

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

CHRISTOPHER A. AMBROSE,  
Plaintiff

v.

Case No.: 3:25-cv-00398-SVN

BANDY X. LEE,  
Defendant

MAR 26 2025 PM 3:44  
FILED-USDC-CT-NEW HAVEN

**NON-CONSENT MOTION TO SEAL**

Pursuant to Fed. R. Civ. Pro. FRCP 26(c), Local Civil Rule 5, and Connecticut Practice Book Section 11-20A, the plaintiff respectfully moves the Court for leave to file and maintain under seal the Motion for Leave to Proceed in *forma pauperis* (docket document #2), filed on March 17, 2025 (referred to herein as the “Application for Fee Waiver” or the “Application”).

**1. ARGUMENT**

Although there is a general presumption in favor of public access to documents filed with the Court, this presumption is not absolute and will be overridden if “[u]pon written motion of any party...the judicial authority concludes that such order is necessary to preserve an interest which is determined to override the public’s interest in viewing such materials.” Connecticut Practice Book Section 11-20A (c). To succeed on a motion to seal in connection with a non-dispositive motion, the moving party must show good cause.

**A. Sealing Is Necessary Because it contains personal and financial information that is not the subject of public interest.**

The plaintiff seeks to seal the Application for Fee Waiver because it contains highly confidential information regarding his financial circumstances, including his income, expenses, and other personal facts that are of no interest to the public. This information has never been made public before, and its public disclosure would seriously violate his privacy and likely cause him serious harm. The plaintiff has a reasonable basis for this apprehension.

The defendant has a well-documented history of disclosing and publicizing the most personal information about the plaintiff, including statements she supposedly elicited from his children, “confidential” reports she made to DCF falsely alleging he sexually molested his children, and her psychiatric diagnostic notes branding him a “duly diagnosed psychopath” - *though she has never treated or even met him*.

The defendant published this information - and much more - on numerous social media platforms and podcasts, destroying the plaintiff’s reputation and making him the subject of intense public scrutiny, ridicule and scorn. In fact, her malicious publication of this false narrative and private information is the basis for the defamation, harassment, and invasion of privacy by false light described in the Complaint.

Moreover, the defendant is not the only individual likely to misuse the private information contained in the Application to harm the plaintiff. His ex-wife, Karen Riordan (“Riordan”), has also waged a vicious online smear campaign and published confidential information about him, even the sealed custody evaluation, as noted in the divorce decree (NNH-FA19-6150042-S, document # 520.10 “Memorandum of Decision” at p. 13). Riordan, who hired Lee, also uses her close associates, including federal felons Frank Parlato, Jr. and Richard Luthmann, with whom the defendant collaborates, to propagate this false narrative and reveal private information about the plaintiff.

In short, the defendant, Riordan, and their collaborators have published “private” information and a false narrative about the plaintiff over the Internet and podcasts, destroying his reputation and quality of life. They will likely publish his Application, exacerbating the humiliation and harm he seeks to address with this lawsuit.

**B. The Document Must Be Sealed Indefinitely**

Due to the confidential and sensitive nature of the information in the Application, the plaintiff requests that the document be kept under seal indefinitely.

**C. There Are No Alternatives to Sealing**

The plaintiff believes that sealing the Application is necessary to preserve the confidentiality/sensitive nature of the document and information contained therein. There is no procedure other than sealing the document to protect its confidential/sensitive nature.

**II. CONCLUSION**

Given the confidential nature of the information contained in the Application for Fee Waiver, the necessity of filing the document with the Court, and there being no alternative than to seal the document, the plaintiff respectfully requests that the Court grant his Motion and enter an Order sealing it and maintaining it under seal indefinitely.

Dated: 26 March 2025

Respectfully submitted,



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