talkative, and there were few breaks in his speech. At times, he would become loud during his statements. However, the evaluator believed that rapport was obtained easily, and Mr. Ambrose was cooperative in answering direct questions.

Mr. Ambrose was provided with the opportunity to give the evaluator any documentation to review. He provided the evaluator with numerous detailed emails describing his interactions with

the children and Ms. Riordan over the course of the evaluation; these were also shared with the GAL. Mr. Ambrose mailed the evaluator copious "journal entries" with detailed narratives of his experiences over the past few years. Mr. Ambrose also shared photos documenting financial infonnation and emails demonstrating Ms. Riordan's interactions with various school districts.

Mini-Mental State Examination (MMSE)

Mr. Ambrose was administered the Mini-Mental State Examination (MMSE), and he was fully orientated to person, place, and time. He obtained a score of 28 out of 30, indicating no cognitive impairment. Of note, he lost two points on a working memory task.

Mr. Ambrose's Current Functioning

Cognitive Functioning

Due to Mr. Ambrose's post-graduate degrees, it was decided to not test his cognitive functioning. Since no concerns about his intelligence were noted, it is believed that his cognitive functioning is at least in the Average range, but is likely significantly higher.

Clinical Functioning

Paulhus Deception Scales (PDS)

Mr. Ambrose completed the Paulhus Deception Scales (PDS), an inventory designed to assess whether the test taker has distorted their test responses to produce an unlikely positive result. The PDS is broken down into two subcategories, as well as a total score. The first subscale is the Impression Management scale, which represents faking or lying. Mr. Ambrose scored in the Average range (T = 47). He had an Average (T = 46) score on the Self-Deceptive Enhancement scale, which measures rigid overconfidence akin to narcissism. His total score fell in the Slightly Below Average range (T = 44). This profile tends to be found in individuals who are aware of any problems and are not overly influenced by what others think of them. As such, Mr. Ambrose may be direct and his responses are likely to be honest and valid.

Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III)

Mr. Ambrose completed the Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III), a self-report measure of social-emotional functioning. Of note, the MCMI-III was chosen instead of the MCMI-IV due to its significant research base and research specific to child custody litigants. The MCMI-III is commonly used in child custody evaluations, but the test was normed using a group that is different from custody litigants.¹

Mr. Ambrose had an elevated score on the Compulsive scale (BR = 83), which measures individuals who are perfectionistic.² Individuals with these elevations are "behaviorally rigid."³ This pattern of responses indicated that Mr. Ambrose believes that there are strict rules for behavior and that things should be organized and carried out in a specific fashion. Compulsive individuals may experience that they have been "coerced into accepting the demands and judgments imposed on them by others."⁴ Looking solely at the MCMI-III results, Mr. Ambrose's

¹ Millon, T. (2009) **MCMI-III** Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 156)

² Strack, S. (2002) *Essentials of Millon Inventories Assessment* New York, NY: John Wiley & Sons, Inc. (pg. 5)

³ Strack, S. (2002) *Essentials of Millon Inventories Assessment*. New York, NY: John Wiley & Sons, Inc. (pg. 24)

⁴ Millon, T. (2009) **MCMI-III** Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 17)

responses were consistent *with* meeting the criteria for Obsessive-Compulsive Personality Disorder (OC PD). Of note, research with the MCMI-III has shown that elevations on the Compulsive scales can "reflect personality strengths rather than personality pathology."⁵ However, the higher the score, the more likely it is to reflect personality pathology rather than being a strength.⁶ Since his compulsive score is quite high, this may indicate that it is not just a strength but reflective of a personality disorder.

Minnesota Multiphasic Personality Inventory-2-Revised Form (MMPI-2-RF)

Mr. Ambrose completed the MMPI-2-RF as part of the current evaluation. This test was used to provide additional information about his social emotional functioning and was chosen specifically because it allowed his scores to be compared to other custody litigants. Mr.

Ambrose's responses on the validity scales indicated that he responded in a consistent manner and there were no indications of over-reporting. However, Mr. Ambrose presented himself as being very well-adjusted, which is relatively rare in the general population.

On the MMPI-2-RF, Mr. Ambrose indicated that he has deficits in his interpersonal functioning. For instance, he reported that he is unassertive (Interpersonal Passivity = 74) and is likely to be passive and submissive in interpersonal relationships⁷ (Interpersonal Passivity = 74, Aggressiveness-Revised = 32). Of note, Mr. Ambrose's responses indicated that he may be overly trusting of others⁸ (Cynicism = 34). The MMPI-2-RF results indicated that Mr. Ambrose may have symptoms consistent with a diagnosis of Dependent Personality Disorder (Interpersonal Passivity = 74).

Trauma Symptom Inventory, Second Edition (TSI-2)

Mr. Ambrose completed the Trauma Symptom Inventory, Second Edition (TSI-2), a self-report questionnaire about trauma symptoms. His responses were valid and did not result in elevations on any of the scales of the TSI-2.

Substance Abuse Subtle Screening Inventory, Fourth Edition

Mr. Ambrose completed the SASSI-4, a screening for a substance use disorder. His results were valid and did not indicate the presence of defensiveness in responding to item questions. Overall, he scored in the Low Probability of having a Substance Dependence Disorder.

Parenting

Child Abuse Potential Inventory (CAPI)

Mr. Ambrose completed the Child Abuse Potential Inventory (CAPI), a self-report measure designed as a screening tool for the detection of physical child abuse in social service agencies. Mr. Ambrose's responses were valid and interpretable. His responses did not elevate the scales

⁵ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 145)

⁶ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 145)

⁷ Anderson, J. L., et al. (2015) Measurement of DSM-5 Section II personality disorder constructs using the MJvIPI-2-RF in clinical and forensic samples. *Psychological Assessment*, 27, 786-800.

⁸ Sellbom, M., et al. (2008) Personality and Psychopathology: Mapping the MMPI-2 Restructured Clinical (RC) Scales onto the five factor model of personality. *Journal of Personality Disorders*, 22, 291-312.

into a range of clinical concern. As such, the results did not detect the presence of physical child abuse.

Parenting Stress Index, Fourth Edition (PSI-4)

Mr. Ambrose completed the Parenting Stress Index, Fourth Edition (PSI-4), a measure of stress related to parenting, in regards to Sawyer. His responses elevated the Defensiveness scale (raw score = 24) and suggested that he presented himself in a competent and stress-free manner. As such, his report suggested that he feels little stress in his life. He reported little difficulty in his attachment and parenting relationship with Sawyer. Mr. Ambrose indicated that he feels competent as a parent and has effective parenting strategies. He also reported having a good social support network and an amicable coparenting relationship with Sawyer's mother.

Stress Index of Parents of Adolescents (SIPA)

Mr. Ambrose completed the Stress Index of Parents of Adolescents (SIPA), a self-report measure of his parenting abilities. However, SIPA scores could not be calculated due to numerous missing responses.

Parenting Interview

Mr. Ambrose was interviewed about any special needs his children may have in regard to education, therapy, and medical needs. He reported that Mia has dyslexia and dysgraphia. Mr. Ambrose described that Mia has difficulty in math because of her working memory and explained that she requires relearning of material. He stated that she was already struggling in first grade, and in third grade it was "heartbreaking for her to learn her times tables." Mr.

Ambrose noted that Mia still counts on her fingers and that her school does not have a remedial class. He shared that she has a math tutor and receives accommodations such as different problems, longer times to work, and possibly a cheat sheet. Mr. Ambrose stated that he does not have as much information this year as he did in the past and explained that he did not ask because he "knew school bending over backwards to help us after a point." Mr. Ambrose discussed that Ms. Riordan was given a "huge download" of information, but it was not shared with him. He stated that for school conferences and back to school nights, Ms. Riordan would often go by herself if he were working; otherwise, they would go together. He discussed that he went to conferences at Kings Highway by himself because Ms. Riordan had issues with the teacher; Mr. Ambrose questioned why she would not go to the conferences if she had issues and noted that it was "odd" as she was an educator.

Mr. Ambrose commented that it was the "same thing with hearing." He explained that he takes Mia to an audiologist in the city four times per year, which is stressful for Mia; Mr. Ambrose shared that he would take Mia out to a restaurant for lunch. He stated "Karen never came." Mr. Ambrose discussed that when they found out that Mia was not hearing as well as they believed, they blamed the audiologist. He stated that Ms. Riordan went to the board and wrote a six page letter about why the woman should be fired. Mr. Ambrose mentioned other such incidents, including Ms. Riordan instigating a DCF investigation when an unrelated boy was restrained at school. Another incident involved Ms. Riordan having a mother arrested for making a "stupid threat" in an email.

Mr. Ambrose reported that Mia's math teacher had just said they should offer separate tutoring for Mia and several other classmates who were not keeping up and have separate tutoring in a study hall during math class. He suggested that Ms. Riordan would likely have an issue with this due to "social implications." According to Mr. Ambrose, Mia is a hard worker but is "not as confident as she should be" because she leans on her mother for help. He stated that she was diagnosed at the end of third grade and had some testing for her IEP. Mr. Ambrose reported that Mia has an average IQ but has some "learning issues." He described her as "a problem solver, brave, able to work around challenges," and a "good self-advocate."

Socially, Mr. Ambrose commented "I don't know what's going on there." He explained that there were "mean girls last year" who are still around. Mr. Ambrose suggested that some of Mia's social issues may have stemmed from her developing early and getting attention in the new school. He suggested that some girls were jealous because boys liked Mia. Mr. Ambrose described that the spring was "really tough" because Mia was ostracized by the girls. He expressed that he has limited information about how things are going this year. He shared that there was a recent incident in which a boy approached Mia for a kiss, and she told him to stop harassing her. Mr. Ambrose stated that "school is social for Mia."

Mr. Ambrose shared that medically, Mia is deaf in her left ear and has difficulty hearing in loud areas. He reported that she had surgery for a cochlear implant and then had a baha device. Mr. Ambrose stated that Mia started her period very early. He reported that she broke her finger in gymnastics and also had an issue with her foot which they believed to be a strain rather than a fracture. Mr. Ambrose stated that Mia saw Allison Kravitz for therapy. He noted that prior to that, she saw Barbara Keyser in the second grade; Ms. Keyser has since retired. Mr. Ambrose also stated that Mia "sat in on a session or two" with Dr. Stubbe in September 2019.

Mr. Ambrose discussed Matthew's educational needs. He stated that Matthew is "super bright" and learns easily; Matthew reportedly started reading "well before Kindergarten." Mr. Ambrose described Matthew as "quiet" and noted that he has not undergone educational testing. He stated that Matthew has had some "bumps" socially. According to Mr. Ambrose, Matthew had panic attacks in the fifth grade and was refusing to go to school. Mr. Ambrose explained that Matthew was already seeing Dr. Horn and Dr. Stubbe at this point, having started with Dr. Horn at the end of fourth grade. Mr. Ambrose reported that Matthew has social anxiety and ADHD and is currently prescribed Cymbalta and Concerta. He noted that Matthew has not seen Dr. Horn since January 2019 when he recommended coparent counseling; Mr. Ambrose stated that Ms. Riordan said he "co-opted" Dr. Horn. He reported that Matthew has been seeing Dr. Stubbe about once a week since September and indicated that the appointments were initially to get him back on a medication schedule. Mr. Ambrose shared that Dr. Stubbe stated Matthew was stressed by the divorce but "not over the top."

Mr. Ambrose returned to the subject of how Matthew is doing in school. He discussed that Matthew has some issues managing himself, such as not turning in homework or passing in assignments late. Mr. Ambrose stated that Matthew is behind in four or five classes. He suggested that Ms. Riordan's house is chaotic, and she is not on top of homework. Mr. Ambrose stated that while Ms. Riordan says school is the most important thing, this is not borne out in

how she manages the children's time. He commented that Ms. Riordan does not think it is right that he asks to see Matt's work, and she prefers to take his word. Regarding school activities, Mr. Ambrose stated that Matthew did basketball last year and will likely make varsity this year.

Medically, Mr. Ambrose denied that Matthew has had any surgeries. He stated that he is on medication for ADHD. Mr. Ambrose commented that he thinks Matthew is a "hypochondriac," noting that he has "frequent stomach ailments." However, Mr. Ambrose also stated that Matthew is usually an accurate reporter. He gave an example in which Matthew said he had a sore throat, and it turned out he had strep throat. Mr. Ambrose noted that Matthew has missed six days of school already this school year.

Mr. Ambrose again discussed that Matthew sees Dr. Stubbe, a psychiatrist at Yale Child Study Center, for social anxiety and ADHD. He explained that Matthew also saw Dr. Horn, mainly for talk therapy. Mr. Ambrose explained that Dr. Stubbe only did counseling "upon occasion." Mr. Ambrose was asked what Dr. Stubbe prescribed Matt, and he stated that she prescribed Concerta and "something else with a c." He noted that she switched his medications in September, and the Concerta stayed the same but the other medication changed. Mr. Ambrose expressed that Ms.

Riordan is bad at monitoring the amount of pills in order to do refills, so he took over that responsibility. He commented that Ms. Riordan is the "most disorganized human being." Mr. Ambrose described that Ms. Riordan is "obsessed" with the medication stunting growth and explained that this is why she will not let Sawyer go on ADHD medication. He shared that over the summer, Ms. Riordan stopped giving Matthew his ADHD medication without telling Dr.

Stubbe because she was worried about his appetite. Mr. Ambrose stated that he found out after two or three weeks when he asked Matthew why he was "acting spazzy." He noted that he gives the nighttime dose and Ms. Riordan gives the morning dose. Mr. Ambrose discussed that prior to September 2019, Matthew's last visit with Dr. Stubbe was November 2018, yet Ms. Riordan "made it sound like [she was] Matt's counselor." He explained that Matthew had reached out to Dr. Horn in January 2019, but Ms. Riordan would not let him go back. Mr. Ambrose stated that Ms. Riordan would not let Matthew or Mia see a counselor since that time. He discussed that Mia had a lot of issues, but Ms. Riordan was "afraid alienation [would] come to surface." Mr.

Ambrose stated that now Matthew is going to Dr. Stubbe twice in a week, but Ms. Riordan will not tell him why. He reported that she told him to call Dr. Stubbe, but he did not feel she should have to explain things twice. Mr. Ambrose shared that he eventually contacted Dr. Stubbe and told her he was concerned he was doing something wrong, and she stated that Matthew was not mentioning him. He stated that on one occasion Matthew saw Dr. Stubbe in the morning, and Dr. Stubbe told Mr. Ambrose that she expected Matthew to go back to school after the appointment; however, Matthew did not go to school. Mr. Ambrose shared that Dr. Stubbe had "no great concerns" and had not changed Matthew's meds. He noted that there was a pattern of Matthew having appointments either the day before or day of a visit with him, and he wondered whether it was a coincidence or whether Matthew was having anxiety but then not reporting it to Dr.

Stubbe. He commented "I know Karen can suggest things" and explained that she has "enormous control" over the children, particularly Mia. He described that Mia once went with him easily after speaking to Ms. Riordan on the phone, commenting "all she had to say was go with me." Mr. Ambrose then discussed that Ms. Riordan would lose her temper with Matthew due to his behaviors before he was medicated, and he would worry about upsetting her. He stated that Mia

would fight with Ms. Riordan and then apologize.

Mr. Ambrose returned to the subject of Mia's therapist, Ms. Kravitz. He expressed that Ms. Riordan feels he "co-opted" her "like I did to [Dr. Hom]." Mr. Ambrose stated that Mia was seeing Ms. Kravitz in the fall of sixth grade. He commented that he was relieved Mia was going because he felt she was alienated from him; he noted that he did not use that word but referred instead to "trouble with Mia." Mr. Ambrose described that in January or February 2019, Ms.

Kravitz saw him and Ms. Riordan separately and then together. He shared that Ms. Riordan told him Ms. Kravitz was going to say that Mia was emotionally unsafe with him, but she said something different. He commented that "Mia and I, definitely a problem" and expressed that Ms. Kravitz was good at navigating that in the sessions. He stated that they would both "get pissed at her" and that "she really does try to be objective." He shared that she would point out when what they were hearing did not match what was said. Mr. Ambrose described that "Karen will be in her face." He stated that after Ms. Riordan heard parental alienation come up, she pulled Mia from seeing Ms. Kravitz. Mr. Ambrose stated that Ms. Riordan wrote a "terrible nasty email" saying that he was a con man who presented differently at home and in public. Mr.

Ambrose discussed that Attorney Hurwitz chose Dr. Horwitz to be the children's new therapist. He shared that Dr. Horwitz had met with each parent but had not yet met the children, noting that it was "really frustrating."

Mr. Ambrose described Sawyer as "our preemie." He explained that Sawyer's mother was addicted to cocaine, and he spent ten days in the NICU. Mr. Ambrose discussed that Sawyer has the "easiest personality" and is liked by adults and peers. He denied that Sawyer has any social issues. Educationally, Mr. Ambrose explained that Sawyer did not thrive in his chaotic kindergarten classroom. He noted that Sawyer has great recall for facts. Sawyer went to Long Ridge School and then repeated the second grade at The Country School. Mr. Ambrose stated that Sawyer is now in third grade rather than fourth. The evaluator asked why Sawyer repeated second grade, and Mr. Ambrose explained that it was "all academic" and that Sawyer was behind in math and writing. He expressed that Sawyer is now successful, and his reading is stronger than his math. Mr. Ambrose stated that he is trying to work with Sawyer on math facts, but he believes Sawyer's early school experiences may have affected his confidence.

Medically, Mr. Ambrose stated that Sawyer broke his collarbone twice. Once, Sawyer jumped over a chair and landed on his collarbone. The other incident resulted from a larger child hitting Sawyer in the same spot from behind while going down a slide. Mr. Ambrose stated that Sawyer recently broke his ankle jumping off a bench, noting that he got a boot rather than a hard cast. He described that Sawyer takes risks, such as going down a black diamond ski trail at age four. Mr. Ambrose denied that Sawyer is prescribed any medications. He then noted that Sawyer has asthma and takes Qvar and albuterol. Mr. Ambrose stated that Dr. Gallo confirmed Sawyer has ADHD. He first commented "the inattentive type" and then questioned whether Dr. Gallo specified the type.

Mr. Ambrose was asked about typical meals for the children. He stated that Matthew is a picky eater and does not have a large appetite. Mr. Ambrose shared that Matthew likes Red Baron frozen pizza. He discussed that Mia and Sawyer will try different foods, adding that Sawyer has

a preference for a certain kind of chicken nuggets but will eat "whatever." He stated that Sawyer is not good with veggies but usually chooses healthy foods. Mr. Ambrose noted that Sawyer does not overeat or binge.

Mr. Ambrose was interviewed about his knowledge of common childhood illnesses. He stated that normal temperature is 98.6 and a fever is over 100. For treatment, he stated that he would probably take the child to the pediatrician and would give Motrin or Tylenol. Mr. Ambrose reported that Mia is "sometimes" on adult strength medicine. He noted that Matthew can swallow a pill and takes one adult pill. For an upset stomach, Mr. Ambrose described that it depends on who it is and what the circumstance is. He explained that he would not take them in just for an upset stomach; he would be more likely to take them to the doctor if they were lethargic or had a sore throat. Mr. Ambrose was able to name Dr. Sellinger as the children's pediatrician.

The evaluator asked Mr. Ambrose about discipline strategies he uses with the children. He noted that Sawyer has not required much discipline. Mr. Ambrose stated that before the divorce, he would take their devices, but now "there is nothing I can do." He described that Mia and Matthew "walk all over" him. Mr. Ambrose commented that he is lucky Matthew will do his homework when with him but noted that it is probably not as complete as it should be. Mr.

Ambrose shared that on Wednesdays, he will tell the children to start their homework after they hang out a little. He described that Mia will tell *him* she has no homework, did it with her tutor, or will do it with Ms. Riordan. If he pushes back for her to do independent reading, she says no. He explained that Mia sometimes does not come at all and recently has only been staying until 7 pm. Mr. Ambrose described that if Ms. Riordan picks up the older children, he will finish homework with Sawyer and then they do "nine year old boy stuff," such as making paper airplanes, until bedtime at 8:30.

Mr. Ambrose described that there is an issue with Ms. Riordan interfering with his ability to discipline the children by telling them not to give him their phones. He explained that he would need to pull the phones out of their hands. Mr. Ambrose stated that Ms. Riordan says they are "not safe" without their phones. Mr. Ambrose expressed concern that the children's behaviors and feelings will "harden" and it will become harder to "win them back and de-rainwash them." Mr. Ambrose expressed that Ms. Riordan is angry at him because he filed for divorce; he described the situation as "unholy revenge."

Mr. Ambrose discussed his bedtime routines for the children. He discussed that when he tells Sawyer to go to bed, Sawyer will try to "dissuade" him. Mr. Ambrose stated that Sawyer is in bed "by 8:30, 8:45, 9:00 the latest." He described that Sawyer reads on his own, gets in bed, they talk, and then he goes to sleep. Mr. Ambrose discussed that Matthew finishes his homework before bed. He commented that he will tell Matthew to go to bed by 11 pm on a Friday, adding "he's usually honest and will be on his phone and will respond in a fair way." Mr. Ambrose shared that Mia will go in her room and lock the door. He stated that Ms. Riordan took the lock off her door in the Westport home. According to Mr. Ambrose, Mia will say that he is "lurking." He stated that he has never walked in on her dressing and that he cannot get her off the phone. Mr. Ambrose commented that there is "no routine with Mia."

Mr. Ambrose was questioned about his parenting strengths and weaknesses. He stated that a strength is that he really loves them; he commented "I hope they know that." Mr. Ambrose was noted to begin crying as he expressed that he is lucky to have the children. He stated that he is willing to do what is best for them. Mr. Ambrose stated that he likes spending time with the children and wants them to be happy people. Regarding his weaknesses, Mr. Ambrose shared that he thinks he is not consistent and is a push over. He described that he will give the same warning multiple times and could be better at "holding the line." Mr. Ambrose stated that he has been trying to have firmer rules and has been "surprised it works." Regarding the division of responsibilities, Mr. Ambrose denied that the children have chores. He stated that he will ask the older children to put dishes in the sink.

Mr. Ambrose was asked about his supports. He stated "my brothers for sure" and commented that there are friends he talks to and considers supportive. Mr. Ambrose discussed that he has not wanted to share the messy situation, noting that he has work friends and does not want to "blur that line." Mr. Ambrose was asked about the possibility of separating the kids, and he denied that it has ever occurred to him. He noted that Ms. Riordan would not go for it and expressed that it was "hard enough to give up on marriage, don't want to give up on Mia." Mr. Ambrose commented that he knows the situation "has to run its course."

B. Ms. Karen Riordan

Ms. Riordan's History

Marital History

Ms. Riordan stated that "we've known each other our whole lives" because "my dad's brother is married to his mom's sister." She further stated that they have mutual cousins. Ms. Riordan noted that the relationship began when Mr. Ambrose wrote her a letter. She discussed that during the time they dated, there was a red flag. Ms. Riordan explained that Mr. Ambrose had borrowed her car and it was towed, and she felt that he "should have felt worse." She stated that during their engagement, she had darkened her hair color, and he remarked "you think it looks better like that." She explained that in previous relationships, she never felt she had to look a certain way, and therefore she felt hurt. Ms. Riordan discussed that they became engaged in December 2003 and that her mother became sick at the end of January 2004 and died on February 2, 2004. She recalled planning the wedding with her mother. Ms. Riordan stated that she had told her boss that she needed to take a leave of absence until her mother passed. Ms. Riordan stated that Mr.

Ambrose was supportive of her during this time period but that he did not want to stay at the hospital with her mother, which she was upset about because he was not working. She added that at her mother's funeral, she had a lot of friends present, and Mr. Ambrose became mad because "I wasn't paying enough attention to him."

Ms. Riordan stated that her father wanted her to change the wedding plans, but she wanted to carry on with the plans. She discussed that two days before the wedding, Mr. Ambrose informed her that he had gotten a job and they needed to move to California. She commented "I still remember being sick" over hearing the information. Ms. Riordan questioned "how did he not know this?" She stated that she believed that Mr. Ambrose could work from home, so she

questioned why they had to move. Ms. Riordan stated that she did not want to leave her job, friends, and family, but that "I agreed to go, I didn't know what else to do." Ms. Riordan indicated that they had planned to go on their honeymoon but that his new job prevented it, so she gave the tickets away. She stated that he was mad that she did not try to get back the money they had spent. She stated that "I felt I got tricked." She noted that they married in June, and she wanted to finish the school year before moving, noting "I'm sure I delayed as much as I could."

When the evaluator asked about their first year as a married couple, Ms. Riordan indicated that "we got along" but "I couldn't get past the fact that he sprung it on me." She noted that "I wish he was honest so I could prepare myself." Ms. Riordan stated that it was "fine between the two of us" and that they would do things together after work. She shared that she began working as a tutor and then homeschooled a child for two years. Ms. Riordan commented that she did not like the Hollywood scene and that she was not as impressed by names and images as she found Mr. Ambrose to be, commenting "I didn't relate to it." Ms. Riordan stated that Mr. Ambrose was "always affectionate" but that there was no intimacy. She stated that Mr. Ambrose no longer wanted to participate in activities or sports he had previously done with her.

Ms. Riordan discussed that "I got tricked going out there." She described that she was close to her sister and her four children and wanted to see them often. She stated that she suggested a frequency for her to fly home, but "he said no." Of note, she immediately clarified that "he wouldn't say no, but wouldn't say yes. He puts it off, left waiting." Ms. Riordan indicated that she wanted to have children but had told Mr. Ambrose that she wanted to wait until they returned to the east coast. She noted that she always wanted to adopt and that Mr. Ambrose agreed, and bought a house in Westport, Connecticut. Ms. Riordan explained that "I say what I think. I'm not meek" but that Mr. Ambrose dismisses her. Ms. Riordan explained that she was filling out paperwork to adopt the children and that she was reaching out to an author of a book about adoptions that have gone wrong.

Ms. Riordan noted that they had a problem with the first agency and then moved to a different adoption agency. She noted they were matched to Mia, and then there was a match to a child that had health issues, so they passed and then were offered Matthew. Ms. Riordan explained that they had bought the home in Connecticut but that they lived in California for another year. She noted that Mr. Ambrose was working long hours and she was home with the children, helping Matthew reach his milestones because he was delayed. Ms. Riordan stated that watching the two children "reminded me of teaching" and that "I gave them a nice world."

Ms. Riordan stated that they eventually moved to Connecticut and that initially Mr. Ambrose was working in New York City. She stated that when the older two children were in preschool, Mr. Ambrose took a job in California and then commuted back and forth for three years. Ms. Riordan stated that "I got used to it. I was consumed with them." She stated that "I felt I gave the kids a rich experience, roots" during the week and that on the weekends, she felt that "sometimes he didn't have awareness." Ms. Riordan stated that she felt she should think "poor him" but she felt "I didn't really care. I love him. I remember him needing a lot of reassurance." She shared that she wanted Mr. Ambrose to get an apartment in California, but he was "cheap" and was staying at Motel 6s. Ms. Riordan stated that she questioned if he was being honest about where he was

staying.

Ms. Riordan indicated that Mr. Ambrose wanted them to adopt a third child but "I was fine with two." She stated that she had told Mr. Ambrose "we can do this, but not with California." Ms. Riordan stated that she did the adoption portfolio and they were matched with a child in Utah. She stated that since Mr. Ambrose is an attorney, he could have pursued that for work and did not have to stay with writing, commenting "I just wanted him on the east coast, I didn't care what he did." Ms. Riordan stated that Mr. Ambrose took a new job and later that same week, they received the call about Sawyer. She shared that Sawyer was born small and that he had to go through withdrawal from cocaine. Ms. Riordan stated that she spent the summer in Rhode Island with the children, living with either her father or sister. She indicated that Mr. Ambrose was not home every weekend that summer, even though "he'll say he home every weekend."

Ms. Riordan discussed the couple's relationship during this time. She stated that he was "totally phoning it in" but that "I didn't see it then." Ms. Riordan reported that after Sawyer, there was "no affection." Ms. Riordan stated that she had been raped in her 20s by her cousin and had gotten pregnant and had an abortion, stating that it was "not a good experience." She stated that she found a support group in Stamford but that "I didn't tell him I'm going. I didn't want to talk about it. I lied to him" and instead told him she was going to a spa. Ms. Riordan reported that Mr. Ambrose had told her that he had called and learned that she was not going to the spa.

However, she stated that she called the spa to apologize and then went in person, but they told her that nobody had called.

Ms. Riordan stated that she asked to go to marriage counseling and that they began working with Amy Wrobel. She recalled writing something where she noted that she did not understand why Mr. Ambrose was acting in a certain way, explaining that "it is frightening" and that "in light of how [he's] acting, I didn't feel comfortable." Ms. Riordan explained that "I feel like I'm pummelled verbally. He says things fast, it's mean and aggressive and unrelenting." She commented that "I don't remember specifics" but that "I felt assaulted with questions almost."

Ms. Riordan stated that Mr. Ambrose wanted her to go to California, but she was concerned about going with all three children. She stated that Mr. Ambrose came to Connecticut and they all traveled to California together. Ms. Riordan stated that Mr. Ambrose continued to work and that "everything was far more difficult than it needed to be." She shared that during this period of time, Mia unexpectedly lost her hearing in one ear. Ms. Riordan noted that she returned to Connecticut and "focused that whole year on hearing." She added that at 18 months old, Mia was diagnosed with shingles, but it is unclear if that was related to her hearing or not.

Ms. Riordan noted that she was unsure if Mr. Ambrose was back in Connecticut when the older two children started kindergarten. However, she stated that "even when Chris home, he's not a participant. He very much doing his own thing Everything to do with raising them came to me." Ms. Riordan stated that Mia needed an FM system for kindergarten, but the school refused to give it to her so "I had to fight to get an FM system."

When asked about the state of the marriage at that time, Ms. Riordan stated "we got along" but that Mr. Ambrose "wouldn't put his hand on my shoulder. Nothing." She noted that Mr. Ambrose

was diagnosed with venereal leakage which made him impotent. However, she commented that "I don't think he went to doctor, or true." She stated that he would have bandages on his hand and tell her he had done bloodwork. Ms. Riordan reiterated that after they were married, they stopped having sex, stating that Mr. Ambrose would say he was "anxious." Ms. Riordan stated that in 2015 she told Mr. Ambrose that "I'm not happy" after Sawyer pointed out to her that the parents never kissed. She explained that "I don't want to model sad to them. I want to model love, affection, whatever. I'm a really physical person." Ms. Riordan added that "his sex drive is just fine apparently." She stated that around Christmas 2015, they moved into a rental house and began construction on the family home. She noted that Mr. Ambrose was "around but not totally participatory." Ms. Riordan shared that the first contractor was hospitalized for depression, and then they began to work with Jim Essies. She stated that "Chris depressed, he not doing well. He bummed about his career. I encouraged him to end [his] writing career. I was really supportive of him." Ms. Riordan stated that Mr. Ambrose became "pretty aggressive with the kids sometimes." She characterized that for Mr. Ambrose "huge things are happening with significant consequences that [he is] not paying attention to, but spill juice or mud is a huge problem with a huge reaction."

Ms. Riordan stated that she did not want Mia to return to Kings Highway, and Mr. Ambrose was "not dealing with it. It needs to be addressed and he wouldn't. I sit there worrying. I can't do anything without his permission or consent." Ms. Riordan indicated that "I just felt he just wasn't engaged," and she found him to be "heavy handed" in his parenting style. She stated that Mr. Ambrose began to work for Instinct and that Mia was attending Southport School. Ms. Riordan noted that Mr. Ambrose was never home because he had a long commute to Brooklyn daily, and she could not get in touch with him. She stated that Mr. Ambrose was "always toughest on Matthew. Really brutal." She explained that Matthew saw Tracey Penoyer "a handful of times" but that Mr. Ambrose went once and refused to allow Matthew to return. Ms. Riordan stated that she called Bill Hom, Ph.D. She stated that Mr. Ambrose was still "mistreating Matthew, mimicking him, calling him names, really mean." Ms. Riordan noted that "I would tell him 'just stay in Brooklyn,'" noting "I couldn't get him out of the house." She shared that she had informed Dr. Hom that "I am done, our marriage is not a marriage." Ms. Riordan then stated "Chr is basically avoiding me like the plague, never home."

Ms. Riordan stated that in September 2017, she received a call from Sawyer, who was crying and said he was scared. She stated that when she got home, Matthew whispered to her "dog gate," explaining that Mr. Ambrose had lost his temper and thrown Matthew into the dog gate. Ms. Riordan stated that Mr. Ambrose had not previously been physical with the children. She stated that he would get mad and throw things. Ms. Riordan explained that she wrote a letter to Dr. Hom and that she purposely did not send Sawyer to school the next day because she was fearful that he would tell his teacher, and she would call DCF. Ms. Riordan indicated that she knew that Dr. Hom was a mandated reporter but she wrote to him, anyway, stating "at that point, I had done everything I could with Chris." Ms. Riordan stated that Mr. Ambrose agreed to start doing therapy weekly or he would report the incident to DCF. She noted that Mr. Ambrose wanted to work with Dr. Hom, and she believed that Dr. Horn would not agree, but he agreed to see Mr. Ambrose. Ms. Riordan stated that she does not understand why Mr. Ambrose wanted to go to a counselor 30 minutes away and why he wanted to see Matthew's counselor. She remarked that

she asked Dr. Horn, and "I felt I wasn't heard." She noted that Dr. Horn had suggested that they start couple's counseling. Ms. Riordan stated that Dr. Horn wanted Mr. Ambrose to call people to arrange counseling, but "I knew he wouldn't call." She stated that Mr. Ambrose "used Bill to control Matthew." Ms. Riordan indicated that she would report her concern to Dr. Horn, and he would not respond, saying "he has Chris's privacy at hand" and that "I couldn't say anything to Bill that Chris couldn't see," which she felt created a "not fair dynamic."

Ms. Riordan stated that things started to get worse in the fall of 2017. She explained that "Chris sent an email from my account. Basically, it was a violation of my being. I didn't want to sign an agreement, he wanted to." She added that "I was insane because a major violation of my rights." Ms. Riordan stated that "out of desperation, I wrote to Bill" during the summer of 2018. She then added that after Mr. Ambrose signed an agreement on her behalf, she asked for a divorce; she then remarked "but don't know if I asked for a divorce. Asked him to leave." Ms. Riordan stated that she continued to urge Mr. Ambrose to live in Brooklyn during the week, stating that "I needed space and time to collect my thoughts." Ms. Riordan stated that she wanted to move the family because "when a school wrongs one child as egregiously as they wronged Mia, not just ship Mia off. Thought should have been addressed as a family issue." Ms. Riordan stated that in 2018, she asked for a divorce and then went to her sister's house for three days. She explained that she had emailed Dr. Horn to inform him where she was, noting that "Chris saying now that I just left."

Ms. Riordan commented that the "kids know he lying and he's lying to them." She stated that in therapy, Mr. Ambrose reported that he was abused, and then he stated that the children were abusing him. She recalled a time where Mr. Ambrose reportedly stated that Mia called him a "f--king bitch" but she knows that "Mia doesn't swear." Ms. Riordan stated that when Mia or Matthew would say things to her, she believed that they were embellishing. She noted that Mr. Ambrose was "lurking outside [the] doorway." She reported that Mr. Ambrose eventually went to a marriage counselor but stated that it was "some famous counselor" who believed in "open secrets." Ms. Riordan explained that she did not like that if they were working together that there could be secrets that she did not know. She stated that they went to see Amy Wrobel, and she found that Mr. Ambrose's report was "total bullshit." She stated that she felt that the "whole marriage is a sham" and that "I think he's gay or asexual. I have no evidence about anything." Ms. Riordan explained that since she thought the marriage was a sham, she emailed the counselor and said that she would not return to therapy, noting "I didn't want to go, put more time, energy in. I was already done." Ms. Riordan stated that she did not pursue a divorce at that point because "I wanted kids settled and grounded. I wasn't so miserable with him. I want to figure out what we are doing." She noted that she wanted to relocate and then divorce and live next door to each other.

Ms. Riordan stated that while they worked with Ms. Wrobel, Mr. Ambrose did not say anything about being stressed on the set of *Instinct*. She explained that "I now know he had gotten nailed for plagiarism on *Instinct*." She felt that they were pursuing schools near his work and that "the whole time, now know he knew he wasn't going back to *Instinct* and he didn't tell me." Ms. Riordan stated that when she found out about the plagiarism, "I was worried he would kill himself." She noted that after she processed it, "then I wanted to kill him" because "he

committed career suicide."

Ms. Riordan stated that she was concerned about lies that Mr. Ambrose had been telling people. She shared that she saw an email that Mr. Ambrose sent to a friend discussing "all these grand things" they had done, but she knew that they were lies. Ms. Riordan stated that when she confronted Mr. Ambrose, he responded that his friend was special forces and he "Just wants me to be this big guy. I got caught up in telling stories." She shared that Mr. Ambrose lied by not telling her that he had contacted her friend, Jennifer, to ask for guidance on the children's school placement. Ms. Riordan noted that she was upset and told Mr. Ambrose not to visit her or the children in Rhode Island. However, she said he came up and so she had him take the children to a hotel instead of staying with her at her aunt's home. Ms. Riordan commented "he has no respect for what I said."

Ms. Riordan indicated that Mr. Ambrose had told the children that they were going to go to Greenwich Catholic School. However, they did not receive an acceptance letter, and then Mr. Ambrose stated that they would be going to The Country School in Madison. Ms. Riordan noted that Mr. Ambrose had reportedly not finished the applications to Greenwich Catholic School. She reported that in the fall of 2018, she asked for a divorce, but she stated that Mr. Ambrose was threatening and told her "you can kiss private school goodbye." Ms. Riordan stated that during the 2018-2019 school year, she felt that Mr. Ambrose was working to show that he was engaging in 50/50 parenting. She noted that "I didn't fully realize what [was] going on. I felt all these mind games, but I couldn't be sure." Ms. Riordan reported that Mr. Ambrose was being "suspicious, abusive, lurking" and that he told her "you're a narcissist, an abuser." She reported that she had written to Dr. Horn to question why he thought she was a narcissist. Ms. Riordan noted that Dr. Horn "of course showed to Chris, and Chris was furious" because he felt that "I tried to shame him. I didn't." Ms. Riordan added that she believes that Mr. Ambrose was "reading all my emails, tracking me on GPS."

Ms. Riordan reported that Mr. Ambrose was preventing Matthew from meeting with Dr. Horn, such as by having Sawyer take tennis lessons during Matthew's appointment time. She noted that Mia had been seeing Allison Kravitz for a year. Ms. Riordan reported that she had gone to Goodwill about five minutes from the home when Matthew texted her to come home because "all hell breaking loose." She stated that when she got home, Mr. Ambrose was upstairs on the phone, the boys were watching television, and Mia was in her loft. Ms. Riordan stated that Mia told her that Mr. Ambrose had chased her up to the loft, and she threw a laundry basket at him. She recalled Mr. Ambrose saying that "she could have killed me." Ms. Riordan noted that "no matter what happens, he is divisive with the kids. He separates them." She said that Mia wanted to see Ms. Kravitz, so she called and "I taped on my side" because she was "afraid Chris would say I filled her head with stuff." Ms. Riordan stated that at the next appointment, Ms. Kravitz informed her that Mia was "emotionally unsafe with Chris." She reportedly wrote this to Dr. Horn, and he told her that he had to inform Mr. Ambrose; she stated that this is "where conflict comes in." Ms. Riordan stated that Mr. Ambrose went to meet with Ms. Kravitz, and then he "continued to see Allison." Ms. Riordan stated that in the spring of 2019, the children had a two week vacation, so she suggested that they each have the children for a week. However, she stated that he told her that they had no money for vacation and then at the last minute, he announced

that he was taking the children to Disney. Ms. Riordan indicated that Mr. Ambrose had suggested that it was Ms. Kravitz's idea for them to do separate vacations. Ms. Riordan stated that she called Ms. Kravitz and left a message, and when she called back she said she had been on the phone with Mr. Ambrose. She explained that "I didn't feel good about it." Ms. Riordan discussed that Ms. Kravitz wanted to meet with the parents together but that "I [was] reluctant to do so." She stated that at a subsequent meeting, Mr. Ambrose informed her that he had been lying. She discussed saying that if they did not have children, "I would have been out of here a long time ago." Therefore, Ms. Kravitz asked if they wanted to work out a parenting plan. Ms. Riordan explained that she did not want to "invest more time," and therefore she left the appointment.

Ms. Riordan noted that there was an appointment during which Ms. Kravitz reported that they have a violent household because the children were "hitting, kicking, abusing your husband and you are allowing it." She added that Ms. Kravitz informed her that she was engaging in parental alienation. Ms. Riordan stated that Ms. Kravitz gave an example of a time Ms. Riordan had knocked on Mia's door, Mia said "go away" and then remarked that "I thought you were dad," and "I didn't say anything." She explained that "I was tired. I wasn't condoning anything." Ms. Riordan indicated that Mr. Ambrose has been keeping a journal where he "run and writes" any examples of the children misbehaving. She recalled that Ms. Kravitz had wanted her to reframe that Mr. Ambrose was not documenting but rather journaling because he reported that he would experience things and Ms. Riordan would deny they happened, which "makes him feel crazy." Ms. Riordan stated that she wrote to Ms. Kravitz that she was not returning, and Ms. Kravitz informed her that she would not meet with Mr. Ambrose without Ms. Riordan present. She stated that Ms. Kravitz recommended that she start her own individual counseling. Ms. Riordan stated that after these meetings, Mr. Ambrose began using the term "alienator" against her.

Ms. Riordan noted that Mia had surgery in April 2019 to get her cochlear implant taken out and her baha put in. She reported being diagnosed with melanoma on her arm. She explained that Mr. Ambrose's behavior was "getting more and more crazy." Ms. Riordan indicated that Mr. Ambrose "took over the downstairs. I was upstairs all the time in my room." She noted that Mr. Ambrose made her feel "constantly monitored." Ms. Riordan stated that she felt that her emails were being accessed from different IP addresses and that her emails to Dr. Horn were gone. She noted asking Dr. Horn to send her the emails, but he refused. Of note, Ms. Riordan shared these emails with the evaluator.

Ms. Riordan stated that she had an appointment with her attorney scheduled on 07/17/2019 and that she was planning to serve Mr. Ambrose. She commented "at that point, I didn't know he [was] reading all my emails." Ms. Riordan stated that she received a text and email from Mr. Ambrose informing her that he had filed for divorce and that the papers were in the cabinet. She reported that "all of July is crazy." She gave an example of having plans to take the children to the beach with her friend and Mr. Ambrose telling her that he wanted to go, too. Ms. Riordan commented that it was new that Mr. Ambrose wanted to be included in her plans. She stated that Mr. Ambrose would text or call her or the children, noting that he was "monitoring around the clock." Ms. Riordan stated that "he would never leave. It kept getting more and more creepy."

Ms. Riordan discussed a meeting at school for Mia before the start of the fall semester in 2019. She stated that she had informed Mr. Ambrose that she wanted to take two cars. She explained

that "he can get very threatening and in close proximity, no way out. He has a hot temper and can be nasty." Ms. Riordan stated that after the meeting, Mr. Ambrose started following her for 75 minutes while texting her. She reported that "I was getting really nervous," and she called the Madison Police Department. Ms. Riordan explained that she asked her friend Tracey to get the children and bring them to her house. She stated that she called her aunt and uncle and went to their home. Ms. Riordan stated "I fear nobody will believe me. He's following me." She noted that when she got to her uncle's home, Mr. Ambrose turned around and left. Ms. Riordan stated that on that date, she asked her relatives if they thought that Mr. Ambrose was gay, and they confirmed her suspicions, stating that "he's always been gay."

Ms. Riordan stated that "I knew he [was] monitoring my phone calls because of "a few things he said." She explained that she saw a yellow note pad that had her attorney's phone number written on it. Ms. Riordan added that she went across the street but had interference on her phone, which made her question if he was tracking or monitoring her. Ms. Riordan explained that she went to the Westport Police Department and they showed her that her GPS was turned on her phone and the children's phones and they showed her how to turn it off. Ms. Riordan reported that the police told her not to use the phones and then escorted her to the house to get the children's belongings. She noted that she took the items to Tracey's home, and they went to Rhode Island the next day.

Ms. Riordan indicated that she questioned if Mr. Ambrose was dating Jim Essies, their former contractor. She stated that she saw on a paper that Mr. Ambrose had written Jim Essies and then wrote GPS, indicating that "he knew I went to his house."

Ms. Riordan discussed that prior to this past year, Mr. Ambrose had never done bedtime with the children. She stated that when he started doing more parenting responsibilities, he began getting in bed with Sawyer, noting that "he insisted on it." Ms. Riordan explained that "everytime, I would make him get out of bed." She noted that at Mr. Ambrose's new house, he puts Sawyer to bed in his room even though Matthew's room has two beds in it. Ms. Riordan added that Mia has informed her that Mr. Ambrose has "laid with Matthew, too." She stated that she then asked Matthew, and he informed her that he told his father to stop and that Mr. Ambrose asked "why are you rejecting me."

Ms. Riordan stated that she wanted to discuss Mr. Ambrose's lies. She stated that he had told Mia that he was with his parents, but she later found out he was in Westport. She noted that there was a time when he told her that he was in Madison, but her neighbors informed her that he was in Westport. Ms. Riordan noted that "you catch him in a lie, but no acknowledgement, he just moves on."

Ms. Riordan stated that there have been issues at transition times. She stated that Mr. Ambrose has told her that it is "your job to get them to go." She commented that "he's out to prove his case, not trying to make it work." Ms. Riordan indicated that Mr. Ambrose will often wait for the children in his car. She shared one incident in which Mr. Ambrose had texted her that she was "lingering." Ms. Riordan stated that during a hospital visit, Mr. Ambrose told her that she did not have a right to be there. She stated that she responded by telling him to not say that in front of the

children, and then she told him "get away from me." Ms. Riordan noted that Mr. Ambrose stated that "he would never want to be near me." She stated that she called the hospital and there were no security videos, so "he gets away with it."

The evaluator asked Ms. Riordan why she believes that Mr. Ambrose wants the children, and she responded "to hurt me." Ms. Riordan then began discussing an incident at Thanksgiving. She stated that Mr. Ambrose had reported that he historically spent Thanksgiving with the children. Ms. Riordan stated that she was able to show that over the last seven years, they had spent the holiday with her family. When the evaluator asked if Mr. Ambrose was present, she acknowledged it but stated that "his attorney put forth that he spent Thanksgiving with the Ambrose family." Ms. Riordan stated that she had told her attorney that she wanted Christmas Eve and Easter. Therefore, she agreed to allow him to have the children on Thanksgiving. Ms.

Riordan indicated that she agreed to the children sleep ing over because she believed that he would be staying with them at his brother Neil's home. She stated that her attorney told her to promote going to Neil's home, and therefore Mia and Sawyer agreed to go. Ms. Riordan stated that when Mr. Ambrose got to the home that night, Mia asked if she could come home that night and "he won't give confirmation or give a distraction." Ms. Riordan indicated that she stated that the children were looking forward to going to Neil's house, but then Mia said she was not going and "chaos broke out"; she stated that Mr. Ambrose said "I wonder who wants this outcome." Ms. Riordan stated that Mr. Ambrose told the children that she had called DCF and the police on him. She said that Mr. Ambrose was outside the home looking at the windows, and she was in the home calling her attorney. Ms. Riordan stated that Mia went with Mr. Ambrose the next day but then called her crying because her father had reportedly said that "Uncle Neil thinks it's weird how badly you want to stay over." Ms. Riordan stated that at the hospital, she told Mia and Sawyer that it would not be weird with their uncle.

Ms. Riordan stated that she has found that with Mr. Ambrose, "everything has a purpose" but that "I'm sure I'm missing most things." She stated that he usually shuts down his computer but that he left it open and she saw messages between him and his brother Colin. Ms. Riordan stated that she took a picture of the messages and sent it to Colin's ex-wife. Ms. Riordan reported that Colin sent her a text that night that she found "aggressive and threatening." She commented that "my kid's ready to commit suicide and not for nothing, I say nothing about them. They not even on [my] radar." Ms. Riordan stated that Mr. Ambrose showed her his phone and stated that she had sent texts to Colin's ex-wife. She stated that she chose to call the ex-wife and apologized.

Ms. Riordan explained that Neil had informed her that it was bad for Colin because it violated a term of his divorce agreement. Of note, Ms. Riordan did not further discuss which child was suicidal or what happened.

Ms. Riordan stated that she decided to have Mr. Ambrose's old computers analyzed by a forensic computer expert "because my goal was to prove" that Mr. Ambrose is gay. She noted that "to this day, I don't see him as a gay person. I didn't really think it." Ms. Riordan explained that she waited because she was afraid that there would be nothing on the computers and Mr. Ambrose would call her paranoid. She reported that Donna Eno, her computer expert, "said she didn't find anything. She said a lot was deleted." However, she stated that the expert later called her and stated that she had found cookies and "there's gay porn all over the place" and that she found Mr.

Ambrose to be "extremely tech savvy." Ms. Riordan stated that she informed Mr. Ambrose that she believed he was having an affair with the contractor. She explained that "he has the most vulgar porn on there. All military stuff. All latino, military guys, banging sore assholes, really graphic and gross." She commented that the children are of Latino descent and one of the webpages was called "yo ung, hot latinos."

Ms. Riordan stated that on Halloween, she decided to bring Matthew to see Dr. Stubbe. She stated that Mr. Ambrose was telling Matthew that Ms. Riordan had broken laws and could be arrested. Ms. Riordan stated that Matthew was supposed to go to a dance at school and then sleepover at Mr. Ambrose's house, but he refused to go. Ms. Riordan stated that she wrote to Mr. Ambrose and asked him to compromise so he did not miss school. She commented that Mr.

Ambrose believes that she can make the children do things. She stated that Matthew went to the dance at school, and she told a teacher that if Matthew resists going, to let her know. She stated that she showed the teacher the latino boys blog, stating that "nobody is listening to me." Ms.

Riordan stated that "I feel my kids at risk. I don't know what's going on. Just err on side of caution and skip sleepover." She stated that Mr. Ambrose's online searches showed "foreign banks all over the place I know nothing about, hook ups all over the place, he soliciting people who have adopted kids on OK Cupid." When asked if the websites were child pornography, Ms. Riordan stated "a lot comes out as child porn, some listed but unclear if child porn." Ms. Riordan stated that her computer expert believes that Mr. Ambrose is "either doing porn as a business, creating, or distributing."

Custody Goals

When asked about her goals for custody, Ms. Riordan stated "Chris is not who he presents to be. My greatest fear is nobody is believing me, nobody is believing the kids." She stated that Mr. Ambrose "does better in short snippets, better in public when other people are watching him." Ms. Riordan added that "even when he's making an effort, he loses his temper, easily frustrated." Ms. Riordan stated that she would like "ideally, to see him a few times a week for short duration. Maybe an overnight but quick to next morning." She explained that the children have been able to not stay over and are refusing visits with their father.

Ms. Riordan stated that Mr. Ambrose is "sympathetic, charming, manipulative." She stated that the "reality is too scary." She noted that she has told the children "Dr. Caverly is a forensic psychologist. If anyone sees it..." but noted that the children "have no faith in me." Ms. Riordan stated that Mr. Ambrose is better with the children in reduced numbers but that she does not think it is in their best interest to be alone.

Ms. Riordan stated that "I want custody." She stated that in a normal situation, she would want legal custody to be 50/50 but that she does not find him to "stick to his word." Ms. Riordan provided as an example that Mr. Ambrose has changed his mind several times about Mia's school placement. She shared that she and Mia had called Mr. Ambrose on speakerphone to discuss the school placement, but he was promoting the school in his current town. Ms. Riordan stated that she was confused when Mr. Ambrose told The Country School that he supported Mia returning after winter break.

Ms. Riordan stated that physically, "I want custody. He should be limited ." She stated that the children do not want to stay overnight with Mr. Ambrose and "I don't want them overnight based on what happening now and the past." She explained that "I think two nights is too much," and she does not believe that the children should be forced to stay overnight. Ms. Riordan commented that there is "a lot I don't know that I want to share with you," noting that "his judgment and deception is frightening." The evaluator asked for clarification so that Ms. Riordan's opinion can be accurately represented in the report. She stated that "I don't want them to spend time there," indicating Mr. Ambrose's home.

Ms. Riordan stated that the children have been taping Mr. Ambrose, and they were concerned that Mr. Ambrose was taping them. She shared that Matthew found tape recorders that were meant to look like USB drives. She noted that the children took the device because they do not want to be taped. Ms. Riordan indicated that the children called her, she posted on Our Family Wizard that he needed to stop recording the children, and that Mr. Ambrose did not respond. Ms. Riordan stated that she had the recorder at home. She explained that Sawyer had told the children that they did something illegal. Ms. Riordan noted that she asked Mr. Ambrose if he was recording the children, and "he about face and walked the other way." She noted that "I waited a minute and asked 'what is wrong with you.'"

The evaluator re-directed Ms. Riordan to discuss what she proposed in regards to parenting time for Mr. Ambrose. She stated that she would like him to see the children on Wednesday and Friday for visits but not for overnights. Ms. Riordan stated that "with the goal being towards working towards a safe and comfortable." She commented that on the stand, Mr. Ambrose admitted that he has been monitoring her phone calls. Ms. Riordan shared that "I know I shouldn't have said on OFW, that I shouldn't have addressed on OFW" her concerns that Mr. Ambrose is gay. She stated that "I don't want to live some lie. This whole thing is a lie. My whole life is a lie." Ms. Riordan reported that she found a sheet where Mr. Ambrose had listed his affairs.

Family History

Ms. Riordan stated that she was raised by her married parents and that she has a sister who is a year older. She noted that her mother died unexpectedly after Ms. Riordan became engaged to Mr. Ambrose. She described that her relationship with her father is "good" and that they have "always been really close." Ms. Riordan noted that there was "some co-dependence" and that "I give Chris credit"; she stated that she distanced herself.

Ms. Riordan discussed that her father married Joannie O'Keefe in the fall of 2019, noting that she is ten years younger than her father. She characterized her relationship with Ms. O'Keefe as being "fine." She noted that her father "is very good in times of crisis, when he rises to the challenge." Ms. Riordan described that Ms. O'Keefe is nothing like her mother, but she believes she can calm her father. She recalled that her father always wanted her mother's individual attention and that she would jokingly need to remind him that she is his daughter. Ms. Riordan discussed that she and Mr. Ambrose had spoken to her father about their concerns that he had become wealthy and that he was spending a lot of money on Ms. O'Keefe.

Ms. Riordan was asked about family mental health history, and she discussed that her father has struggled with depression and alcoholism, sharing that he can now drink wine in a controlled way. She noted that her grandmother was an alcoholic when she was younger.

Medical History

Ms. Riordan receives medical care by Dr. Singer. She stated that she has had two surgeries, one for a herniated disk and one when she was diagnosed with cervical cancer. Ms. Riordan shared that she was diagnosed with cervical cancer when she was 29 years old and that she no longer requires follow up care. She denied any history of broken bones, food allergies, or other known diagnoses.

Mental Health History

Ms. Riordan reported that she was diagnosed with a panic disorder after she was raped, noting "I still get a startle response sometimes." She reported that she previously saw Doug Thorpe for therapy following the rape. Ms. Riordan reported that she is prescribed Amphetamine Salts 30mg and Lexapro 10mg by Dr. Amiri, whom she reported diagnosed her with Attention Deficit Hyperactivity Disorder (ADHD). She noted that Dr. Kitzman had thought she had ADHD and Obsessive Compulsive Disorder (OCD), but Dr. Amiri did not endorse the OCD.

Ms. Riordan discussed that she attended therapy with Mr. Ambrose with Amy Wrobel, noting that she thought the treatment was "a sham." She shared that she met with Chrissie in Guilford, sharing that "I feel like a fool for many reasons," particularly because she did not recognize Mr. Ambrose's behavior as abuse. She described that he would withhold affection and that she now knows that "he didn't have any concern for the pain it caused me." Ms. Riordan indicated that Mr. Ambrose had seen a therapist who believed in "open secrets," but she did not participate because she did not agree with there being secrets.

Ms. Riordan denied that she has ever been hospitalized. She denied that she ever experienced thoughts of wanting to harm herself or others. She reported that a previous therapist, Doug Thorpe, "took sexual advantage of me." Ms. Riordan described that they dated for approximately a year and that she reported it to the police several years later. Ms. Riordan shared that she currently sees Dr. Amiri "not often enough" and that she wants to stay with her for psychiatry and switch to someone else for regular therapy.

Trauma History

Ms. Riordan reported that she was sexually abused by her cousin. Of note, during her interview, Ms. Riordan reported that she was raped by a previous therapist, but she did not report it while discussing her trauma history. She reported that her father was "less than kind at times," which she indicated was emotional abuse.

Legal History

When asked on the intake paperwork if she had a legal history, she reported that she was arrested but never charged with a crime. During the interview, she explained that when she had taken her former students on a field trip, she was pulled over and did not have her license. She noted that years later, she cut through a church parking lot, and it was determined that she had never shown

her license so she had to go in a police car. She stated that "everything dropped. " Of note, Ms. Riordan denied that she has called the police on Mr. Ambrose.

Substance Use History

Ms. Riordan denied that she ever smoked cigarettes. She reported that she tried alcohol when in high school, identifying that it was her period of heaviest use. Ms. Riordan reported that she currently consumes one drink a month, stating that her last drink was a Tanqueray and Tonic the previous weekend at her aunt's house. She shared trying marijuana in college, noting that she "really liked it" so she did not use it again. Ms. Riordan denied all other illicit substance use. She reported that she took her sister's Lorazepam once when anxious and a Flexeril when she could not go to the doctor.

Relationship History

Ms. Riordan reported that she dated someone in high school for a year, noting that she is still in touch with him. She discussed that she dated someone for two years in high school, sharing that they broke up when he went to college. During college, she began dating someone whom she dated for ten years. Ms. Riordan stated that the relationship "officially ended because of the rape thing." She commented "that's why I can kill myself now. I had really nice boyfriends. I was so aware, so didn't want this and got so taken." Ms. Riordan stated that she dated someone for a year after, but that it was long distance. She noted that she dated a cop in Stamford and then lived with someone in Norwalk whom she dated for four years before Mr. Ambrose. Ms. Riordan commented "he proposed but I panicked. Definitely afraid of commitment." She denied any relationship since the end of the marriage and denied any chance of pregnancy.

Employment History

Ms. Riordan stated that she used to work as a special education teacher in several middle schools, both in New York and Connecticut. She noted that she left Greenwich School District, adding that she remains certified and "can easily get a job in Greenwich."

Educational History

Ms. Riordan stated that she has a master's in psychology and a master's in special education from UConn. She denied ever having accommodations in school, but stated that "I know I'm dyslexic" and that she probably experienced attention deficit in school. She denied ever being retained in school.

Presentation and Mental Status

Ms. Riordan arrived on time to the first appointment. On the morning of the second appointment, Ms. Riordan had left a voicemail for the evaluator canceling the appointment. When the evaluator spoke with Ms. Riordan, she shared that she did not have access to a credit card or cash, and she did not have gas to get to the appointment. The day before the rescheduled second appointment, Ms. Riordan canceled, stating that Mia had been in the hospital the day before to be evaluated for appendicitis. Ms. Riordan did attend the next rescheduled appointment, but she was noted to hold a metal disc in her hand throughout the second interview. When asked, she identified that it was a rock. The evaluator repeatedly reminded her that they had discussed at the start of each appointment that she could not record. Ms. Riordan attended the appointment with

the children, bringing snacks and activities as recommended by the evaluator. Of note, throughout the first appointment, Ms. Riordan was observed to eat many bags of skittles candy at a continuous rate of consumption.

At the first appointment, the evaluator felt that rapport with Ms. Riordan was difficult to obtain. However, at the second appointment, rapport was easily reached. During the first appointment, it was noted that Ms. Riordan would often begin telling a story but then not finish the remaining part, just lowering her voice instead. She also was noted to provide contradictory statements. For instance, she stated that she struggled to get Mr. Ambrose out of the home but stated a few minutes later that Mr. Ambrose was avoiding her like the plague. Ms. Riordan also stated that she did not send Sawyer to school due to fears that she would contact DCF, but then she stated that she wrote a letter to Dr. Horn, knowing that he is also a mandated reporter.

During the interview, Ms. Riordan made a number of allegations, but when asked for examples, she did not provide them. For instance, she stated that she learned that Mr. Ambrose had been reading her emails and tracking her on GPS, but when asked how she knew, she asked to discuss something else first and never returned to the statement. Ms. Riordan stated that Mr. Ambrose was abusive but then did not provide details of abuse. She reported finding a list of the people Mr. Ambrose has had affairs with, but she did not ultimately show this to the evaluator. It was noted that Ms. Riordan often stated that she feels that people are not hearing her, but it seems that it actually is that they do not agree with her.

During Ms. Riordan's first appointment, Matthew was calling his mother when he was supposed to be going on a visit after school with his father. Ms. Riordan answered the calls on speakerphone so that both sides of their conversations could be heard. Ms. Riordan was heard telling Matthew "I'm so sorry, Matt. I think she's going to talk to you guys and she'll hear what you say. I promise," possibly referencing the evaluator. She asked Matthew at one point "are you afraid he's going to keep threatening you with stuff?" Ms. Riordan recommended that Matthew find a teacher at one point and then instructed him to "put it in writing" by texting Mr. Ambrose if he was not going with him. At the end of the conversation, Ms. Riordan remarked "just try to enjoy what you can."

Mini-Mental State Examination (MMSE)

Ms. Riordan was administered the Mini-Mental State Examination (MMSE), and she was fully orientated to person, place, and time. Ms. Riordan obtained a score of 29 out of 30, indicating no cognitive impairment. Of note, she lost a point on a delayed verbal recall task.

Ms. Riordan's Current Functioning

Cognitive Functioning

Due to Ms. Riordan's multiple post-graduate degrees, her cognitive functioning was not assessed as part of the current evaluation.

Clinical Functioning

Paulhus Deception Scales (PDS)

Ms. Riordan completed the Paulhus Deception Scales (PDS), an inventory designed to assess whether the test taker has distorted their test responses to produce an unlikely positive result. The PDS is broken down into two subcategories, as well as a total score. The first subscale is the Impression Management scale, which represents faking or lying. Ms. Riordan scored in the Above Average range (T = 62). She had an Average (T = 49) score on the Self-Deceptive Enhancement scale, which measures rigid overconfidence akin to narcissism. Ms. Riordan's total score fell in the Above Average range (T = 62). This pattern of scores suggested that she may have presented herself in an overly positive manner or responded in a socially desirable manner.

Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III)

Ms. Riordan completed the Millon Clinical Multiaxial Inventory, Third Edition (MCMI-III), a self-report measure of social-emotional functioning. Of note, the MCMI-TU was chosen instead of the MCMI-IV due to its significant research base and research specific to child custody litigants. The MCMI-III is commonly used in child custody evaluations, but the test was normed using a group that is different from custody litigants.⁹

Ms. Riordan had an elevated score on the Desirability Index, which "assesses the degree to which the patient's results may have been affected by his or her inclination to appear socially attractive, morally virtuous, or emotionally well composed."¹⁰ On the Desirability Index, any score over 75 is considered to indicate that the person is trying to present themselves in a positive light,¹¹ and "the higher the score, the more likely it is that the patient concealed some aspect of his or her psychological or interpersonal difficulties."¹² Of note, Ms. Riordan's score was elevated (BR = 80), but it was determined that her profile was able to be interpreted.

Ms. Riordan had an elevated score on the Histrionic scale (Base Rate = 96) which includes "gregarious behavior, ease of social engagement and social facility, easy display of feelings, extroverted traits, flirtatious behavior, and need of excitement."¹³ Individuals with this elevation often have a need for attention and seek praise. They may manipulate others for attention and approval, and relationships are often strained due to emotional outbursts and self-centeredness. Ms. Riordan indicated that she is sociable, outgoing, and finds it easy to make new friends. Of note, research with the MCMI has shown that elevations on the histrionic scales can "reflect personality strengths rather than personality pathology."¹⁴ However, the higher the score, the more likely it is to reflect personality pathology rather than being a strength.¹⁵ Since her score was significantly elevated, this may indicate that it is not just a strength but reflective of a personality disorder.

⁹ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 156)

¹⁰ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 138)

¹¹ Strack, S. (2002) Essentials of Millon Inventories Assessment. New York, NY: John Wiley & Sons, Inc. (pg. 16)

¹² Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 138)

¹³ Strack, S. (2002) Essentials of Millon Inventories Assessment. New York, NY: John Wiley & Sons, Inc. (pg. 20)

¹⁴ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 145)

¹⁵ Millon, T. (2009) MCMI-III Manual, Fourth Edition. Bloomington, MN: NCS, Inc. (pg. 145)

Ms. Riordan also received an elevated score on the Anxiety scale (BR = 82). It is noted that individuals with similar elevated scores have been associated with physiological arousal, including symptoms of apprehension, restlessness, jittery, and indecisiveness.¹⁶ Research has indicated that this scale correlates well with other measures of anxiety.

Minnesota Multiphasic Personality Inventory-2-Revised Form (MMPI-2-RF)

Ms. Riordan completed the MMPI-2-RF as part of the current evaluation. This test was added to provide additional information about her social emotional functioning and was chosen specifically because it allowed her scores to be compared to other custody litigants. Ms.

Riordan's responses on the validity scales indicated that her protocol was interpretable and there were no indications of over- or under-reporting.¹⁷ Ms. Riordan's responses indicated that she may be experiencing head pain (Head Pain Complaints = 65) and that she likely has multiple somatic complaints¹⁸ which are likely due to her developing physical symptoms in response to stress.¹⁹

On the MMPI-2-RF, Ms. Riordan indicated that she has deficits in her interpersonal functioning. For instance, she reported that she is unassertive (Interpersonal Passivity = 68) and is likely to be passive and submissive in interpersonal relationships²⁰ (Interpersonal Passivity = 68, Aggressiveness-Revised = 37). Of note, Ms. Riordan's responses indicated that she may be overly trusting of others²¹ (Cynicism = 34). Ms. Riordan was found to report little or no social anxiety (Shyness = 37). The MMPI-2-RF results indicated that Ms. Riordan may have symptoms consistent with a diagnosis of a Somatoform Disorder (Head Pain Complaints = 65) or Dependent Personality Disorder (Interpersonal Passivity = 68).

Trauma Symptom Inventory, Second Edition (TSI-2)

Ms. Riordan completed the Trauma Symptom Inventory, Second Edition (TSI-2), a self-report questionnaire about trauma symptoms. The validity scales fell within the acceptable range. Ms. Riordan's responses elevated the Hyperarousal scale to the Problematic range (AA-H = 60). This suggested that she experienced overarousal in her sympathetic nervous system which can lead to jumpiness, irritability, or sleep disturbance. Overall, her results do not suggest that she is experiencing a trauma related disorder.

Substance Abuse Subtle Screening Inventory, Fourth Edition (SASSI-4)

Ms. Riordan completed the Substance Abuse Subtle Screening Inventory, Fourth Edition (SASSI-4). Her results were valid and did not indicate the presence of defensiveness in

¹⁶ Strack, S. (2002) Essentials of Millon Inventories Assessment. New York, NY: John Wiley & Sons, Inc., pg. 29 ¹⁷ Ben-Porath, Y. S. (2011) MMPI-2-RF Manual for Administration, Scoring, and Interpretation. Minneapolis, MN: University of Minnesota Press (pg. 21-32)

¹⁸ Burchett, D. L., & Ben-Porath, Y. S. (2010). The impact of over-reporting on MMPI-2 - Rf substantive scale score validity. *Assessment*, 17, 497-516.

¹⁹ Tellegen, A., & Ben-Porath, Y. S. (2008/2011). The Minnesota Multiphasic Personality Inventory-2-Restructured Form (MMPI-2-RF): Technical manual. Minneapolis : University of Minnesota Press.

²⁰ Anderson, J. L., et al. (2015) Measurement of DSM-5 Section II personality disorder constructs using the MMPI-2-RF in clinical and forensic samples. *Psychological Assessment*, 27, 786-800.

²¹ Sellbom, M., et al. (2008). Personality and psychopathology: Mapping the MMPI-2 Restructured Clinical (RC) Scales onto the five factor model of personality. *Journal of Personality Disorders*, 22, 291-312.

responding to item questions. Overall, she scored in the Low Probability of having a Substance Dependence Disorder.

Parenting

Child Abuse Potential Inventory (CAPI)

Ms. Riordan completed the Child Abuse Potential Inventory (CAPI), a self-report measure designed as a screening tool for the detection of physical child abuse in social service agencies. This measure could not be scored, however, due to the number of items which were either not answered or were given two answers.

Parenting Stress Index, Fourth Edition (PSI-4)

Ms. Riordan completed the Parenting Stress Index, Fourth Edition (PSI-4), a self-report measure of her parenting stress associated with being a parent. Ms. Riordan completed the form with regard to Sawyer. Her responses suggested a valid and interpretable protocol. However, select scales (Total Stress; Parent Domain Competence) were prorated due to a missing response. As such, her responses were interpreted with caution. She described the stress she is experiencing as in the normal range, and any parenting difficulties are isolated and manageable. She indicated a number of environmental stressors that appear to have a mild impact on her resources and attention. Her responses also indicated a strong and healthy attachment between herself and Sawyer. Additionally, her responses indicated that she feels capable of handling the demands and responsibilities of parenting. Her responses also suggested that she has a good co-parenting relationship with Sawyer's father.

Parenting Interview

Ms. Riordan was interviewed about any special needs her children may have in regards to educational, medical, and therapy needs. Ms. Riordan first discussed the children's medical needs. She noted that they have limited background on Mia, but she was diagnosed with shingles at 18 months and her mother was illiterate. Ms. Riordan listed that Mia has audio neuropathy, dyslexia, dysgraphia, and single sided hearing. She stated that in spring 2018, Mia had alopecia on her left eyebrow, and it has come back; Ms. Riordan noted that this was why she took Mia to get her hair dyed. She shared that Mia had a cochlear implant and then a baha implant. Ms. Riordan discussed that Mia "copes better" when it is quiet. She shared that Mia lip reads well but sometimes will hear rhyming words instead of what was actually said. Ms. Riordan described that Mia can typically "roll with things," but she added that Mia "can't roll with things now." Ms. Riordan commented that Mia felt frustrated after her first interview with the evaluator but felt good after the last interview. Ms. Riordan reported that Mia broke her finger during gymnastics three years ago. She stated that Mia broke her big toe on the growth plate at a party in fall 2018. Ms. Riordan stated that Mia began getting her period over a year ago, and she has a severe vitamin D deficiency.

Ms. Riordan reported that Matthew got stitches on his eyebrow at age two when he fell forward onto the edge of a table. She stated that he was diagnosed with ADHD in the third grade by Dr. Amiri. Ms. Riordan described that since preschool, she would take Matthew on "special walks" for breaks. She shared that she began to notice him forgetting things in third grade, but the teacher said he was fine. Therefore, Ms. Riordan brought Matthew to Dr. Amiri to be diagnosed.

She discussed that she brought Matthew to Dr. Stubbe for a "fresh look," and he was diagnosed with anxiety. Ms. Riordan described that there were a few incidents in which Matthew was "really sad" which "came out of nowhere." She stated that she was "alarmed." Ms. Riordan reported that Matthew takes Concerta 72 mg in the morning, and 20 mg of a different short acting medication in the afternoon. She noted that he does not like to take Concerta in the afternoon because he will not eat. Ms. Riordan added that Matthew takes Cymbalta nightly as a mood stabilizer; she noted that she did not know the amount. Ms. Riordan stated that Matt's meds have been constant for two years and seem to help. She discussed that Matthew was struggling at the beginning of fifth grade; he was in a partial day program and was having panic attacks. Ms. Riordan explained that he had not been happy at the end of fourth grade, and she and Mr. Ambrose had agreed he would go to a smaller school. However, then Mr. Ambrose disagreed. Ms. Riordan felt that Mr. Ambrose set her up by initially agreeing. Ms. Riordan stated that Matthew went to Kings Highway for fifth grade, and she felt "they wouldn't do anything." Ms. Riordan described that they would not qualify Mia for special education, and Matthew went to the nurse "a million times" but she felt they did not know him. Ms. Riordan commented "they did some things," and Matthew got through the fifth grade. She stated that Matthew was good in sixth grade and played at recess, while in fifth grade he was having panic attacks and had to be dragged to school.

Ms. Riordan shared that Sawyer's mother used cocaine during pregnancy, and he was born early. Ms. Riordan commented "newborns are not my thing" and stated that Sawyer was given oxygen and had trouble eating; he was in the NICU for ten days. She noted that he was very short. Ms. Riordan listed that Sawyer has significant asthma and allergies, and exercise and cold are triggers. She expressed that it was "really problematic" when he was younger, and he coughed constantly. Ms. Riordan explained that Sawyer had many absences in preschool due to his health. She shared that there was one occasion when Sawyer had a 104 degree fever, and she was by herself. She described that her cousin came over. Ms. Riordan then whispered that she emailed Mr. Ambrose, he wrote back, and there was "a total disconnect." Ms. Riordan discussed that Sawyer's asthma has been "managed," sharing that he had a chest x-ray and the doctor changed his program. She stated that he is prescribed albuterol.

Ms. Riordan discussed that Mr. Ambrose took Matthew and Sawyer to be assessed for growth, commenting that Sawyer would cry when he was lifted. She stated that he "looked more typical" this year, though his "bone growth is a year behind." Ms. Riordan noted that he repeated a grade. She denied that either child needs hormone treatment. Ms. Riordan discussed that Sawyer started having tremors, and the doctor was worried but then said "kids do funny things." She explained that he outgrew it, and the symptom may have been due to his mother's cocaine usage. Ms. Riordan reported that Sawyer broke his collarbone twice, once at home and once at school when a child hit him on the slide. She stated that he fractured his ankle this fall. Ms. Riordan shared that Sawyer was tested and diagnosed with ADHD, and it was noted that he had anxiety related to performance. Ms. Riordan commented "it was so easy and [Kings Highway School] could have helped but didn't." Ms. Riordan expressed that Sawyer was beneath the tenth percentile, and it "shot his confidence." She stated that he started at The Country School last year, and she felt his teacher was "phenomenal." Ms. Riordan denied that Sawyer is prescribed any medications. She explained wanting to wait until his teachers say his ADHD is really interfering.

Ms. Riordan commented "I'm sure that will come soon" but explained that she does not want to give Sawyer anything that will hurt his appetite since he is finally growing. Ms. Riordan shared that it is hard for Sawyer to sustain focus when he is writing, but his teacher said he is doing "fine." She discussed that Sawyer was tested by Dr. Terry D' Elisa, and she recommended further evaluation for an auditory processing disorder.

Educationally, Ms. Riordan stated that Mia qualifies for an IEP under dyslexia. She explained that because her school is private, there are no services such as counseling or a school psychologist. Ms. Riordan stated that they pay extra to have Mia see a learning support person three times per week. She explained that Mia took Latin by her own choice, but at the last meeting it was recommended she not take it.

The evaluator asked whether Mia was in school that day, and Ms. Riordan stated that she was at home. When asked why, she responded "because she was led to believe she [was] going to switch to public school, and whole understanding and agreement was if [Mia] wanted to return to The Country School, her prerogative, would try to turn around dynamic." She stated that Mr.

Ambrose "took on" talking to one of the moms from the year before. Ms. Riordan described that there was a "history with same group of girls and a bad outcome." She reported believing that it was taken seriously and there would be a change, but this year Mia was not being included. Ms. Riordan expressed that she had made efforts to help Mia make friends, but the "same core group are excluding her." She commented "Mia has tried." She stated that her concern is that Mia is trying but "not getting anything back." The evaluator asked about the current plan, and Ms.

Riordan stated that they would be meeting with Dr. Horwitz. She stated that she knew she and Mr. Ambrose were both open to switching to public school, but she was not planning to endorse it until school break. Ms. Riordan stated that Mr. Ambrose was saying she never informed him of anything and that "all he doing is trying to prove his alienation case."

Ms. Riordan described a recent time when she had the kids ready to go with Mr. Ambrose, but she came outside because she wanted to have them tell him directly what was bothering them. She stated that he shooed her away and that he says if she is outside, she is not supporting him. Ms. Riordan commented that the night before the interview she had Mia tell him how she was feeling, and he wrote back "maybe mom can do it." She stated "he wants it to be on me." Ms. Riordan expressed that Mr. Ambrose "thinks I can control everything they think and do."

Ms. Riordan stated that Mia has "plenty of reason" for not wanting to go to school and added that she dragged Mia to school in first grade 28 times. Ms. Riordan noted that at that time she was unaware that Mia was failing because the school did not give them her test scores. She stated that one day at The Country School, Mia did not want to go because another child was absent due to weather; Mia said that no one would talk to her if that child were not there. Ms. Riordan commented that she texted Mr. Ambrose five times to come to the school and "see the reality of your actions." She stated that "even yesterday" she had told Mr. Ambrose to come by and talk to Mia. Ms. Riordan stated that while Mia would love for the situation at school to change, she does not believe the kids will change and does not think Ms. Coyne could do anything besides telling the girls they have to be friends with Mia. She suggested that Mr. Ambrose was setting it up so that she would be the "awful parent" and he would be the "nice guy." Ms. Riordan stated that

Mia experienced "a lot of not good things" last year. She explained that they were hoping things would be better by the year-end camping trip, but all the girls ignored her and a prank was pulled on her. Ms. Riordan stated that she was hopeful for this year, but Matthew came home and said "don't let Mia go to school tomorrow." She stated that Matthew "lost it" at lunchtime and was yelling due to some mean spirited kids. Ms. Riordan then discussed that she was informed via email that Mia had handed in another girl's paper and put her own name on it. Ms. Riordan commented that "I said she has to own it, not a big deal, Mia owns it." She stated that it was upsetting that nobody noticed what happened all day, referring to what Matthew had told her.

Ms. Riordan shared that she had gone out to get a thermometer, and two boys FaceTimed Matthew and said that Mia smashed their heads into lockers. Ms. Riordan expressed that nothing Mia does "would rise to this level of exclusion." She noted that there was also a cyber bullying incident.

Ms. Riordan reported that The Country School is good with Matthew. She explained that he learns easily but needs help with "executive functioning stuff" such as making a strategy. Ms. Riordan described that he does better later at night and with down time, stating that then he can focus better even without meds. She reported that he is in advanced math but has extended time because things take him longer. Ms. Riordan added that Matthew is embarrassed by his bad handwriting. The evaluator asked Ms. Riordan whether Matthew would leave The Country School if Mia does. She commented that it is working for Matt, and she does not think he wants to leave. She stated "his heart breaks for Mia." Ms. Riordan described that Mr. Ambrose identified a group of kids as a "bullying pack," but when she gave him credit for this he said "don't speak for me." She explained that he says the behavior is coming from the parents, and she commented "what parent says 'don't talk to that kid'?" Referring to the day Matthew said not to send Mia to school the next day, Ms. Riordan stated "Matt felt it that day." She reported that he is "an accurate and fair reporter." The evaluator questioned why Matthew did not go back to school before winter break, and Ms. Riordan stated that his attendance records are wrong. She stated that three dates when he did not go were the "direct result of bullying." Ms. Riordan expressed that the teachers "have no idea what went on." She explained that she wrote to the school and explained what the kids said, and she wanted to give the school time to investigate.

The evaluator asked for more details about what happened, and Ms. Riordan stated that according to the school, a boy "said something" and Mia shoved him. According to Ms. Riordan, Ms. Coyne said that Mia "probably had enough." Ms. Riordan expressed that she was not sure if it happened and speculated that the boy may have set her up. She noted that she was "not saying Mia didn't do it." Ms. Riordan explained that she wanted to know what would be different for tomorrow. She commented "historically, things didn't get dealt with." Ms. Riordan stated that Mia was going to go in on Monday, but on Sunday night a "cyber thing" happened, and Mia was "a mess." She expressed that she was frustrated with how Mr. Ambrose dealt with the situation, commenting that he failed to see the urgency of it.

Ms. Riordan then discussed Sawyer's educational needs. She expressed that he does not currently have accommodations. She commented that the classes are small, and he can go to a separate area for writing. Ms. Riordan reported that Sawyer was held back in third grade. She shared that he has a lot of friends and that if Mia left the school, Sawyer would stay. She then expressed "I wish Mia didn't want to leave." She added that Mia wishes there were friends at her

school, and she stated "she's brave."

Ms. Riordan discussed that in August, she and Mr. Ambrose were supposed to suggest names for counselors. She commented "I have always been a proponent of counseling." Ms. Riordan then stated that she knew what Mr. Ambrose was doing and did not want the children "used to serve his purposes." She brought up Dr. Horn, and she stated that Mr. Ambrose convinced Attorney Hurwitz that Dr. Horn and others were family therapists when actually they were individual counselors. Ms. Riordan described that the children were resistant to going to therapy. She commented that she thought Attorney Hurwitz would be more involved. Ms. Riordan explained that Attorney Hurwitz recommended Dr. Horwitz for family therapy. She stated that at the time, she wanted individual therapists. Ms. Riordan felt that Matthew would share things, and then the information would be used against him. She stated that Mr. Ambrose said that Dr. Horn diagnosed her with narcissism. She commented that Dr. Horwitz is nice with kids, but they "have been burned." She discussed that she heard Mr. Ambrose say that she is a bully, and Dr. Horn agrees. She noted that he has never met Mia. Ms. Riordan felt that it was intentional that Mr.

Ambrose wanted Matthew to have the same therapist as him. Regarding Dr. Horwitz, Ms. Riordan explained that she contacted him to make appointments and that she wanted Mia to see him to deal with the school situation, and he responded that he wanted to take "one thing at a time." She stated that Dr. Horwitz thinks the "kids are empowered, kids decide what they are doing." The evaluator questioned whether Ms. Riordan felt Dr. Horwitz is biased, and she said "no." She noted that Dr. Horwitz had forwarded her something that Mr. Ambrose wrote. Ms.

Riordan stated that Dr. Horwitz is a "family systems guy," and he said that court interferes with this work. She explained that she told him she does not want to sit with Mr. Ambrose because he stalked her, and it is not a "good dynamic." Ms. Riordan then expressed that Mr. Ambrose is not consistent with what he says and does.

Ms. Riordan discussed that Matthew sees Dr. Stubbe "for counseling." She explained that he sees her more regularly when he is in crisis. Ms. Riordan noted that Dr. Horn "never included" Dr.

Stubbe. She stated that she let Mr. Ambrose take over driving Matthew to therapy because he said she was alienating him, but then she was the one being pushed out. Ms. Riordan shared that her uncle felt Mr. Ambrose seeing Dr. Horn ended his ability to see Matthew individually.

Ms. Riordan expressed that Dr. Horwitz "took forever to start," and she needed the children to have someone to call. She stated that she did not get the go ahead, but then she was asked whether she had made appointments; Ms. Riordan commented that the "ball was dropped." She stated that she asked Mr. Ambrose about sending Mia to an individual therapist while waiting for Dr. Horwitz, but he said to wait.

Ms. Riordan was interviewed about her knowledge of common childhood illnesses. She stated that normal temperature is 97 degrees. The evaluator asked what a fever would be, and she stated "low grade 100, 102, 104." For treatment, Ms. Riordan would give Motrin. She stated that Mia has to take liquid so she does the conversion, while Matthew can swallow one adult tablet. For an upset stomach, Ms. Riordan stated "I don't do a lot." She discussed that she would give ginger ale, pepto, or kapectate for diarrhea, and she would tell the child to "keep it easy." Ms. Riordan added that Matthew can sometimes "have a problem," and she gives kids' pedialax. Ms. Riordan

reported that the children see Dr. Sollinger at Willows Pediatrics. She commented that they "usually see someone else anyway." Ms. Riordan described that Dr. Sollinger forgot Mia had a cochlear implant, but Mr. Ambrose did not want to switch doctors. She stated that it was "almost a joke in the house." Ms. Riordan reported that Matthew had bad ear infections, and Dr. Sollinger had her look in his ear to see what she thought. She described that Mr. Ambrose is now "making he doesn't like him either" because Dr. Sollinger did not remember Mia. She commented "whatever, it's fine" and said they usually go with Dr. Marks at the same practice.

The evaluator asked Ms. Riordan about discipline strategies she uses with the children. She stated that it "depends on what they are doing" and that she will usually address the issue with them firmly. Ms. Riordan explained that she finds it works better to give them time to cool off if they are upset rather than talking to them in the moment. She stated that she will not go back and forth and argue with them, and she finds it more effective if she walks away. She commented "they know what they are doing" and stated that if they are "fresh," she leaves. Ms. Riordan described that the children "usually circle back and apologize." She stated that she wants Mia to say what she is apologizing for and commented that she does not think Mia is aware of her face. The evaluator questioned how this might affect Mia's relationships with the girls at school, and Ms. Riordan stated that Mia had friends in the beginning of the year. She commented that Mia is "stressed to max now, feeling sh-tty, gained 20 pounds." The evaluator asked Ms. Riordan if she takes away the children's phones. Ms. Riordan stated "not usually" and explained that she will "tell them to get off it." She discussed that she is tired of hearing about phones and electronics, noting that there are "so many threats." Ms. Riordan clarified that Mr. Ambrose threatens to take away the children's phones. She commented that she told Mr. Ambrose not to get into a power struggle and described "he gets on their level and go against them." Ms. Riordan shared that Mia tried to show Mr. Ambrose a video, and he was "really rejecting about it." She stated that Mia "slammed it, said forget it, and walked away."

Ms. Riordan continued to discuss Mr. Ambrose. She commented "from what I understand, swear fests in car." Ms. Riordan felt that it is hard for the children to "get the rules straight." She noted that Dr. Horn had spoken about consistency, and she stated that the "kids tell me he's a different person." Ms. Riordan stated that Mr. Ambrose says the kids are abusing and assaulting him; she commented that she feels "he wants that outcome." Ms. Riordan explained that Mr. Ambrose is fat and was encouraging Sawyer to hit him in the stomach. She reiterated that it is "like he wants to be the abuse victim." Ms. Riordan expressed that "damage is getting done" and that he "looks insane on videos." She became upset when discussing that she no longer had people over because of Mr. Ambrose. Ms. Riordan described that Mr. Ambrose would "flip" and had "no loyalty." She gave an example of him changing his mind about whether Mia could get a haircut. Regarding discipline, Ms. Riordan stated that Mr. Ambrose would not take anything away and did not want to be a disciplinarian. She commented "people acting out, he not responding."

Ms. Riordan then began to discuss that Mr. Ambrose was tracking her phone. She stated that the police said to get new phones, but he would not give access to the plans. Ms. Riordan explained that there was an agreement that Mr. Ambrose would take the phones during his time so that the children could not communicate with Ms. Riordan. She commented that he left Mia at home with no phone one day. Ms. Riordan then stated that there was an agreement that allowed the kids to

keep their phones. She reported that Mr. Ambrose said he had never taken phones, but the kids said that he had. Ms. Riordan expressed that "given stuff that happened, they need to be able to reach out." She stated that Mr. Ambrose will get into a physical altercation with the children over electronics. Ms. Riordan described that now, he wants to take the phones so they can do homework. She added "it scares the hell out of me." The evaluator questioned Ms. Riordan about what happens if the kids reach out to her. She stated that Mr. Ambrose portrays that she is calling and interfering. Ms. Riordan claimed that this is "not true at all." She gave an example in which Mia called her to go over sentences for her homework, and Mr. Ambrose came in and said that Mia was not supposed to be on the phone with her mother and that he could help with sentences. Ms. Riordan stated that there is "no rule about it." She stated that she is not alienating the children. Ms. Riordan questioned "why not say it is awesome." She stated that she does not believe she is interfering on his time and noted that she can show times of calls in and out. Ms.

Riordan discussed that she felt a lot was misrepresented at a recent court date because she did not have data. She stated that the number of times Mia had seen Mr. Ambrose since September was not accurate. Ms. Riordan reported that there was a judge's order saying not to contact the children on each other's time. She then stated that Mr. Ambrose told the children "you know you can call your mom." Ms. Riordan shared that if the children do a FaceTime call, she has them go in the bedroom because she does not like to feel that Mr. Ambrose is invading her house. She noted that on one call, he asked if she had a new tv.

Ms. Riordan discussed the judge's order regarding the Christmas holiday. She stated that Mr. Ambrose had a lot of time and that the order leaned in his favor. She noted that she did not think her lawyer had prepared well. Ms. Riordan stated that she wanted to bring the kids back from Rhode Island Christmas morning, but Mr. Ambrose did not agree to that plan and she had to bring them back by 10 pm on Christmas Eve. Ms. Riordan commented that it was "such a no win" and the kids were upset. Ms. Riordan then discussed that the judge discouraged contact, but Mr. Ambrose then said the kids can call her; she stated that it is "all about winning."

Ms. Riordan shared that a "big thing" was that visits are now mandatory. She explained that before, Attorney Hurwitz suggested backing off on having the kids stay over with Mr. Ambrose. Ms. Riordan stated that she did not interfere with the visits, but Mia was resisting and Matthew kept calling on the phone. She stated that they did not want to stay over, although Matthew tried to comply. Ms. Riordan discussed that Mr. Ambrose said on Our Family Wizard that he would not make them stay over, but then he did. The evaluator asked Ms. Riordan about what happened on December 27th, and she stated that Mr. Ambrose texted her, and there was some discussion about whether he would pick up the kids or they would be dropped off. Ms. Riordan stated that she had the kids outside, and he was at the house for four minutes and then left. She commented "I have notes on it at home." Ms. Riordan stated that he said he needed to make a call and then was texting in his car. She described that if anything happens "other than 100% compliance" Mr. Ambrose will make a phone call. Ms. Riordan shared that she asks who he is calling, and he lists his lawyer, the judge, the evaluator, and Dr. Horwitz; he reportedly believes that everyone is "on his side." She expressed that Mr. Ambrose will say that everyone is on his side to Ms. Riordan and in front of the kids, and it sometimes makes her feel hopeless. She added that Matthew has said that nobody will do anything. Ms. Riordan returned to the story and stated that Sawyer was outside and tapped on the car with a stick. She explained that she was watching from inside and

saw Mr. Ambrose swing open the car door, hitting Sawyer. She stated that Sawyer ran away and threw the stick, and all the kids ran into the house. Ms. Riordan reported that Mr. Ambrose charged into the house and asked what she was going to do about what Sawyer did with the stick. He then reportedly stormed off. Ms. Riordan reiterated that when he flung the door open, he hit Sawyer. Ms. Riordan stated that she went to the police because she wanted something documented. She commented that she did not think it was malicious. Ms. Riordan shared that he came back the next day and they were all outside again, but "the way he comes over, he doesn't want it to work."

Ms. Riordan stated that the children are compliant and want Mr. Ambrose to like them. She discussed that Matthew had to go to tutoring, but "nobody wants to be alone in the car with him." Ms. Riordan stated "to me, just honor it, even if not valid." She added that Mr. Ambrose called her and was ranting about Matthew. He reportedly told her that he wanted her to tell Matthew to get in the car with him, but she said she would not do that. Ms. Riordan stated that she does not feel that is a fair position to put her in. She expressed that he is giving the children more reason to be concerned, such as by taking the doorknobs off the doors. Ms. Riordan stated that a dispute about who would drive Matthew to tutoring "created such chaos" and "was about control." She noted that Mia had to give up a team she had worked for as a result. Ms. Riordan explained that Matthew was upset about going to tutoring, and Mr. Ambrose said he would take all three children in the car, but then he only took Matthew. She stated that "he deceived Matt."

A. Mia Ambrose

Interview with Mia Ambrose, minor child

The evaluator met with Mia briefly before the interactional appointments with her mother and father, and she was interviewed after each interactional. Both interviews took place in the evaluator's personal office, which is believed to be a more comfortable setting than the conference room. Mia was shown the sound machine sitting outside the evaluator's office, and it was explained to her that it would prevent either parent from hearing the conversation. Of note, the evaluator's office has a glass door, so either parent was able to look in the room if they were passing by the office.

Mia completed a brief interview about herself during her December 27, 2019 appointment. She indicated that she was in seventh grade at The Country School. She stated that the other children in her grade were mean to her, bullied her online, and made negative comments about her physical appearance. Mia stated that her teachers were caring and supportive. Mia reported that she had a few close friends, and at least one knew that her parents were getting divorced. Mia denied any symptoms of suicidal or homicidal thoughts. She denied experiencing delusions or hallucinations. She denied experiencing any physical or sexual trauma.

Mia indicated that she had a nice room at her father's residence and felt safe in her room at her mother's residence. Mia stated that she did not like how her father took the doorknobs off of the doors in the home and that they had been recently reinstalled. Mia expressed a belief that her father is frequently angry with her over trivial events. She stated that her father would call her a "bad sister" and try to get her brother to agree. Mia reported that her father told her that her

behavior is dictated by the things her mother tells her to do. Mia told the examiner that she has a "bad feeling" around her father, as if he is going to hurt her in some way. She indicated that her father had never hurt her before but that she gets that "bad feeling" because her father watches many scary movies. Mia stated that her father's face turns red when he is angry and he yells at her and her siblings. She indicated that on one occasion, her brother was crying in his room because he was afraid, and their father screamed at them from the other side of the closed door. Mia stated that she has called the police for help with the belief that they would take the children back to their mother. Mia indicated that the police came to the home but did not intervene.

Mia indicated that her mother discussed the evaluation with her and stated that she would help Mia with the process. Mia could not explain what her mother meant by that statement. Mia indicated that her mother reminded her to tell the truth and reminded Mia about past events. Mia could not recall what specific events she and her mother discussed. Mia stated that her father did not talk to her about the evaluation. Mia stated that her father told her that the judge and her therapist were sympathetic to his situation. Mia indicated that she told this to her mother, who stated that the judge is a neutral party. Mia stated that she liked her therapist and talked to him about her family life.

Mia stated that her father uses his phone to openly record her and her siblings and that he frequently lies. Mia indicated that her father lied to the police when he spoke to them before she could. Mia stated that her father can trick people and is different around teachers and her friend's parents.

Mia indicated that she had a good relationship with her mother and stated they were akin to best friends. Mia indicated that her mother expressed concern that her children are always upset. She stated that her mother wants her children to feel heard. Mia stated that she is always worried about visits with her father and hoped for a change in visitation. She stated that she does not feel comfortable having overnight visitation with her father. Mia indicated that she has tried to talk to her father about his behavior towards her, and she stated that he has not changed. Mia reported that she and her siblings have no choice but to go with her father, and he does not want them talking to their mother during his time with them. Mia indicated that she will call her mother to say goodnight and that her mother apologizes for their situation. Mia reported that she would be willing to see her father multiple times a week as long as she no longer had to sleep at his residence. Mia stated that she completes her homework at her mother's house and does not need a parent to help her with her assignments. Mia indicated that she recently fell behind in her schoolwork after missing a few days of school because she stayed home due to illness and to avoid bullying.

Mia completed an additional interview on January 3, 2020, following her interaction with her father. Mia stated that she cried over the weekend due to the "bad feeling" she had about her father and thoughts that he would hurt her. Mia stated that she had to sleep in her brother's room with the lights on. Mia indicated that her father blamed them for taking a flash drive. Mia stated that her father threatened to "call the men in the white coats" because she and her siblings needed help. Mia then told the examiner that she recorded an interaction she had with her uncle because she knew her father would talk to her about it later. She stated that her father made an

attempt to be nice to her but felt that his attempts were disingenuous and solely related to their appointment that day. Mia indicated that on the way to the office, her father said that she could try to call the police, or go to the hospital, but that no one would help her. Mia stated that he asked her how well things went for her the last time she tried to get help. She explained that she saw her father start recording them in the car ride to the office but that he denied it when she confronted him. Mia stated that her brother Sawyer has been very scared lately and that she has felt that way too.

Behavioral Observations

After Mia's first appointment with the evaluator, she rejoined her mother in the evaluator's conference room. Ms. Riordan then announced in front of all of the children that Mia had stated that she was not able to answer the evaluator's questions. The evaluator re-assured Mia and her mother that there would be a second interview where she could explain herself further. Of note, the evaluator chose not to re-interview Mia that day since she had spoken at length and did not struggle to answer any such questions. It was noteworthy that Mia's conversation with her mother was only for a few seconds as the evaluator entered the conference room less than a minute after Mia.

During Mia's interview, she complained that she was accused by her father of stealing the flash drive when it was not true. However, Ms. Riordan later confirmed that the children had in fact stolen the flash drive, and then she provided the information on the flash drive to the evaluator to review.

Mia Ambrose's Current Functioning

Millon Pre-Adolescent Clinical Inventory (M-PACI)

Mia completed the M-PACI, a self-report measure of her social emotional functioning. Her responses were valid and interpretable. Her profile suggested an anxious conformity, where she may act in a manner to appease others due to a fear of criticism from others. However, she also has a desire to be more assertive and expressive. She experiences a level of insecurity about her abilities and as such is prone to be emotionally distant from others and lean towards self-blame and self-punishment for her perceived failings. Her profile also suggested that she may act out on occasion due to feelings of resentment. When overwhelmed, she is likely to show signs of sadness or irritability. She is also prone to more prolonged bouts of mood disruption, including feelings of apathy. In her responses, Mia indicated that she has experienced thoughts of harming herself.

Behavioral Assessment System for Children, Third Edition (BASC-3)

The Behavioral Assessment Scale for Children, Third Edition (BASC-3) is a multidimensional, standardized questionnaire that is used to assess children's adaptive and maladaptive functioning in a variety of emotional and behavioral domains, as observed by the parent or teacher. Items are listed as statements about the child's behavior, verbalizations, self-perceptions and personality characteristics. Scores that fall in the Clinically Significant range suggest a high level of maladjustment. Scores that fall in the At-Risk range suggest either a significant problem that may not be severe enough to require formal treatment or a developing problem that should be carefully monitored. Mr. Ambrose and Ms. Riordan completed Parent Forms of the BASC-3. All

validity fonnns on Mr. Ambrose's form fell in the Acceptable range. Ms. Riordan's form could not be scored as multiple responses were provided on a number of survey items.

Mr. Ambrose's responses elevated the Conduct Problems subscale to the At Risk range. This suggested that Mia occasionally engages in rule-breaking or deceptive behavior.

BASC-3 Clinical Scales	Parent Rating: Father	
	T-score	Percentile
Hyperactivity	51	64
Aggression	59	87
Conduct Problems	60*	88
Externalizing Problems	57	84
Anxiety	43	27
Depression	50	63
Somatization	39	4
Internalizing Problems	43	25
Attention Problems	50	53
Atypicality	49	64
Withdrawal	46	41
Behavioral Symptoms Index	51	67
Adaptability	56	69
Social Skills	49	41
Leadership	50	47
Activities of Daily Living	45	29
Functional Communication	43	25
Adaptive Skills Composite	40	40

* = At-Risk ** = Clinically Significant

Mia completed the Self-Report version of the BASC-3, and all validity scales fell within the acceptable range. Her responses elevated the Atypicality, Social Stress, Anxiety, Depression, Hyperactivity, Interpersonal Relations, and Self-Esteem subscales. These responses suggested that Mia sometimes experiences unusual thoughts and feels isolated and alone. She also sometimes feels dissatisfied with her work even when she puts forth her best effort. She has occasionally experienced somatic symptoms such as headaches and stomach aches. Also, she is sometimes restless and displays disruptive behaviors. In contrast, Mia indicated that she frequently feels symptoms of anxiety and depression. Her responses also indicated frequent difficulties with her self-image and in maintaining interpersonal relationships.

BASC-3 Self-Report				Ambrose evaluation
Clinical Scales	T-score	Percentile	Descriptor	
Attitude to School	58	79	Average	
Attitude to Teachers	41	22	Average	
Sensation Seeking	46	37	Average	
School Problems Composite	48	46	Average	

Atypicality	66	91	At Risk
Locus of Control	49	55	Average
Social Stress	67	93	At Risk
Anxiety	75	98	Clinically Significant
Depression	90	99	Clinically Significant
Sense of Inadequacy	64	90	At Risk
Internalizing Problems Composite	73	97	Clinically Significant
Attention Problems	59	80	Average
Hyper activity	64	90	At Risk
Inattention/Hyperactivity Composite	62	88	At Risk
Emotional Symptoms Index	78	99	Clinically Significant
Relations with Parents	46	31	Average
Interpersonal Relations	29	5	Clinically Significant
Self-Esteem	17	1	Clinically Significant
Self-Reliance	51	51	Average
Personal Adjustment Composite	32	6	At Risk

Sentence Completion Series, Adolescent Form (SCS)

Mia completed the Sentence Completion Series for adolescents, a form that provides prompts about different life experiences for that population. Mia wrote that she is at a difficult age because people are not nice. She also wrote that it was easy for her to make friends, but difficult to keep them. She identified her family as her biggest stressor but also reported that she is confident when she is with her mother and brothers. She noted that her father is "mean" to her and that her mother understood her. She wrote that she gets advice from her parents but struggles when she gets "yelled at" by others. Her sentences indicated that she has a negative view of her looks and has some fear around being alone at night.

B. Matthew Ambrose

Interview with Matthew Ambrose, minor child

Matthew discussed that he was present for the current evaluation because we "act differently with each parent." He explained that "at dad's, a lot of yelling back and forth, at mom's, there's not." The evaluator asked what each parent had discussed with him about the appointment. He stated that Ms. Riordan had told him "we'll talk. That's all I really remember." When the evaluator asked if there were any items provided to him in list format about what he should discuss, he stated that "he yells a lot." Matthew then provided an example from the previous evening where "something happened, I forgot what. It made Mia scared so she slept in my room. Then she really scared that dad would hurt her." Matthew then was able to recall that the incident was that Mr. Ambrose had accused them of "stealing something. Some USB thing." He noted that "he kept accusing us of stealing it but we didn't." When asked why Mia was scared that their father would hurt her, Matthew expressed "I don't

know. I think because of way he was acting.

Ambrose evaluation

He loud, yelling, accusing us. She's mentioned that she worried he would hurt her in the past." When asked if Mr. Ambrose has ever hurt Mia, Matthew denied it. When asked if Mr. Ambrose has ever hurt him, Matthew replied "not that I remember, no." When asked about Sawyer,

Matthew stated "I think there was one time" and then he paused and stated "he was on the swing, dad tried to push Sawyer, Sawyer not holding on, he pushed him off." When the evaluator asked if it was an accident, Matthew stated "yeah, I think that was it." The evaluator then asked if Matthew believed that Mr. Ambrose was trying to intentionally hurt Sawyer, and he stated "I don't believe so." The evaluator then asked if Mr. Ambrose has intentionally harmed any of them, and he replied "no." The evaluator then asked why they are afraid of Mr. Ambrose, and Matthew indicated that "he's kind of intimidating. His voice gets loud when he gets really angry, he shouts. He accuses like last night." The evaluator commented that in the interaction, Matthew did not appear scared, and he said "no, not really." The evaluator then noted that "you were at times downright rude in there" and Matthew acknowledged it. Matthew explained that "he's been pretty rude to me in the past." The evaluator asked Matthew what Mr. Ambrose has done that was rude, and he stated that "he accused us. One time where Sawyer scared because dad following him. We were playing video games, I left. Dad accused me of making Sawyer cry.

He said 'you did this Matthew, this is your fault.'" Matthew added that "Sawyer told me later dad was following him." The evaluator asked Matthew why they did not go to their father's house the previous visit, and Matthew stated that he forgot and then stated "we don't want to go. Dad saying we don't have a choice." The evaluator asked what Ms. Riordan says when they refuse, and he said "she stays out of it." Matthew noted that "one minute he's Mr. Friendly Guy, next minute, his whole mood changes."

The evaluator commented that Matthew appears to have a lot of angst against his father but he seems to have forgotten why. Matthew stated that "it's hard to explain. Let me think of something. It was pretty aggressive. He gets really mad, pretty easily." Matthew then recalled a time when his father asked "why are you yelling at me," noting that "he makes stuff up as he goes." The evaluator asked what is the worst thing that Mr. Ambrose has ever done to him, and Matthew said "I'm not sure." The evaluator asked who would know, and Matthew said "probably Mia." Matthew stated that "more things [happen] to them than me."

The evaluator asked Matthew what Mr. Ambrose had spoken to the children about before coming to the appointment. He explained "he reminded us we coming. That's it really." Matthew expressed that he already knew from the first appointment. The evaluator asked if Mr. Ambrose instructed him to say anything about Ms. Riordan, and Matthew responded "no." The evaluator questioned if Mr. Ambrose instructed him not to say anything specific, and Matthew again replied "no."

The evaluator asked Matthew if Mia had told him to say anything, and he replied "no, she said to express how I was feeling." The evaluator asked why Mia had reported that she did not want Matthew to leave his room last night, and he stated "because she was scared dad was sitting outside the door." The evaluator asked if Mr. Ambrose was sitting there, and Matthew said "no, he does not. He didn't do that last night." The evaluator asked about the children barricading their door against Mr. Ambrose, and Matthew stated "I wouldn't call a barricade. Sawyer crying so I put this box that had pillows in it against the door." The evaluator asked if Mr. Ambrose could still enter the room, and Matthew indicated "he would a little but I kept pushing more against the wall." Matthew acknowledged that he had spoken to Ms. Riordan about the incident, stating that it was "because he making it seem my fault for doing something to Sawyer."

Matthew then acknowledged that he has been advised to tell his mother when something happens at his father's house, and he stated that he complies.

The evaluator asked if Mr. Ambrose tries to take their cell phones, and he said "no" and then explained "because I hide them or keep on me." Matthew acknowledged that his mother has instructed him to not give the phone to Mr. Ambrose "because personal info on there that I didn't think dad has to know." Matthew explained that "if I record something he's done." Matthew then added that he makes notes on his phone of incidents that happen. Matthew stated that Mr. Ambrose has told him that the "Judge feels bad for him for not getting enough time for us."

Matthew then talked about the previous visit, and he said that "we stood outside. He got in his car, he texting. After, he drove off." The evaluator asked if anything else happened and Matthew replied "all I remember." When Matthew was asked what Sawyer did, Matthew stated "he grabbed twigs, no sticks and started hitting dad's car with it. Not like hitting where wanted it to break, tapping on it. Dad got out of the car, he hit Sawyer with the door. Told Sawyer to 'stop hitting my car.'" The evaluator asked Matthew if Ms. Riordan had told Sawyer to stop hitting his father's car, and he replied that "Mia told him to do it. I told him not to." Matthew indicated that Ms. Riordan was inside and did not see the incident.

The evaluator asked Matthew what he would like in terms of parenting time with his father. He stated that "I don't want no time at all with dad. Maybe Friday night and Saturday until 3pm, just my idea." The evaluator asked if he would be safe for that amount of time, and Matthew said "yeah, I think so." Matthew explained that most incidents happen at night and "if time is shorter, then won't be as much." Matthew stated that he would agree to do dinner with his father two to three times per week.

The evaluator asked Matthew what Mr. Ambrose has said about Ms. Riordan, and he replied "she lies, makes up stuff. We shouldn't believe what mom says." He was asked what Ms. Riordan says about Mr. Ambrose, and he stated "that he's mean about us. If I tell her something, she says 'he's just mean.'" Matthew then stated that he did not remember more, expressing "I feel I forget stuff easily." He noted that if Mr. Ambrose says he is working, Ms. Riordan would say "he not working, he's lying." Matthew indicated that Mia showed him an article about Mr. Ambrose copying an episode of *Bones* to *Instinct*. Matthew was asked about Sawyer sleeping with his father, and he said that Sawyer says his father kisses him on the "cheek" and that "Sawyer said it made him uncomfortable."

Behavioral Observations

Matthew came to two appointments, once with each parent. He completed his long interview during his father's interactional. Matthew was instructed at the first appointment to not take his medication for ADHD on the day of his next appointment. These instructions were also reviewed with Mr. Ambrose. Matthew denied that he took medication at the second appointment, and therefore he was administered testing for ADHD. Of note, at both appointments his temperament was consistent. At his long interview when he was not medicated, there were no symptoms of hyperactivity observed.

During Matthew's interview, it was noted that he had lied when he stated that he had not stolen his father's listening device. At Ms. Riordan's next appointment, she acknowledged that the children had taken the device and that it was in her possession. Therefore, it is noteworthy that he lied during his interview.

Matthew provided the evaluator with a number of emails. However, the emails did not appear to be consistent with his language or with his age. For instance, many of his emails began with "I just wanted to inform you," which does not sound like the language of a pre-adolescent.

Matthew Ambrose's Current Functioning

Millon Pre-Adolescent Clinical Inventory (M-PACI)

Matthew completed the M-PACI, a self-report measure of his social emotional functioning. His responses were valid and interpretable. His profile suggested that others see him as a gentle soul who is sensitive to the needs of others. Matthew indicated a tendency towards anxious submissiveness and dependency on others, and he is likely to become distressed over perceived disapproval from others. As such, Matthew is likely to be overly compliant and obliging due to his fear of losing emotional support. Matthew is likely to take extra steps to respond to the wishes of others. His profile suggested that he may experience some sadness due to feelings that he does not have a sense of self outside of his relationships with others.

Conners Continuous Performance Test, Third Edition (CPT-3)

The Conners Continuous Performance Test, Third Edition (CPT-3) assesses attention-related problems in children over eight years old. Matthew and Mr. Ambrose were instructed that he should not take his ADHD medication at the second appointment. Matthew denied that he had taken the medication on the morning of the interview, and therefore these results are determined to be valid. Overall, he earned zero atypical scores, which does not indicate any clinical attentional difficulties.

Behavioral Assessment System for Children, Third Edition (BASC-3)

The Behavioral Assessment Scale for Children, Third Edition (BASC-3) is a multidimensional, standardized questionnaire that is used to assess children's adaptive and maladaptive functioning in a variety of emotional and behavioral domains, as observed by the parent or teacher. Items are listed as statements about the child's behavior, verbalizations, self-perceptions and personality characteristics. Scores that fall in the Clinically Significant range suggest a high level of maladjustment. Scores that fall in the At-Risk range suggest either a significant problem that may not be severe enough to require formal treatment or a developing problem that should be carefully monitored. Mr. Ambrose and Ms. Riordan completed Parent Forms of the BASC-3, and all validity scales fell within the Acceptable range.

Mr. Ambrose's responses elevated the Socialization and Withdrawal scales to the At Risk range. This suggested that Matthew sometimes appears alone, is reluctant to join groups, and has difficulty making friends. It also suggested that Matthew sometimes exhibits somatic symptoms, such as headaches, which may be due to emotional distress. Ms. Riordan's responses elevated the Attention Problems and Anxiety scales to the At Risk range. This suggested that Matthew

sometimes exhibits symptoms of anxiety, worry, or fear. He also sometimes struggles to maintain appropriate levels of concentration.

BASC-3 Clinical Scales	Parent Rating: Father		Parent Rating: Mother	
	T-score	Percentile	T-Score	Percentile
Hyperactivity	41	12	53	72
Aggression	47	55	50	67
Conduct Problems	48	58	54	78
Externalizing Problems	45	38	53	74
Anxiety	58	80	66*	92
Depression	48	55	52	69
Somatization	60*	86	55	77
Internalizing Problems	56	79	59	84
Attention Problems	53	65	60*	84
Atypicality	43	7	45	36
Withdrawal	60*	86	58	82
Behavioral Symptoms Index	48	57	54	75
Adaptability	50	47	45	29
Social Skills	53	57	56	69
Leadership	41	19	41	19
Activities of Daily Living	49	44	52	53
Functional Communication	54	59	49	43
Adaptive Skills Composite	49	44	48	40

Matthew completed the Self-Report version of the BASC-3, and all validity scales fell within the Acceptable range. He ranked himself in the At Risk range of functioning on the Anxiety and Depression scales. This suggested that Matthew sometimes feels sad, depressed, anxious, worried, or fearful. His Clinically Significant score on the Somatization scale suggested that he often experiences somatic symptoms (e.g., headaches) which may be due to emotional distress.

His responses elevated the Attention Problems scale to the At Risk range, which suggested that he sometimes struggles to maintain appropriate levels of attention.

BASC-3 Self-Report			
Clinical Scales	T-score	Percentile	Descriptor
Attitude to School	56	74	Average

Attitude to Teachers	39	13	Ambrose evaluation Average
Sensation Seeking	50	52	Average
School Problems Composite	48	46	Average
Atypicality	44	35	Average
Locus of Control	57	78	Average
Social Stress	53	67	Average
Anxiety	69*	95	At Risk
Depression	64*	90	At Risk

Sense of Inadequacy	56	78	Average
Somatization	72**	95	Clinically Significant
Internalizing Problems Composite	62*	87	At Risk
Attention Problems	66*	91	At Risk
Hyperactivity	53	65	Average
Inattention/Hyperactivity Composite	60*	84	At Risk
Emotional Symptoms Index	56	75	Average
Relations with Parents	54	58	Average
Interpersonal Relations	58	78	Average
Self-Esteem	60	91	Average
Self-Reliance	56	68	Average
Personal Adjustment Composite	59	80	Average

Sentence Completion Series, Adolescent Form (SCS)

Matt completed the Adolescent Form of the Sentence Completion Series. He wrote that his moods and emotions "are confusing. One minute I am happy and then the next I am anxious. Matthew wrote that now that he is no longer a child, "life has more meaning. Life has its sunny days and its thunderstorms." He expressed that his attitude "can change depending on my mood." Matthew shared that he has trouble coping with "my dad because he doesn't listen to me." He noted that when he is punished, "I sometimes feel I didn't do anything wrong." When given the prompt "my parents don't understand," Matthew wrote "my mom understands me very well. My dad doesn't understand me at all. He never really listens to what I think is best for me or how I feel." For the prompt "I feel like an adult," Matthew wrote "I feel like adults can get you in trouble for no reason." He wrote that what scares him most is "death, tsunamis, thunderstorms, heights, my mom dying before I become an adult and repay her for all the good she has done to me, bees."

C. Sawyer Ambrose

Interview with Sawyer Ambrose, minor child

Sawyer completed an interview about himself on December 27, 2019. He told the examiner that he enjoyed the interaction because it was fun. He stated that he attended third grade at The Country School and liked his teacher and recess. Sawyer stated that he did not like math because it is difficult, and that he sometimes needs extra help with his work. Sawyer indicated that he has gotten into trouble around three times but could not provide additional details. Sawyer stated that he had friends at school and in his neighborhood. Sawyer reported that he had a best friend and that he liked to play sports with his friend.

Sawyer stated that he liked that the family dogs lived at his mother's home. Sawyer stated that at his mother's home there are somewhat more arguments because his siblings do not listen.

Sawyer also stated that his father punishes the children less often. Sawyer reported a time when he and his siblings broke glass in his mother's house and tried to hide it. Sawyer indicated that his mother knew the children were hiding something and was "fine with it" when they told her the truth. Sawyer also reported that one time, his father got hit in the eye with a nerf gun and

called the emergency room for medical advice. Sawyer stated that his father reported that he briefly lost vision in the eye but that it improved after a short time. Sawyer indicated that Mia and their father argue over her behavior and that this can be triggered when Mia tells him that she wants to call their mother. Sawyer then stated that the children do not want to be with their father but the court makes them stay with him. Sawyer reported that he knows the court makes them stay because his mother tells them about it. Sawyer stated that his job was to remember what to say about his father's behavior. Sawyer indicated that his father lied to the court about where the children spent their holiday. Sawyer stated that the siblings had to spend Christmas with their father and did not get to decorate a tree.

Sawyer denied experiencing any suicidal or homicidal thoughts. He denied experiencing any physical or sexual abuse. He reported that his father touched his left bicep (pointing) on one occasion, and Sawyer moved away. Sawyer stated that he told his mother about the event and she commented that it was "weird" for his father to do that. Sawyer reported that his father lays with him in bed even though he does not want his father to do that. Sawyer stated that it makes him uncomfortable, but he has not told his father because he is afraid that his father will yell. Sawyer stated that his mother hugs him but does not get into bed with him.

Sawyer stated that his father lies about his mother and says that she lies to the court. He stated that his father lies. Sawyer stated that he has heard a lot from his siblings about his father's lies. He reported that his father says bad things about his mother. Sawyer denied that either parent told him what to say or not say during the interview.

During the interview, Sawyer had a cast on his right ankle. He reported that he broke it jumping off a bench. He also stated that he broke his collarbone twice, once from jumping off a chair, and another time on a slide.

Behavioral Observations

Sawyer was interviewed at length at the first appointment, and he completed a shorter interview at his second interactional appointment. Sawyer was noted to have difficulty staying in one place during the interview. The instructions for completing the self-report measures were discussed with Sawyer at length, but he struggled to complete them correctly. For instance, he made numerous markings and crossed things out, making his forms difficult to decipher, and ultimately it was decided that his M-PACI could not be scored.

Sawyer Ambrose's Current Functioning

Millon Pre-Adolescent Clinical Inventory (M-PACI)

Sawyer completed the M-PACI, a self-report measure of his social emotional functioning. However, due to a number of incorrectly completed prompts his results were unable to be scored.

Conners Continuous Performance Test, Third Edition (CPT-3)

The Conners Continuous Performance Test, Third Edition (CPT-3) assesses attention-related problems in children over eight years old. Sawyer's results on the CPT-3 were valid. Overall, he demonstrated a conservative style of responding, which suggested that he emphasizes accuracy over speed. Test results indicated that Sawyer appears to have difficulty with inattentiveness and

sustained attention. Overall, Sawyer earned six atypical scores, which is associated with a high likelihood of having an attention deficit disorder such as ADHD.

Behavioral Assessment System for Children, Third Edition (BASC-3)

The Behavioral Assessment Scale for Children, Third Edition (BASC-3) is a multidimensional, standardized questionnaire that is used to assess children's adaptive and maladaptive functioning in a variety of emotional and behavioral domains, as observed by the parent or teacher. Items are listed as statements about the child's behavior, verbalizations, self-perceptions and personality characteristics. Scores that fall in the Clinically Significant range suggest a high level of maladjustment. Scores that fall in the At-Risk range suggest either a significant problem that may not be severe enough to require formal treatment or a developing problem that should be carefully monitored. Mr. Ambrose and Ms. Riordan completed Parent Forms of the BASC-3, and all validity scales fell within the Acceptable range.

Mr. Ambrose's responses resulted in scores within the Average range on all indexes and subscales for Sawyer. This overall score profile suggested adequate perceived coping skills, behavioral characteristics, and adaptive abilities for Sawyer when compared to age-matched peers. Ms. Riordan's responses resulted in a similar profile with one exception; the Somatization subscale fell in the At Risk range. This suggested that Sawyer sometimes complains of physical symptoms (e.g., headaches, stomach aches) that appear to be expressions of internal or emotional distress.

BASC-3 Clinical Scales	Parent Rating: Father		Parent Rating: Mother	
	T-score	Percentile	T-Score	Percentile
Hyperactivity	41	17	49	53
Aggression	51	63	54	75
Conduct Problems	48	51	59	85
Externalizing Problems	46	42	55	75
Anxiety	44	31	54	71
Depression	42	21	48	54
Somatization	40	14	61*	86
Internalizing Problems	40	14	55	77
Attention Problems	51	58	51	58
Atypicality	44	32	44	32
Withdrawal	44	30	46	44
Behavioral Symptoms Index	44	31	48	50
Adaptability	58	76	49	46
Social Skills	59	82	58	75
Leadership	63	91	54	62
Activities of Daily Living	52	56	52	56
Functional Communication	56	71	50	45

Adaptive Skills Composite	59	79	.53	Ambose evaluation 58
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Sawyer completed the Self-Report version of the BASC-3, and all validity scales fell within the Acceptable range. He scored himself in the Average range on most subtests except for: Attitude to School; Atypicality; Locus of Control. These subtests fell in the At Risk range and suggested that Sawyer sometimes wishes he was not in school, feels like he has odd thoughts, and does not feel like he has control over his life or environment.

BASC-3 Self-Report			
-Clinical Scales	T-score	Percentile	Descriptor
Attitude to School	67	93	At Risk
Attitude to Teachers	56	75	Average
School Problems Composite	63	88	At Risk
Atypicality	63	89	At Risk
Locus of Control	67	93	At Risk
Social Stress	48	48	Average
Anxiety	57	79	Average
Depression	52	68	Average
Sense of Inadequacy	53	67	Average
Internalizing Problems Composite	58	82	Average
Attention Problems	54	65	Average
Hyperactivity	52	61	Average
Inattention/Hyperactivity Composite	53	65	Average
Emotional Symptoms Index	55	73	Average
Relations with Parents	39	14	Average
Interpersonal Relations	51	42	Average
Self-Esteem	40	14	Average
Self-Reliance	48	39	Average
Personal Adjustment Composite	43	22	Average

Sentence Completion Series, Child Form (SCS)

Sawyer completed the Sentence Completion Series for children, a form that provides prompts about different life experiences for that population. Sawyer wrote that he is proud of his dog. He wrote that he gets angry when "I have to talk on the phone." When presented with the prompt "fathers are" Sawyer made a couple of marks but did not write any words. He shared that he is bad when "I'm alone," and he feels happy when "I am with my family." Sawyer wrote that school is "hard." He wrote that he will never be "dad," and he completed the sentence "a mother is" by writing "a mother." Sawyer wrote that what bothers him is "snichtes" [sic]. Sawyer was noted to have

doodled all over both sides of the paper.

Ambrose evaluation

D. Interactionals

Prior to the first interactional, the evaluator spoke briefly with the children to make introductions and to give an outline of the day. The children came to two interactional appointments, first with their mother and then with their father. The interactional appointments took place at a neutral location (i.e., the evaluator's office) each time.

Ms. Riordan came prepared for the first interactional with activities and snacks for the children, as recommended by the evaluator. They began by playing Goose, but Mia stated that she did not like the game. Ms. Riordan urged her to roll the dice, but Mia did not want to engage and drew in a book instead. They then decided to play charades and then quickly switched to Moral Dilemma. Of note, Ms. Riordan often looked at the evaluator, who intentionally ignored her and focused on observing the visit instead. Mia acted out the clues during charades, and Matthew guessed while Sawyer played with his beyblades. Ms. Riordan gave Matthew verbal praise when he solved the question correctly. Ms. Riordan asked Sawyer to play and when he refused, she approached him; he then played. When Matthew struggled to get a question correct, Ms. Riordan changed the game to include playing with descriptions. Of note, for one of the clues, Matthew stated that he did not have this type of Christmas holiday, and the answer was a Christmas tree. Mia was talking and stated that "we supposedly" went to the theater with Mr. Ambrose, and she used air quotes. Ms. Riordan did not correct her or comment but allowed her to speak negatively about their father. On another question, Matthew gave the clue that "dad worked on this" and Mia was able to list a number of his shows. Matthew told Sawyer that he is crazy and Ms.

Riordan stated that he is not crazy. Ms. Riordan then told them to "be careful to not repeat the things that have been said, not to call people liars or crazy." She then tried to get the evaluator's attention and said "because of everything going on, everyone is more sensitive."

The children then completed an interactional approximately one week later with their father. Mr. Ambrose came to the appointment prepared with snacks and activities as recommended by the evaluator. They decided together to play Uno, and Mr. Ambrose reviewed the rules of the game with the children. Mr. Ambrose reminded Sawyer that he has to say "uno" when he has only one card, noting that it was a problem once before. The children were talking together during the game, and it initially appeared appropriate and respectful. The children had a wild card, and Mr. Ambrose went to read the directions. Mia joked with him "dad, you're the only one who reads the directions." They were noted to joke together, and Mr. Ambrose joked that Sawyer had "half the deck" and he helped Sawyer play the game. The children were noted to be giggling while playing. When Mr. Ambrose asked if it was his turn, Mia and Matthew answered simultaneously and with mild annoyance "yes, dad." At this point, Matthew started getting more annoyed with his father, telling him "dad, he knows" when Sawyer appeared to need help. Matthew then turned to his father and said "don't shush me," but Mr. Ambrose had not said anything.

Matthew then stated "if dad has three files of work and lost three, how many files does he have left." Mr. Ambrose did not respond, and it was curious whether Matthew was alluding to the plagiarism scandal or to stealing the USB drive. Mia was then struggling to play, and Mr. Ambrose was helping her; Matthew complained "you've explained to us 13 million times." When Sawyer became excited, Mr. Ambrose gave him verbal praise. Matthew responded by complaining, and Mr. Ambrose stated "let's not beat a dead horse." Sawyer told his father a story about a recent event when they were shuffling cards before the next game. Mr. Ambrose offered Sawyer praise about not stressing about having so many cards while Matthew was making fun of him. Matthew and Mia began making faces and eye rolls at each other from across the table. Mr. Ambrose asked a question and Matthew again commented, "you should know, you read the directions 13 million times." The children all got loud and were joking about the game. Matthew suggested that they switch to Go Fish, but Mia wanted to continue to play Uno. Matthew

commented that he was thirsty because Mia did not let him go outside last night to get a drink. Mr. Ambrose asked Mia how the weather was by her, and she replied "sad."

I. Collateral Contacts

For the parents:

Amy Wrobel

Ms. Wrobel shared that she only saw the parents for a few sessions almost two years ago but that she recently had some phone sessions with Ms. Riordan. She remarked that she was "hesitant to weigh in on a custody case," and the evaluator discussed that she would not be asked for custody recommendations but to share what she experienced with the family in therapy. Ms. Wrobel stated that they were referred by Dr. Horn since he was working with Matthew and felt that the parents were ready for marital counseling. She recalled that Ms. Riordan had called and stated that Mr. Ambrose had gone behind her back and talked to other therapists. Ms. Wrobel stated that Mr. Ambrose then became "so persistent over the weekend, demanding a conversation before they came in." She commented that Mr. Ambrose showed up early and did not want Ms. Riordan to know, but she informed him that she would be honest if asked.

Ms. Wrobel stated that she had a session with each parent individually. She explained that Ms. Riordan felt that Mr. Ambrose had not been helpful to her about dealing with the school to get services for the children. Therefore, when they attended appointments together, that was the focus. She shared that Mr. Ambrose maintained that he could not be honest with Ms. Riordan because he was afraid of her. She noted that Ms. Riordan was angry that she found her husband to be deceptive or not honest about his work or the children. Ms. Wrobel stated that she had worked with other families who had struggles with school districts. She recalled repeatedly saying to Ms. Riordan "you finally have his attention" so they should discuss her feelings. Ms. Wrobel noted that she offered to see Ms. Riordan individually, recommend a therapist, or help her get back on medication, but she reached out the evening before an appointment and stated that "he was done." Ms. Wrobel shared that it was "never clear what made her abruptly stop."

Ms. Wrobel stated that during their work together, Mr. Ambrose had expressed needing to "manipulate to get by" because it was hard for him to speak up to Ms. Riordan. Therefore, he was working with Dr. Horn on "speaking up." Ms. Wrobel stated "he wasn't directly manipulative with her in here, more hesitant. She was very angry." She stated that Ms. Riordan struggled to move on and that she was perseverating. Ms. Wrobel recalled that the parents indicated that they had no sexual relationship. She noted that Ms. Riordan dismissed concern that Mr. Ambrose was having an affair and was fine without a sexual relationship.

Ms. Wrobel stated that Ms. Riordan had called recently, and they spoke on the phone for approximately 30 minutes. During that call, Ms. Riordan filled her in on what had gone on. Ms. Riordan stated that she felt that Mr. Ambrose had filed for divorce "behind her back." Ms.

Wrobel stated that she offered to help Ms. Riordan find a therapist near her new home and that she knew her psychiatrist wanted her to find someone, too. She noted that Ms. Riordan expressed that "nobody was listening to her, nobody getting it." Ms. Wrobel stated that after the first session, Ms. Riordan texted her to say she was concerned that Mr. Ambrose was into child pornography. She shared that Ms. Riordan reached out again to schedule another appointment,

noting that her father would pay or she would pay by credit card. However, when Ms. Wrobel provided her with openings, Ms. Riordan did not respond.

Charles Riordan, MD., and Pat Riordan

The evaluator spoke with Dr. Riordan regarding his experiences with Mr. Ambrose and Ms. Riordan. Of note, Pat Riordan joined the conversation near the end of the interview. Dr. Riordan shared that he had confirmed with Mr. Ambrose and Ms. Riordan that they had given the evaluator permission to speak with him. He commented that they are two parents in their fifties, and the "major damage" from the situation is to the kids. The evaluator asked whether Mr. Ambrose is gay, and Dr. Riordan stated that he does not know. He explained that it is a "unique situation" in that Mr. Ambrose's mother is Dr. Riordan's wife's sister, and Ms. Riordan's father is Dr. Riordan's brother. He expressed "we straddle both sides of the family." Dr. Riordan described that both Mr. Ambrose and Ms. Riordan were around his home since they were born; he expressed that as a little boy, Mr. Ambrose "showed all the stigmata of somebody who might turn out to be gay." Dr. Riordan noted that at age six or seven, they wondered about his future sexual orientation and "kind of assumed" he would be gay. He stated that it did not bother them and was not an issue. Dr. Riordan shared that people assumed Mr. Ambrose was gay when he was single, but then he married Ms. Riordan. He stated that it "made us scratch our heads." Dr. Riordan discussed that it was an open question in the family, but Mr. Ambrose's parents would not be open to him being gay. He explained that Mr. Ambrose's mother is in a memory care unit, and his father is in his eighties. Dr. Riordan shared that they were always very rigid. However, he felt that Mr. Ambrose's brothers would be open to him being gay. Dr. Riordan described that "he has certain feminine attributes" but explained that he does not know "absolutely" whether Mr. Ambrose is gay. He reported that Ms. Riordan has told him that they never consummated the marriage. Dr. Riordan expressed that he does not know what Mr. Ambrose being gay would have to do with the divorce or care of the children.

Dr. Riordan shared that "as far as their behavior with the kids," neither Mr. Ambrose nor Ms. Riordan has been "exemplary" in the divorce. He stated that the kids have been used as tools, and both parents are angry at each other. Regarding why the parents would adopt a third child, Dr. Riordan commented that it was not his job to ask those questions.

Dr. Riordan stated that both parents have their own psychological difficulties. He commented that Mr. Ambrose was never warm and funny around the kids. Dr. Riordan noted that Mr. Ambrose's parents do not know about his brother Colin's divorce. He stated that Mr. Ambrose minimized the plagiarism incident and commented that "he has always been the secret guy." Dr. Riordan suggested that Ms. Riordan has a personality disorder. He recalled that before they were married, Ms. Riordan asked Mr. Ambrose if he was gay, and he said no. Ms. Pat Riordan noted that Mr. Ambrose is not "lily white" in the situation and that her major concern is that the children are "deteriorating" because of what is going on. Dr. Riordan expressed that they would like the parents to grow up and realize it is about the kids, not about them. He suggested that the reason Mr. Ambrose is concerned about how much time he has with the children is about money. Ms. Pat Riordan added that Mr. Ambrose was never a "parenting kind of person."

Dr. Riordan expressed that to give the children to Mr. Ambrose would be "a disaster." He stated that Ms. Riordan is "pissed off" at Mr. Ambrose and questioned whether she would distort things to make him look bad. Dr. Riordan discussed that if the kids are given to Mr. Ambrose, they may have a hard time if the alienation is successful. He noted that Ms. Riordan claims to tell the children to go and enjoy their father. Dr. Riordan observed that Ms. Riordan would always say that Mr. Ambrose wants to make himself look good.

Dr. Riordan shared that they did not go to the wedding but that most people say it was a disaster. He reported that Ms. Riordan was drunk and cursing during the reception while holding a microphone. He then shared that Mr. Ambrose's brother Colin had a psychotic break during his sophomore year of college and was hospitalized. Dr. Riordan stated that his mother said "you've ruined my life," but since that time he has done well.

For. Mr. Ambrose:

William Horn, Ph.D.

Dr. Horn discussed that he initially began treatment with Matthew in May 2017 for social anxiety. He shared that Matthew was sad, and he did not fit in and had concerns about friendships. Dr. Horn stated that he treated Matthew for inattention, hypersensitivity, and regulatory issues. He questioned how much was due to his not having secure attachments for the first six months of his life. He shared that Matthew was evaluated and placed on Zoloft and Ritalin. Dr. Horn stated that after approximately six or seven weeks of treatment, Matthew began talking to him about concerns at home. He shared that for most patients, he meets with the adolescent four to six times and then will meet with the parents. However, he remarked that "Karen got to me early to give the real heads up about what going on," which Dr. Horn found to be "a red flag." He noted that "she pretty quickly threw Chris under the bus."

Dr. Horn shared that he had previously known Ms. Riordan when she was a special education teacher, and he believes that she assumed that their history would give her a different relationship than she had shared with previous therapists. He noted that Ms. Riordan had previously worked with other therapists whom she fired when she did not like their recommendations. Dr. Horn stated that at the family's initial meeting, it was "pretty apparent that whatever pre-existing anxiety with Matthew was exacerbated with extremely conflicted marital relationship." He noted that he had explained to the parents that he could work with the parents and Matthew, stating that "Chris was open to that. Karen was hesitant" because "she didn't want to mix things together." Dr. Horn commented that from a family systems standpoint, "no one exists in a vacuum."

Dr. Horn indicated that **Mr.** Ambrose then began to attend appointments. He shared that Mr. Ambrose "took ownership" and commented that he was "frustrated in parenting" because Ms. Riordan was undermining him. He noted that Ms. Riordan would often be "emasculating him" in front of the children, and therefore the children were "getting the message they didn't have to listen to dad."

Dr. Horn stated that Ms. Riordan likes to indicate that Mr. Ambrose is "totally inadequate in parenting skills," but he stated that "I have always been impressed." Dr. Horn commented that Mr. Ambrose "has better judgment when it comes to making choices. He can be rational. He

wants to make decisions in best interest of children." Dr. Horn stated that Mr. Ambrose "recognizes he can benefit from getting input from professionals. He recognizes parenting doesn't come naturally. He is sensitive to issues kids dealing with." Dr. Horn stated that "Karen, who sees herself as knowledgeable about children, has extremely poor judgment."

Dr. Horn indicated that Ms. Riordan always has to have "someone to fight." He referenced her difficulties with various school systems and that she would fight with the administrators. Dr. Horn remembered discussing with Mr. Ambrose his desire to end the relationship "in as amicable a way as possible," but he forewarned that "knowing Karen and her personality structure, she is going to be very reactive to this." He commented that "I saw this going in this direction. I think Karen has significant issues." Dr. Horn stated that he sent the parents to two different marital therapists but noted that Ms. Riordan would fire them after a few sessions. He shared that Ms. Riordan is controlling in the relationship and would make Mr. Ambrose feel "inadequate." However, since Mr. Ambrose "got his voice," the situation "has intensified significantly." He noted that "Karen continues to undermine him."

Dr. Horn noted that "the degree of her disturbance is almost challenge the Court in limitations they have placed." He stated that Ms. Riordan "doesn't take responsibility for her own behavior. She is not going to think in best interest of kids, all about her." Dr. Horn discussed Ms. Riordan keeping the children from school. He noted that Ms. Riordan continues to depict Mr. Ambrose negatively to the children. He suggested that "I don't think we know the half of what she is saying to the kids about Chris. Doing everything she can to undermine him."

Dr. Horn stated that he believes that Ms. Riordan will "tie this thing up as much as she can." He believes that she wants to drain Mr. Ambrose "financially and emotionally." Dr. Horn stated that he has advised Mr. Ambrose to not read all of Ms. Riordan's negative emails because it "just raises his anxiety." Dr. Horn shared that Matthew and Mr. Ambrose "had a conflicted relationship." He stated that he would meet with them together and Matthew would acknowledge his problems in the relationship.

In regards to his mental health, Dr. Horn stated that he has diagnosed Mr. Ambrose with an Adjustment Disorder. He denied that Mr. Ambrose has any personality issues but stated that he may be more dependent. The evaluator questioned Dr. Horn about Mr. Ambrose's sexuality, and he stated that Mr. Ambrose denies that he is gay. He stated that Mr. Ambrose acknowledges a lack of intimacy in the marital relationship but denies any affairs. The evaluator asked Dr. Horn about Ms. Riordan's assertion that Mr. Ambrose is a narcissist or con man, and he replied "if he's the mastermind or narcissist, he's fooled me." He stated that "Karen has a tendency to spin information the way she wants it to go. I put little faith in Karen's characterization of anything." When Dr. Horn was asked about Ms. Riordan's statement that Mr. Ambrose controls the finances, he stated that "no, she spends money like it's water." He noted that Mr. Ambrose has been unsuccessful in getting Ms. Riordan to control her spending, stating that "she's doing everything she can to bankrupt him."

Neil Ambrose

Mr. Ambrose shared that "there is a unique situation in that Karen 's dad's brother is married to my mother's sister." He shared that he has "known Karen all her life." He discussed that there were family issues around the wedding, including the date since their brother Colin had to take an examination that day. Mr. Ambrose stated that Ms. Riordan did not want children at the wedding, but that upset Dr. Riordan because he wanted his grandchildren at the wedding. When Ms. Riordan did not agree, Dr. Riordan did not attend, causing an upset in the family. He added that his mother and sister did not talk for years because of this issue and that the families no longer celebrate Thanksgiving together. Mr. Ambrose stated that Ms. Riordan spoke at the wedding and began talking about when she learned that there was no santa, so he asked her to wait until he could have his three children under ten years old get out of the room. She refused and was "drunk and cursing into the microphone."

Mr. Ambrose stated that his brother sacrificed his career for them to live on the east coast. He called Ms. Riordan "very domineering," explaining that they always went to her family for the holidays. Mr. Ambrose stated that there was one year that his brother hosted Thanksgiving, and he described that it was food bought from a caterer and that his brother prepared everything while Ms. Riordan was upstairs.

Mr. Ambrose stated that the children attended Thanksgiving at his home this year and that they were "just fine." He discussed the recent issue at the hospital. He stated that Mia had his wife talk to Ms. Riordan, and she "feigned ignorance to everything" even though they knew Mia was talking to her over text all day. Mr. Ambrose stated that Ms. Riordan responded by calling the hospital and having them moved to the waiting room. He observed that his brother is "between a rock and hard place. If he tries to discipline at all, blows up in his face." Mr. Ambrose stated that historically, "Chris cooked meals, ate with them. He made kids do their homework. Karen was upstairs. Homework was not Karen's priority. Karen put social things ahead of academics." He recalled a time when his brother said that Ms. Riordan was upset that Sawyer wanted him when he was sick, not his mother. Mr. Ambrose stated that his brother struggled with the idea of getting divorced. He stated that he told his brother that he was "being openly bullied by his wife in front of the kids." Mr. Ambrose discussed Ms. Riordan's difficulties with the children's schools and therapists. He commented that a problem he foresees is that Ms. Riordan has allowed Mia to believe that she is the victim.

Mr. Ambrose stated that he used to share a room with his brother growing up. He denied that his brother has ever stated that he was gay. He commented that "my parents are very open minded and accepting" and therefore would have accepted his brother if he were gay. Mr. Ambrose stated that his brother has not paid for a computer expert because he does not want to spend the money. He noted that his brother is now paying the mortgage on the family home, Ms. Riordan's rental, and his own rental. Mr. Ambrose stated that his brother has made financial offers and Ms. Riordan has not responded. He explained that the current evaluation was needed "because Karen won't stop." He commented that "I don't think Karen is fit to be a parent right now" because he has concerns that she has "significant mental illness." Mr. Ambrose suggested that if Ms. Riordan continues to raise the children, they "will be dropping out of school, on drugs, no respect for authority. Way she is raising them is chaos."

Rich McKean, CCE, Cyfortec Group

Mr. McKeon stated that he reviewed Ms. Eno's reports of the computer analysis of Mr. Ambrose's computers. He stated that "I didn't see anything that concerned me." Mr. McKeon was asked about Ms. Eno's assertion that there is information not on the computers that must be on some exterior drive. He stated that he did not see any evidence of offshore accounts or bitcoins. Mr. McKeon explained that the links to bitcoins were articles not accounts or a bitcoin wallet. He stated that there were a number of entries that included the word "bank" but that again, most were websites where articles were read and not banks where he had logged in.

Mr. McKeon stated that in Ms. Eno's report, there were 90 pornographic websites viewed on three separate dates, 02/24/2010, 02/27/2010, and 04/04/2011. He stated that the times were approximately 1 hour 20 minutes even though the web history spanned from 2010 to 2013. He highlighted that there were over 87,000 web entries but only 90 pornographic sites, which he felt was a low percentage. Mr. McKeon stated that "if we had more history, we would find in other artifacts." He questioned if Ms. Riordan had used Mr. Ambrose's computer to access those pages, stating that there was evidence that Ms. Riordan had used the computer, including her shopping history and email access. Mr. McKeon highlighted that there was no evidence that any of the pornographic websites were of children. He denied that there was any evidence of Mr. Ambrose trying to clean the images.

For Ms. Riordan:

Tamela Amiri, MD.

Dr. Amiri stated that she first began treating Ms. Riordan in November 2015. She shared that Ms. Riordan had previously seen Dr. Irene Kitzman for Obsessive Compulsive Disorder (OCD) and depression. Dr. Amiri recalled that Ms. Riordan was prescribed Zoloft 400mg, which she noted was double the maximum dose. She worked on reducing the Zoloft to 300mg and added Adderall 20mg twice a day. Dr. Amiri stated that the only diagnosis given at intake was ADHD, Inattentive Type.

Dr. Amiri noted that for the first two and a half years of treatment, Ms. Riordan's main concern was the children and getting them the necessary school supports. However, over the past 12 to 24 months, the focus has changed to Mr. Ambrose and his having a secret life and being gay. Dr.

Amiri recalled that Ms. Riordan told her that they never consummated their marriage. She shared that Dr. Riordan, a well known psychiatrist who is a relative, always thought that Mr. Ambrose was gay. Dr. Amiri stated that Ms. Riordan informed her that she had evidence of pornography, including gay sex sites and sites where gay men had adopted children. Dr. Amiri stated that "she has become undone or incredibly fragile in the last year." She noted that Ms. Riordan is "paranoid she is being followed."

Dr. Amiri stated that Ms. Riordan started Lexapro 10mg in October 2018 but dropped it to 5mg in November 2018. She noted that it was hard to follow the different family providers and that Ms. Riordan then was refusing to see Ms. Wrobel. In June 2019, Ms. Riordan discussed that she was planning to see an attorney the next day. She discussed that Ms. Riordan felt that Mr. Ambrose was gaslighting her. Dr. Amiri shared that Ms. Riordan returned a month later, in July

2019, and that she observed that her speech was pressured and hard to follow. She noted that Ms. Riordan returned a week later, which was "unusual." Ms. Riordan reported that she was experiencing her heart to be racing and felt anxious. Dr. Amiri stated that in October 2019, Ms. Riordan reported for the first time that the marriage was never consummated. Dr. Amiri indicated that Ms. Riordan attended her next appointment in January 2020, and at that point she indicated that the GAL was "useless" because she was taking Mr. Ambrose's side. She reported that a computer forensics expert "uncovered child, gay porn."

Dr. Amiri expressed that Ms. Riordan's presentation had changed and that "I'm worried about Bipolar, manic defense against stress." She shared recommending that Ms. Riordan work with a local psychiatrist and therapist because she needs to be seen regularly. She noted that Ms. Riordan had stated that she was "too busy seeing lawyers" to be able to attend regular appointments. Dr. Amiri noted that her secretary has reached out to Ms. Riordan to come for another follow up appointment. She stated that she has told Ms. Riordan that she needs to have a local therapist and psychiatrist near her new home.

Dr. Amiri discussed that she met with Matthew in February 2016 and for two or three follow-up appointments. She shared that she diagnosed Matthew with ADHD, Inattentive Type and prescribed him Ritalin 5mg twice a day. She noted that Matthew complained at follow up that he was experiencing stomach aches, and she started him on Zoloft for anxiety. Ms. Riordan informed her in February 2017 that Matthew was more withdrawn and that she was changing his therapist but never returned with Matthew.

Margaret Coffey, M.D.

Dr. Coffey shared that she recently began seeing Ms. Riordan and that she has consulted with Dr. Amiri about the case. She commented that "the story is so outrageous, I wanted to make sure all are truths." She stated that from what she has heard, Mr. Ambrose is "horrible." Dr. Coffey stated that Ms. Riordan has put her calls with Mr. Ambrose on speakerphone so that she can hear him. She noted that "he was barraging her with accusations." Dr. Coffey was discussing when Mr. Ambrose brought Mia home after her dentist appointment recently, noting that it was an "epic fail" for him to believe Mia without calling the school. Dr. Coffey commented that it is concerning the "threatening tone of how he speaks to his children." She expressed concern that "his tone is not parental" and that how he speaks to the children is "not natural. It seems to me like for an audience."

Dr. Coffey stated that Ms. Riordan has ADHD, which she stated was "untreated for a few weeks." She reported that she has prescribed Ms. Riordan Adderall 20mg. Dr. Coffey indicated that Ms. Riordan is "a little scattered," which she stated is indicative of the ADHD. The evaluator discussed with Ms. Coffey if Ms. Riordan has some symptoms of personality disorder, and she indicated that it is possible.

Donna Eno, CCNA, D. Eno Forensics

Ms. Eno discussed that Ms. Riordan initially contracted with her to do IP address tracing. She stated that she found that IP addresses were used all over the "northeast sector of the grid" which for Ms. Riordan "validated her fears." Ms. Eno noted that in her contract, it had Ms. Riordan

affirm that "she has legal power over the devices. If not true, I have no way of knowing. I just do what I'm told." She explained that the scope of her work was to get all emails, texts, and communications. Ms. Riordan also wanted internet history focusing on adult content. Ms. Eno clarified that in regards to criminal content, such as child pornography, she found zero, adding that she found "no adult content." She noted that Ms. Riordan went through each URL found and "found all this stuff that is potentially incriminating." However, Ms. Eno explained that she was not asked to do this level of examination, which would include looking at the "evidence artifacts" and determining if external devices were attached to the computer. Ms. Eno stated that the "evidence does not reflect that he produces and distributes pornography." She shared that the computer held 1,457,000 graphic images but none of adult content. Ms. Eno concluded that the pattern of hiding data, including having URLs without the pictures, has previously meant "nefarious activities going on."

For the children:

Jonathan Sollinger, MD., Willows Pediatrics

Dr. Sellinger stated that he has not seen the children for physicals recently. He stated that one of his associates was scheduled to see Matthew and Mia in November 2019 for physicals, but they both no showed. When looking at the records, he shared that Sawyer had missed his physical in September 2019. Dr. Sellinger noted that when the office called about the no showed appointment, Ms. Riordan had informed him that they had moved to Madison. He noted that there have been some communication problems with the family and the office, such as the family reporting that they do not get reminders. Dr. Sellinger noted that there were a number of no shows throughout their time with Willows.

Dr. Sellinger stated that both parents have been involved in the children's medical care. He noted that the children have "more complex medical issues than regular families," noting that Sawyer has asthma, Matthew has learning issues, and Mia has hearing loss. Dr. Sollinger stated that the children's care was "fragmented" and that he would often make referrals but they would not follow his recommendations. He stated that he feels he knows Mr. Ambrose better and finds that Ms. Riordan is "a difficult person."

Robert Horwitz, Ph.D.

Dr. Horwitz shared that he believes that Ms. Riordan means well and wants her children to have a good life but that she is "so unaware of how her hostility towards her husband is destructive to the kids." He noted that he has not yet found where her rage at Mr. Ambrose is coming from but that she repeatedly states that Mr. Ambrose is gay. Dr. Horwitz stated that he has found that Ms. Riordan "forms conclusions based on pretty scant evidence and magnifies things to create drama." He stated that Ms. Riordan has expressed feeling "uniquely discriminated against," and therefore her upset has given her some special attention.

Dr. Horwitz stated that Mr. Ambrose "comes across as likeable, sensible, trustworthy." He stated that the children's biggest concerns are that he is gay and has been video taping them. Dr. Horwitz noted that he believes that the children's refusal to go with Mr. Ambrose is without basis, and they will make remarks such as that he is "mean or unsafe." He remarked that the comments take on a "rehearsed, imitative quality."

Dr. Horwitz spoke to the evaluator again near the conclusion of the evaluation. He commented that while he is available to see the children, he has not seen all three children since January 21st. Dr. Horwitz shared that he saw Mr. Ambrose with the boys on February 5th and that since that time, he has only seen Mr. Ambrose. He highlighted that "she hasn't refused to come" but that Ms. Riordan has not called him to schedule an appointment.

Dr. Horwitz concluded that at this point, the "parents are so polarized, kids so caught up in war, only so much good therapy can do at this point." He stated that the "question then becomes what can be done that has any chance of making a difference to restore some level of contact with father for [the] children." Dr. Horwitz clarified that it is "not enough for individual for everyone" on the case, noting that it "won't change anything." He stated that he would be available if the family wanted to resume treatment.

Tracy Pennoyer, Ph.D.

Dr. Pennoyer shared that she first saw Matthew in February 2017 because he was having anxiety. She noted that it was not a long term treatment. Dr. Pennoyer described that she mainly had contact with Matthew and his mother, and she was unsure if she had met Mr. Ambrose. Dr. Pennoyer explained that Ms. Riordan said he would not want to participate in therapy. She described that she saw Matthew for therapy and felt he was uncomfortable. She noted that he was on medication at the time. Dr. Pennoyer expressed that Matthew was a very compliant child with "a lot going on inside him." She stated that their last meeting was in May 2017, noting that she has spoken to Ms. Riordan since then. According to Dr. Pennoyer, Ms. Riordan's main concern about Mr. Ambrose was that he was pressuring Matthew. She commented that there was "nothing dramatic" about the ending of this therapy, noting that there was some miscommunication and he did not show up to an appointment. Dr. Pennoyer described that the therapy was mostly about his anxiety and that he was "trying hard to be good." She expressed that Ms. Riordan's behavior was appropriate. Dr. Pennoyer noted that Ms. Riordan was "insistent that dad didn't believe in therapy and wouldn't come in."

Beth Coyne, Assistant Head of School, The Country School

Ms. Coyne discussed that Mia has not attended any days of school since the new year and that she had missed a number of days before the break. She expressed concern that Mia was not at school. Ms. Coyne stated that when they were first informed about the divorce, the children did not initially seem impacted as they were attending school and getting work done. Ms. Coyne noted that in the fall, Mia began to have conflicts on Wednesdays because she was refusing to see her father. Mia reported to Ms. Coyne that Ms. Riordan instructed her to go to Ms. Coyne when she did not want to go to a visit, adding that Ms. Riordan confirmed this to her at one point. Ms. Coyne commented that "school should not be in that position weekly. Not our role." She suggested that there should be a plan before the day and then Mia would have to follow the plan.

Ms. Coyne shared that Ms. Riordan had called her and had Mia and Sawyer tell Ms. Coyne why they did not want to go with Mr. Ambrose. She noted that "I'm a mandated reporter but nothing they said was any danger. Just 'we don't want to go.' They don't like when he's stern." Ms.

Coyne noted that Ms. Riordan wanted the children to meet with John Fixx, but she stated that it was not something the children would initiate. Ms. Coyne recalled a time where Ms. Riordan showed up at dismissal with the dog on Mr. Ambrose's parenting time.

Ms. Coyne noted that if a conflict would happen, none of the children would bring the issue to her. However, she stated that the next day, Ms. Riordan would send a detailed email and Mia would come to her office to explain what happened. Ms. Coyne highlighted "we tried to get to a place where Mia would come in and tell us directly right away, but we never got there." Academically, Mia has needed ongoing support from the learning specialist. She noted that the school does not have a counselor, which may have been challenging, but then she commented that Mia likely would not have met with a counselor on her own. Ms. Coyne stated that Mia does well with support, but that when she missed school, "no one at home made her do any work, so she'd fall behind."

Ms. Coyne stated that academically, Matthew has problems with anxiety and attention. She shared that the teachers recognize that he is a bright student. Ms. Coyne commented that if Matthew misses school, "nothing gets done." She explained that the school has an online portal, but he would not do any work. Ms. Coyne stated that Sawyer is "always super happy." She stated that Sawyer requires some support in class to get started. She noted that he likes his teachers and is open to feedback.

Ms. Coyne discussed Mia's conflict with peers. She stated that it is "never as bad as mom has said." She stated that the issues last year were typical behaviors but that the reaction of the parents was "a blown up issue." Ms. Coyne noted that the parents would demand apologies or that something be done. She explained that Ms. Riordan often refers to bullying, but the school does not believe it is bullying but rather "conflict" and that they "need to teach her how to navigate it." Ms. Coyne indicated that the parents have demanded that the school suspend a particular child or set up an appointment with the other child's parents. She shared that there was an issue this year with Mia and a male peer about a kiss that she felt "became a huge issue." Therefore, Mia never fully re-engaged after Thanksgiving. Ms. Coyne suggested since the boy's mother is on the board of the school, there was "a lot of interpretation at adult level that not fully what is going on between two kids."

Ms. Coyne noted that Mia began sharing with her peers details of the divorce. She shared that peers approached her to complain that they did not know what to do when Mia was over sharing. Ms. Coyne added that they learned that Mia was texting a boy all summer about what was happening. She suggested that Ms. Riordan would attempt to use Matthew as a witness when issues arose with Mia. Ms. Coyne gave an example of seeing Matthew be super cheerful one day, and then he would return to school the next day and report how bad the day before had been, even though he did not appear affected.

Ms. Coyne discussed that Ms. Riordan usually emails her in the middle of the night. She noted that the emails usually contained a "layer that was pretty hurtful, can bring a teacher, administrator to tears." She stated that "her emails are really harsh and very long." Ms. Coyne stated that last year, Mr. Ambrose would call and apologize if he did not see an email before Ms.

Riordan had sent it, noting "he would try to smooth it over." Ms. Coyne stated that "Chris is trying to be more of the calm person, really supportive of school and apologetic. His presentation is pretty consistent."

Ms. Coyne called back the following day to discuss that the three children had come into her office after 5pm. She noted that Mia urged Matthew to tell her, and he told her that Mr. Ambrose was in the car in the parking lot; Mia told her that "we don't feel safe." Ms. Coyne indicated that she asked Sawyer why he did not feel safe, and Mia responded that Mr. Ambrose had put a recording device in her room and that she was scared that he would hit her. Of note, Ms. Coyne shared that Mia denied that Mr. Ambrose had ever hit her. She shared that the children reported that "we told everyone and nobody believes us."

Ms. Coyne stated that she called the GAL but was unable to speak with her. She stated that she called Mr. Ambrose, and he explained that Ms. Riordan was there at the drop off and that she is "under a direction to follow a script" but that she just left and then the children refused to get in his car. Ms. Coyne indicated that she called Ms. Riordan, and she responded "I'm on the way" and hung up the phone. She noted that she called Ms. Riordan back and asked that she not hang up on her. Ms. Coyne then explained that they were in the after care program Owl's Nest, and Ms. Riordan apologized. Ms. Coyne stated that when she called Mr. Ambrose to state that Ms. Riordan was coming to pick up the children, "Sawyer immediately smiled at his siblings."

Allison Kravitz, LCSW

Ms. Kravitz discussed that she began seeing Mia for individual therapy approximately four years ago because she was having difficulty in the public school setting. She explained that as a former educator, Ms. Riordan was concerned about Mia both academically and socially. Ms. Kravitz commented that Mia was anxious about her school performance and felt sad regarding her lack of comfort within a peer group. During therapy, she noted that Mia would use her therapist to elicit her help in having "difficult" conversations with her mother. An example of this is when Mia disclosed in therapy that her ear surgery did not work and she remained almost completely deaf in one ear. Of course, this information was critical in understanding Mia's academic performance and difficulty in understanding/hearing her peers. The last time Mia was seen by Ms. Kravitz, (about one year ago) Mia recounted a story of a laundry basket and verbal fighting between Mia and Mr. Ambrose. Ms. Riordan was very upset. Mia was very anxious. Ms. Kravitz made a very strong recommendation that she wanted to see Mia again to learn more about Mia's feelings and understand the situation more thoroughly. According to Ms. Kravitz, Ms. Riordan refused, stating Mia did not want to come and she (Mia) could make the decision. Mr. Ambrose wanted Mia seen by Ms. Kravitz. Ms. Kravitz stated she was very clear that Mia should be seen.

Ms. Kravitz noted that Ms. Riordan has a tendency to catastrophize Mia's experience and then try to overcompensate for her issues. She shared that Mia may avoid things because she knows that her mother has a tendency to overreact. She noted that Ms. Riordan often came in for parenting work as part of Mia's therapy. At one point, Ms. Kravitz said she discussed with the parents that she believed that until the parents were engaged in meaningful and rigorous parent work, child work would not be effective. The parents agreed. However, Mrs. Kravitz said when she discussed with Mr. and Ms. Riordan that Ms. Riordan was alienating the children from Mr.

Ambrose and that the children have a right to have a loving relationship with their father, Ms. Riordan became very angry and did not return. She noted that Mr. Ambrose attended approximately four or five parent guidance sessions at the end of treatment. Additionally, Ms. Kravitz said that Ms. Riordan sent very lengthy texts that required her to tell her to stop communicating using text messaging.

Dorothy Stubbe, MD., Yale Child Study Center

Dr. Stubbe discussed that she diagnosed Matthew with Attention Deficit Hyperactivity Disorder, Combined Type and Anxiety Disorder with Depression. She reported prescribing him duloxetine (Cymbalta) 30mg and Concerta 72mg. She noted that he has been on this regimen for approximately six months. Dr. Stubbe noted that Matthew had previously seen Dr. Amiri. Dr.

Stubbe noted that Matthew was exhibiting symptoms of ADHD but that his main issue was school avoidance. She explained that the family decided to switch providers because they were concerned that Matthew was not improving.

Dr. Stubbe noted that in the past, their work was focused on medication management. However, since October 2019, she has been seeing Matthew more regularly and therefore she has been able to provide him with both talk therapy and medication management. Dr. Stubbe noted that Matthew initially felt that he was being pulled between his parents and was experiencing tension because of this issue. She explained that Matthew informed her that Mr. Ambrose is "fairly unpredictable" and that he "doesn't want to disappoint his dad, but he's afraid." Dr. Stubbe remarked that more recently, Matthew does not want to see his father at all.

Dr. Stubbe shared that Matthew has been vague about what happens at his father's house. He reported that his father took off the doorknobs and started audiotaping in his room. She stated that Matthew then became stuck on not trusting his father. Dr. Stubbe stated that when asked, he says that his father is "just mean" and that he "says mean things." She noted that Matthew is currently "terrified that Court will tell him he has to be with his dad" but that "I can't really say why." She remarked that "the issues he brings up don't sound so bad." Dr. Stubbe questioned if the children feel that they have to choose one parent.

Dr. Stubbe stated that she made a DCF call because Ms. Riordan called her from the car, and Sawyer was heard screaming and crying in the background that he was refusing to see his father. Sawyer had reported to her that Mr. Ambrose "made him sleep with him." Dr. Stubbe reported that the reportable issue was that Sawyer did not want to see his father. She noted that "I don't know dad as well. I haven't seen either of them as being their treater."

Dr. Stubbe shared that she has found Matthew to be a "pretty rigid thinker." She shared that while she does not feel that he meets criteria for an autism spectrum disorder, she finds that he has some of those qualities, such as needing things done a specific way and having difficulty with change. Dr. Stubbe added that Matthew struggles to forgive or forget if he is frightened or criticized. She noted that Matthew has sensory sensitivities, and he struggles with knowing how to manage stress and social interactions. Dr. Stubbe stated that "our therapy is to help him articulate his experience and feelings in a way that is more nuanced."

Hallie Buckingham, Ed.D., Southport School

The evaluator spoke with Dr. Buckingham regarding Mia's time at Southport School. Of note, Southport School focuses on children with language-based learning differences, according to its website. Dr. Buckingham explained that students come to them already diagnosed, and they remediate and then transition to a more academic environment. Dr. Buckingham stated that she has not dealt with the family since June 2018. She described Mia as a "hard working young lady" and stated that Mia took pride in her accomplishments. Dr. Buckingham noted that Mia's self-confidence "grew tremendously" while at the school. She reported that Mia was able to self-advocate for her needs and wants, adding that "part of that was you don't always get what you want because you ask for it." Dr. Buckingham observed that this issue "peaks more to the parents." She shared that Mia's parents "wanted certain things in place," and she did not always agree.

Dr. Buckingham described that she was able to work with Mia, and Mia was able to reason with her. She explained that Mia was developing socially and learning to go from having individual friendships to dealing with larger groups. According to Dr. Buckingham, Mr. Ambrose and Ms. Riordan were "very involved" with Mia's education and social life. She commented that "mom's intervention and involvement was at a more elevated level than I had experienced with others." Socially, Dr. Buckingham reported that Mia formed friendships and relationships, and she had the typical interactions and "bumps." She stated that "mom's level of intervention in Mia's social engagements was elevated and may have compromised some friendships." She observed that Mr. Ambrose was "easier to deal with." Dr. Buckingham noted that she was not sure if Mia was able to sustain the friendships after leaving. The evaluator questioned why Mia left the school, and Dr. Buckingham explained that from the school's perspective, they had provided all they could to Mia.

Melissa Yetso and Karen Mooney, Adams Middle School

The evaluator spoke with Ms. Yetso, school social worker, and Ms. Mooney, special education teacher, from Adams Middle School. They discussed that when Mia first started at the school, they saw much more reaction to days she had to go to Mr. Ambrose's house, including her not feeling well and "lots of tears." They noted that this has subsided. Ms. Yetso commented that recently, Mia has been taking the bus instead of being at school when Mr. Ambrose comes to pick her up. She explained that they made a plan to make sure she got to him and did not need intervention. Ms. Yetso described that she planted herself in the dismissal area and saw Mia go to her father. She noted that she did this at least twice. Ms. Yetso explained that Mr. Ambrose had called, and they were able to resolve the situation. She stated that Mia did not appear upset. They denied having heard from other children that Mia had been talking about the divorce, and Ms.

Mooney noted that Mia has not been forthcoming with her. Ms. Yetso stated that Mia has not sought her out and explained that she has come if she had a hard morning or has been tearful at school. She reported that she has only sat with Mia three times. Ms. Yetso described that Mia sought an "over the top reaction" for what she was talking about. She described that Mia would cry and remember a situation that happened in the past. Ms. Yetso explained that Mia would be thinking about it due to anticipatory stress about having to go with Mr. Ambrose. She reported that there was "only one incident where she felt he put his hands on someone" and which led her to feel afraid of him.

Ms. Yetso discussed that Mr. Ambrose said the children had some challenging behaviors, and she spoke with him about managing behaviors. She shared that he reported the kids going through his personal items and purposefully giving him a hard time; he felt that the behaviors were designed to make him angry. Ms. Mooney reported that Mia sends Mr. Ambrose poop emojis.

Ms. Yetso stated that Mia is not open to finding solutions to make things better with Mr. Ambrose, and she wants to avoid going. She added that Mia felt the family therapist had joined with Mr. Ambrose and was not hearing her or taking her seriously. Ms. Yetso discussed that she coached Mia about talking to the therapist. She stated that she does not think Mia is open to the process and expressed that Mia has already decided she does not like her dad.

Ms. Yetso reported that she has not had any conversations with Ms. Riordan. Ms. Mooney noted that Ms. Riordan had called her recently; she returned the call but they had not yet connected at the time of the interview, so she was not sure what the call was about. Ms. Mooney shared that Ms. Riordan came to the PPT at the beginning of the year and was very vocal about what is going on. She stated that Mia is doing great at school and is happy there; Ms. Mooney noted that Mia talks more with Ms. Yetso. Ms. Mooney expressed that the school is able to meet and accommodate all of Mia's learning disability needs. Ms. Yetso shared that Mia has a nice group of friends and is able to do her work. Ms. Mooney noted that with more time, they can see what needs to be accommodated. She discussed that she believes Mia is doing her homework and has not heard differently. Ms. Mooney explained that Mia comes to learning center every day and can do homework there. Ms. Yetso reported that there are other kids at the school from minority backgrounds, but it is only a small percentage. She stated that it is not on Mia's IEP that she needs to come see her, but Mia can come as needed. She again noted that she has only met with Mia three times. Ms. Yetso stated that Mia definitely needs family therapy and may also need some individual therapy for issues related to the divorce. She described that Mia seems to be "over the top anxious" with Mr. Ambrose. Ms. Yetso suggested that this could get better over time, but Mia needs support in that area. Ms. Mooney noted that on those anxious days, it does impact Mia in school. They expressed that if a custody swap happens, it will be hard for Mia initially. Ms. Yetso stated that Mia does not talk to her about Matt; she reported that Mia has only mentioned him to her one or two times. Ms. Yetso stated that according to Mia, Matt feels the same way she does. She reported that they try to challenge Mr. Ambrose and get angry with him to see what he will do. She explained that she told Mr. Ambrose "he has to pass this test" and that "his job is to hold firm, be clear with limit setting, boundaries." Ms. Yetso stated that she coached him on being empathetic.

The teachers reported that Mia has a chromebook in school and sometimes for homework. They stated that she has a school gmail account, and it is open to receive emails from anyone. They explained that they could turn off the internet, but then Mia could not do her academic tasks. The teachers shared that she uses it for most classes. They noted that there is a way to monitor it but were not sure if emails could be monitored, explaining that they could see the websites she was on. The teachers recommended that Mia should engage in IICAPS initially if she were to be transitioned to Mr. Ambrose's care. They indicated that if Matthew were to transfer to the school, he could be on a different academic team from Mia; they noted that there are 300 children in each grade.

Attempted Contacts:

Dr. Irene Kitzman

Dr. Kitzman informed the evaluator that she no longer had records for Ms. Riordan as she had not treated her in over fifteen years.

Dr. DiBella, Kings Highway Elementary School

Dr. DiBella was contacted and informed the evaluator that she was unable to speak to the evaluator about the family and sent the evaluator records instead.

Dr. Richard Singer

The evaluator sent left messages on 01/21/2020 and 01/27/2020 and sent a fax on 01/27/2020.

II. Documentation Review

The following section includes a brief summary of the materials provided to the evaluator by either party and any relevant summaries. It is not exhaustive or inclusive of all material reviewed.

A. Documentation provided by Mr. Ambrose

Mr. Ambrose provided numerous detailed summaries of visits to the evaluator via email. He also shared summaries from before the evaluation began which he had originally provided to the GAL. These summaries frequently indicated that either the children left a visit with Mr. Ambrose early (such as leaving after a few hours rather than staying for an overnight or full weekend), or only one of the children would agree to come for the visit (typically Sawyer). An email to the GAL dated 09/10/2019 indicated that in the time since the court order regarding visitation (a little over two weeks prior), there had been no visits with Mia, and Sawyer had declined the most recent visit due to Ms. Riordan arriving at the school with a puppy. From 10/20/2019 through 02/26/2020, Mr. Ambrose noted 20 visits which were either short or did not include all three children. Additionally, three visits did not happen at all, and one visit started two hours late due to Ms. Riordan dropping the children off late.

An email dated 12/26/2019 indicated that on 12/18/2019 the children did stay overnight, but during the visit Mia called the Westport Police Department and reported that she did not feel safe. Another email on 12/26/2019 described that on 12/20/2019, Matthew punched Mr. Ambrose repeatedly on the arms and torso and said "tell your attorney Nancy I assaulted you." Mr. Ambrose reported that on the same visit, they went to see Mia at the ER, and she refused to leave with Mr. Ambrose even though it was his parenting time. He described that the doctor told Mia she could either leave with Mr. Ambrose or spend the night in the hospital, and Mia chose the hospital. Mr. Ambrose reported that Mia agreed to leave with him after speaking with a social worker.

Mr. Ambrose noted in an email dated 12/27/2019 that on Christmas, Matthew had expressed wanting to speak with the evaluator and had stated that she "is the one with the power." In another email (01/06/2020), Mr. Ambrose described a visit which took place from 01/01/2020 until 01/04/2020. He stated that Ms. Riordan brought the children two hours late; upon arrival,

Matthew pushed him and called him a "f-cking fat ass." Mr. Ambrose reported that during this visit, the children found the audio recorder he had recently purchased. He expressed that the police had advised him to purchase such a device. Mr. Ambrose stated that he could not find the device after returning from picking up pizza, so he asked the children to help him, describing it to them as a USB containing work files. He expressed that the children denied knowing anything about it. Mr. Ambrose reported that Matthew shoved him again later in the weekend.

An email dated 01/09/2020 indicated that the 01/07/2020 visit ended early because Ms. Riordan came to the library while they were there, and the children went home with her. On 01/22/2020, Mr. Ambrose wrote that at a recent appointment with Dr. Horwitz, he had asked Ms. Riordan to endorse his visits in front of the children and the doctor, and she refused. An email dated 01/31/2020 indicated that Mr. Ambrose was late to Sawyer's basketball game due to Ms. Riordan telling him the wrong start time. He described that he was taking Sawyer and Mia out to eat, but Ms. Riordan brought a puppy out to the car and told the children that it was being adopted that day, so they would never see it again; the children then decided not to go on the visit. In the same email, Mr. Ambrose wrote that on a visit from 01/29/2020 to 01/30/2020, Matthew hit him in the chest with boxing gloves on.

According to an email dated 02/09/2020, during an abbreviated visit on 01/31/2020, Matthew and Mia told Mr. Ambrose that they know he is gay and a pedophile. Mr. Ambrose then described that on the 02/05/2020 visit, Mia said he is "gay gay gay" and that this is why he divorced Ms. Riordan. Mr. Ambrose described that he asked where Mia heard this, and Sawyer responded "from mom, right Mia?"

The emails described several occasions on which the children went to Ms. Riordan on Mr. Ambrose's parenting time without first consulting him. In an email dated 02/14/2020, Mr. Ambrose stated that Matthew was at the library and texted him that he had left with his mother. Emails from 02/21/2020 and 02/27/2020 described that Mia took the bus to Ms. Riordan's house rather than staying at school to be picked up by her father. The former email also indicated that when Ms. Riordan brought Mia to Mr. Ambrose's house, Mia threw mud inside the house, kicked him, and took receipts from his dresser, saying that she would give them to Ms. Riordan. The email also described Mia punching and cursing when Mr. Ambrose tried to take her phone. An email dated 02/23/2020 indicated that Mr. Ambrose had to have Ms. Riordan pick up the children from the 02/21/2020 visit because all three children spat at him.

Educational Records

Mr. Ambrose provided a copy of Mia's most recent IEP and Individual Services Plan from the Madison Public Schools dated 11/04/2019. Mia was found eligible for special education under the category Specific Learning Disabilities/Dyslexia. The meeting summary noted that "Mia saw the nurse last year numerous times, but has visited her less this year." The summary also reported that Ms. Riordan described that Mia would sometimes look at her and appear "blank." Recent testing results from October and November 2019 were reported in Mia's Individual Services Plan, including the following scores: WJIV Reading= 82 (low average), Math= 75 (low), Broad Math= 79 (low), Math Cale= 78 (low); WISC-V FSIQ= 93 (average); CTOPP-2 Phonological Awareness= 86 (below average), Phonological Memory= 82 (below average), Rapid Symbolic

Naming= 79 (poor); Beery VMI (Visual Motor Integration) = 79 (below average). BASC-3 parent results found anxiety to be in the at-risk range, while teacher scores found at-risk ratings for anxiety and adaptability and a clinically significant rating for somatization. The plan indicated that Mia would receive access to Lexia, Symphony math, and consultation one hour per month with a special education teacher.

B. Documentation provided by Ms. Riordan

Recordings

Ms. Riordan sent the evaluator a USB drive of recordings. An accompanying email dated 02/20/2020 indicated that Ms. Riordan got the drive from Mia and then misplaced it for a period of time. In the earliest recordings on the drive, the children could be heard discovering the directions for Mr. Ambrose's recorder while he was out picking up pizza. When he returned, he asked the children if they found his missing flash drive, which he claimed he needed for work. The children denied they knew anything about the drive. However, the device continued to make numerous recordings which appeared to take place in the children's bedroom. The device also recorded the children's trip to the evaluator's office with Mr. Ambrose; it appeared to be on Mia's person for the beginning of the visit but then was left behind when she had her individual interview with the evaluator.

The recordings included multiple examples of the children speaking to Mr. Ambrose in an extremely disrespectful manner. For instance, in one recording Sawyer was crying after hurting himself, and Mr. Ambrose attempted to check on the child. While Sawyer was crying, Mia was laughing loudly. Matthew said "why don't you shut the f--k up and get out of my room," and Mia called her father a "f--king pervert." They told Mr. Ambrose to leave the room, and Mia exclaimed "we're protecting our brother from a f--king pervert." Mia called Mr. Ambrose a "child predator" and said that he is "like Michael Jackson." Matthew told Mr. Ambrose to "call Nancy," referring to his attorney. Matthew and Mia could be heard trying to physically keep Mr. Ambrose out of the room, and Mia stated that he hit her head with the door. After Mr. Ambrose left, Sawyer stated "I will literally throw this at his face if he comes in." Later, Mia complained that she thought she had a concussion, and the children could be heard watching Family Guy.

The children often responded to typical parenting behaviors, such as discussing what the children would have to eat or telling them it was time to go to bed, with aggression, such as Mia responding "shut up fat ass." At one point, the children were laughing while telling Mr. Ambrose that he is a "gay homosexual perv" and that he lies "just to get full custody." Mia repeatedly stated "you're f--king gay." They then discussed blocking the door once he left the room. The children listened to a rap song which included the word "b-tch," and Sawyer then stated "you're a gay b-tch."

Mr. Ambrose occasionally used sarcastic language with the children. For example, he asked Mia "are you in your drama stage?" when she was upset about something. He also responded to Mia asking "can you leave?" by stating "I don't know, can I?" He did then leave the room after the interaction. Mr. Ambrose occasionally appeared to become frustrated with the children. One such instance occurred when he left the children in the car while he went into a grocery store. The children accidentally set the car alarm off twice; Matthew attempted to call Mr. Ambrose, and

they also called Ms. Riordan. Mia reported to her siblings that Ms. Riordan said not to do anything. When Mr. Ambrose learned that the children called Ms. Riordan, he became upset and said "that's low. That's really really lousy." He also commented that it was "trying to stir the pot."

Some of the recordings were notable due to the children's interactions at night. In one example, Matthew and Mia were joking around, and Matthew stated that it was 12:16. A little later, Matthew stated that Ms. Riordan texted him and said that if he pushed a button on the recorder, it would stop recording. The children continued to speak quietly, and Mia at one point asked if dog penises are different. Mia then could be heard saying she was scared, and Matthew offered to lay with her; he commented "just please don't hit me." In another recording, Matthew and Mia discussed animal penises. They appeared to be googling the topic, as at one point one of the children stated "what the h-11 is that? Go back." The children also listened to a comedy song about penises multiple times on the recordings, including in Sawyer's presence.

Emails

Ms. Riordan sent the evaluator emails including a variety of screenshots, voicemails, audio recordings, and word documents. One audio recording, which was attached to an email dated 03/13/2020, was of Mia calling Mr. Ambrose and asking him how he knew about them taking the dogs to the vet. Mia asked the question immediately, and it was clearly the sole purpose of the call. Mr. Ambrose stated that he was not answering the question, and Mia asked if he was hiding something. The recording then ended.

In a recording attached to an email dated 03/13/2020, Mr. Ambrose was attempting to explain to the children that parents need to make some decisions for children in response to Mia stating that judges make the decisions for children. Mr. Ambrose explained that he and Ms. Riordan messed up, and that was why they had to go to a judge to make decisions. Matthew and Sawyer repeated his phrases in mocking voices, and one of the boys asked if he was texting his attorney. Matthew stated "dear Nancy, I am being assaulted and harassed." Mia then began saying "stinky asser, child harasser."

Ms. Riordan sent images of text messages in an email on 03/15/2020. In a text exchange between Matthew and Ms. Riordan (image undated), Matthew wrote that Mr. Ambrose would get mad if he called her and asked her not to tell Mr. Ambrose what he was saying. Ms. Riordan responded that she would not say anything, that she was really sorry, and that he is loved. She did not make any statements telling Matthew to behave with his father or to try to get along with him. In an email dated 03/14/2020, Ms. Riordan described that at her house, Sawyer told Mr. Ambrose "our house, our rules." She commented that it was "sad and good at the same time." Ms. Riordan explained that she wanted the children to **feel** safe in her home. She made no indication of attempting to reassure Sawyer that he would be safe in his father's home.

Ms. Riordan's emails included a number of complaints about Mr. Ambrose, including that he lies, accessed her emails, records the children, and is financially controlling. She emailed the evaluator a word document of complaints titled "Pinocchio." The document listed issues such as Mr. Ambrose following the children "as a way to frighten and intimidate." Ms. Riordan also

alleged that Mr. Ambrose hid Mia's special Billie Eilish shoes in a closet and denied having received the package.

Ms. Riordan emailed the evaluator several spreadsheets which she explained were produced by her computer forensics expert, Donna Eno. She also sent numerous images which appeared to be screenshots of search results regarding porn websites, offshore banking, and other topics of concern to her. Of note, a Court order prohibited the evaluator from reviewing the documents Ms. Riordan provided from Ms. Eno. See the collateral contacts section for the evaluator's communication with both parties' experts in this area.

C. Documentation provided by collateral sources

DCF Records

The evaluator reviewed the Family Assessment Protocol for case number 405913 provided by DCF. Of note, the document indicated that there were no previous accepted CPS reports for the family. The case was opened after a report in December 2019 from an unidentified hospital employee.

Documentation described that Mia and Sawyer were with Mr. Ambrose at the emergency room due to Sawyer experiencing chest pain; he was treated for asthma. It was noted that Matthew was at Mr. Ambrose's house at this time. When Sawyer was discharged, he and Mia reportedly stalled crying in the waiting room and refused to go home with Mr. Ambrose.

The caller spoke with Mia and Sawyer privately, and they "expressed feeling unsafe with father and going home with father"; they also reported that he is verbally abusive. Mia told the caller that Mr. Ambrose is "very mean verbally" and that she was afraid it would become physical. The caller reportedly did not feel comfortable sending the children home with Mr. Ambrose, and Mr. Ambrose refused to let the children go home with Ms. Riordan because it was his parenting time. Ms. Riordan reportedly appeared at the ER for about an hour, although the caller was unaware of how she learned the children were there.

The report stated that the Department had received several non-accept reports, including one on 10/01/2019 from Dr. Stubbe. Dr. Stubbe reported that Sawyer had indicated not wanting to go to Mr. Ambrose's home and that he "does not like it when father gets in the bed with him and it makes him feel uncomfortable." She also reported that Matthew likes Mr. Ambrose but does not like it when he gets in bed with him to snuggle. Dr. Stubbe stated that Mia reported not feeling comfortable with her father. Dr. Stubbe denied any allegations of inappropriate touching.

The worker described that she called Ms. Riordan on 12/23/2019, and Ms. Riordan was in the car and spoke for about ten minutes in detail about her concerns with Mr. Ambrose. The worker then learned that Mia was present; Ms. Riordan reportedly stated that she left the car so Mia could not hear her. The worker then visited Ms. Riordan's home and met with her and the children. Ms.

Riordan discussed that she had Mr. Ambrose's computers examined, and the worker noted "she hasn't gotten the results but feels they will be in her favor." Ms. Riordan also told the worker that Mr. Ambrose was fired for plagiarism. Mia met with the worker alone and reported that Mr.

Ambrose does not speak "nicely," uses sarcasm, and changes how he acts in front of other people. The worker spoke with Matthew, and he reported that at the hospital, the paternal uncle and aunt "weren't being nice." He stated that once they went back to Mr. Ambrose's house

"things were fine." Matthew shared that there were some things that could be fixed in his

relationship with his mother, such as her raising her voice, and "then it would be perfect." He stated that he does not like to go to his father's house and that they do not have a good relationship. The worker spoke with Sawyer, and he stated that he likes visiting both parents. Sawyer was asked whether anyone ever questions him after visits, and he reported that his mother does; he described that she asks a lot about what happens at Mr. Ambrose's house.

On 12/27/2019, the Guilford Police Department called to share that Ms. Riordan had reported the incident in which Sawyer hit Mr. Ambrose's car with sticks, and Mr. Ambrose reportedly hit Sawyer with the car door. The same day, the worker contacted Ms. Riordan due to an after-hours voicemail. The worker asked if Ms. Riordan had any new concerns, and Ms. Riordan responded with a lengthy text about issues with transitions. She also reported that Mr. Ambrose had taken the doorknobs off the children's doors. The worker subsequently interviewed Mr. Ambrose at his home, and he explained that he removed the doorknobs because the children had locked themselves in their rooms and refused to come out.

On 01/19/2020, Yale reported that Ms. Riordan brought Matthew to the ER for a UTI. The report indicated that he was questioned about whether he has been touched inappropriately, and he denied it.

The report noted that no releases of information were signed for medical providers or school. It was indicated that the children are in the process of switching medical providers. The parents reported that the children do "overall well" in school and that they all attend The Country School; there was no indication of the worker being informed about Mia's absences or switching schools.

The report's conclusion, dated 02/02/2020, indicated that the SDM Risk Assessment result was "low." The report described that the children "appear confused and loyal to mother but it's difficult to determine the true reason for this." In closing the case, the report noted that the family is involved in family court, including participating in the current evaluation.

Police Reports

The evaluator received two reports from the Westport Police Department. The first report was dated 04/22/2019 and described that Ms. Riordan (then Ms. Ambrose) stated she must speak to that specific officer about a complaint rather than to a patrol officer. The officer had an additional officer sit in on the meeting because she believed Ms. Riordan was planning to file a complaint against her regarding a statement she had made to DCF about a Facebook page. Ms. Riordan reportedly began crying while discussing "issues she [was] having with the Westport Public School system." The officer described that none of what Ms. Riordan discussed was actionable by the police and rather was civil in nature. One of her complaints was that there was a vehicle on her street occupied by the school psychologist from Kings Highway Elementary School; it was explained to Ms. Riordan that this was not criminal. Ms. Riordan also had complaints about "the manner in which the BOE has handled requests for records." Ms. Riordan was urged to seek legal advice and to obtain an educational advocate. Ms. Riordan reportedly stated that she had done these things and left "abruptly and very upset."

On 11/02/2019, Mr. Ambrose filed a complaint to the Westport Police Department because he believed Ms. Riordan had taken his computer and had it "forensically hacked." Mr. Ambrose reported that she had shown a pornographic photo to the teacher of one of their children and stated "this is what is on his father's computer." It was determined that the issue would be resolved in family court.

The Guilford Police Department provided the evaluator with two incident reports. The first incident was a family dispute on 12/27/2019. An officer arrived at the scene, and Ms. Riordan explained that she wished to make a complaint against Mr. Ambrose. She stated that she had full custody of the children. She then began to detail previous events to the officer, including the children not wanting to go home from the hospital with Mr. Ambrose. Ms. Riordan stated that she was being followed around Madison by Mr. Ambrose and that he was tracking her phone.

She also reported that the doorknobs were missing from the children's bedrooms at his home and that he had remarked that he would remove the doors as well. Ms. Riordan stated that the incident that day was that when Mr. Ambrose came to pick the children up, they did not want to go with him. She stated that he was text messaging his attorney in his car, and one of the children (name redacted) began tapping the side of his car with two sticks. Ms. Riordan described that Mr. Ambrose opened the car door quickly and struck the child in the right upper arm and right side of the head. He began to drive away and the child threw the sticks at the car, at which point Mr.

Ambrose came back. The children then ran inside. Both parents informed the officer that the child did not fall to the ground. The report indicated that the child did not have any apparent injuries, pain, or bruising. The incident was reported to DCF.

Ms. Riordan made a report of harassment to the Guilford Police Department on 01/16/2020. She stated that she believed Mr. Ambrose was tracking her movements. Ms. Riordan shared that she had seen on Our Family Wizard that Mr. Ambrose knew she had taken her dogs to the vet. She discussed that she believed he was tracking her via the Apple watch he gave her at Christmas.

The officer advised Ms. Riordan to have the watch checked at the Apple store. The officer brought up the possibility of a restraining order, and she stated that her attorney does not want her to do this. Ms. Riordan also stated that she was having some computers analyzed for pornography; the officer asked whether it could be child pornography, and she responded that she did not know. The officer advised Ms. Riordan to contact her attorney and to bring the information from the computers to the Westport Police Department. The officer left the case open for a week to see if Ms. Riordan got any information from Apple; as of 01/23/2020, he had not heard from Ms. Riordan and made the case inactive.

One police report was received from the Madison Police Department regarding an incident on 01/15/2020. Ms. Riordan reported that Mr. Ambrose approached her at The Country School while picking up the children and harassed her; she made the report on 01/17/2020. Ms. Riordan told the police that she has full custody of the children. She also stated that Mr. Ambrose had been harassing her over text messages and Our Family Wizard and had put tracking devices on the children's cell phone and Apple watch. Ms. Riordan explained that she knows this because "he shows up at the locations or knows where they were when she and the kids do not tell him where they are going." She also reported that a forensic analyst looked at "her computers" for spyware and found "young Latino pornography." The officer asked what had happened at the

school, and Ms. Riordan discussed that the children had not wanted to go with their father earlier in the day, and around 4 pm Mr. Ambrose texted her to pick up the children because they would not go with him after Matthew's basketball practice. She described that he pulled up in his car and started taunting her. He then reportedly called her crazy while driving away. Ms. Riordan stated that when she and the children were leaving, there was a car parked with its high beams shining on them; the children identified it as their father. She stated that the car peeled out, and she saw that it was his car. Ms. Riordan stated that she "just wanted the incident documented." She stated that she would make a report with the Guilford Police Department and would file for a restraining order. Ms. Riordan noted that her lawyers advised her not to get the police involved.

Kings Highway Elementary School Records

A PPT meeting summary for Matthew dated 02/01/2018 indicated that he was not found eligible for an IEP. It indicated that Matthew had a 504 Plan for Anxiety Disorder and ADHD. The meeting summary noted that Matthew was attending partial days of school earlier in the year due to his anxiety.

Our Family Wizard messages

The messages between the parties on Our Family Wizard are notable in that the platform is not being used as intended. The messages often included personal attacks or lists of complaints. The parents often alleged that the other was misrepresenting events. Mr. Ambrose made multiple requests that the platform be used as intended only to communicate about the children, while Ms. Riordan stated that Mr. Ambrose should only contact her using OFW and should not text or email her except in case of emergency.

Ms. Riordan was noted to sometimes respond to Mr. Ambrose's messages with unrelated statements. For example, on 03/15/2020, Mr. Ambrose asked Ms. Riordan about whether she had received information from Sawyer's teachers for one of his doctors; he noted that he had told the doctor Ms. Riordan would be in touch with him directly. Ms. Riordan responded by stating "I can't trust a word you say Chris." She then stated that he had "spoken on behalf of Jocelyn, Dr. Horwitz and Judge Grossman." It was unclear how this related to Mr. Ambrose's message. In a message on 02/26/2020, Mr. Ambrose indicated that Ms. Riordan had scheduled an appointment for Matthew with Dr. Stubbe; he reiterated that she was supposed to talk to him before making any doctor appointments. Ms. Riordan responded by discussing the history of Matthew seeing Dr. Horn as well as claiming that Mr. Ambrose had called Matthew a liar before discussing the current situation with the appointment with Dr. Stubbe.

III. Opinions and Recommendations

A. Clinical Summary

The below opinions are based on the data gathered during the evaluation. This examiner understands that the court may be privy to a wider breadth of information than was available to this examiner. Therefore, these recommendations are based on the information available to the evaluator at the time of the report.

- A. What is the quality of the relationship between each of the children and each parent?

During the interactional with Ms. Riordan, the children appeared comfortable and bonded. The children have expressed a desire to remain in Ms. Riordan's care by voicing their opinions during the interviews and by refusing to engage with their father at visits. For most of the interactional with Mr. Ambrose, the children engaged with him similarly. However, at the end of the interactional, Matthew was making negative statements about his father and appeared to be rude. As the course of the evaluation progressed, the children began to refuse contact with their father more, even though a Court order was put in place in December 2019 that required the children to attend all visits with their father. Since the new year, the children have been engaging in more negative behaviors, such as throwing things at his car and spitting at him. Therefore, it is believed that the relationship between Mr. Ambrose and the children has been significantly compromised as the divorce proceedings have progressed. However, the interactionals give some indication that the entire relationship has not been ruined and can be salvaged.

B. Do the parents provide a consistent and nurturing environment for the children?

Ms. Riordan appears to provide a consistent environment where the children's basic needs are met. However, there is concern that based on the children's report, Ms. Riordan is making negative statements about Mr. Ambrose to the children and not stopping the children when they engage in negative behaviors towards their father. This would indicate that the environment is not a nurturing one, since negative behaviors are being promoted. In addition, there is concern that Ms. Riordan is not using good judgment when she is making decisions for the children, such as not requiring them to go on visits with Mr. Ambrose even though it is Court ordered. Mr. Ambrose has consistently attempted to have visits with the children. However, the children have refused or shortened the visits, making it difficult to determine Mr. Ambrose's ability to be consistent and nurturing. Matthew stated that Mr. Ambrose has informed him that Ms.

Riordan is lying, which could indicate that the environment is also not nurturing.

C. Does either parent present any mental health issue that interferes with his or her ability to effectively parent the children or co-parent with the other parent?

Ms. Riordan appears to have a significant personality disorder that impacts her ability to effectively co-parent with Mr. Ambrose. Ms. Riordan completed testing as part of the current evaluation to learn more about her personality and psychological functioning. Ms. Riordan's testing and interview indicated that she meets criteria for **Other Specified Personality Disorder, Mixed Personality Features (F60.89)**. Her testing indicated that she presents with some features of Histrionic Personality Disorder, Borderline Personality Disorder, and Narcissistic Personality Disorder. However, she did not meet full criteria for any specific diagnosis and therefore the Other Specified Personality Disorder, Mixed Personality Features best encompasses her current presentation.

In regards to the Histrionic Personality Disorder traits, Ms. Riordan's testing indicated that she has a need for attention and may use manipulation to gain that attention and approval (MCMI-III). In regards to the Borderline Personality traits, Ms. Riordan appears to have a pattern of unstable interpersonal relationships. These deficits can be seen in her terminating treatment with multiple providers (Ms. Pennoyer, Ms. Wrobel, Ms. Kravitz,

Dr. Horn, Dr. Horwitz) when she did not like how the sessions were going or something that the therapist said. In addition, Ms. Riordan appears to have consistently had difficulties with teachers, administrators, and parents in each school that the children have attended (Westport School District, Southport School, The Country School). Ms. Riordan has reportedly had difficulty with various family members at times, including her father, stepfather, and sister. It appears that Ms. Riordan refers to these deficits as others not hearing what she has to say or not understanding her perspective. In regards to the Narcissistic Personality Disorder traits, Ms. Riordan demonstrated a sense of entitlement in how she has engaged with the various school districts, with providers, and with Mr. Ambrose. Ms. Riordan has also displayed this sense of entitlement when she twice canceled appointments with the evaluator with little or no notice and when she waited until the report was almost complete to send most of her documentation. Of note, most of the material that she sent was from 2018 or 2019, so it could easily have been sent earlier. Lastly, Ms. Riordan has been actively violating the Court order from December 2019 by not requiring that the children attend visits with their father.

In addition, Ms. Riordan's results on several measures indicated that she may be experiencing physical symptoms related to her stress (MCMII-III, MMPI-2-RF, TSI-2). While the current evaluation did not indicate that Ms. Riordan meets criteria for a specific anxiety disorder or somatic disorder, it is something that should be further explored in treatment. In addition, Mr. Ambrose indicated that Ms. Riordan previously had an eating disorder and that she continues to engage in disordered eating habits.

During the evaluation, Ms. Riordan was observed to eat skittles candy almost continuously during her interview, which could be indicative of disordered eating. However, Ms. Riordan would require further assessment to determine if she has such a condition. Ms. Riordan has been diagnosed with Attention Deficit Hyperactivity Disorder (ADHD) for some time and treated with stimulant medication. It is unclear if her eating the skittles was due to hyperactivity or an eating issue. There was not evidence to support an ADHD diagnosis during testing, but it should be further explored by her psychiatrist.

It is believed that Ms. Riordan's personality traits would make it very difficult for her to be able to work with Mr. Ambrose to co-parent. In reviewing their interactions on OFW, the two struggle to work together to make even the smallest of decisions. It is believed that Ms. Riordan's distrust and dissatisfaction with Mr. Ambrose would impact her ability to parent her children. For instance, she is not setting any limits or consequences on the children when they act negatively towards their father and instead, she is telling them details of the divorce, including her allegations that Mr. Ambrose is gay and a pedophile, which were mirrored in audiotapes of the children towards Ms. Ambrose.

In regards to Mr. Ambrose's mental health, it is believed that he does not have a personality disorder. Mr. Ambrose has been in consistent weekly therapy for some time, and his provider denied that he has a personality disorder but stated that he seems to be dependent on others, namely Ms. Riordan during the marriage. Dr. Horn has diagnosed Mr. Ambrose with an Adjustment Disorder, indicating that his current symptoms are related to him adjusting to the breakdown of the marriage and the subsequent divorce.

proceedings. Mr. Ambrose's testing indicated that he has traits of perfectionism and that he is behaviorally rigid (MCMI-III). His responses indicated that he is unassertive and passive interpersonally (MMPI-2-RF). While his testing indicated a potential Obsessive-Compulsive Personality Disorder, this does not appear to be supported by the interviews, as there was no evidence of him following strict rules and having difficulty with change. Ms. Riordan indicated frequently that Mr. Ambrose "lied" about certain things, and she provided her narratives of times she believes he was dishonest with her. However, these all appear to be during the context of a struggling/ending marriage and are likely related to their circumstances and are not indicative of a greater personality disorder. While he does not appear to meet criteria for a specific personality disorder or other disorder, Mr. Ambrose's diagnosis of an **Adjustment Disorder, with Mixed Anxiety and Depressed Mood (F43.23)** will be continued.

It is believed that Mr. Ambrose's diagnosis will not impair his ability to parent or to co-parent. It is believed that during the marriage, Mr. Ambrose allowed Ms. Riordan to make all decisions, and when he began consistent therapy and learned about having a say in his life, Ms. Riordan could not tolerate losing full control and Mr. Ambrose having an opinion. This shift in the dynamic of their relationship is what ultimately led to the breakdown of the marriage and divorce. In regards to his ability to parent, there is nothing about Mr. Ambrose's diagnosis that would prohibit him from being an appropriate parent.

D. Do either of the parents attempt to undermine the children's relationship with the other parent?

It is believed that Ms. Riordan is intentionally telling the children things about the divorce that they should not know, such as her concerns that Mr. Ambrose is gay, that he enjoys or is involved with child pornography, and the allegations of plagiarism. Ms. Riordan was observed to not try to encourage the children to attend the visits but rather instructing them to document things via text and go to a teacher. She provided the evaluator with videos in which the children are calling Mr. Ambrose a pedophile and gay. Ms. Riordan telling the children upsetting things is being done in an attempt to undermine Mr. Ambrose's relationship with the children. Ms. Riordan has consistently refused to demand that the children attend visits and refused to place consequences on the children for their behavior, even when requested by Mr. Ambrose, as evidenced by the spitting episode and when Sawyer was throwing things at Mr. Ambrose's car. Ms. Riordan has instructed the children to not give Mr. Ambrose their cell phone and then she has taken their calls and gone to get the children whenever they ask. In addition, Ms. Riordan does not correct the children when they say inappropriate or disparaging things about their father, as evidenced in the interactional.

Matthew reported that Mr. Ambrose has informed the children that Ms. Riordan is lying to them. While this may be an attempt to undermine the children's relationship with Ms. Riordan, it is believed to be his attempt to help the children understand that they should not believe everything that Ms. Riordan is saying. Therefore, it is not believed that Mr.

Ambrose is intentionally trying to undermine Ms. Riordan's relationship with the children.

- E. Does each parent exhibit appropriate empathy for and insight into the children and their physical, educational, psychological, and emotional developmental status and needs? If not identify the issues with specificity.

Ms. Riordan seems to have a clear understanding of the children's physical and educational needs. However, she appears to struggle to understand how to best help the children, particularly Mia, when there is a social incident at school. From conversations with the various school administrators, it is perceived that Ms. Riordan's interventions often exacerbate the problems, and she does not give the schools time to try to resolve matters. A recent example of this was when Ms. Riordan kept Mia home from school following winter break instead of sending her to school so that the school could attempt to resolve the social issues. Of note, during Mia's absence from school, it did not appear that Ms. Riordan was requiring her to do any make-up work. School noted that when any of the children are absent, they do not make up the work. Ms. Riordan has engaged the children in therapy, but it appears that she terminates treatment when she is upset at something that happens. The children are currently supposed to be in treatment with Dr. Horwitz, but Ms. Riordan has not been taking the children for appointments even though he is available and able to see them. Therefore, it is believed that by not providing the children an outlet to discuss the current situation, Ms. Riordan is not meeting the children's psychological and emotional needs. It is believed that Ms. Riordan has limited insight and judgment into how her behaviors can negatively impact the children.

Mr. Ambrose appears to have a clear understanding of the children's physical and educational needs. He has reported a desire to resume therapy for the children or re-engage them in treatment with Dr. Horwitz. It is believed that Mr. Ambrose understands the potential emotional problems that could be occurring due to the children's negative behaviors towards him. The schools expressed that Mr. Ambrose was better able to understand that the school could intervene to assist in meeting Mia's emotional and social needs.

- F. Is either parent more likely or less likely to foster a positive relationship with and regular access between the children and the other parent?

It is believed that if Ms. Riordan were to have sole physical custody of the children, she would not foster a positive relationship with Mr. Ambrose. She would likely not provide regular access to Mr. Ambrose, as demonstrated now even when under a Court order for the children to have consistent visitation with Mr. Ambrose. Ms. Riordan has historically interfered with Mr. Ambrose's parenting time, such as when she brought a dog to school on Mr. Ambrose's time and left school with Sawyer without telling Mr. Ambrose. In addition, Ms. Riordan appears to communicate consistently with the children during Mr. Ambrose's parenting time and is available to pick up the children at the child's request.

It is believed that if Mr. Ambrose were to have sole physical custody of the children, he would foster access between Ms. Riordan and the children. Mr. Ambrose does not appear to have a history attempting to interfere with Ms. Riordan's parenting time.

- G. Does either party present a physical, psychological, or emotional danger to himself, herself or the children?

It does not appear that Ms. Riordan would be a physical danger to herself or the children. However, her continuing to engage in attempts to undermine Mr. Ambrose with the children is likely posing an emotional and/or psychological problem for the children. The children likely struggle with their desire to have a relationship with their father versus supporting their mother. This puts the children at great risk for a future psychological problem.

It does not appear that there is any evidence to support that Mr. Ambrose poses a physical danger to himself or the children. Ms. Riordan has not provided sufficient evidence that Mr. Ambrose has ever harmed the children or that he is engaged in child pornography. It is believed that Mr. Ambrose would support the children's psychological needs.

- H. Is each party capable of effectively and appropriately parenting the children?

If Ms. Riordan were to focus on parenting the children and not engage in trying to destroy Mr. Ambrose's character to the children, then it is believed that she can appropriately parent the children. Ms. Riordan would require some intervention to assist her in learning when to advocate for her children or when to allow the school to mediate any social issues that may arise.

It is believed that Mr. Ambrose is capable of effectively and appropriately parenting the children. His provider indicated that Mr. Ambrose uses therapy to help learn how to be an effective parent and that he knows how to utilize resources for support as needed.

- I. Is each party capable of co-parenting with the other? If not, does either party present any issues which may interfere with his or her ability to effectively make decisions pertaining to the children or work with the other parent or work with the other parent in making those decisions?

It is believed that Mr. Ambrose would be able to co-parent with Ms. Riordan. However, there are concerns about the length of their discourse and the significantly negative things that have occurred which may diminish his ability to co-parent. Therefore, it is believed that Mr. Ambrose could work on his struggles about co-parenting in therapy, which would allow him to co-parent.

It is believed that Ms. Riordan is not able to co-parent with Mr. Ambrose. She has demonstrated that she struggles to follow court orders and she does not appear to attempt to work with Mr. Ambrose to make parenting decisions, instead deciding to make

decisions on her own or focusing on Mr. Ambrose's faults. Ms. Riordan's personality traits will likely continue to impair her ability to co-parent even with intervention.

- J. Does either party present any significant issues relevant to the determination of an appropriate parenting plan addressing the minor children's physical custody?

Ms. Riordan's current presentation would make it difficult for the parties to agree to a parenting plan. She has demonstrated being unable to follow the current Court ordered parenting plan, so it is unlikely that she would follow a parenting plan if she were not being closely monitored by the GAL and/or the Court. It does not appear that Mr. Ambrose has any issues that would prevent him from following a parenting plan. Of note, the children's current contentious relationship with Mr. Ambrose may make his initial parenting time difficult, and he would need support.

- K. Has either parent made parenting decisions that place the parent's needs over the needs or best interests of the children? If so, explain.

Ms. Riordan has demonstrated this on numerous occasions. For instance, she demonstrated this when she did not require Mia to attend school following winter break and only supported her switching schools. Ms. Riordan did not allow The Country School an opportunity to try to make accommodations or intervene on Mia's behalf. Ms. Riordan believed strongly that Mia should no longer attend the school, so therefore she did not send her back. In the past, Ms. Riordan has not wanted to accept a settlement with the Westport School District that would have covered the cost of the child's tuition at Southport School and the family's incurred legal expenses. Her decision to postpone signing the settlement led to the family losing money and continued uncertainty about where Mia would go to school. At this time, there is no evidence to support that Mr.

Ambrose has made any significant parenting decisions that place his needs over the needs of the children. However, it is believed that his decision to install listening devices may have been more for the benefit of the legal case than for parenting.

- L. Does any party or any child require ongoing psychological or psychiatric treatment? If so, what type of treatment is recommended.

At this time, it appears that all members of this family should be engaged in ongoing psychological treatment. Ms. Riordan recently engaged in psychiatric care with a new provider, but she continues to not engage in psychological treatment, which would be imperative for her to make any gains in treating or ameliorating the symptoms of her personality functioning. Mr. Ambrose is currently engaged in psychological treatment and he should continue as such. It does not appear that he requires psychiatric treatment at this time. Mia should be engaged in both individual and family psychological treatment. It is unlikely that her current presentation would benefit from psychiatric medication. Matthew should also be engaged in both individual and family psychological treatment. He should continue in psychiatric treatment. Sawyer would benefit from both individual and family psychological treatment, but it is believed that his therapy would likely be more short term than that of his siblings.

- M. Are there any characteristics of either parent or the children which have significant impact on the parent-child fit? If so, explain.

It is believed that these children require caring and loving parents who work with their schools and mental health providers to help them achieve to their full potential. That being said, Ms. Riordan's belief that she does not find any providers or schools to be able to meet the needs of the children would impact her ability to care for them. Ms. Riordan has some symptoms that are consistent with narcissism which could impact the parent-child fit, as she would focus on having her needs met before the needs of the children. It is not believed that there are any characteristics of Mr. Ambrose that would impact the parent-child fit. He will likely need assistance from his therapist to be able to understand the children's needs and to make parenting decisions in their best interest.

- N. What parenting schedule best meets the developmental needs of the children, considering all information, including but not limited to: the ages of the children; the educational, social, and extracurricular schedules of the children; and the parent's personal and professional schedules?

In most cases, the most beneficial parenting schedule is a split custody schedule in which both parents have equal access to the children. In this case, it is believed that the children have unlimited access to Ms. Riordan which makes it difficult for them to be able to spend time and have a relationship with their father. Therefore, it is recommended that Mr. Ambrose have primary physical custody of the children. However, in an effort to overcome the negative consequences of Ms. Riordan's actions in regards to undermining Mr. Ambrose's relationship with the children, it is recommended that there be a period of 90 days in which the children do not have contact with Ms. Riordan and remain exclusively in their father's custody. Since the children have multiple electronic devices and access to similar electronics at school, it will be particularly difficult to ensure that no contact happens during this period. Therefore, the parents should make the best efforts to avoid contact. If the children contact Ms. Riordan, she should not engage with them.

After that time, they can begin to have contact with Ms. Riordan in a supervised and therapeutic setting, such as during reunification therapy. Once at least three months of reunification has been completed and Ms. Riordan has engaged in intensive therapy with a licensed psychologist, and at the discretion of the reunification therapist, then the children can begin to have more contact with Ms. Riordan. The contact should progress slowly in order to make sure that the children are remaining emotionally stable. For instance, the contact can begin unsupervised for a few hours, then twice a week unsupervised for a few hours, before starting unsupervised for longer periods of time, and then ultimately, unsupervised overnight access. It is recommended that the children remain in consistent mental health treatment during this transitional period so that their mental health needs are being fully explored and treated. It is recommended that the children remain primarily in Mr. Ambrose's care and have access to Ms. Riordan once a week for an overnight and every other weekend for an overnight.

- O. Explain any other data that you believe is important in determining the best interest of the children based upon your professional judgment.

In the current case, it appears that Mr. Riordan is doing everything she can to undermine the children's relationship with their father. In some literature, this undermining has been referred to as parental alienation. While this evaluator is not saying that parental alienation is occurring, the processes that have been happening appear consistent with the literature on parental alienation.

In regards to this case, it appears that whether purposefully or not, Ms. Riordan is engaging in undermining Mr. Ambrose's relationship with the children, thereby effectively alienating the children from their father. By her comments and actions, she is turning the children against Mr. Ambrose, rewarding them verbally for their negative behavior. In the literature, parental alienation has been described as

a child- usually one whose parents are engaged in a high-conflict divorce-allies himself or herself strongly with one parent (the preferred parent) and rejects a relationship with the other parent (the alienated parent) without legitimate justification. The primary behavioral symptom is that the child refuses or resists contact with a parent, or has contact with a parent that is characterized either by extreme withdrawal or gross contempt. The primary mental symptom is the child's irrational anxiety and/or hostility toward the rejected parent.²²

In the current case, Mia and Matthew (and to a lesser degree Sawyer) have allied themselves strongly with Ms. Riordan and rejected their relationship with Mr. Ambrose without significant reason. During the interviews with the children, they provided a few examples of reasons why they dislike their father, such as feeling "unsafe" or that he is "mean." However, they struggled to provide statements to support this allegation.

Researchers have discussed that parental alienation occurs when "the child [is] in the heart of the conflict. Negative comments about the targeted parent are made directly to the child, intimate aspects of the marital relationship and financial matters are openly discussed with the child, and children are forced to choose between their parents rather than be allowed to love them both."²³ Matthew was able to discuss that he feels that both parents make negative statements about the other parent. However, it appears that Ms. Riordan's statements have portrayed Mr. Ambrose in a significantly negative light.

The DSM-5 identified the diagnosis of Child Affected by Parental Relationship Distress and stated that it should be used "when the focus of clinical attention is the negative effects of parental relationship discord (e.g., high levels of conflict, distress, or disparagement) on a child in the family, including effects on the child's mental or other physical disorders." In addition, the DSM-5 indicated that the condition "may include negative attributions of the other's intentions, hostility toward or scapegoating of the

²² Bernet, W., von Boch-Galhau, W., Baker, A., & Morrison, S. (2010). Parental Alienation, DSM-Y and ICD-11. *The American Journal of Family Therapy*, 38, 76-187.

²³ Baker, J.L., & Darnall, D. (2006). Behaviors and Strategies Employed in Parental Alienation: A Survey of Parental Experiences. *Journal of Divorce & Remarriage*, 45 (1/2), 97-124.

other, and unwanted feelings of estrangement." At this time, all three children meet criteria for **Child Affected by Parental Relationship Distress (V61.29)**. There are concerns that if the children do not receive proper treatment and learn coping strategies, their feelings of anger and anxiety may result in a mental health condition in the future.

As part of the current evaluation, the evaluator examined Matthew's hyperactivity and testing did not support a continued diagnosis of ADHD. His presentation on and off the medication was similar and the guardian(s) should discuss Matthew continuing to take stimulant medication with his treating psychiatrist. Sawyer was also evaluated to determine if his current presentation supports a problem with hyperactivity. His testing was consistent with hyperactivity. However, his prenatal exposure to cocaine may be causing his presentation to mimic ADHD when it is actually due to his prenatal exposure. Therefore, Sawyer should be evaluated by a psychiatrist to determine if he would benefit from ADHD medication.

Impressions Pertaining to Custody

It appears that the conflict in the parents' relationship has been becoming increasingly worse over time. The results of the current evaluation supported that Ms. Riordan has a personality disorder that is blocking her ability to work with Mr. Ambrose to co-parent. These issues have made any attempts at co-parenting to be chaotic and unachievable. It seems unlikely that the parents will ever be able to work together in the best interests of their children.

At this time, it strongly appears that Ms. Riordan has been engaging in attempts to undermine Mr. Ambrose to the children, often described in the literature as parental alienation. Research describes that "the essential feature of parental alienation is that a child - usually one whose parents are engaged in a high-conflict divorce - allies himself or herself strongly with one parent (the preferred parent) and rejects a relationship with the other parent (the alienated parent) without legitimate justification. The primary mental symptom is the child's irrational anxiety and/or hostility toward the rejected parent"²⁴ Mia and Matthew (and to a lesser extent Sawyer) have terminated their previous relationship with their father which may have been due to their desire to "avoid being caught between warring parents by gravitating to one side and avoiding the other side of the conflict."²⁵ Often, this is done by making small statements that show the child that they can speak negatively about the other parent without getting in trouble. It has been said that "these criticisms often focus on bonding with the child in an adolescent manner around issues of independence against the target's 'authority.'"²⁶ In many cases of parental alienation, the child feels torn, but it is often easier to side with the demanding parent (Ms. Riordan) against the target (Mr. Ambrose). The child often finds that there is more to risk in challenging the parent who is alienating than the parent being alienated. The research has found that "it is

²⁴ Bernet, W., von Boch-Galhau, W., Baker, A., & Morrison, S. (2010). Parental Alienation, DSM-V, and ICD-11. *The American Journal of Family Therapy*, 38, 76-187.

²⁵ Bernet, W., von Boch-Galhau, W., Baker, A., & Morrison, S. (2010). Parental Alienation, DSM-V, and ICD-11. *The American Journal of Family Therapy*, 38, 76-187.

²⁶ Eddy, B. & Kreger, R. (2011). *Splitting-Protecting Yourself While Divorcing Someone with Borderline or Narcissistic Personality Disorder*.

undeniable that a parent can undermine a child's relationship with the other parent."²⁷

In the current case, Mia, Matthew and (to some extent) Sawyer have aligned themselves strongly with Ms. Riordan and rejected their relationship with Mr. Ambrose without significant reason. During the interviews with the children, they had significant difficulty verbalizing their reasons for disliking their father. Mia repeatedly discussed that her father is "unsafe" or "mean" without providing reasons for feeling that way. Bill Eddy identified the signs of an alienated child as "children who are not abused, but are alienated have emotionally intense feelings but vague or minor reasons for them The children complain that they are afraid of the other parent, yet their behavior shows just the opposite - they feel confident in blaming or rejecting that parent without any fear or remorse."²⁸ Mr. Eddy suggested that research on the brain indicates that the "spilling over of negative emotions from upset parent to child may have begun years before the divorce, so that the child is very tuned to the upset parent, and automatically and instantly absorbs their emotions and point of view." Research on parental alienation discussed a number of ways in which the alienating parent tries to interfere in the child's relationship with the other parent, including badmouthing, interfering with contact, limiting phone contact, emotional manipulation, and an unhealthy alliance.²⁹ It appears that Ms. Riordan has engaged or likely engaged in all of these behaviors. Parental alienation is detrimental to the wellbeing of the children as "it is hypothesized that children exposed to parental alienation will develop unhealthy attachment patterns, low self-regard and self-sufficiency, and be at higher risk for depression in adulthood."³⁰

The current question of contact and custody is particularly sensitive and difficult to answer in this case. It is clear that these two parents will never be able to successfully co-parent. Therefore, it is necessary for one parent to have sole custody. In this particular case, the children can then have sole custody with their mother and decide to have no contact with their father until they are adults, or they can have sole custody with their father due to their mother's campaign of undermining their father and monitored contact with their mother. At this time, it is therefore recommended that the children reside primarily with their father. In regards to the ultimate question of custody, it is the evaluator's opinion that sole legal custody be given to Mr. Ambrose as Ms. Riordan's personality has impacted her ability to communicate effectively with the children's school, therapist, and pediatrician.

The children should not have any contact with their mother for the next 90 days, to provide them with a "cooling off" period in which time they can acclimate to their father's home. To reiterate, the children should not reach out to their mother and Ms. Riordan should not reach out to them. If the children attempt contact with their mother, Ms. Riordan must respond by reminding them

²⁷ Joan S. Meier, A Historical Perspective on Parental Alienation Syndrome and Parental Alienation, 6 J. Child Custody 232 (2009).pp. 50.

²⁸ Bill Eddy (2007)., "Is Your Child Alienated?" www.billeddy.com/articles

²⁹ Baker, A.J.L. & Darnell, D. (2006). Behaviors and Strategies Employed in Parental Alienation: A Survey of Parental Experiences. *Journal of Divorce and Remarriage*.

³⁰ Jaffe, A. M., Thakkar, M. J., & Piron, P. (2017). Denial of ambivalence as a hallmark of parental alienation. *Cogent Psychology*, 1-15.

of the rules of no contact or respond with "planned ignoring," where she intentionally ignores any attempts at contact with the children. It will be imperative for the family to share this information with the schools so that they are unable to access technology to contact their mother. Mr. Ambrose should consider not allowing them access to their phones or only have access under supervision. The children should only use the computer to complete homework or reports and should not use social media to contact their mother. After these initial 90 days, the child should begin reunification therapy with their mother. This therapy should be the only contact between them for approximately three months. After that time, the reunification therapist and the Guardian ad Litem will work together to make recommendations for the Court about the children's contact with their mother. Some families have then utilized supervised visitation or incremental increases in visit time with the alienating parent.

In regards to therapy, the reunification work **must** be completed by a therapist who is separate from the children's individual therapist. Research has demonstrated that "when therapists selected for the child have no knowledge of child alienation processes or collaborative efforts needed to assist such children and families, considerable harm can be done in supporting and consolidating the child's rage and unwarranted rejection of the parent."³¹ Therefore, it is imperative that all therapists working on the case are significantly knowledgeable about parental alienation and high conflict divorce. The children must be working with separate therapists who can work individually with each child.

Mr. Ambrose is strongly urged to continue to work with his own therapist about how he can best support the children during this transition. It is very important that Mr. Ambrose initially provide the children and especially Mia with a significant amount of space and not try to engage in long discussions about the family situations or try to win their favor. It is recommended that Mr. Ambrose and the children (and possibly a provider) work together to determine the house rules. Mr. Ambrose should give the children "space" upon the initial change in custody and then incrementally increase his interactions with them. For instance, he may only interact with them for meals when they first arrive at his home, but then he should start suggesting that they do an activity together daily, such as watching television or going for a walk. In addition, in light of the current crisis where the children will likely be home from school for a significant amount of time, it is recommended that the transition from Ms. Riordan's home to Mr. Ambrose's home happen immediately. Therefore, the children can transition without the additional stress of having to attend school. Mr. Ambrose can potentially access his therapist via telehealth so that he can continue to have guidance about easing the transition. Since the children will be at home, Mr. Ambrose can carefully monitor that the children do not have access to technology via their devices or phones so that there can be a break from communication with their mother. While it may be beneficial for the family to engage in an in home service such as Intensive Family Preservation, this service is unlikely to begin work during the current situation.

³¹ Kelly, J.B., & Johnston, J. R. (2001). The Alienated Child: A Reformulation of Parental Alienation Syndrome. *Family Court Review*, 39(3), 249-266.

B. Recommendations

Mr. Ambrose

Mr. Ambrose is currently engaged in individual therapy with a psychologist. It is strongly recommended that he continue to engage in this treatment, either with his current provider or one of his choosing. His current provider appeared to have a clear understanding of Mr. Ambrose's functioning and deficits.

Mr. Ambrose's psychologist should work with him on improving his relationship with the children. Mr. Ambrose needs to gain an understanding of why he should focus on the children's individual and joint interests.

Mr. Ambrose and the children should engage with a highly experienced reunification psychologist as per the Court order. The reunification psychologist should initially help the children transition to living with their father and then, at three months, begin doing reunification work between the children and Ms. Riordan in an office setting and helping them transition to visits in the community and ultimately his home. Mr. Ambrose is strongly encouraged to actively engage in the process so that he can learn how to develop a relationship with his children in the middle of the parental conflict. He should be open to the reunification psychologist's opinions and changes that are recommended.

Ms. Riordan

Ms. Riordan should engage in individual therapy with a highly experienced psychologist. It is recommended that she work with a psychologist who will coordinate with the other providers and with the Guardian ad Litem. Ms. Riordan would significantly benefit from learning how her personality traits and style are impacting her relationship with Mr. Ambrose and the children. Ms. Riordan would benefit from learning that her relationship with the children is more important than "winning" her war with Mr. Ambrose.

Ms. Riordan must engage with the reunification process in reunification therapy with a skilled reunification psychologist and learn about how her behaviors may be negatively impacting the children's ability to continue a relationship with their father. Ms. Riordan can learn how to talk to the children about the visits in a positive way that does not make the children feel that they are being placed in the middle.

Ms. Riordan should continue to engage in psychiatric treatment to determine how medication can be beneficial.

Mia Ambrose

It is recommended that Mia engage in individual therapy to assist her with her current refusal to see her father and her feelings about being in the middle of the parental discord. She would likely benefit from therapy geared to learning anxiety reduction techniques. Mia will benefit from having a safe place for her to express her thoughts without parental interference.

Mia should engage in reunification therapy with her brothers and Mr. Ambrose to help them rebuild their relationship. They should work with the reunification therapist on developing home

rules and creating an environment where Mia can safely express any reservations she has for his father. The reunification therapy should then switch to focusing on the children's relationship with their mother.

It is recommended that the parents refrain from allowing the children to share a bed.

Matthew Ambrose

Matthew would significantly benefit from individual therapy. Matthew has experienced significant parental conflict and has been pulled by both of his parents, placing him in the middle. He needs a safe environment where he can voice his feelings and concerns without parental interference or prompting.

Matthew should engage in reunification therapy with Mia, Sawyer, and Mr. Ambrose to help them rebuild their relationship. They should work with the reunification therapist on developing home rules and creating an environment where Matthew can safely express any reservations he has for his father. He should then engage in reunification therapy with his mother to work on their relationship.

Matthew should continue to engage in psychiatric treatment and take his medication as prescribed.

It is recommended that the parents refrain from allowing the children to share a bed.

Sawyer Ambrose

Sawyer should engage in short term individual therapy to assist him with discussing his feelings about the parental conflict.

Sawyer should complete a psychiatric evaluation to determine if he would benefit from medication for his hyperactivity.

Family Recommendations

It is strongly recommended that the family continue to have a Guardian ad Litem (GAL) who can assist the family with making decisions pertaining to parenting time and in setting goals for the children.

The family is currently using Our Family Wizard (OFW), an online platform that allows for a professional to monitor the parents' ongoing dialogue and communication, to its fullest. However, they are using it to continue their fighting and to discuss past wrongs. OFW should be used to discuss child issues, drop-offs, pickups, medical issues, and school topics. In no way should OFW be used to make negative statements or to constantly rehash the past. OFW should not be used to make accusations or be derogatory but to assist parents in co-parenting in a safe place.

It is strongly recommended that the family share a calendar, such as a google calendar, that both can keep on their phones. Then, when appointments are scheduled, they can be inputted directly

into the calendar so that neither parent has the responsibility of contacting the other about appointments. If a same day appointment is scheduled, the scheduling parent should notify the other using OFW. For all other appointments, no advanced notification is required.

In regards to the ultimate question of custody, it is the evaluator's opinion that sole legal custody be given to Mr. Ambrose as Ms. Riordan's personality has impacted her ability to communicate effectively with the children's school, therapist, and pediatrician.

In regards to holidays and school vacations, the parents should split time in a similar way as during the school week. For instance, Ms. Riordan can maintain his having the children on Wednesday if it is a school holiday. During the summer, Ms. Riordan can continue to have her two weeks of vacation time with the children. However, no parent during the summer should have more than two weeks continuously without the children without having at least one overnight with the other parent. It will be the decision of each parent about how the children spend time while in their care, such as going to camp or staying home with the parent. Parents should continue to evenly distribute the major holidays as outlined in their original divorce decree.

It is recommended that the parents make efforts to speak about the other parent using positive words. The parents should make all efforts to not speak negatively about the other parent within earshot of the children. Both parents should support the other parent's relationship with the children, and neither parent should block the other parent's access to the children.

It should be court ordered that therapy for the children be mandated. In addition, the therapist should not be terminated unless the therapist releases the family from treatment because the treatment goals have been met or other referrals have been made.

It has been a pleasure working with and getting to know the family. Please feel free to call or email me with any questions or concerns.

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Biren Caverly, Ph.D. Licensed
Psychologist



Western Connecticut Behavioral Health, LLC

ENGAGEMENT AGREEMENT FOR PSYCHOLOGICAL EXPERT SERVICES

SERVICE: A forensic psychological service is a psychological evaluation, consultation, or expert witness service that is undertaken for legal purposes. A forensic psychological evaluation typically involves face-to-face interviews with the person to be evaluated, psychological testing, interactional appointments, collaborative interviews with individuals deemed necessary by Dr.

Biren Caverly to conduct a thorough and complete evaluation, and review of documents and other evidence. Evaluation sessions, including testing, are arranged by appointment. The parties that will be examined, and regarding whom reports will be prepared, are Christopher Ambrose and Karen Ambrose. Dr. Biren Caverly may form and provide findings, impressions, opinions, conclusions, and recommendations regarding the legal issue(s) at hand. These services are not intended for the purpose of therapy. Dr. Biren Caverly's findings, impressions, opinions, conclusions, and recommendations are based on the evaluation procedure and are independent.

RETAINING PARTY: The retaining parties in this agreement specifically are Mr. Ambrose and Ms. Ambrose, who are retaining the forensic psychological expert services of Dr. Jessica Biren Caverly. Other psychologists and psychometricians working at WCBH may be utilized to administer psychological testing and to score the assessment tools.

CONFIDENTIALITY: The usual laws governing confidentiality between psychologist and patient do not apply to the relationship or information obtained during the course of the forensic evaluation. Information obtained in the course of the forensic evaluation will be shared equally with the attorneys of both Christopher Ambrose and Karen Ambrose. This policy also recognizes Dr. Biren Caverly's use of professional test scoring services, and other professional consultation as deemed necessary by Dr. Biren Caverly. Be aware that in certain instances, the law requires Dr. Biren Caverly to disclose privileged information, for example, in situations of suspected child abuse, of potential harm to oneself or another, and in instances where the court orders the disclosure of privileged information and records.

RESULTS: Any results, reports, and copies of records shall only be prepared, written, and provided after the full evaluation is completed. Dr. Biren Caverly will only provide written results to the Guardian ad Litem, Attorney Jocelyn Hurwitz. Attorney Hurwitz will then disseminate the report to the attorneys for Christopher Ambrose and Karen Ambrose. The attorneys are then responsible for reviewing the findings of the case with their client. Dr. Biren Caverly requires that the attorneys do not provide their client with a copy of the evaluation. The parents are encouraged to not discuss the contents of the evaluation report with others, including the minor children.

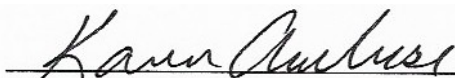
FEES: Dr. Biren Caverly's usual and customary fee for the interviews, evaluation appointments, interactional appointments, collateral appointments, testing, test scoring and interpretation,

reviewing documents and other evidence, and preparing and providing the report is \$12,000. For testimony at deposition or trial, Dr. Biren Caverly shall be paid at the rate of \$2500.00 per full day and \$1500 per half day. If the deposition is cancelled within 24 hours, the full fee is required. The rate for testimony preparation is at \$250 per hour. The rate for testimony is \$2500 per day and \$1500 per half day. The fees shall apply while Dr. Biren Caverly is preparing to give testimony, waiting to give testimony, whether at an office or court, for time taken for breaks or meals, as well as for time spent actually giving testimony. A retainer will also be assessed for testimony and will need to have been received by this office prior to the trial date. The amount of this retainer will generally reflect 50% of the estimated time required. Of note, testimony at deposition or trial requires that Dr. Biren Caverly cancel other clinical commitments in order to accommodate the deposing attorney's request. Therefore, in order to be certain that Dr. Biren Caverly shall be compensated for the time that she schedules for the deposition. If the deposition is cancelled more than three (3) days prior to the scheduled time, all fees collected will be returned. If notice of cancellation occurs three (3) days or less prior to the scheduled deposition the deposition, fee shall be forfeited in full. If a trial is cancelled within 24 hours, a rate equivalent of one day of testimony is required. If the parties require photocopying of the file, it is at a rate of \$0.65 per page and \$10 per USB drive (audio/video content), plus shipping. The parties will be responsible for any attorney's fees incurred by the evaluator as a result of this evaluation.

AGREEMENT: All agreements and contracts with Dr. Biren Caverly are in writing. Any modification of the terms of this agreement must be in writing and signed by Dr. Biren Caverly. Dr. Biren Caverly, in agreeing to provide this forensic psychological service, is specifically relying on the responsible party's agreement to abide by all the terms of this agreement. An authorized representative of the law firm retaining Dr. Biren Caverly shall signify agreement to this Engagement Agreement by signing below.

Jessica Biren Caverly, Ph.D.
Licensed Psychologist

Date



Karen Ambrose



Date

Christopher Ambrose

Date

Robin M. Lynch, PhD
Psychologist, New York State License #013654
P.O. Box 158 Riverdale Station Bronx, New York 10471

December 14, 2020

To: Nickola J. Cunha Esq.
2494 Whitney Avenue
Hamden, Connecticut 06518

For: peer review of the
Child custody evaluation report
In the matter of Riordan v. Ambrose

Dear Ms. Cunha,

I am a New York State licensed psychologist and sit on the New York State Appellate Division's panel of child custody evaluators. I have been a child custody evaluator, consultant on child custody cases and an expert witness on child custody matters for over twenty years. Pursuant to your request I have prepared my peer review of the child custody evaluation report in the matter of Riordan v. Ambrose conducted by Jessica Biren Caverly, PhD.

Introduction: The Child Custody Evaluation Report

A "peer review" of a child custody evaluation (CCE) is an independent assessment of the CCE's accuracy by a qualified child custody evaluator. Accordingly the report is reviewed for the extent to which it adhered to the American Psychological Association, (APA) "Guidelines for Child Custody Evaluations in Divorce Proceedings" (2010/2016) and other guidelines and peer review literature including: the APA's "Specialty Guidelines for Forensic Psychology," (2012), APA's "Ethical Principles of Psychologists and Code of Conduct, (2002); Association of Family and Conciliation Courts (AFCC) Model Standards of Practice for Child Custody Evaluations (2006), Flens and Drozd, "Psychological Testing in Child Custody Evaluations (2005), Melton et al, "Psychological Evaluations for the Courts" (2007) Martindale and Gould, "Deconstructing Custody Evaluation Reports (2013) and Simon and Stahl, "Analysis in Child Custody Reports: A Crucial Component" (2014).

The following section of the APA's "Guidelines for Child Custody Evaluations in Divorce Proceedings" introduce the principal concern and primary responsibility of child custody evaluations:

Psychologists do have an ethical requirement to base their opinions on information and techniques sufficient to substantiate their findings (Ethics Code, Standard 9.01(a)) and may wish to emphasize this point for the court's benefit if pressed to provide opinions.

.. If psychologists choose to make child custody recommendations, these are derived from sound psychological data and address the psychological best interests of the child. When making recommendations, psychologists seek to avoid relying upon personal biases or unsupported beliefs. Recommendations are based upon articulated assumptions, interpretations, and inferences that are consistent with established professional and scientific standards. Although the profession has not reached consensus about whether psychologists should make recommendations to the court about the final child custody determination (i.e., "ultimate opinion" testimony), psychologists seek to remain aware of the arguments on both sides of this issue (Bala, 2005; Grisso, 2003; Heilbrun, 2001; Tippins & Wittman, 2005) and are able to articulate the logic of their positions on this issue. Psychologists strive to identify the psychological best interests of the child. To this end, they are encouraged to weigh and incorporate such overlapping factors as family dynamics and interactions; cultural and environmental variables; relevant challenges and aptitudes for all examined parties; and the child's educational, parental, and psychological needs.

Psychologists attempt to provide the court with information specifically germane to its role in apportioning decision making, caretaking, and access. The most useful and influential evaluations focus upon skills, deficits, values, and tendencies relevant to parenting attributes and a child's psychological needs. Comparatively little weight is afforded to evaluations that offer a general personality assessment without attempting to place results in the appropriate context. Useful contextual considerations may include the availability and use of effective treatment, the augmentation of parenting attributes through the efforts of supplemental caregivers, and other factors that could affect the potential impact of a clinical condition upon parenting.

Psychologists are encouraged to monitor their own values, perceptions, and reactions ...and to seek peer consultation in the face of a potential loss of impartiality. Vigilant maintenance of professional boundaries and adherence to standard assessment procedures, throughout the evaluation process, will place psychologists in the best position to identify variations that may signal impaired neutrality.

Article 1 APA Guidelines and Mental Disorders in Child Custody

The guidelines and academic articles emphasize three fundamental points that are relevant to peer review: (1) the scope of the report and the methodology used to address the specific issues mandated in the order (referred to in the report as the "stipulation"), that this has been made clear to the litigants in the form of a "consent for a child custody evaluation" agreement; (2) the evaluator describes in the report the standardized tests being used, the reason for their use and the limitations of their results in the present context and (3) the analysis is clearly informed by the data collected, that the analysis considered each party's concerns and weighed them equally and that the report's conclusions and recommendations are informed by multiple hypotheses. Concerning this last point the evaluator is required to discuss the alternative hypotheses they considered, generated by the academic literature on contested child conflicts and by the litigants themselves and their rationale for upholding one particular hypothesis over another.

Adhering to these three guiding principles described above allows for a scientifically crafted evaluation that allows for "the best interest of the child" standard to be met. Accordingly, an evaluation requires sound psychological data that is typically obtained from

four areas: 1) clinical interviews with the subject parents and the subject child(ren), (2) observations of parent-child interactions, (3) testing and (4) outside sources of information. The latter category typically includes collateral interviews with those individuals whose observations help place the evaluation in context and whose observations can be compared with the evaluator's clinical impression of the litigants, as well as medical, school and court records as appropriate. The evaluator may choose to expand or limit these data sources in accordance with the court order and the scope of the evaluation, as well as the rules of evidence, however, they must explain their methodology, regardless of the sources of data used. Data is to be collected and analyzed in a fair and balanced way, mindful of the threats to the integrity of the report by such factors as confirmatory bias and other forms of bias that undermine the report's findings.

Peer Review

I based this peer review on my analysis of the court's stipulation (after this referred to as "the court order") authorizing the child custody evaluation report, the child custody evaluation itself, extensive interviews with Ms. Riordan, the transcript from the August 2019 hearing and the April 2020 hearing and several emails forwarded to me by Ms. Riordan that documented her children's medical and educational histories and related information largely unaddressed in the report. I was concerned by the following: the discrepancy between the court's order and Dr. Caverly's stated objective in the report, that the clinical interviews were reported without analysis, that the test results were reported without explaining their limits although they appeared to figure critically in the analysis, that information relevant to the children's well-being was omitted from the report, and finally by Dr. Caverly's analysis, which did not consider alternative hypotheses, particularly the limits of "parent alienation" theory and the research undermining its usefulness in child custody evaluations.

The following elaborates on these concerns. First, it addresses the matter of the discrepancy between the court order and the objective of the report stated by Dr. Caverly, then it addresses the nature of the data collected from the litigants, family members and collaterals and the inherent discrepancies in this data which are not analyzed, next it examines the use of the testing data and whether the information obtained addresses the psychological and legal issues of this case and finally it discusses alternative hypotheses based on the information provided in the report and in the additional information noted above.

Court Order: Informed Consent, Evaluator's Role, and Purpose of the Evaluation

Prior to the evaluation the child custody litigants are expected to sign a form indicating they are aware of the purpose and scope of the evaluation, the limits on confidentiality of such an evaluation and the means and responsibility for assuming the cost of the evaluation. The APA ethics code detailing this is provided below:

9.03 Informed Consent in Assessments

(a) Psychologists obtain informed consent for assessments, evaluations, or diagnostic services, as described in Standard 3.10, Informed Consent, except when (1) testing is mandated by law or

governmental regulations; (2) informed consent is implied because testing is conducted as a routine educational, institutional, or organizational activity (e.g., when participants voluntarily agree to assessment when applying for a job); or (3) one purpose of the testing is to evaluate decisional capacity. Informed consent includes an explanation of the nature and purpose of the assessment, fees, involvement of third parties, and limits of confidentiality and sufficient opportunity for the client/patient to ask questions and receive answers.

Information and concerns regarding the manner in which the “informed consent” in this matter was conscripted is described below. The literature on peer reviews emphasizes the importance of the CCE being scientific, meaning its methodology and attendant data collection, findings and analysis is designed to answer the specific inquiry asked by the court order; this goal is expected to be reflected in the consent form. In this instance the order read, with slight edits, as follows:

A psychological evaluation and any other testing as deemed necessary and appropriate. And the order stated that the CCE shall examine all family members and it may include: drug and alcohol evaluation, home visits, record requests, collateral information sources interactions and discussions with the Guardian ad Litum (GAL). Furthermore, the CCE shall answer the following questions:

- What is the quality of the relationship between each of the children and each parent?
- Do the parents provide a consistent and nurturing environment for the children?
- Does either parent present a mental health issue that interferes with h/her ability to effectively parent the children or co-parent?
- Do either parent attempt to undermine the children's relationship with the other parent?
- Does each parent exhibit appropriate empathy for and insight into the children and their physical, educational, psychological and emotional and developmental status and needs? If not identify the issues with specificity.
- Is either parent more likely or less like to foster a positive relationship with and regular access between the children and the other parent?
- Does either party present a physical, psychological or emotional danger to himself, herself or the children?
- Is each party capable of effectively and appropriately parenting the children?
- Is each party capable of co-parenting with the other? If not does either party present any issues which may interfere with his or her ability to effectively make decisions pertaining to the children or work with the other parent in making those decisions?
- Does either party present any significant issues relevant to the determination of an appropriate parenting plan addressing the minor children's physical custody?
- Has either parent made parenting decisions that place the parents' needs over the needs or best interests of the children? If so, explain.
- Does any party or any child require on-going psychological or psychiatric treatment? If so what type of treatment is recommended.
- Are there any characteristics of either parent or the children which have significant impact on the parent-child fit? If so, explain.
- What parenting schedule best meets the developmental needs of the children considering all information including but not limited to: the ages of the children; the education, social and extra-curricular schedules of the children; and the parents' personal and professional schedules.

- Explain any other data that you believe is important in determin[ed] the best interest of the children based upon your professional judgment.

This broad order is consistent with the “best interest of the child” standard as it seeks information on the important factors that impact a child’s life; notably, however, it does not specifically include parent-child observations, yet it emphasizes the parent’s ability to address each child’s “best interest” and the relationship between the children and each parent. Important information is gleaned from these observations yet these observations are limited to the children’s relationship with their parent during testing sessions.

Notably, in her introduction to the CCE Dr. Caverly wrote only that the court was seeking information “on the parents’ individual psychological functioning while in a parenting role with the children,” (p. 2). This is a much more narrow focus than what was ordered by the court. However, Dr. Caverly proceeds to conduct a more traditional CCE, in line with the court order, collecting a wealth of information from multiple sources that might have a bearing on the children’s “best interest,” but uses the sole question of the parents’ mental health as the basis of her analysis. This inconsistency and the implications for the integrity of this report will be discussed further in the “Analysis” section below.

Data Collection

Sources of Data and Method of Evaluation

Dr. Caverly provides more than eleven pages of data collected to inform her report, representing the traditional sources of information used in a CCE, described above. Among these data sources there were two clinical interviews of Ms. Riordan of unknown length, three clinical interviews of Mr. Ambrose of unknown length, more than sixty emails from Mr. Ambrose to Dr. Caverly alone and more than one hundred from Ms. Riordan to Dr. Caverly. Data sources included hundreds of other electronic messages such as recordings and videos. Also, according to the report, there were eight objective tests administered to Ms. Riordan and nine to Mr. Ambrose. Additionally, there were 24 collateral contacts listed, eight of which Dr. Caverly reported could not be reached. The methodology behind the collection and analysis of this data was not discussed. Implications for manner in which data was collected and used will be described below.

Clinical Interviews

Simon and Martindale (2013) delineate rules for conducting interviews and parent-child interactions in CCEs that help preserve the integrity of the report. Specifically they point out the importance of follow-up questions throughout the interview as well as follow-up interviews. In addition to exploring the interviewee’s responses they point out the value of getting information that is relevant to the individual’s developmental history, cultural background, family life, academic interests and work background, as well as a detailed health history among other areas relevant to their analysis. Also, they make clear that there should be detailed information about these interviews in their notes. The authors note that collateral interviews can be used to inform questions appropriate for follow-up interviews with the

litigants and help flesh out the litigants' specific behavior in situations that are relevant to their analysis.

Clinical interview: Christopher Ambrose

Dr. Caverly's description of Mr. Ambrose's clinical interviews consisted of a more than 14 page, single space description of Mr. Ambrose's account of the conflict in which he and Ms. Riordan are currently embroiled. Very little information is known about him from the report as a person; as a father, a son, a brother, an attorney, a television writer or meaningful experiences in his life, his personal goals, his reason for wanting to marry Ms. Riordan, his interest in adoption or various other traits or experiences that put his experience of this current conflict in perspective. Follow-up questions were not reported that would have provided information about Mr. Ambrose's perception on the discord, other than he was being victimized by Ms. Riordan and through her influence, by the children.

Additionally, it is very difficult from Dr. Caverly's account to follow the source of the conflict or who how the couple was attempting to deal with it; rather separate, disjointed accounts are reported, that are out of sequence, that refer to various medical professionals, geographic locations and school systems without the reader knowing the time frame in which they are occurring, the age of the children and the role various professionals play in the life of the family. It is known that the children each presented with either various learning differences, physical disorders such as deafness, and socio-emotional issues; each of which required intervention and might have understandably contribute to significant stress for each of the family members. (It is important to be mindful that, alternatively many parents are particularly adept at raising children with special needs; regardless of the parent's response, it figures into the family dynamics and the post-divorce arrangement.)

Clinical Interview: Karen Riordan

Dr. Caverly's description of her clinical interviews with Ms. Riordan consisted of more than 12 pages, single spaced report. Again, the report did not describe Ms. Riordan in a way that gave a sense of her character, her hopes and aspirations for herself and her family, her love of her work and her extended family. Again, there were not follow-up questions that would have provided insight into Ms. Riordan nor was their follow-up about Mr. Ambrose's reported aggressiveness to her and to the children. Ms. Riordan reported to me that the report, which is difficult for her to discuss as she is struggling emotionally with the separation from her children, was not reflective of what occurred between her Mr. Ambrose and the events leading up to the end of their marriage. Again, the account of these clinical interviews were disjointed, so that the various behavior depicted could not be put in context and were not evaluated for their validity.

Clinical interview: Ambrose Children

The accounts Dr. Caverly gave of her interviews with the children were similarly devoid of context, without giving a description of the children's experience of their family life, their parents' separation, their hopes for the future both individually and as a family. The children's responses will be incorporated in the analysis section

Standardized tests

Flens and Drozd (2005) establish the importance of describing the tests the evaluator is using to collect data about the litigants, the strengths and weaknesses of the instrument(s) and what can be reasonably concluded from the results. Test results risk being a threat to the integrity of the study if the results are not integrated with other data used in the analysis.

The following section of the APA's ethical guidelines (2016) explains the chief concerns of testing:

9.02 Use of Assessments

- (a) Psychologists administer, adapt, score, interpret, or use assessment techniques, interviews, tests, or instruments in a manner and for purposes that are appropriate in light of the research on or evidence of the usefulness and proper application of the techniques.*
- (b) Psychologists use assessment instruments whose validity and reliability have been established for use with members of the population tested. When such validity or reliability has not been established, psychologists describe the strengths and limitations of test results and interpretation.*
- (c) Psychologists use assessment methods that are appropriate to an individual's language preference and competence, unless the use of an alternative language is relevant to the assessment issues.*

9.06 Interpreting Assessment Results

When interpreting assessment results, including automated interpretations, psychologists take into account the purpose of the assessment as well as the various test factors, test-taking abilities, and other characteristics of the person being assessed, such as situational, personal, linguistic, and cultural differences, that might affect psychologists' judgments or reduce the accuracy of their interpretations. They indicate any significant limitations of their interpretations.

The following tests were used in the CCE report to assess the parents:

- Mini-mental state examination (MMSE)
- Paulhus deception scales PDS
- Millon Clinical Multiaxial Inventory: Third edition (MCMI-III)
- Minnesota Multiphasic Personality Inventory-2-Revised Form (MMPI-2-RF)
- Trauma Symptom Inventory, Second Edition TSI-2
- Substance Abuse Subtle Screening Inventory, Fourth Edition
- Child Abuse Potential Inventory (CAPI)
- Parenting Stress Index, Fourth Edition (PSI-4)
- Stress Index of Parents of Adolescents (SIPA)

Ms. Riordan reportedly had an elevated score on the Millon Clinical Multiaxial Inventory: Third edition (MCMI-III) histrionic scale which includes in its description “gregarious behavior, ease of social engagement and social facility, easy display of feelings, extroverted traits, flirtatious behavior and need of excitement.” However, Dr. Caverly reported that this instrument is not normed on custody litigants so that it is particularly important that it be given consideration only if supported by other data. Her scores on other instruments fell in the normal range with the exception of a slight elevation on the Paulhus deception scales; as that scale is more relevant for addicted individuals which Ms. Riordan is not, it will not be discussed further. Also, the Minnesota Multiphasic Personality Inventory-2-Revised Form which evidenced an elevation in interpersonal passivity suggesting possibly, a dependent personality disorder, which will be discussed below.

Mr. Ambrose's scores on each of the scales were within the normal range with the exception of the Millon Clinical Multiaxial Inventory: Third edition (MCMI-III) which indicated Obsessive Compulsive Disorder and the Minnesota Multiphasic Personality Inventory-2-Revised Form which evidenced an elevation in interpersonal passivity suggesting possibly, similar to Ms. Riordan, an elevated passivity score similar to a dependent personality disorder. These results are discussed below.

The results of the Ambrose children's responses are not relevant for the purpose of this review.

Analysis

The analysis will review in order each of the sections of the CCE described above.

The Consent Form:

Ms. Riordan reports that she did not sign a form that reflected the "order" described above or the goal of the CCE stated by Dr. Caverly at the beginning of the report. Furthermore she said Dr. Caverly was not paid jointly as the court denied her access to any of the marital accounts. Ms. Riordan assumes Mr. Ambrose paid Dr. Caverly however she is not aware of the amount she was paid or whether Dr. Caverly continues to be paid. Ms. Riordan's statement on this matter is confirmed by her attorney, Ms. Cunha.

Both parties must consent to having a child custody evaluation as it is necessarily an invasive, long-term and expensive undertaking in which the litigants must put their faith and trust in the expertise of the evaluator. Ms. Riordan stated that she would not necessarily have agreed to the evaluation had she known its principle purpose. Furthermore, asymmetrical payment sets up the condition for bias as Dr. Caverly is dependent on Mr. Ambrose for payment, not on both parents equally. Finally, Ms. Riordan reports and her attorney corroborates that Dr. Caverly made the report available to her one month after she made it to the court, that she was able to view it in her attorney's office once and that Dr. Caverly has not submitted her underlying notes as ordered by the court, that would help explain the inconsistent findings in the report. Finally, as an expert witness Dr. Caverly must remain completely independent from the court proceedings to ensure the objectivity of her testimony. Nonetheless Ms. Riordan and her attorney believe that she has had communication with the GAL since submitting the CCE; Ms. Riordan and her attorney believe Dr. Caverly may have communicated with the GAL and interfered in what was reliably reported to me as a recent child sexual abuse (CSA) investigation by the Hartford Children's Hospital. Dr. Caverly is permitted to speak with the GAL under the court order, but not subsequent to submitting the report; such communication constitutes "dual roles" and is a conflict of interest. Child custody evaluations are highly correlated with abuse including CSA and abuse must be prioritized in determining "best interest," (Drozd, et al 2016)

Data Collection: Sources of Data and Method of Evaluation:

Dr. Caverly did not account for the reason she was unable to contact eight of the 24 collaterals she listed in her collateral contacts as sources of information, however, Ms. Riordan believes that information from those omitted sources would have supported her concern for the children and the need to protect them. This omission suggests a form of

“selection bias” unless there is relevant reason for excluding this information from the report.

Additionally, Dr. Caverly does not explain the purpose of collecting the various sources of data, nor does she describe the content. Data is collected from multiple sources to increase convergent validity and is essential to minimizing bias; the evaluator must make clear how this information is used in the evaluator’s analysis.

Data Collection: *Clinical Interviews:*

Dr. Caverly did not describe the context in which the evaluation took place prior to describing the litigants’ clinical interviews so that the report provides no understanding of the basis of the conflict between the litigants. Similarly, a timeline was not provided of the events that lead to this court action. These factors combined made it difficult to grasp the significance of the information each parent provided and to evaluate the truthfulness of the parents’ responses. Additionally, the clinical interviews do not establish the parent’s perspective, except that Mr. Ambrose feels he is a victim of “alienation” and Ms. Riordan feels isolated and unsupported.

Most importantly, however, Ms. Riordan denies vehemently and it appears with evidence much of what is reported by Mr. Ambrose which, while not of course proof of her veracity, does require Dr. Caverly to consider her side of the story. Even though the responses frequently contradicted one another and many accounts, examples of which are listed below, were not only flatly denied by Ms. Riordan, but Ms. Riordan showed evidence that the exact opposite was true, the report did not follow up with the litigants on these matters that clearly are relevant to the children’s “best interest.” As a result important information supporting each parent’s perspective on the conflict was lacking.

Examples of the disparities between these parent’s accounts include: from page 15 of the report Mr. Ambrose reports that Ms. Riordan showed poor judgment when she left their daughter in the care of a cousin who had raped Ms. Riordan when she was in her twenties; in fact Ms. Riordan’s cousin died before their daughter was born; if this is true this allegation is false. Another example from page 18 of the report: *Mr. Ambrose noted that Dr. Horn had texted him that he had gotten an angry message from Ms. Riordan but that he was not responding. He stated they all stayed in the Aunt’s apartment that night and Miss Riordan asked him to edit a scathing email she had written to the head of special education at the Westport school district. This evaluator confirmed that none of their children were rolled in that district at that point. [sic] Stated that Miss Riordan did not like his edits and that when she went to work on the letter ... his phone was flying through the door and she stormed out of the room telling him to leave or else she would call the police Mr. Ambrose stated that Matthew was present for the exchange; he reported that when he went into the bedroom to get his wallet and keys she smacked me over the head with my own laptop he stated that she screamed out to Matthew mommy didn’t hit Daddy. Ms. Riordan said it was not she who lost her temper; rather she sought to be the peacemaker in this instance and in most instances in their marriages. This example Ms. Reardon said is a real reversal of what occurred as she was in Rhode Island seeking to protect the children from their father who so frequently lost his temper with the children and threw things at the children. Also, Ms. Riordan said that considering all that our daughter went through with the Westport School system she had, overall, showed great patience and restraint and that she showed Dr. Caverly proof of this in the emails she sent the school.*

Also, another example from page 25 of the report: *Mr. Ambrose stated that Ms. Riordan is this way with everyone, so reactive so vengeful, he provided an example of a former teacher that Miss Riordan wanted to be fired and to be unable to get another job in another school district Mr. Ambrose stated that it is bad enough our marriage didn’t work instead of moving on she’s going to destroy me with*

everyone I know. Mr. Ambrose stated that I want alienation to stop; only way to do that is if the kids are with me- he stated that I don't want to trash talk Karen to them but they need to know how I've been portrayed isn't good or fair he stated that I am loath to say I don't want full custody don't know if it's best in the long run but may be right in short term. Ms. Riordan said there is overwhelming proof from emails and collateral contacts how consistently she supported their children's relationship with their father. She said she was, however, increasingly concerned about the way he was physically touching the children, including sleeping with them which she tried to manage in a way that harmed the children as little as possible.

Finally, the report contains an example of how the subject child was holding what the interviewer thought was a recording device in order to report the interview to Ms. Riordan; in fact according to Ms. Riordan the "recording device" is a blue heart that the children gave their mother and which the child was holding during the interview as a source of comfort. The blue heart was shown to the interviewer and its purpose in helping the child feel comfortable had been fully explained to the interviewer, yet it appeared to Ms. Riordan that nonetheless, the interviewer reported it as potentially a "recording device" in order to make her look uncooperative and devious.

Mr. Ambrose's account of the alienation has to be evaluated as to whether or not it is a reversal that abusers adopt as part of their psychological defense system, (Lynch, 2015). Lynch points out that reversal occurs because individuals who cannot regulate their negative feelings "project" them onto others, so they accuse others of what in fact they are doing. It should be understood that alienation is part of an abusive dynamic; what needs to be established is who is doing the alienating.

Lubit (2019b) points out as well, that alienation can only be proven if competing hypothesis for the children's rejection can be disproven. These alternative hypotheses might be rejection of one parent on the basis of "justified rejection," "estrangement" or affinity. The first two causes stem from the rejected parent's problematic behavior, including abuse and "affinity" refers to preferring one parent over another. Ms. Riordan's behavior has not met the definition of "alienation" and the children's increasingly problematic relationship with their father is clearly the result of his behavior.

Data Collection: Testing: Ellis (2012) argued that test results have little reliability in custody evaluations; additionally Emery, Otto, and O'Donohue (2005) noted their inappropriateness for custody evaluations. This criticism is based on the literature showing their misuse in child custody evaluations and that results are frequently confounded with the parents' significant stress. The use of tests to assist in addressing the question the CCE is analyzing has to be shown; generally this information can be obtained through other, more reliable sources of data. Tests generally are not used to form the basis of a clinical opinion unless corroborated by other sources. The findings of the tests administered for this CCE are not fully explained; the specific scale items are not described allowing the respondent's to clarify their responses and the results are not corroborated by other data in the report, nor, in Ms. Riordan's case, are they supported by my own clinical impression.

Dr. Caverly concludes that Ms. Riordan has a personality disorder, is incapable of co-parenting the children with Mr. Ambrose and is in fact, alienating the children from their father to the point where the children do not want to be with him. She then recommends that the children be separated from their mother altogether until a reunification therapist can reduce the negative comments and foster a positive relationship between Ms. Riordan and Mr. Ambrose. She states that she bases her conclusions on objective tests and it appears on the reports of collateral interviews.

There is no basis for Dr. Riordan's conclusions that Ms. Riordan has a personality disorder or is alienating the children. During the course of preparing this review I had twenty hours of conversations with Ms. Riordan and a two and one half hour zoom meeting. I have been impressed with her steadfast determination to protect her children, to appreciate the context under which this crisis unfolding and to take intelligent steps to correct what the court has done. Ms. Riordan suffers from ADD which she readily admits but maturely recognizes and adjusts her behavior accordingly. What is essentially termination of parental rights, an extraordinary step, especially when it involves terminating the children's relationship with their primary attachment figure, which the CCE establishes Ms. Riordan is, may be putting the children in harm's way. (While Ms. Riordan acknowledges she was offered supervised visitation last April, she refused on the basis that it would be a bad example for her children.) This de facto termination of rights is done, however, with increasing frequency in the courts (Meier, 2017) when there are charges of "parental alienation." This phenomenon has triggered a national outcry such that several states are enacting laws preventing "parent alienation" as a defense, in child custody conflicts as a child should never be removed from their parent unless they are in danger from that parent. Ironically the "alienation" defense has been highly correlated with abusive fathers Meier demonstrates and represents the reversals caused by the projection which is the root cause of much abuse. Furthermore, consistent with this reversed reality abusers characteristically think of themselves as victims. These concerns are enhanced by information not provided in the report analyzing Mr. Ambrose's relationship with the children. There are accounts that need to be investigated that the relationship with his children was potentially harmful to them, that the children are uncomfortable with him and that these fears have worsened considerably since they have been with their father exclusively. In the interest of protecting the children Ms. Riordan and her attorney have informed me of their concerns; they report that the court and the authorities who are apparently in communication with one another, are treating these concerns under the umbrella of "alienation."

Leading researchers in the field of attachment describe the impact of separation from one's primary attachment figure in the following:

Preventing children from being with their primary attachment figure for a significant part of the week is likely to do significant harm. Following divorce, children's anxiety, and attachment issues are inversely proportional to the amount of warm parenting time the children receive (Huff, 2015).

Van der Kolk (2014) notes that attachment is "the secure base from which a child moves out into the world... having a safe haven promotes self-reliance and develop the self-awareness, empathy, impulse control and self-motivation" (p. 111). The adult world, court system, child guardians, and custody evaluators are supposed to protect children from mistreatment. Removing children from their primary attachment figure to be with a parent, with whom they are uncomfortable, causes betrayal trauma and serious long-term psychological damage (Kleinman & Kaplan, 2016; Lubit, 2019a).

Child maltreatment can adversely affects a child's developing brain (Anda et al., 2006; Teicher, Andersen, Polcari, Anderson, & Navalta, 2002; Van der Kolk, 2014). The marked negative impact of maltreatment on children has been solidly established. PA/PAS advocates argue that PA has serious negative impacts on children but have not produced scientific studies showing it is as harmful as harsh or abusive parenting, or even as harmful as taking a child from her primary attachment figure.

To conclude Dr. Cavalery's analysis did not investigate the litigant's contradictory account of the conflict that lead to their separation, drew conclusions unsupported by the data presented in the report or available in other court data, misused psychological tests to diagnose Ms. Riordan as mentally ill when there is no information to support this diagnosis,

including from the tests themselves, and when it against best practice in CCEs to diagnose in the course of a CCE, (AFCC, 2006) failed to report or overlooked data that was critical to the subject children's best interest and safety, and did not consider alternative hypotheses for the information that she provided. As a result many questions about the subject parents and their three children relevant to the children's best interest were not considered which is especially important given that the children have deprived of their primary attachment figure for the last eight months and are possibly at grave risk given what researchers know is at the root of accusations of alienation.

Respectfully Submitted,

Robin M. Lynch, PhD

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