

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

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.

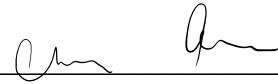
NOW, WHEREFORE, the plaintiff respectfully moves for the Court for an Order:

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

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

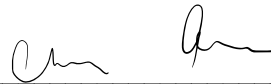
Judge/Clerk

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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