

D.N. FBT-FA-19-6088163-S	)	SUPERIOR COURT
CHRISTOPHER AMBROSE	)	J.D. OF FAIRFIELD
v.	)	AT BRIDGEPORT
KAREN AMBROSE	)	NOVEMBER 4, 2021

**MOTION FOR CONTEMPT RE: VIOLATION OF COURT ORDERS, PENDENTE LITE**

The Plaintiff respectfully represents the following:

1. On July 19, 2019, the Plaintiff brought an action by way of Summons and Complaint for a dissolution of marriage;
2. There are three (3) minor children from the marriage, namely, Mia Matthew and Sawyer Ambrose.
3. On October 19, 2021, during the dissolution trial, the Plaintiff filed a motion for contempt re: violation of court orders pendent lite (#374). The motion included allegations that the Defendant was continuously, deliberately violating the children's privacy by among other things providing their psychological/medical records, their texts and writings to at least three different social media sites, and that she had caused distress to the mental health

professionals and others working with the children by directly intimidating them as well as by using third parties and social media sites to do so.

4. On October 20, 2021, this Court granted clear and unambiguous Temporary Orders (#377) which provide, among other things, "the Defendant shall not violate the privacy of the minor children by sharing with any third party through any means, any information about the children, including but not limited to, their mental/emotional/physical health... as well as their interactions with their father-the Plaintiff, without first obtaining written permission and consent from the GAL." The orders go on to state, "The prohibition above shall apply specifically to any member of the professional media, social media, including but not limited to bloggers nor shall she allow any third party to do the same."
5. The Temporary Orders also provide that the Defendant is not to threaten, harass or intimidate, in any manner or by any means, any professionals working with the children including but not limited to their therapists, the GAL and the custody evaluator, and she is not to attempt to accomplish the same through any third party or social media.
6. On October 21, 2021, the Plaintiff duly served the Defendant, as ordered by the Court, the notice of the Temporary Orders (#378).
7. Contrary to and in direct violation of the Court's recent orders, the Defendant willfully and in bad faith continued and is continuing to provide at least three different social media sites with information regarding the children, including photographs of and writings and texts about or allegedly produced by them. This information has been published on October 21, 22, 23, 24,

27 and 30 (in the case of [familycourtcircus.com](http://familycourtcircus.com)), on October 24 and 30 (in the case of the [frankreport.com](http://frankreport.com)) and on October 22 (Dolcefino Consulting at YouTube). The Defendant is the only person who had those photographs of the children, and would have been able to provide all of these particular private photographs, communications and information regarding the children.

8. On October 24 and October 30, both [familycourtcircus.com](http://familycourtcircus.com) and [frankreport.com](http://frankreport.com) also published photographs of and a narrative that accuses various professionals involved in the case of crimes against the children, including conspiracy, child abuse, federal racketeering and pedophilia. This narrative contains certain information only the Defendant could provide, and the allegations track those she or her counsel have made against these individuals over many months in court and/or to various police departments, DCF and in published interviews.
9. Throughout this dissolution trial as well as in prior court proceedings over the past two years, the Defendant has been in willful contempt of nearly every order any court has issued against her. This court has attempted to stop her persistent misconduct by imposing sanctions, including appropriate evidentiary limitations and monetary fines. The Defendant has willfully and in bad faith disregarded every single one of these measures and continues to aggressively, deliberately and publicly ignore the clearly stated, unambiguous orders of this court. The Defendant's history of disobedience in this case impedes and impairs the Plaintiff's rights, and subjects the children and the professionals treating them to significant

harm; wherefore, the Plaintiff respectfully requests that serious sanctions be employed in an effort to stop the Defendant's current egregious violation of the court's orders.

10. The Defendant's current contempt of court orders violates the children's privacy, and is most concerning because it inflicts damage directly on them. The Defendant is not only sharing information for publication that is not appropriate for them to see about themselves, but the publication subjects them to intense scrutiny by the general public, including their peers, which can lead to ridicule, humiliation and embarrassment. The Defendant's publication of information about the children has created an indelible digital footprint.

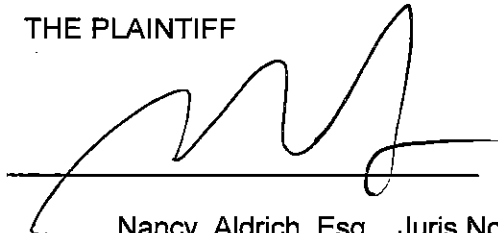
11. The Defendant's willful contempt for the orders regarding the professionals in the case is similarly damaging. Over time, the Defendant has attempted to have most of the professionals working with the children removed from their roles. When that failed, the Defendant attempted to intimidate many of these individuals directly or by using third parties. Now the Defendant has resorted to using social media to publish extremely incendiary, unsubstantiated allegations, including pedophilia and child trafficking, which could reasonably have the effect of inciting acts of violence against those accused of such morally reprehensible crimes. In fact, on October 22, one of the sites on line ([familycourtcircus.com](http://familycourtcircus.com)) indicates that readers are driving past the Plaintiff's home and the children's schools.

WHEREFORE, the Plaintiff respectfully requests that the court make the following orders:

1. That the Defendant be found in willful contempt of the current court order,
2. That a civil capias warrant be issued for the Defendant's immediate arrest for contempt and a violation of the Court's order, and failing to appear at trial, and an order that she be brought to court at the next hearing date,
3. That the court set a new trial date, and continue the dissolution trial with or without the Defendant in the event she fails to appear,
4. That the Defendant pay all reasonable costs in connection with the preparation and prosecution of this motion, including attorney's fees and the plaintiff's portion of the GAL's fees and costs; and
5. That the Court make such further orders as it deems fair and equitable.

THE PLAINTIFF

BY: \_\_\_\_\_



Nancy Aldrich, Esq. Juris No.409128

Aldrich & Aldrich

152 King's Highway North

Westport, CT 06880

**ORDER**

The foregoing motion having been duly presented and heard, it is hereby ORDERED:  
GRANTED/DENIED;

And it is further ORDERED:

BY THE COURT

Judge/Clerk

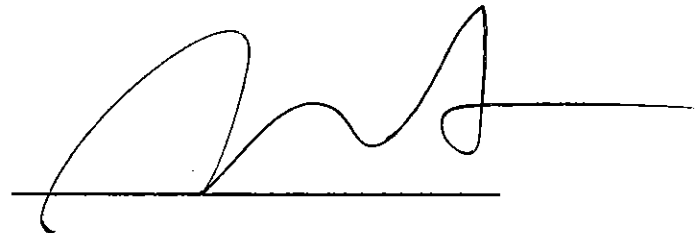
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**CERTIFICATION**

I hereby certify that a copy of the foregoing was sent this date, via email, to all counsel of record as follows:

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A handwritten signature in black ink, appearing to read 'Nancy Aldrich', is written over a horizontal line. The signature is stylized and cursive.

Nancy Aldrich

Commissioner of Superior Court