

D.N.: FBT-FA-19-6088163-S) SUPERIOR COURT

CHRISTOPHER AMBROSE) J.D. OF FAIRFIELD

v.) AT BRIDGEPORT

KAREN AMBROSE) January 20, 2022

Plaintiff's Memorandum in Support of Motion Opposing the Unsealing the Entire DCF Record

The Plaintiff, Christopher Ambrose, is grateful for the court's December 10, 2021 decision which unambiguously states that after an extensive investigation, DCF concluded that all abuse allegations repeatedly made against him by Nickola Cunha and Karen Riordan were not substantiated, and that Cunha's persistent assertions to the contrary, despite numerous cautions from the court, on December 1 were lies made to deliberately deceive.

It would be personally gratifying for the Plaintiff to have the entire DCF record publicly accessible so anyone interested could see how: vicious and relentless Cunha and Riordan were in making these false allegations that were intended to send the Plaintiff to prison for years; how disruptive and intrusive the allegations were to the children's lives and how harmful to their emotional well being; and how incredibly thorough the many, many professionals from different DCF offices, different police departments and different medical facilities were in doing their work.

Most importantly, as the Dec. 12 decision states, the DCF records would show the public that all of these professionals determined that every single one of Cunha's and Riordan's accusations were unsubstantiated. Every. Single. One. The public would also see that DCF concludes, as three different DCF officers testified to in court, that it is in the children's best interest for them to remain in their father's custody. In short, the Plaintiff would derive considerable benefits from opening the DCF records to the public.

However, the Plaintiff is very concerned about the history of twisting or completely ignoring the truth that has been exhibited over time by Cunha and Riordan as well as by the many nefarious "supporters" on social media who publicly echo and amplify their every misrepresentation. These bloggers include but are not limited to *Family Court Circus*, *The Frank Report* and *Dolcefino Videos*.

As the court is aware, for over a year this cadre of bloggers has been manipulating facts and distorting the truth to fit the specious narrative spun by Cunha and Riordan in a diabolical public campaign to destroy the reputations of the participants in this case, including each of the judges, the Guardian ad Litem, the various therapists, the many DCF and police officers, the Plaintiff's

counsel and the Plaintiff. Some of these bloggers even aggressively incite readers to use violence against those named, and have facilitated such action by publishing the Plaintiff's phone number, address and photos of the home where he lives with the children.

In contempt of direct court orders, Cunha and Riordan have collaborated with some, if not all, of these individuals. The most confidential information about the children, including their psychological records, the sealed custody evaluation and photos from private family albums, has been provided to and published by the bloggers. The bloggers also have a well-documented pattern of cherry-picking facts and publishing them devoid of context to create wholly untrue, defamatory versions of reality, all of which precisely echo Cunha's and Riordan's own narrative in the courtroom.

Like most children their age, Mia, Matthew and Sawyer, now 14, 14 and 11, are acutely aware of social media. Despite rigorous parental oversight, they have received anonymous communications alerting them to these hateful websites. The children's peers - both life-long friends in Westport and very new friends in Madison - as well as others in the community have also seen the incredibly disturbing abuse claims and private information. As a result, the Ambrose children have been subjected to intense scrutiny, hurtful comments and mean-spirited teasing. They have been embarrassed, humiliated and mortified by every one of these blogs, which are published with great frequency by individuals closely associated with Cunha and Riordan's false malignant allegations.

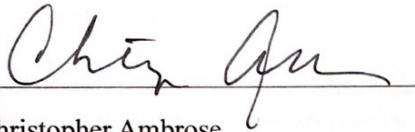
Adolescence is difficult under the best circumstances, divorce only makes it harder; the one-sided public campaign actively being waged by these blogs associated with Cunha and Riordan is nothing short of cruel. What's perhaps most painful for Mia, Matthew and Sawyer is that the private information and the savage false allegations causing their upset are being provided to these blogs and thus to the world by someone very close to them, someone they should be able to trust, someone who should be putting their interests above all else.

As stated, opening the entire DCF report to the public would further exonerate the Plaintiff of the brutal, life-altering accusations made by Cunha and Riordan. However, if the records are open it is certain that the bloggers will seize on and twist any facts or incidents to create new, salacious social media posts. This will expose the children to even more hurt and emotional trauma. The Plaintiff firmly believes that their privacy and emotional well-being over-ride any interest the public may have in accessing the false allegations made by Cunha and Riordan, the details of the subsequent investigations and any other information in the DCF records.

So, with the best interests of the children his singular concern, the Plaintiff respectfully asks that the DCF record remain sealed, except for references to specific information the court may believe, in its sole discretion, are required to express its decision. Any authorities, including health professionals, therapists and law enforcement, who need access to the sealed DCF report are able to do so through appropriate channels. If necessary, the Plaintiff will consent to any such review.

The Plaintiff is confident that the Court's representation of the contents of the DCF record will more than satisfy any reasonable public interest in the document. He is also confident - and deeply appreciative - that the Court will continue to display sensitivity to - and focus on what is best for - the children.

Signed this 20th day of January, 2022

A handwritten signature in black ink, appearing to read "Chris Ambrose", written over a horizontal line.

Christopher Ambrose