

RETURN DATE: AUGUST 9, 2022 : SUPERIOR COURT
CHRISTOPHER AMBROSE : JUDICIAL DISTRICT OF NEW
HAVEN AT NEW HAVEN
v. :
MICHELLE PAWLINA : JULY 12, 2022

COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF

PARTIES

Christopher Ambrose, who resides at 381 Horsepond Rd., Madison, CT (“Plaintiff”), hereby alleges the following, on information and belief, against Michelle Pawlina, who resides at 799 Manchester Rd., Glastonbury, CT (“Defendant”):

SUMMARY OF ACTION

On or about April 21, 2022, Defendant gave an interview to Frank Parlato, Jr. (“Parlato”), which was published on April 26, 2022 in *The Frank Report*, an on-line tabloid “news” website run by Parlato. <https://frankreport.com/2022/04/26/three-children-threatened-hollywood-screenwriter-uses-police-to-attack-godmother/>. In the published interview, Defendant knowingly made false, incendiary statements about Plaintiff, including but not limited to, that he: abused and is abusing his children; produced pornography; committed larceny; is a thief; and did not financially support his (now former) spouse. In addition to falsely accusing him of these morally reprehensible crimes, Defendant deliberately made additional, insidious misrepresentations about Plaintiff and shared confidential records that further defamed him and put him in a false light. Her malicious intentional acts have caused him extreme emotional distress and significant financial harm.

Defendant elected to publish with *The Frank Report* knowing that since October 3, 2021 that site has published over 48 (and counting) articles all falsely accusing Plaintiff of malignant conduct, including pedophilia, child abuse, possessing/viewing child pornography, bribery, grand larceny and RICO conspiracy. The site has also published confidential information about his three minor children, including their psychiatric records. As will be explained, the children’s peers have seen the site and subsequently subjected the children to brutal ridicule and humiliation. This was all known to Defendant as Plaintiff had advised her of same, and yet that is where she chose to publish her damning lies.

On or about April 22, 2022, Defendant also provided information about Plaintiff to *The Family Court Circus*, a virulently anti-Semitic, racist, homophobic website targeting the Connecticut family courts. This blog also published a link to Defendant’s entire interview. <https://thefamilycourtcircus.com/2022/04/22/thin-blue-threats/>.

Defendant knows that since January 2021, *Family Court Circus* has published over 150 articles falsely accusing Plaintiff of the same crimes as *The Frank Report* and exposing private, sensitive information about the children, including the custody evaluation, which was under court seal.

In order to give her statements a veneer of authority, Defendant referenced her long-standing, “close” relationship to Plaintiff’s former spouse and her current employment as a school nurse. To add still more artificial luster still to her deceptive narrative, Defendant published purported “evidence,” including screenshots of confidential records, which she published out of context, and omitted material information to create a wildly false light portrait of Plaintiff.

On May 3, 2020, Plaintiff sent (via email and USPS) to Defendant a “cease and desist” letter, stating that Defendant’s published falsehoods had defamed him, invaded his privacy by false light and inflicted extreme emotional distress on him (the “Letter”). He requested that she: cease publishing the falsehoods and misrepresentations as well as the confidential information about his children; publish a retraction of the numerous falsehoods; and formally apologize for her life-altering false allegations and violations of privacy. The Letter afforded Defendant a ten (10) day opportunity to correct her published falsehoods; if she did not so respond, Plaintiff advised he would be forced to pursue legal action to address her many lies.

It has now been more than sixty (60) days, Defendant has not responded, even to offer an apology for so callously violating the children’s privacy and causing them upset.

That Defendant acted with knowing disregard for the truth - malice - not only makes her conduct more egregious, it makes her dangerous. The law does not tolerate such hateful, amoral, life-altering misconduct. Plaintiff brings this complaint to vindicate this principle and to right the contemptible wrongs Defendant has committed against Plaintiff.

JURISDICTION AND VENUE

Both parties are full-time residents of Connecticut and fully subject to its jurisdiction.

Pursuant to § 51-345 of the Connecticut General Statutes, venue properly lies in this Judicial District in that Plaintiff resides in this Judicial District.

FACTUAL ALLEGATIONS

A. Relationship with Defendant

1. Defendant has been a friend of Plaintiff’s former spouse, Karen Riordan Ambrose (“Riordan”), since they went to college together over 35 years ago. Defendant was in the couple’s wedding party and is the godmother to their middle child. Defendant and Plaintiff got along well; in fact, Plaintiff arranged for Defendant to audition on two network television shows even though she had very limited professional acting experience.
2. Despite this cordial relationship, Defendant and Riordan often excluded Plaintiff from joining them with the children at events, such as Broadway plays and even stay-away vacations. Nevertheless, Plaintiff maintained a friendly rapport with Defendant.

3. Because Defendant's misconduct is so connected to the dissolution of Plaintiff and Riordan's marriage, a brief factual background will be helpful: In July 2019, Plaintiff filed for divorce in Bridgeport Superior Court, as the family resided in Westport. Plaintiff sought shared custody of the three children, then 13, 13 and 10, and though he had been the sole provider and Riordan offered to split their assets 50/50. (Even during the three years before the couple had children, Riordan was never employed outside the home throughout the duration of the marriage except as a tutor to one middle school student). Plaintiff made this "most equitable" offer to preclude any legal battle.
4. Riordan never responded to this offer. Within two weeks after Plaintiff filed, Riordan began engaging in such seriously disturbing, ever escalating misconduct regarding the children that on April 24, 2020 the court awarded Plaintiff temporary sole physical and legal custody and ordered a 90-day "no contact" period for Riordan, after which she could have supervised visitation. Almost immediately, she violated the no contact order, and continued to do so many times - even as she was held in contempt for her behavior.
5. In July 2020, the couple entered a Supervised Visitation Agreement filed with the court. Within 48 hours, Plaintiff completed his paperwork, the required in-take interview and paid the \$7500 retainer in full to insure the children could see their mother. However, Riordan waited until November to contact the supervisor, never completed the paperwork and never scheduled a visit. Other than one deeply troubling episode, which will be explained and which involved Defendant, Riordan hasn't seen the children since April 2020.
6. Defendant, who identifies herself as Riordan's "best friend," is, on information and belief, thoroughly aware of all of the above circumstances.

B. Defendant's Misconduct Toward Plaintiff

7. Before Plaintiff filed for divorce in July 2019, the family had never been involved with DCF or the police. By August 2019, Riordan began a relentless campaign of falsely accusing him of serious child neglect and abuse to DCF and various police departments. Defendant and others engaged by Riordan would ultimately participate in this effort. These false reports continued through at least April 2022; Defendant was involved in covert reporting as late as March 2022. The allegations included that Plaintiff: abused his children sexually, physically and emotionally; produced "kiddie porn"; and engaged in child sex trafficking. These very serious accusations were intended not only to destroy Plaintiff's relationship with his children and cause him to lose custody, but also to send him to prison for years.
8. The allegations prompted multiple, intensive investigations by different authorities including DCF, the Madison Police, even a joint task force that involved the CT State Police. These investigations were very intrusive and subjected the children and Plaintiff to considerable, sustained stress as they went on for month at a time. *Every single allegation against Plaintiff - including all those made by Defendant - was investigated and deemed to be baseless. Every. Single. One.*

9. These allegations were also the subject of considerable testimony at the divorce trial, held before Judge Adelman in Superior Court in Middletown that began in March 2021 and concluded in March 2022 (the "Trial"). At the Trial, no fewer than four witnesses - including police officers and DCF personnel - testified that Riordan had led the children to make the abuse allegations against their father. Based on this and other egregious misconduct by Riordan, after much testimony from many professionals, Judge Adelman awarded Plaintiff permanent sole legal and physical custody of the three children in April 2022.
10. A significant number of the defamatory statements Defendant made against Plaintiff originated with the following incident: In December 2020, Riordan obtained a Temporary Restraining Order against Plaintiff after falsely alleging that he sexually abused two of the children and was a threat to her. At an emergency hearing held less than 24 hours later, the same judge was advised of the misrepresentations made by Riordan. The judge vacated the TRO and ordered custody immediately restored to Plaintiff. But by then, Riordan, who had not appeared at the hearing, had fled her Guilford home with the children and was hiding in a hotel 20 miles away.
11. At the hotel, Riordan left the children alone in the room with Manuel Gomez, who she had hired as a "private investigator" to follow Plaintiff. Gomez has a lengthy violent criminal record and was fired by the NYPD for cause, including witness tampering and gang affiliations.
12. Gomez made it clear to the children that the only way they could see their mother was to say that their father abused them. Then, as he filmed them, Gomez questioned the children about this supposed abuse. Shortly afterward, Riordan took the children to Connecticut Children's Hospital in Hartford (the "Hospital") and had them repeat the allegations discussed with Gomez.
13. However, when the children were questioned by Hospital personnel privately, away from their mother, the stories of abuse quickly "fell apart" and it was determined that the children had been coached. This was later confirmed by DCF.
14. While all of this was going on, Plaintiff did not know where Riordan and the children were. She did not answer repeated calls from the judge, who tried to reach her several times from court, or the Guilford Police, whose assistance Plaintiff had sought. Just before a "Silver Alert" was to go out on the children, the police finally located Riordan at the hotel by "pinging" her phone.
15. When the police arrived at the hotel, Riordan refused to honor the custody order. For over four hours, officers attempted to reason with her. During this time, *in front of the children*, Riordan made many phone calls alleging abuse by Plaintiff and critical of the judge, GAL, police, all of whom she said were working against her and the children. During this time, Riordan was in touch with Defendant via phone.
16. Riordan had the couple's daughter "live stream" the hours-long incident at the hotel. When police showed Plaintiff the stream (he was in his car in the hotel parking lot), in order to

protect the children from their mother's erratic behavior, he agreed to allow the children to be released to a DCF caseworker, who would take them to spend that night at the home of the *Defendant, who was the only person Riordan would release the children to.*

17. The next day, at yet another hearing which Riordan did not attend, the court issued yet another order immediately ordering custody be restored to Plaintiff. He texted a screen shot of that order to Defendant, and asked her to call DCF, the police or the guardian ad litem to confirm that the order was valid and to get any questions she may have answered. He did this so Defendant would not refuse the order in front of the children the way Riordan had the night prior.
18. Defendant called no one. Instead, she unilaterally decided not to comply with the court order and returned the children to the Hospital. She later claimed that she had determined they seemed "upset" to her at the prospect of going home. Despite Defendant's brazen attempt to manipulate custody by defying the court order, the Hospital honored the order and immediately released the children to Plaintiff when he arrived. He wanted no further contact with Defendant nor did he want any action taken against her or Riordan because he didn't want to escalate already unpleasant situation.
19. Subsequent to this incident, Defendant - by her own admission - continued to make allegations against Plaintiff to DCF, the police and school counselors *even though she had not seen or spoken with the children and, on information and belief, was relying solely on the word of Riordan, who was objectively troubled.* To Plaintiff's knowledge, Defendant's most recent call to authorities regarding the children was in March 2022. To repeat: *Defendant has never substantiated a single one of her allegations and every authority has dismissed all of her claims as baseless.*
20. In January 2022, Defendant began sending the couple's daughter no fewer than five unusually expensive, albeit belated, Christmas packages. She sent nothing to the couple's two sons. As Defendant was well aware, Riordan has used third parties to secretly communicate false allegations against Plaintiff to the daughter. These false allegations have included that he is under investigation by the FBI, produces child pornography and is engaged in child sex trafficking. So when Defendant sent this barrage of gifts directly to the daughter, Plaintiff requested that she send everything through him. Defendant responded with outrage and invective.
21. On March 2, 2022, classmates of the two older children discovered articles published on line that contained the children's confidential psychological and other records, photos and the false allegations that they had been sexual and emotionally abused by their father. As explained, these articles were published on the very same sites that Defendant would choose to publish her interview, *The Frank Report* and *The Family Court Circus.*
22. On that day, knowing her mother was the source of the confidential records and false allegations, the daughter sent an e-mail directly to her, pleading that she remove the articles. Riordan did not respond to her daughters pleas. On information and belief, by then Riordan was living in Florida with the publisher of *The Frank Report.* But Riordan had been claiming

she lived with Defendant in Glastonbury, so Plaintiff texted Defendant and asked her to intercede and have Riordan remove the articles on behalf of the children. Defendant responded aggressively, but she did not address the published articles or the child's requests.

23. A few weeks later, Defendant invited Plaintiff and the children to her home for Easter. Given her abject hostility toward Plaintiff, including making repeated false allegations against him to authorities and her flat unwillingness to help the children regarding their mother's betrayal of their privacy, he assumed this was an insincere offer designed to needle or provoke. Hoping to end this harassment, he didn't respond. Defendant continued to send the invitation, as did Riordan.
24. Though the Easter invitation was not accepted, a few days after the holiday, on April 21, Defendant arrived - uninvited - at Plaintiff's home in Madison. She did not call in advance, which further suggests she knew she was not welcome. If she had any doubt about that, Plaintiff met her outside - alone - and asked her to leave, several times. She adamantly refused, stating that she had "Easter bags" for the children. When he reminded her that anything for the children was to be given through him, Defendant insisted she was going to see them. She pushed past him to greet his daughter who had appeared from inside the house. (Defendant had honked her horn several times to call attention to her presence, something she had never done before). In front of the girl, Defendant angrily castigated Plaintiff, telling him he "created the mess" his family was in. Not wishing to escalate the situation, especially in front of his daughter, Plaintiff didn't counter her accusations. When she finished her speech, he repeated his request that she leave, which she finally did, after pulling the daughter aside to speak with her.

C. Defendant Retaliates Against Plaintiff by Publishing False Allegations

25. On information and belief, Defendant is aware that *The Frank Report* and *The Family Court Circus* have published Plaintiff's home address and incited readers to go to his house to seek vigilante justice. In separate incidents, three adult males have come on to his property demanding to see the children. The police were involved and advised Plaintiff to report every incident of trespass. Since Defendant had adamantly refused to leave the property and was hostile to him in front of his daughter, Plaintiff reported the April 21 incident to the Madison Police. They advised that a visit from the police typically calms an antagonistic "civilian" such as Defendant. This is how they had handled the three adult male strangers who had trespassed, and none of them had returned.
26. So on April 21, the Madison Police requested that the Glastonbury Police go to Defendant's home to ask her to stop harassing Plaintiff. Rather than heeding this simple request, Defendant retaliated against him on that same evening. On information and belief, Defendant contacted Parlato and gave him a lengthy interview, filled with maliciously false statements about him, even allegations of crimes of moral turpitude. She deliberately set out to defame him, invade his privacy by false light and inflict emotional distress and economic harm.
27. Defendant published the interview in *The Frank Report* and *The Family Court Circus* provided a subsequent article that linked to the full interview. What is more insidious still,

Defendant knew these were the very same websites that the children's peers had discovered and used to ridicule them just a few weeks prior. Therefore, Defendant knew it was highly likely her interview would subject the children to further humiliation. Defendant's conduct toward the children is unconscionably cruel.

28. By publishing on multiple sites Defendant clearly intended to reach as wide an audience as possible in order to inflict the greatest harm possible on Plaintiff's reputation, privacy, emotional health and finances.
29. As explained, on May 3, 2022, Plaintiff sent Defendant the Letter offering her the opportunity to retract her malicious falsehoods. It is now more than sixty (60) days beyond the date of that request, Defendant never responded nor have any of the malicious, false statements been retracted from either site.

FIRST CAUSE OF ACTION

(Defamation at Common Law and Connecticut General Statutes § 53-237)

1. Plaintiff incorporates by reference all preceding allegations as though fully set forth herein.

A. Defendant maliciously and falsely accused Plaintiff of child abuse and states that he is psychologically unwell.

2. In the published interview, Defendant makes numerous references to Plaintiff's supposed abuse and mistreatment of his children. Defendant states, "[The children] had been evaluated at Connecticut Children's Hospital concerning allegations of abuse by their father."

3. Child abuse is a crime under CGS § 53-21.

4. On information and belief, at the time Defendant made these statements, she knew that all allegations of abuse - including those to which she was specifically referring - had been thoroughly investigated by multiple authorities (including DCF, the police and a joint task force that included medical professionals and the state police) and were determined to be baseless. *Defendant deliberately omitted this information from her published statements to defame Plaintiff and put him in a false light.*

5. To support her false portrayal of Plaintiff as abusive, Defendant also caused to be published confidential, un-redacted records from the Hospital showing that a child had made allegations of abuse against Plaintiff.

6. At the time Defendant caused the records to be published, she was aware that when the children were interviewed privately at the Hospital, away from their mother, it was determined that they had been coached about the abuse. But Defendant intentionally portrayed Plaintiff in a false light by omitting this material fact and by using records that did not convey the truth. This was done deliberately to imply that her allegations of criminal child abuse were endorsed by medical personnel *when in fact she knew the opposite was true and the medical personnel had determined the allegations were false.*

7. Defendant also stated, “The Department of Children and Families intervened. They dropped the children off to me in the middle of the night. A person from DCF said they might be here for a while because there’s an investigation concerning allegations of the father abusing the children.” Defendant also caused to be published the confidential DCF record from that night, which states DCF was involved because of “a pattern of allegations parents have made against each other.”

8. Again, on information and belief, when Defendant made these statements, she knew that DCF had taken the children to her home because Riordan refused to honor the custody order and Plaintiff wanted to end the stand-off Riordan created with the police. By omitting this information, Defendant intentionally created a false impression that criminal abuse allegations against Plaintiff, which she had discussed in the interview, were the reason the children were taken to her home.

9. On information and belief, Defendant also knew that the children were never to stay with her beyond that one night. The paperwork she provides makes no mention of a longer stay and the DCF caseworker’s after action report as well as testimony at Trial states the placement was to be for one night, which is what Plaintiff had consented to.

10. To further substantiate her false allegations that Plaintiff was abusive, Defendant caused to be published a confidential record from the Connecticut Superior Court indicating that Plaintiff was “a high-risk abuser.”

11. On information and belief, at the time Defendant made this statement and caused this document to be published, she knew it was prepared by an interviewer who had spoken only with Riordan, who has committed both perjury and spoliation of evidence during the Trial and is a most unreliable source. By intentionally omitting the fact that Riordan was the sole source, Defendant created the false impression that the determination was based on a fully informed analysis. By the time Defendant made the statements in the interview, she also knew that uncontested testimony from multiple witnesses at the Trial and numerous court decisions had determined that Plaintiff has never been found to be abusive, which is why he has had sole legal and physical custody since April 2020.

12. Defendant claims that on the day after the children were brought to her home by DCF (in December 2020), “[Plaintiff] texted me and said, ‘I’m on my way to get the kids.’ According to DCF, he’s not supposed to see the kids. So, I said to the kids, ‘Your dad’s on his way here. Do you want to go home with him?’ They all said no. They were scared. They didn’t want to go back.”

13. When Defendant made these statements, she knew that DCF had not in fact objected to the children being returned to his custody. At the time he was going to retrieve the children in Dec. 2020, Plaintiff texted this fact to Defendant and encouraged her to confirm it with DCF. Likewise, when she made the statements in the interview, Defendant was aware that the children’s fear was due to what Gomez had told them in the hotel room, not due to Plaintiff. In short, Defendant yet again deliberately omitted material facts to create an alternative narrative in order to cast Plaintiff in a false light.

14. In the interview, Defendant states, “I pick up shifts in two different hospitals, psych, adolescent, and adult, so I’m very familiar with abnormal behavior... From what I saw... I understand why [Plaintiff’s] hiding [the children]. Because anybody who knows them, who’s known them for years, would know they’ve been brutalized, absolutely brutalized.” She goes on to say, “You can tell [the daughter’s] depressed, you know? ... This girl is not happy. I work in a school. I’m a school nurse. I also work in the psych field in the hospital... so I’m very familiar with abnormal behavior.” Defendant also states, “[Plaintiff] is a sick man. He’s not behaving logically... [Plaintiff] became more and more controlling. He was getting more irrational... He treats his children like a ‘bully.’”

15. Defendant had not seen Plaintiff in over a year . She hadn’t seen the children in at least 18 months. On April 21, she saw Plaintiff and his daughter for a few minutes and did not see the boys at all. Defendant’s frequent references to her professional credentials (and, earlier, her long-term relationship with Plaintiff) to deliberately create the false impression that her statements come from an informed clinician who has made a professional assessment, over time. That is not the case. In addition, Defendant knew that all three of the children’s therapists, the Guardian ad Litem, the custody evaluator, other mental health professionals and at least three judges had determined that Plaintiff was so stable that he should be awarded sole custody. Defendant’s deliberately omitted this critical information to create a false light impression to destroy Plaintiff’s reputation.

B. Defendant maliciously and falsely stated that Plaintiff stole his spouse’s inheritance.

16. Defendant states, “[Riordan’s] mom died before they got married... [Riordan] inherited money. And [Plaintiff] took it.”

17. Larceny is a crime under CGS § 53a-122.

18. At the time Defendant made this statement, she was aware that Riordan has never provided *any* evidence whatsoever of an inheritance, and that her claim was determined to be meritless during the Trial. Defendant knowingly falsely accused Plaintiff of this serious and morally offensive crime to harm his reputation.

19. Defendant also alleges that before filing for divorce, “[Plaintiff] had already moved the money into his name”. On information and belief, Defendant knew that testimony at the Trial established that Plaintiff’s management of the family’s finances before and throughout the divorce was ethical and that there was never any evidence beyond Riordan’s false, unsubstantiated accusation that he “moved money into his name.”

C. Defendant maliciously and falsely stated that since Plaintiff filed for divorce in July 2019, he did not financially support his estranged spouse.

20. In the interview, Defendant states, “[Riordan] hasn’t received a penny from [Plaintiff]. I don’t know how she’s surviving.”

21. Failure to support a spouse is a crime under CGS § 53-304.

22. On information and belief, Defendant knew this statement in paragraph 20 was not true and she intentionally portrayed Plaintiff in a false light to be a scofflaw who behaved amorally.

23. On information and belief, Defendant was aware that between July 2019, when Plaintiff filed for divorce, and May 2021, when Riordan's fifth attorney asked for a formal support order, *Plaintiff voluntarily financially supported Riordan*, which is stated in Judge Adelman's Memorandum of Decision of April 26, 2022.

24. On information and belief, Defendant is aware that part of the financial support Plaintiff provided Riordan entailed allowing her unrestricted access to the couple's joint credit card. At the Trial, it was established by uncontested testimony and substantiated by credit card and banking statements that, as during the marriage, Plaintiff did not attempt to control Riordan's spending, even when he thought it irresponsible or against his own interest. In fact, charges Riordan made with this card led to Plaintiff discovery that she had two different private investigation firms following him and that she had published a "[change.org](https://www.change.org)" petition in Jan. 2021, falsely claiming that he was a child molester. As uncontested testimony at the Trial and credit card and bank statements corroborated, Riordan's spending during this period *on this card alone* was well into six figures. Plaintiff paid for every single purchase Riordan made.

25. On information and belief, since this was also testimony at Trial, Defendant is aware that bank statements from the same period further disprove her false allegation of no support. Plaintiff routinely paid for Riordan's living expenses, including: her \$3500 rent (throughout the entire 18 month lease term on her waterfront home); bills from two other credit cards in her name only; and any other bill she presented to him. Again, uncontested Trial testimony supported by bank statements demonstrated that these payments totaled well into six figures, all of which Plaintiff paid.

26. On information and belief, Defendant also knew that in Sept. 2020 Riordan received nearly \$200,000 as her share of the proceeds from the sale of the couple's Westport home, and that in 2021 Riordan covertly liquidated at least one pension fund that she testified was valued at "over \$100,000" as well as another mutual fund worth approximately \$30,000. Riordan did not pay taxes on any of these sums, so she had access to at least \$330,000 cash. It's highly likely that Riordan also liquidated a second pension fund she had from the Southbury, CT Board of Ed. However, she stopped coming to court before she could be asked about this (and it never appeared on any of the incomplete financial affidavits she filed). All of this was corroborated at the Trial by uncontested testimony and financial records. As Riordan's primary confidant during this period, on information and belief, Defendant was aware of her true financial circumstances.

D. Defendant maliciously and falsely stated that Plaintiff is "making money illegally" from "pornography."

27. Defendant states, "[Riordan] had evidence...that [Plaintiff] is doing some underhanded things...Like pornography. I believe he is making money illegally." Defendant goes on to state that Riordan "had discs from computers as evidence" of Plaintiff's supposed involvement with porn. Defendant also caused to be published screenshots suggesting that the porn involves children.

28. Producing or possessing child pornography is a crime under CGS § 53a-196.

29. At the time Defendant made these statements, she knew that police and private forensic experts had investigated these false allegations of there being child pornography on computers and found every one of them to be baseless. Moreover, Defendant also knew that not one of Riordan's five attorneys ever made these allegations in court, let alone tried to introduce any of this supposed computer evidence, because the "evidence" couldn't withstand the most basic scrutiny.

30. It is worth noting here that during the Trial, based on Riordan's insistent claims that she had evidence on her computer, the court ordered her to provide her laptop for examination by a Special Master. Every day, Riordan had a new excuses as to why she hadn't delivered the laptop as ordered; after more than a week, her excuses were exposed as lies. She was forced to admit that she had deliberately destroyed her laptop (and everything on it) as soon as she had been ordered to turn it over. Defendant was aware that Riordan was sanctioned by the court for spoliation of evidence and perjury regarding this supposed computer "evidence". Therefore, Defendant's use of screenshots supposedly showing this damning computer proof is deliberately deceptive and intended to put Plaintiff in a false light.

E. Defendant maliciously and falsely stated that Plaintiff colluded with and/or bribed various professionals involved in the case in order to unlawfully gain custody.

31. Defendant falsely stated that, "[Plaintiff] researched all the players, including Jocelyn Hurwitz, for guardian ad litem," and that Plaintiff had his attorney collude with Riordan's attorney against her, "Either [Riordan's first attorney] colluded or he's a bumbling idiot."

32. Conspiracy is a crime under CGS § 53a-48.

33. On information and belief, Defendant knew that it was Riordan's first attorney who requested a guardian ad litem to be appointed and it was also he who recommended Hurwitz for the role. Plaintiff did not research anyone, nor did he or his attorney collude with anyone, including any of Riordan's five attorneys.

34. Defendant also stated that, "[Plaintiff] got the judge switched and suddenly, [Plaintiff] has full custody."

34. Plaintiff had no influence over which judge oversaw the case at any time. If Defendant, Riordan or any of her five attorneys have evidence of this, it would have been reported long before now. Defendant is aware that such egregious, false allegations of criminal conspiracy resulted in Riordan's fifth attorney being disbarred. Defendant's parroting of this same false conspiracy in the face of such serious consequences manifests her utter contempt for the truth

35. As Defendant is aware, Riordan lost custody because of her alarming parental misconduct which included: leading the children to make false allegations of abuse against their father; telling them that he was not financially supporting them or their mother; telling them that Plaintiff was stalking them; telling them Plaintiff is like "Michael Jackson" and so should not be left alone with the younger son; hiring a woman who advertises her role in child abductions to

covertly send the daughter texts stating that Plaintiff was under investigation by the FBI for producing child porn and sex trafficking; obtaining a restraining order on misleading pretenses to gain custody, when the order was vacated 24 hours later, Riordan hid with the children in a hotel, refusing to take calls from the judge or the police, who located her only after pinging her phone; hiring a “private investigator” with a record of violence, witness tampering and gang affiliations, leaving him alone in a hotel room to discuss with the children the supposed sexual abuse they suffered at their father’s hands, while he filmed them, then Riordan taking them to a hospital to repeat the allegations.

36. As Defendant is also aware, the court’s decision to deny Riordan custody was further informed by her vicious, very public Internet smear campaign against Plaintiff that included exposing confidential information about the children which caused them significant trauma. Riordan putting her desire to destroy Plaintiff by putting him in a false light at the expense of the children was determined not to be in their best interest.

37. Defendant was well aware that *this* sort of conduct outlined in paragraphs 34 and 35 is what led police detectives, DCF investigators, therapists, the custody evaluator, guardian ad litem and all the judges to determine that Riordan should not have custody; the decision was not due to Defendant’s claim that Plaintiff had gotten “the judge switched.”

F. Defendant maliciously and falsely maligned Plaintiff as an absentee, neglectful parent, and falsely stated that he prevents the children from seeing their mother or her family.

38. Defendant states, “[Plaintiff] was never home. He was in LA. When he was writing in New York, he’d leave early in the morning to get into Manhattan and wouldn’t get home until after the kids were in bed...[Riordan] had great neighbors who would help her. Her dad would come over and help...[Plaintiff] was not around.”

39. Child neglect is a crime under CGS §46b-120.

40. Plaintiff’s career required him to be in LA, but Riordan said that providing her extended family and former work colleagues with access to the children was more important to her than keeping the family intact. So for six months in 2010, nine months in 2011 and three months in 2012, Plaintiff commuted cross-country every weekend (at great expense) in order to see his children. Plaintiff had never before lived apart and, when his contractual commitment was up in April 2012, he never lived away again, even though his career suffered as opportunities on the East Coast are much more limited in his business. Publicly available, uncontested Trial testimony corroborates all of this. Defendant’s statements intentionally omit these facts and so present Plaintiff in a false light as someone who put his career ahead of his children when the opposite is true. Defendant’s comments about the children not only falsely inform the public’s sense of Plaintiff, but may affect the children’s perception of their father’s priorities.

41. On information and belief, Defendant was not an absentee or neglectful parent, quite the opposite: he was very involved in his children’s lives, as uncontested testimony at the Trial established. Plaintiff attended every parent/teacher conference, even those Riordan admitted she skipped because she “didn’t respect” or wasn’t getting along with the teacher. Unlike Riordan,

Plaintiff never missed a little league game or gymnastics tournament. The pediatrician, dentist and audiologist said Plaintiff was “far more likely” to bring the children to their appointments than Riordan, and all three described her as “difficult.”

42. Defendant states, “[Plaintiff] somehow got the judge switched, and suddenly...[Riordan] can’t see the kids at all.” Defendant goes on to falsely allege, [Riordan] is “not able to talk to [her] kids for two years and not see them, not talk to them.”

43. In July 2020, a supervision agreement was signed by Riordan and Plaintiff. Within 48 hours, Plaintiff submitted the paperwork, had the required in-take interview and paid the \$7500 retainer in full to the selected professional supervisory firm. Riordan did not contact the supervisor until November 2020, she never completed the paperwork nor did she ever contact the supervisor to arrange a visit. *Defendant is aware that Riordan’s own decisions and actions, not Plaintiff’s, are the reason she did not see the children.*

44. On information and belief, Defendant was aware that Riordan was unable to follow the court’s orders and so could not be trusted with the children. To cite only one example, within days of the court issuing the no contact order, Riordan acquired a “burner” phone and secretly contacted the older son, repeatedly ordering him to falsely accuse his father of abuse, delete her texts and never tell anyone - including his psychiatrist - what she had done. This wasn’t a one-off moment of weakness, it was done over the course of days because the boy was not complying with her orders. Again, Defendant is aware that it is this sort of conduct, not anything Plaintiff did, that has resulted in Riordan’s lack of contact with the children.

45. Plaintiff has not denied Riordan’s family/friends access to the children. In fact, the children frequently text Riordan’s sister and her children, which Plaintiff encourages, and they celebrated Christmas Eve 2021 at his home. Any of Riordan’s extended family/friends who asked to communicate with the children has been able to do so. There are only two exceptions, both due to the troubling behavior of the individuals. The first is Riordan’s aunt, who after several FaceTime calls with the children arranged by Plaintiff published negative remarks about him in *The Frank Report*. One of the children showed him the October 12 article and asked Plaintiff, “Why is Aunt Barbara trying to make mom hate you?” Plaintiff later explained to the aunt that he felt he could no longer trust her to speak privately with the children. The other individual is Defendant, who Plaintiff learned had been making multiple false allegations of child abuse against him to DCF. Like the aunt, Defendant was also involved with *The Frank Report*. When a reader criticized Parlato in the “Comments” for publishing confidential info about the children, Defendant took a position against Plaintiff and justified Parlato’s extreme violation of the family’s privacy. Literally everyone else from Riordan’s “side” who has asked has communicated with the children. This is corroborated in texts, e-mails and uncontested Trial testimony.

46. Defendant made the all of the defamatory statements described under sections A - F above in an article in which she identified Plaintiff and which she caused to be published to the public at large on at least two websites on the Internet, *The Frank Report* and *The Family Court Circus*. When material is published on the Internet it must be regarded as substantially certain to become

public knowledge. Publishing defamatory material on multiple sites not only increases the number of people likely to see the misrepresentative and untrue statements about Plaintiff, it enables more meta tags and links to be utilized to draw traffic to those sites and so increases over time the damage done to Plaintiff, as search engines “drive” readers to those sites in perpetuity.

47. An opinion is privileged as fair comment only when the facts on which it is based are truly stated or otherwise known because the facts are of common knowledge. Neither of these circumstances apply to any of the above-described statements. Moreover, opinions which invade the legitimate expectations of privacy of the person about whom the opinion was stated are not protected. Therefore, Defendant made these statements without privilege or justification.

48. Defendant made all of the defamatory statements described in Sections A- F with knowledge of their falsity or, alternatively, with a reckless disregard for their falsity and so had an improper and unjustifiable motive - i.e., actual malice in fact.

49. The statements made under sections A - F above are not only defamatory, they accuse Plaintiff of crimes of moral turpitude and so are actionable *per se*. When the defamatory words are actionable *per se*, the law conclusively presumes the existence of injury to the plaintiff’s reputation. The individual plaintiff is entitled to recover, as general damages, for the injury to his reputation and for the humiliation and mental suffering which the libel caused him. *Devito v. Schwartz*, 66 Conn. App. 228, 784 A.2d 376 (2001).

50. Pursuant to CGS § 52-237, Plaintiff is entitled to all damages available at law, including compensation for mental suffering, reputational damage, loss of business profit and employment suffered as a result of Defendant’s acts in an amount to be determined at trial.

51. As explained, in the Letter on May 3, 2022 Plaintiff afforded Defendant the opportunity to correct her published lies. It has now been more than sixty (60) days, not only has Defendant not retracted the falsehoods, she has not shown any remorse or taken responsibility for the harm she has caused (even to Plaintiff’s children). Under CGS §52-237, Plaintiff is entitled to compensatory damages.

52. All of the above-described statements in A- F convey a defamatory meaning. They harm Plaintiff’s reputation as to lower it. Defendant’s above-described statements concerning Plaintiff directly injured him by diminishing his reputation.

53. Defendant intentionally and wrongfully made the above-described defamatory statements knowing that her actions were certain or substantially certain to injure Plaintiff emotionally and economically, including but not limited to by lessening his ability to secure employment.

54. Defendant’s published, life-altering lies about Plaintiff have destroyed his reputation and exposed him to public hatred, contempt and ridicule. Defendant’s published lies have pulled apart Plaintiff’s extended family and destroyed personal relationships with friends, colleagues and former neighbors. The psychological damage done by the sort defamation and invasion of privacy Defendant has engaged in is severe and can cause suicide and attempted suicide. It has resulted in a diagnosis and need for treatment for Plaintiff. Defendant’s very public, false

allegations of crimes of moral turpitude have also deprived Plaintiff of business opportunities. Executive recruiters confirm that in today's market, every employer checks a candidate's Internet profile, and the false accusations of immoral, even unlawful conduct that Defendant has publicly made have made Plaintiff "unemployable." This has only added to Plaintiff's emotional harm.

55. That Defendant's published falsehoods have incited people to hate Plaintiff is apparent from the comments from readers responding to her interview in *The Frank Report*. These readers made blistering statements like, "[Plaintiff] is a monster and clearly mentally unstable" and "Know anything about the alleged N.A.M.B.L.A membership/affiliation of a certain male divorcé in residing Connecticut?" One lengthy comment shows how completely the public will believe and even repeat Defendant's many false allegations, "The court finds [Plaintiff] a HIGH RISK abuser. This is based on input from the father himself. But judge grossman ignored the recommendations of hospital and dcf and forced these kids back with the father immediately. This is corruption. Same players: Jessica Biren caverly, custody evaluator and judge jane grossman. Jocelyn Hurwitz and Janis Laliberte are GALs known to traffic children. In The Worst Interest of the Child: Traffickibg Children Through Family Court. The court isn't making life better fir this clown. Just using him for all his money. He made a deal with the devil." [sic]. These comments alone put to rest any doubt about the extraordinarily life-altering negative impact Defendant's defamation has had on Plaintiff's reputation and subsequently his emotional and financial states.

56. As a proximate result of Defendant's malicious defamation, Plaintiff has suffered and will continue to suffer actual, consequential and/or incidental damages to his emotional and financial health in an amount to be determined at trial.

57. Defendant's actions were independently wrongful, were proscribed by common law defamation and meet the tests for libel per se and actual malice.

58. Defendant has knowingly engaged in highly reprehensible and despicable conduct warranting damages.

SECOND CAUSE OF ACTION

(Invasion of Privacy by False Light at Common Law)

1. Plaintiff incorporates by reference all preceding allegations as though fully set forth herein.
2. The above-described statements made by Defendant under Sections A - F are not true and are such major misrepresentations of Plaintiff's character, history, activities or beliefs that serious offense may reasonably be expected to be taken by a reasonable person.
3. In addition, the above-described statements made by Defendant under Sections A - F are allegations of crimes of moral turpitude and constitute a false light invasion of his privacy.
4. As demonstrated, Defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matters and the false light in which her statements placed Plaintiff. She made the statements with actual malice in fact.

5. Defendant intentionally and wrongfully invaded Plaintiff's privacy by communicating false statements of fact about him, including false accusations of crimes of moral turpitude, to a wide, public audience. Defendant also caused to be communicated confidential records and so further invaded his privacy and used these documents to put him in a false light. In so doing, Defendant intended to harm Plaintiff or knew that her actions were certain or substantially certain to achieve this result.
6. As a proximate result of Defendant's deliberate false light invasion of his privacy, Plaintiff has suffered and will continue to suffer actual, consequential and/or incidental damages to his emotional and financial in an amount to be determined at trial. The essence of the tort of invasion of privacy by false light is the injury to the plaintiff's emotional well-being because of outrageous treatment by the defendant. Defendant's conduct here is sufficiently flagrant to give rise to the tort, so the injury the law seeks to redress is the anguish itself and it need not rest, parasitically, on more demonstrative loss or injury. Mental anguish itself is the actual damage, and proof of special damage in terms of out-of-pocket expenses of exact pecuniary measurement is not essential to a recovery of damages.
7. Defendant's conduct is so reprehensible and despicable that Plaintiff is entitled to monetary damages, the amount of which shall be determined at trial.

THIRD CAUSE OF ACTION

(Intentional Infliction of Emotional Distress at Common Law)

1. Plaintiff incorporates by reference all preceding allegations as though fully set forth herein.
2. By publishing the statements in Sections A - F above, Defendant maliciously set out to destroy Plaintiff's reputation by falsely accusing him of crimes of moral turpitude as well as making additional false statements that defamed him, invaded his privacy by false light and have severely harmed him emotionally and economically. Defendant's actions constitute an intentional infliction of emotional distress.
3. In considering intentional infliction of emotional distress it bears emphasis that the primary focus is on the question of *foreseeability* and not on the physical manifestation of the emotional injury. Any reasonable person would foresee that Defendant's conduct - specifically publishing falsehoods about Plaintiff, including that he is guilty of crimes of moral turpitude - would create an unreasonable risk of causing Plaintiff emotional distress. Moreover, as Defendant boasts multiple times in her published remarks, she has professional-level experience with mental health issues and so she has an even greater understanding of the emotional distress her willful, malicious defamation would likely cause. In addition, Plaintiff made Defendant aware of the emotional harm the publication of false information causes when he sought her help on behalf of his children to get Riordan to remove posts on *The Frank Report* and *The Family Court Circus*. Having this self-described enhanced awareness of psychological matters, Defendant still made her damaging, false statements against Plaintiff, which manifests not only malice, but extreme malice.

4. In that Defendant publicly, falsely accused Plaintiff of the most morally repugnant crimes, including abusing his own children, her conduct is so extreme and outrageous as to exceed all bounds usually tolerated by decent society.
5. The heinous nature of Defendant's false accusations was exacerbated by her repeated re-statements of her professional credentials as a nurse with mental health experience and her lengthy relationship with Plaintiff. These statements were clearly intended to induce readers into giving her allegations greater credibility. That this "worked" is demonstrated by the viciousness of the published reader responses to her lies, and has caused the Plaintiff even more anxiety and upset.
6. A reasonably foreseeable, proximate result of Defendant's intentional, egregious conduct was Plaintiff suffering significant emotional distress, including depression, anxiety and other serious conditions associated with such stress.
7. The severe emotional distress sustained by Plaintiff as a result of Defendant's intentional misconduct entitles him to damages, which shall be determined at trial.
8. Plaintiff has no other adequate remedy at law for the injuries he has suffered and will continue to suffer as a result of Defendant's unlawful acts.
9. As explained, when Plaintiff sought help from the police because of Defendant's misconduct, she retaliated by publishing her false allegations against him. But she has continued through the present to harass him. On July 11, 2022, she sent him unsolicited, mean-spirited, accusatory texts. Unless restrained by this Court, Defendant will continue to pursue her malicious and unlawful conduct, including but not limited to defaming Plaintiff, invading his privacy by false light and subjecting him to severe emotional distress, all of which have harmed and will continue to harm him emotionally and financially.

PRAYER FOR RELIEF

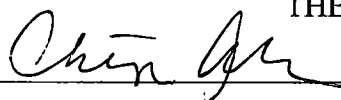
WHEREFORE Plaintiff respectfully prays for the following:

1. Monetary damages demanded are an amount greater than \$15,000, exclusive of interest and costs;
2. Equitable relief as follows:
 1. An order enjoining Defendant from engaging in further defamatory or/and or retaliatory conduct toward Plaintiff or his minor children;
 2. An order enjoining Defendant to immediately request in writing to *The Frank Report, Family Court Circus* and any other sites on which her false statements described herein that the site publish a retraction of all of her false statements about Plaintiff and all confidential information about the children and him. She must request that the retractions appear in the manner comparable to that of Defendant's original statements and must be disseminated to the same audiences. Stating that she has requested the retractions in response to court order or that Plaintiff denied her accusations will not do. The requested retraction must be a frank and full acknowledgement that her statements are false and that publishing confidential information was wrong. Defendant will "cc" Plaintiff on each request for retraction;
 3. An order enjoining Defendant to immediately apologize in writing to Plaintiff and his children for her many defamatory statements, for exposing confidential information, for invasions of privacy by false light and for the extreme emotional and other harm she has caused. A weak, grudging or half-hearted effort will not suffice. The apology must be frank and full. This apology will be sent to Plaintiff via both USPS and e-mail;
 4. An order enjoining Defendant to immediately request in writing that *The Frank Report, Family Court Circus* and any other publication in which her false statements described herein appear that the publication publish her letter of apology to Plaintiff and his children in the manner comparable to that in which Defendant's original statements appeared and that it be disseminated to the same audiences. Stating that she is requesting the apology be published in response to court order or that Plaintiff denied her accusations will not do. The request must be a frank and full acknowledgement that her statements are false and that exposing confidential information was wrong and she regrets the harm she caused. Defendant will "cc" Plaintiff on each request for publication.
3. Costs and interest to the extent provided for by law; and

4. Such other and further relief as the court may deem equitable and just.

DATED: July 12, 2022

THE PLAINTIFF



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