

**APPLICATION FOR EMERGENCY
EX PARTE ORDER OF CUSTODY**JD-FM-222 Rev. 12-21
C.G.S. § 46b-56f, P.A. 21-15**This form is available
in other language(s).**For information on ADA
accommodations,
contact a court clerk or go to:
www.jud.ct.gov/ADA.STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov**Instructions**

1. Complete this form, including the affidavit on page 2.
2. Attach an Affidavit Concerning Children, form JD-FM-164.
3. If there is not yet a court case, or post-judgment motion to modify custody, you must file it with this application (e.g., the divorce, legal separation, annulment, custody action, or post-judgment motion to modify custody must be filed with this application).
4. Bring the original and a copy of this form to the court clerk's office.
5. After your application is processed, the clerk will give you the proper papers to have served on the respondent.
6. Make sure the originals are returned to court after service.

Court Use Only

EXPCUS



Judicial District of Fairfield	At (Town) Bridgeport	Return date (if applicable)	Docket number FBT-FA19-6088163-S
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Name of case (Plaintiff v. Defendant)

Ambrose, Christopher v. Ambrose, Karen1. I, (Name and address) **Christopher Ambrose, 381 Horsepond Rd. Madison, CT 06443**,am the Applicant for this emergency ex parte order of custody, and I am the ☒ Parent ☐ Legal Guardian of the following child or children for whom I am seeking this order (attach additional sheets if necessary):

Child's Name (First, Middle Initial, Last)	Date of birth (Month, day, year)
Mia C. Ambrose	1.28.2007
Matthew C. Ambrose	2.20.2007
Sawyer E. Ambrose	7.6.2010

2. The Respondent (Name and address) **Karen Riordan c/o 700 Manchester Rd., Glastonbury, CT**is the ☒ Parent ☐ Legal Guardian of the child or children named above.

3. I am filing or there is already a pending matter in which I am a party for:

- ☐ divorce (dissolution of marriage). ☐ legal separation.
☐ annulment. ☐ custody of the child or children named above.
☒ post-judgment modification of custody.

4. I believe there is an immediate and present risk of physical danger or psychological harm to the child or children listed above as further explained in the attached affidavit.

I ask the Court to enter the following ex parte orders:

- ☐ Temporary legal and physical custody to _____
☐ Visitation as follows: _____
☐ No visitation.
☐ Respondent may not remove the child or children from the State of Connecticut.
☐ Respondent may not interfere with Applicant's custody of the child or children.
☐ Respondent may not interfere with the educational program of the child or children.
☒ Other (specify):

Orders prohibiting the defendant, Karen Riordan a/k/a Ambrose, from:

- publishing/publicizing in any manner, on any forum or medium, any information about the minor children or any information which will reasonably negatively impact them, including but not limited to making accusations against the plaintiff, or engaging any associate, including but not limited to Paul Boyne and Frank Parlato, Jr., to do so; and
- coming within one mile of plaintiff's home and the children's schools, or engaging any associate to do so.

Signed (Attorney or self-represented party)

Printed name of person signing

Date signed

Address (Number, street, town or city, state, zip code)

Telephone number

381 Horsepond Rd. , Madison, CT 06443**(203) 505 - 1889**

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Affidavit

I, (Name) Christoipher Ambrose, am the Applicant in this matter and swear to the following
(explain the events that have occurred, when they occurred, and why you believe that there is an immediate and present risk of physical danger or psychological harm to the child or children):

1. An emergency ex parte order is required because (attach additional sheets if necessary):

Please see atached pages.

2. An emergency ex parte order is in the best interests of the child or children because there is an immediate and present risk of physical danger or psychological harm to the child or children named in this application.

3. (Select one) I ☒ have ☐ have not been a party or a witness or participated in any other capacity in cases in Connecticut or in any other state concerning custody or any child listed in this application. If you have, identify the name of any court(s), the court case number(s) and the date(s) of any order(s):

Judicial District of New Haven heard at RFTD at Middletown; NNH-FA-20-5049348-S; April 26, 2022.

4. (Select one)

☐ I have or another person has taken the following actions to inform the respondent of this application (if it was another person, state who it is):

☒ No actions have been taken to inform the respondent of this application, but the court should consider this application on an ex parte basis for the following reasons:

The respondent has a history of misrepresenting facts to the court, especially via ex parte communications. This practice has prevented the Applicant from being able to successfully protect the children.

I certify that the statements above are true to the best of my knowledge and belief

Signed (Affiant)

Subscribed and sworn to before me (Assistant Clerk, Commissioner of Superior Court, Notary Public)

My Commission Expires March 31, 2023

Print name of person signing

Christopher Ambrose

Date signed

10-7-22

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Order (To be completed by the court)

☐ The Court has reviewed this application and finds that an immediate and present risk of physical danger or psychological harm to the child or children exists, and in the best interests of the child or children the Court enters the below ex parte order and orders that a hearing be held no later than 14 days from the date of this order.

☐ Temporary legal and physical custody to _____

☐ Visitation as follows: _____

☐ No visitation.

☐ Respondent may not remove the child or children named in the application from the State of Connecticut.

☐ Respondent may not interfere with Applicant's custody of the child or children named in the application.

☐ Respondent may not interfere with the educational program of the child or children named in the application.

☐ Other: _____

☒ This application for ex parte orders is denied. A hearing shall be ordered on the application, pursuant to General Statutes § 46b-56f (c).

By the Court (Judge)

None J

Date ordered

10-17-22

Order for Notice and Summons (To be completed by clerk)

The court orders that a hearing on this Application be held on (date) _____ at (time) _____.

This hearing will be held ☐ in person at:

Superior Court, Judicial District of:	Room number (if known)	Phone number (Area code first)
Court location (Number, street and town)		

☐ remotely (online by video). You are ordered to:

- File an Appearance form with a current, valid e-mail address at least 5 days before this hearing, unless you have already done so;
- Attend this hearing by following the instructions that are sent to your e-mail address by the court; and
- Contact the court clerk's office before the scheduled time of this hearing if you are unable to follow the instructions.

You must contact the court clerk's office at least 5 days before this hearing if you do not have or cannot get an e-mail address, or if you do not have access to an electronic device that you can use to participate in this remote hearing.

The court further orders the Applicant to give the Respondent notice of this Application, the Affidavit, any ex parte order, and this order, by having a true and attested copy served on the Respondent by any proper officer at least 5 days before the date of the hearing. Proof of service must be made to this Court.

To any proper officer: By the Authority of the State of Connecticut, you must serve a true and attested copy of the Application, Affidavit, Ex Parte Order (if any), and this order on the person named below in one of the ways required by law at least 5 days before the date of the hearing, and file proof of service with this Court.

Person to be served

Karen Riordan a/k/a Ambrose

Address

c/o 799 Manchester Rd. Glastonbury, CT

By the Court

Assistant Clerk

Date signed

AFFIDAVIT WITH APPLICATION FOR EMERGENCY EX PARTE ORDER OF CUSTODY

Since well before the court issued the divorce decree on April 26, 2022, the defendant has maliciously and continuously interfered with the plaintiff's custody of the children by publishing the most confidential information about them on multiple Internet sites, including their psychological, DCF, and hospital records. This unconscionable betrayal of maternal trust has brought them great emotional pain and led to ridicule by their peers, causing further humiliation. The daughter has begged the defendant - her mother - in writing to stop publishing these insidious posts. The defendant never responded; she continued publishing more aggressive articles, which recently resulted in a physical altercation between one of the children and taunting peers. In addition, the defendant's online reports have incited published threats of violence against the plaintiff and demands that the children must be "rescued." The defendant also has a long history of other alarming behavior, which includes abducting the children in December 2020, sending three "associates" on different occasions to the plaintiff's home demanding to see the children, and stalking the plaintiff and the children by secreting a GPS under his car. The police were formally involved in all of these events. The divorce court sanctioned the defendant for intimidating/threatening multiple witnesses. More troubling still, the defendant's small "team" consists of individuals with felony criminal records for violence and fraud; others are under investigation by the FBI and state police. In short, the defendant is relentlessly harassing the children and poses an ever-escalating threat to their emotional and physical well-being.

For these reasons, the plaintiff respectfully requests that the court take immediate action to protect the children from the profound psychological distress and potential physical danger the defendant is causing them with her rancorous conduct and associations to prevent her from doing even more harm.

Brief Procedural History:

1. On August 15, 2022, the plaintiff filed a Motion for Order (#545.000; attached as EXHIBIT A) because the defendant was causing the children great upset by publishing on multiple Internet sites their most confidential information, including psychiatric, DCF, and hospital records. On the same websites, the defendant also falsely alleged that the plaintiff was sexually and emotionally abusing the children, charges which had long ago been investigated and determined to be baseless. The plaintiff has informed the defendant many times that the two older children read her articles, as do their classmates, who ridicule and brutally humiliate them. In addition, the pieces have incited readers to seek vigilante justice against the plaintiff and to "rescue" the children, which pose additional distress and potential danger.

2. All of this was explained in detail in the August 15 Motion, which requested the court to take urgent action; unfortunately, the court declined to rule and assigned a Resolution Plan Date for September 20, more than a month in the future.
3. On September 20, the plaintiff attended the Resolution hearing, where he learned that the defendant - in an *ex parte* communication with the court - claimed she had not been notified of the Motion. This claim was false, as the plaintiff later demonstrated, but nothing could be resolved on September 20 because the defendant didn't show up.
4. The next day, September 21, the plaintiff filed a Case Flow Request (#562.00), reciting incidents that occurred since the August 15 Motion was filed and further interfered with the plaintiff's custody and upset the children. He requested that the court hear the Motion as soon as possible. (The Case Flow Request and the proof of service referenced immediately above are attached hereto as EXHIBIT B). The Memorandum of Resolution Screening, prepared by Family Relations personnel, echoes the need for the court to act with all due haste.
5. Again, despite the stated urgency, the court took no action. After two weeks of silence, the plaintiff called the clerk. The next day, the court scheduled a hearing for January 31, 2023, nearly four months later. The court did not explain the lengthy delay of an urgent matter involving the children's emotional and physical safety.
6. Without immediate accountability, the defendant has become increasingly aggressive, as will be detailed below. But first, to provide a complete picture of why her behavior is so concerning, additional context is necessary:
 - A. In December 2020, the defendant filed an affidavit in which she falsely claimed that the plaintiff was sexually abusing two of the children. Based on this false information, a judge granted her a TRO. Within 24 hours, the same judge was made aware of the defendant's fraudulent statements, vacated the TRO, and ordered custody immediately restored to the plaintiff. But the defendant, who had removed the children from school, had fled with them. She did not answer repeated calls from the plaintiff, the judge, or the police. She took the children to a hotel, where she left them alone with a man with a violent criminal record. The police eventually located the defendant and the children by pinging her phone. The defendant still refused to return the children, resulting in an hours-long stand-off with the police and another order from another judge. The children were aware of these circumstances.
 - B. In the summer of 2021, on different occasions, the defendant directed three adult males, unknown to the plaintiff, to enter his property and demand to see the children. The children were home and aware of these upsetting incidents, and the police were involved.
 - C. During the summer and fall of 2021, the defendant and her associates threatened/intimidated the plaintiff and multiple witnesses, including the custody evaluator,

guardian ad litem, children's therapists, and an attorney the defendant had engaged to represent the children. The divorce court sanctioned the defendant.

- D. These extremely concerning episodes - as well as others - led the divorce court (Adelman, G.) to issue temporary orders (#377.00) in October 2021 prohibiting the defendant from: going within a mile of the plaintiff's home and the children's schools or directing others to do so; sharing or causing others to share in any way any information about the minor children; and intimidating/threatening/harassing any professionals working with the children. These *ex parte temporary* orders ended with the final divorce decree on April 26.
- E. Because of the defendant's disturbing and unlawful behavior, the court awarded the plaintiff permanent sole physical and legal custody. The court also recommended that the defendant undergo a psychiatric evaluation with a court-approved professional within 60 days, "followed by a therapeutic course of treatment with the goal of minimizing or eliminating the defendant's negative behaviors that have had a negative impact on the minor children and their relationship with the plaintiff. Said therapy is to be more challenging than therapeutic in nature." (Memorandum of Decision at p. 37; #520.10). The defendant has not scheduled a psychiatric evaluation or therapy to date.

RECENT INCIDENTS:

1. Instead of heeding this severe rebuke and moderating her behavior, the defendant continues her vindictive aggression, which victimizes the children and causes them pain and subjects them to harm. She continues to publish her hurtful articles online, primarily in *The Frank Report*. (This is a tabloid-style blog run by Frank Parlato, Jr., with whom the defendant lives. He has a violent arrest record for battery, false imprisonment, and witness tampering; he recently forfeited \$1,000,000 and paid over \$250,000 in fines as part of a federal fraud case; his sentencing is on December 7). These articles are a constant source of distress and pose difficulties for the children.
2. **On September 18**, peers brutally taunted one of the children about information in the articles. A physical altercation ensued and was filmed and circulated among the entire school population. This resulted in significant humiliation for the child, made all the worse because mom caused it.
3. **On September 28**, the defendant appeared - uninvited and unannounced - at one of the children's high school volleyball games. The defendant hadn't seen the child in over a year but approached her without warning. Immediately after, the child alerted her father (the plaintiff, who was not present) in tears asking how the defendant knew she was on the team.
4. **On October 1**, the defendant sent the plaintiff an email informing him that she knew the youngest child had a soccer game that afternoon. The defendant has engaged in such stalking before; as explained in the August 15 Motion, the defendant seems to take perverse delight in letting the plaintiff know she (or someone reporting to her) is watching the plaintiff's residence and monitoring the family's movements. The Madison Police are aware of these situations and are actively investigating. They have determined that a GPS device discovered under the plaintiff's car traces back to one of the two private

investigators (another man with a violent criminal record) the defendant hired to follow him. Given her associations and long history of abduction, intimidation/threatening, and stalking, the defendant's relentless monitoring of the children's activities is highly alarming.

5. **On October 10**, the defendant published another online article attacking the plaintiff with toxic, false allegations intended to destroy his relationship with the children. The link to this article is here: <https://frankreport.com/2022/10/10/three-women-comment-on-worst-abuses-in-ct-family-court/>.
6. **On October 11**, in response to the article, the following comments were published, "Yeah – they [plaintiff and other custodial fathers] need to be hurt like they are hurting their kids. Bet a brick through the window would make them reconsider." Another comment reads, "I think these guys need to be stopped whatever the cost. I live in CT and I bet I can make their lives miserable enough for those children to be saved." A third comment, "Bricks through their windows should get their attention – just like it did a long time ago. If we have to let's find these kids ourselves and bring them justice by keeping them from these abusive parents." The link to these comments is here - scroll down to the "Comments" section after the article: <https://frankreport.com/2022/10/10/three-women-comment-on-worst-abuses-in-ct-family-court/>. The children have read these threats and know that the defendant has previously sent unknown adult males to the house. The defendant seems incapable of putting their best interests ahead of her desperate need for revenge against the plaintiff.

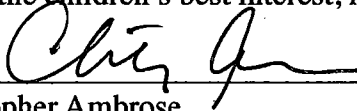
In anticipation of a hearing, the plaintiff respectfully reminds the court that the defendant has a long record of deliberately destroying evidence and frequently lying - in affidavits and testimony. The divorce court sanctioned her for these offenses several times. The defendant committed fraud and perjury most recently at a hearing on August 22 when she filed an affidavit filled with material omissions and lied many times during her testimony. During the August 22 hearing, the plaintiff also learned that the defendant had had many *ex- parte* communications with the court. As a result, on August 31, he filed a Motion for Reconsideration (#549.00), which detailed these egregious violations. The court (Truglia, A.) denied the Motion without explanation and took no action regarding the fraudulent affidavit, multiple instances of perjury, or *ex parte* communication. Unsurprisingly, this indulgence of misconduct and absence of accountability has only emboldened her to the point where she seems likely to take even more aggressive action, as evidenced by her concerning activities in recent weeks.

For these reasons, the plaintiff respectfully moves the court for an order prohibiting the defendant from:

1. publishing/publicizing in any manner, on any forum or medium, any information about the children or any information which will reasonably negatively impact them, including but not limited to making accusations against the plaintiff, or engaging any associate, including but not limited to Paul Boyne and Frank Parlato, Jr., to do so;
2. coming within one mile of his home, the children's schools, or contacting the children in person or via any means, or engaging any associate to do so; and

3. harassing, intimidating, threatening or publicly disparaging on any platform any professional supporting the children, including but not limited to their therapists and the guardian ad litem, or engaging any associate to do so.

When the plaintiff filed for divorce in July 2019, he requested shared custody. He firmly believes - and so testified many times - that it is in the children's best interest to have a healthy relationship with both parents. With the support of the guardian ad litem, he repeatedly tried to co-parent, but the defendant's relentless misconduct made that impossible. So, after testimony from numerous DCF investigators, social workers, the lead police detective, custody evaluator, and guardian ad litem (as well as the defendant's own therapist), the divorce court agreed with that assessment and awarded sole custody to the plaintiff. While this was the only reasonable decision, the plaintiff feels it's a tragedy for the children. He hopes the defendant will seek the help she desperately needs, which the court has recommended. However, until she is stable and acts in the children's best interest, he must protect them.



Christopher Ambrose
October

EXHIBIT A

FBT-FA-19-6088163-S)	SUPERIOR COURT
CHRISTOPHER AMBROSE)	J.D. OF NEW HAVEN
v.)	AT MIDDLETOWN
KAREN AMBROSE)	AUGUST 12, 2022

MOTION TO PROTECT CHILDREN FROM EMOTIONAL DISTRESS CAUSED BY INVASION OF PRIVACY

The Plaintiff respectfully represents the following:

1. On July 19, 2019, by way of Summons and Complaint, the plaintiff brought an action for dissolution of marriage, from which there are three minor children.
2. On October 19, 2021, the plaintiff filed a motion for contempt re: violation of court orders pendente lite (#374). The motion included, among other allegations, that the defendant was using multiple websites to violate the children's privacy by publishing: narratives about them, including falsehoods such as they were sexually and emotionally abused by the plaintiff; texts and correspondence that they had purportedly written and/or were written about them; their confidential psychological and medical records; DCF and hospital reports about them; private photos and audio and video recordings of them (collectively, the "Private Information"). The defendant was also publishing incendiary, even criminal accusations against the Guardian ad Litem, the children's therapists and others.
3. On October 20, 2021, this court issued clear and unambiguous Temporary Orders (#377) which provided, 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 also provided that the defendant is "not to threaten, harass or intimidate, in any manner or by any means, any professionals working with the children" and she is "not

to attempt to accomplish the same through any third party or social media.” The Temporary Orders also directed the defendant not to come within one mile of the plaintiff’s residence or the children’s schools and not to hire, direct or request any third party to do so. This prohibition was made because - in separate incidents - three adult males, who were directed by the defendant but unknown to the plaintiff, had entered his property demanding to see the children.

4. On October 21, 2021, the plaintiff duly served the defendant notice of the Temporary Orders (#378).

5. Within days of being served, and continuing throughout the remainder of the trial, the defendant showed her willful contempt for this court and her disregard for the children’s best interests by continuing to publish the Private Information and in so doing violating their privacy. She also continued to falsely accuse the GAL, therapists and others of misconduct in an apparent effort to disrupt the children’s relationships with these professionals, by which she seems threatened.

6. On April 26, 2022, the dissolution was finalized pursuant to a Memorandum of Decision (the “Memorandum”).

7. Since the Memorandum was published, the defendant has continued to willfully and maliciously violate the children’s privacy by relentlessly publishing the Private Information on numerous websites, most consistently on thefamilycourtcircus.com, which has published over 130 “articles” about this case since December 2020, and frankreport.com, which has published at least 50 articles since October 2021. These sites also use information provided by the defendant to wage constant, defamatory attacks against the GAL and the children’s therapists.

8. The defendant is the only person who has access to all the Private Information published on these sites, and the published narratives track with granular specificity the claims she and her counsel made in court throughout the trial and/or in reports to various police departments, hospitals and DCF.

9. While the defendant continues to provide the Private Information to multiple sites, she now seems to work most closely with *The Frank Report*, which has

published nine lengthy articles since April 26, the most recent on August 9. The articles egregiously violate the children's privacy and/or attack the GAL and therapists and are listed here: **April 26** <https://frankreport.com/2022/04/26/three-children-threatened-hollywood-screenwriter-uses-police-to-attack-godmother/> **April 27** <https://frankreport.com/2022/04/27/ambrose-puts-himself-with-two-comments-in-dumb-freudian-slip/> **May 16** <https://frankreport.com/2022/05/16/anti-semitism-claims-against-lawyer-led-to-disbarment-might-lead-to-rico-charges-against-corrupt-ct-family-court-judge-gerard-adelman/> **May 21** <https://frankreport.com/2022/05/21/disbarred-attorney-cunha-avoids-arrest-makes-statement-about-corrupt-ct-family-court-judges-adelman-and-moukawsher/> **May 29** <https://frankreport.com/2022/05/29/ct-family-court-creepy-chris-ambrose-lies-about-plagiarism-in-threat-to-frank-report/> **June 8** <https://frankreport.com/2022/06/08/frank-responds-to-vicious-ambroses-nasty-11-page-cease-and-desist-sue-me/> **July 8**, <https://frankreport.com/2022/07/08/ct-family-court-enabled-father-to-steal-marital-funds-lie-about-it-and-get-the-children/> **Aug 4** <https://frankreport.com/2022/08/04/aldrich-sues-ambrose> **Aug 9** <https://frankreport.com/2022/08/09/bangkok-defends-father-who-steals-3-kids-condemns-parlato-who-strikes-back/>. Each of these malicious articles are amplified by extensive commentary that incites readers against the plaintiff, the GAL and the children's providers, which subjects the adults to harassment and potential physical harm and causes the children further emotional distress.

10. The article published on **August 4, 2022** in *The Frank Report* is notable for the scope of its falsehoods and intensity of its violation of the children's privacy, as well as the viciousness of its attacks on their providers. The timing of the article suggests the defendant published it in retaliation against the plaintiff, to explain: On August 3, the day before the article was published, the plaintiff emailed an up-date about the children to the defendant, in which he indicated that he would not provide the specifics she sought (e.g., the identity of people providing them lessons) because in the past she has used such information to defame the named individuals on the websites, which only serve to upset the children. Less than 24 hours after the plaintiff sent this email, the defendant published

the blistering August 4 narrative in *The Frank Report*.

11. Pursuant to the Memorandum, this court awarded sole physical and legal custody of the three minor children to the plaintiff, and instructed the defendant to secure a psychiatric evaluation in order to determine a course of treatment that would enable her to participate more fully in the lives of the children. This process was to begin within 60 days after April 26. However, health insurance records confirm that the defendant did not seek any evaluation/treatment prior to June 1; on information and belief, she has not sought such help since June 1. Her willful defiance of the court's orders is not in the best interests of the children, nor are her repeated violations of their privacy and defamatory attacks on the professionals who work with them.

12. On August 2, the defendant sent an email to the plaintiff in which she pointedly indicated that she - or a third party reporting to her - had observed his residence (e.g., she noted the absence of the children's trampoline, that the basketball hoop was not currently in sight, that the driveway was flat and large enough for a full court game). These comments suggest that the defendant has not only recently observed the plaintiff's home (or had third parties do so), but that she wants the plaintiff to know that she has been observing his residence. It is worth noting that in Dec 2020, the defendant filed a specious application for a temporary restraining order and gained custody of the children. When the order was vacated 24 hours later and the defendant was directed to return the children to the plaintiff, she fled to a hotel, where she hid them and ignored multiple phone calls from a judge and the police. When the police located her by pinging her phone, she still refused to return custody. Given this history as well as her relentless, defamatory attacks against the plaintiff, the defendant's insinuations that she is watching his residence feels like a veiled threat; it must be taken seriously.

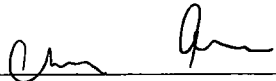
ORAL ARGUMENT MAY BE REQUIRED

The defendant is waging a relentless, vengeful campaign - across multiple websites - to defame and destroy the plaintiff and professionals who work with the children and seem to

and all references to and images of the children, including any Private Information, be immediately removed from the site. Each such letter shall be simultaneously sent to the GAL and plaintiff;

6. providing specifically that if the defendant violates any of the above, she shall be required to appear in court, in person, and if she does not, a capias warrant shall be issued for indirect civil contempt, and upon the delivery of a duly certified copy of such warrant by the state marshal or appropriate law enforcement officer, that she shall be held pursuant to the laws of this state;
7. providing that the defendant pay all reasonable costs in connection with the preparation and prosecution of this motion, including any costs incurred in service on the defendant of any orders the court may issue and the plaintiff's portion of any GAL fees and costs; and
8. That the Court make such further orders as it deems fair and equitable.

THE PLAINTIFF



Christopher Ambrose
381 Horsepond Rd.
Madison, CT 06443
203.505.1889

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

threaten her. She has clearly decided that she will use the children - by publishing the Private Information about them - to achieve her disturbing ends, even as she is aware that in so doing she violates their privacy and otherwise inflicts deep emotional harm and pain on them.

Both before and since April 26, the plaintiff has informed the defendant many times that the children see her posts. The incendiary opinions and blatant falsehoods made about their emotional health, their daily lives, even their appearance, as well as the feelings for the plaintiff attributed to them by the defendant, upset them greatly, as does the publication of their most confidential records. The children are upset further still because they realize that information on the Internet is indelible and so will follow them for the rest of their lives, to be seen by future schoolmates and employers. In addition to causing them emotional distress, it is not age-appropriate for the children to see sensitive material such as their psychological, DCF and hospital records. What hurts the children most of all is their awareness that their mother is the betrayer of their privacy and source of their pain and that she continues to publish the articles even though they have begged her to stop. On March 2, 2022, the two older children were brutally ridiculed by classmates who had seen the defendant's articles, including her false allegations that they were sexually abused by their father and that they are "caged" in his home. The oldest child immediately emailed the defendant, begging her to remove the offensive posts and to refrain from including the children in any future publications. The defendant never responded to her daughter. Instead, within a few days, in an unconscionable act of cruelty, the defendant posted new information about the children on the very same sites that prompted the tearful plea. She continues to do so through this week, four months after the divorce became final. It is likely another retaliatory article will appear in response to the filing of this motion.

Therapists have expressed their concerns about this insidious emotional abuse and the adverse impact such sustained parental betrayal will have on the children's emotional health and development, including their self-esteem and ability to trust others. The defendant, who has a masters degree in psychology, realizes this. To repeat: the defendant has been made aware of the public humiliation and subsequent emotional pain her articles bring upon the children yet she continues to ignore the children's requests and best interests by publishing

Private Information about them.

Because the defendant publicly (albeit falsely) accuses the plaintiff of heinous sexual abuse of his children and emotional mistreatment (like killing their pets, as was stated on August 4) there is reason for concern that the readers of the blogs will be incited to act and either harm him or attempt to “rescue” the children, both of which are frequently encouraged by *The Family Court Circus* and *The Frank Report* commentary. As mentioned, unknown adult males have entered the plaintiff’s property in the past, cars have also idled in his driveway very late at night and since April 10, he has received many obscene and/or threatening phone calls as well as eight voicemails (the last on Aug 7 at 10:12PM). All the callers reference *The Frank Report* by name and/or information that recently appeared there. These incidents (and the voicemail evidence) have been reported to the police, who are well aware of the defendant’s history of attempting to manipulate custody with bogus calls for welfare checks as well as her many efforts to intimidate the plaintiff, the professionals and witnesses in the case.

This sort of threatening harassment is more concerning still because the defendant is intimately involved with “advisors” who have not only caused the children emotional harm, but also have significant records of unlawful behavior. Leaving aside the defendant’s fifth attorney, whose misconduct in this case resulted in her disbarment (and who is potentially facing criminal charges for grand larceny), one of the defendant’s associates advertises her role in child custody abductions and has multiple defamation verdicts against her. At least two of the defendant’s associates have violent criminal histories: Manuel Gomez, one of her two private investigators and who police believe placed a GPS device recently discovered under the plaintiff’s car, has a record of witness tampering, domestic violence and a pending case for strangulation; and Frank Parlato, Jr., the publisher of *The Frank Report*, was arrested in Dec 2021 for battery, false imprisonment and witness tampering. On Aug 5, 2022, Parlato pled guilty to federal tax evasion/fraud in a case brought by the US Attorney. He must forfeit \$1M and pay more than \$200,000 in restitution and fines. He will be sentenced on Dec 7, 2022 in the Western District of NY (Buffalo). The two Internet bloggers she works with most closely have each been under multi-year investigations by law enforcement. The aforementioned

Parlato was investigated for four years by the IRS and the FBI, and the publisher of virulently anti-Semitic, racist *Family Court Circus* is currently under investigation by the FBI and the State Police Departments of VA and CT.

The defendant has become especially close to Parlato. While the nature of their relationship is not known to the plaintiff, unimpeachable authority indicates that in January 2022 the defendant went to Buffalo, where Parlato has family, then on to Florida, where the federal probation office permitted him to relocate. On information and belief, since the winter, the defendant has resided with Parlato in a modest house in Big Pine Key, FL. She has never provided the plaintiff with her physical location or her current cell phone number, which despite her representations to this court, the plaintiff has been told she has. The defendant has instructed the plaintiff to use Michelle Pawlina's Glastonbury address, but neither Pawlina nor the defendant will confirm whether correspondence he sends is received. (Pawlina's behavior is antagonistic: on April 21, she arrived - uninvited - at the plaintiff's home and castigated him in front of his daughter for the "mess" he created for his family. That same night, she provided an "interview" along with new Private Information about the children to Parlato, which he published on April 26). The plaintiff reasonably fears that all of these individuals embolden the defendant and will incite her to interfere even more aggressively with custody.

When the plaintiff filed for divorce, he requested shared custody. Over the past three years, as defendant's behavior made that option no longer realistic, the courts, GAL and therapists - as well as the plaintiff - continued to work with her to try to effect peaceful co-parenting. The defendant has not only rejected every overture, she continues to do so with abject hostility. Even significant judicial sanctions, which generally curb a litigant's misconduct, have repeatedly proven unsuccessful with her. The plaintiff's primary concern is his children - their best interests, their physical and emotional safety. This motion seeks the court's help to protect them from the defendant's persistent bad acts, which include her constant violations of their privacy. The plaintiff is greatly appreciative of the steadfast support offered to the children by the GAL and therapists who continue to work with them even in the face of the defendant's repeated public attacks. While he recognizes that the law expects capable adults to seek their own protections, the plaintiff respectfully requests that the

court consider any options it may have to guard these individuals from the defendant's harassment so they can work unimpeded with the children.

NOW, WHEREFORE, the plaintiff respectfully moves for the Court for an Order:

1. directing the defendant not to come within one (1) mile of the plaintiff's home at 381 Horsepond Rd., Madison, CT or any of the schools in which any of the children are enrolled;
2. directing the defendant not to hire, direct or request any third party to come within one (1) mile of the plaintiff's home or any of the schools in which any of the children are enrolled;
3. directing the defendant not to violate the privacy of the minor children by sharing with any third party - including through social media or any other publication of any sort, including but not limited to frankreport.com and familycourtcircus.com - through any means any information about the children, including but not limited to their mental/emotional/physical health, their appearance, their school performance, including their grades, their extracurricular activities, their relationships with or interactions with the plaintiff or his family, any texts or correspondence by or about the children, and any photos, audio or video recordings made by or about them, without first obtaining the written permission and consent of the Guardian ad Litem;
4. directing the defendant not to threaten, harass or intimidate in any manner or by any means the Guardian ad Litem, any of the children's mental health professionals, past or current teachers, school administrators or counselors, and that she is not to attempt to accomplish the same through any third party or through any publication of any sort, including but not limited to frankreport.com and familycourtcircus.com;
5. directing the defendant to write an email to any website with which she has shared the Private Information, including but not limited to familycourtcircus.com, frankreport.com and dolcefino.com, requesting that any

CERTIFICATION

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

Karen Riordan
799 Manchester Rd.
Glastonbury, CT 06033
riordan.kmms@gmail.com

Jocelyn Hurwitz
Cohen and Wolf
115 Broad Street.
Bridgeport, CT 06604
203.368.0211
jhurwitz@cohenandwolf.com



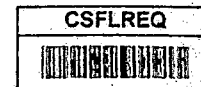
Christopher Ambrose, *Pro Se*
381 Horsepond Rd.
Madison, CT 06443

EXHIBIT B

CASEFLOW REQUEST

JD-CV-116 Rev. 1-16

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov



Instructions

1. Fill out all sections and file with the court.
2. File at least 3 days before the date of the scheduled event.

Note: If the request is granted, the court will try to schedule the event for the requested date. However, if that date is not available, it will be scheduled for the next available date.

Name of case (First-named plaintiff v. First-named defendant) Ambrose, Christopher v. Ambrose, Karen		
Judicial District of Fairfield	Date of request Sept. 21, 2022	Date of scheduled event (if applicable)
Name of Judge who scheduled the event (if applicable) Hon. Judge A. Truglia	Docket number FBT FA19 6088163	

Requested Action ("X" box(es) that apply and give reason(s) for request below)

- ☐ Status Conference on or about: _____ Date _____
- ☐ Client/adjuster to be available by phone for _____ Event _____ scheduled on _____ Date _____
- ☐ Pretrial on or about _____ Date _____
- ☐ Party to be excused from _____ Event _____ scheduled on _____ Date _____
- ☒ Other: **Request to hear Motion #545.00 at the court's earliest convenience.**

Reason(s) for request:

Please see attached.

I agree to notify my client and all counsel of record and self-represented parties whether the requested action is granted or denied, and if granted, the specific ruling of the court. I have told all counsel and self-represented parties of record that I would be asking for the requested action. **All Counsel and Self-represented Parties:**

- ☐ Consent ☒ Do not consent to the action requested above

Signed (Person making request) 		Name of attorney and juris number or self-represented party (Print or type)	
The person requesting the action is the:			
<input checked="" type="checkbox"/> Plaintiff	<input type="checkbox"/> Defendant	<input type="checkbox"/> Attorney for Plaintiff	<input type="checkbox"/> Attorney for Defendant
Firm name (if applicable)	Address 381 Horsepond Rd., Madison, CT 06443	Telephone number (with area code) 203.505.1889	

I certify that a copy of the above was mailed or delivered on the date shown below to all counsel and self-represented parties of record. A sheet is attached listing the name and address of each party the copy was mailed or delivered to.

Signed (Individual attorney or self-represented party) 	Date Sept. 21, 2022
--	-------------------------------

Order

Request is	Signed (Judge)	Date
<input type="checkbox"/> Granted <input type="checkbox"/> Denied		

ADA NOTICE

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA/

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Ambrose v. Ambrose
FBT-FA19-6088163-S
Request/Reason for Request

Since the motion to protect the children was filed on August 15, the defendant has continued to invade their privacy, most recently on September 20. In addition, there have been new, very upsetting incidents involving the children directly caused by her publication of confidential material and false allegations. Therefore, the plaintiff echoes the sentiment expressed in the Memorandum of Resolution Screening and respectfully requests the court recognize the urgency of addressing the defendant's continuing misconduct at its earliest convenience.

The defendant's claim that the plaintiff did not serve her is false. As the attached email proves, the plaintiff timely served the defendant electronically, as has been the custom between the parties. This is yet another example of the defendant making material misrepresentations to the court, as she did - many times - in her testimony on August 22 and her financial affidavit. Moreover, the plaintiff's motion was e-filed and posted on August 15. Since then, the defendant has made eight e-filings of her own. Her claim that she couldn't make it to Family Relations because she was not aware of the proceeding or contents of the motion is preposterous and further reflects her troubling propensity to disrespect the court with falsehoods. Finally, as during the divorce trial where the defendant asked for 15 continuances, this seems to be another effort to delay the proceedings without regard for the children's best interests or the plaintiff's and the court's time.

FYI

9/21/22, 8:53 AM

From: ca0515@aol.com,

To: jhurwitz@cohenandwolf.com, riordan.kmms@gmail.com,

Subject: FYI

Date: Fri, Aug 12, 2022 4:24 pm

Attachments: MotionViolationChildrensPrivacy.pdf (146K) ←

*Contained
Motion Filed on
8.15.22,
attached
as Exhibit
A*

Have a great weekend.

