

FBT-FA-19-6088163-S	)	SUPERIOR COURT
CHRISTOPHER AMBROSE	)	J.D. OF FAIRFIELD
v.	)	AT MIDDLETOWN RFTD
KAREN AMBROSE	)	October 6, 2023

PLAINTIFF’S LIST OF MOTIONS

Because the Court is new to this case, the plaintiff respectfully notes that Judge Adelman stated in his Memorandum of Decision of April 26, 2022 (#520.10, “The Decision”) that the defendant’s conduct has been “nothing short of horrendous,” she “never even attempted to follow the court’s orders and work toward being restored to her former parental role” (The Decision at p. 12), and “caused [the children] harm by making them pawns...without any thought as to [their] best interests.” (p. 28). Since the instant action started when the defendant unlawfully took the first child on April 22, 2023, her contempt has become ever more alarmingly aggressive. The plaintiff respectfully requests the court consider her history of contempt when considering remedies.

Judge O’Neill issued Protective Orders against the defendant and Supplemental Orders after finding her in contempt of those orders on August 8 and September 15, respectively (collectively, the “Orders”). The Orders provided some of the relief the plaintiff was seeking. Similarly, Child Support Enforcement Services is now garnishing the defendant’s wages, so her refusal to pay the modest \$249/week¹ child support is no longer an issue.

Below is the edited list of motions and modified requests for relief that the Orders did not address and which the plaintiff respectfully asks the court to consider:

1. Emergency Motion for Contempt

Docket Entry No.: **585.00**

Date Filed: **April 28, 2023** (after Mia was taken on April 22)

2. Motion for Contempt

Docket Entry No.: **605.00**

Date Filed: **May 25, 2023** (after Matthew was taken on May 22)

3. Amended Motion for Contempt of Custody

Docket Entry No.: **626.00**

Date Filed: **July 18, 2023** (after Sawyer was taken on July 4)

¹ This amount was assessed when the defendant was unemployed; even after securing employment, she refused to pay.

Consolidated Relief Sought:

- That the court consider incarceration of the defendant for her relentless contempt of the custody/no contact orders. Incarceration has never been the plaintiff's goal, but all remedies - including monetary sanctions and mandated therapy - haven't stopped her willful contempt. Even now, as explained below, the defendant is currently in contempt of the Orders. Unless she is held accountable, her contempt will continue, further harming the children who have yet to attend school as they have been secretly moved from state to state, to stay with the defendant's friends and relatives.
- That the defendant under *Strobel* not be allowed to file any motion until she files a request for leave to file same and the Presiding Judge approves the motion.
- That the Court direct the defendant to cancel the children's phone plans and to instruct via email her cousin, John Laurenzi, to inform the children to immediately return their phones to him so that he may return them to the defendant. The defendant shall comply with these orders within two days of the order and provide copies of the email to the Court and the plaintiff.
- That the Court order the defendant to return to the plaintiff the children's iPhones, which he provided and which the children report are at the defendant's residence, within five days of the date of the order.
- That the Court order the defendant not to violate the children's privacy by sharing with any third party or entity, including but not limited to [frankreport.com](#), [familycourtcircus.com](#), and [@therobbieharvey](#) on [tiktok.com](#), any information/narratives/photos/recordings about, by, or referencing the children, and not to hire, direct or request any third party to attempt to accomplish the same. The children's most confidential information, including their psychiatric records and the sealed custody evaluation, has been published on the defendant's live-in boyfriend's website, [frankreport.com](#).
- That the Court order the defendant to demand via email within two days of the order that [@therobbieharvey](#) on [tiktok.com](#) and [frankreport.com](#), a website published by her boyfriend, Frank Parlato, Jr., immediately remove the hundreds of photographs, records, audio/video clips of, and any references to the children. Copies of said emails shall be sent to the Court and the plaintiff.
- In his August 8 ruling, Judge O'Neill determined that the defendant exerts coercive control over the children's thoughts, emotions, and actions. On September 15, he found that she communicated with and influenced the children in willful defiance of the Protective Orders. On September 20, the Mt. Pleasant (NY) PD began a criminal investigation after discovering that third parties closely associated with the defendant instructed the children not to return to the plaintiff and prevented their rescue by NY Child Protective Services by arranging for them to be secretly transported to yet another location late at night. The plaintiff respectfully requests that the Court direct the defendant to instruct John Laurenzi via email to inform the children that she wants them to return to the plaintiff's home and begin attending school immediately. This would be a one time exception to the Orders prohibiting the defendant from communicating with the children through a third party. The defendant shall comply with these directions within two days of the order and provide copies of her email to the Court and the plaintiff.

- That the Court order the defendant to pay all reasonable costs incurred in preparing and prosecuting these contempt motions, including attorney and marshal fees and subpoena costs.
- That the Court make such further orders as it deems fair and equitable

4. Motion for Contempt and for Order of Compliance

Docket Entry No.: **629.00**

Date Filed: **July 19, 2023**

Relief Sought:

- That the Court hold the defendant in contempt for failure to comply with the payment obligations outlined in The Decision.
- That the Court order the defendant to pay the \$2,000 required by Order IX of The Decision within ten (10) days after the entrance of the order.
- If the defendant does not make the complete payment on time, she shall pay an additional \$100 every week until the entire amount (including accrued sanctions) is paid, beginning at noon on the day after the payment deadline.
- That the Court award of the costs of this motion, including attorney fees and the State Marshal fees of \$85 to serve the defendant.
- Any other orders the Court deems fair and equitable.

5. Plaintiff's Motion to Dismiss Third-Party Motion to Intervene and Memorandum in Support of Motion

Docket Entry Nos.: **632.00 and 633.00**

Date Filed: **July 20, 2023**

Relief Sought:

- That the Court dismiss the Third-Party Motion to Intervene for lack of standing. The party is the birth mother of the youngest child, who was adopted at birth in a closed adoption. There has been no contact with her since he was born
- That the Court award of the costs of this motion, including attorney fees and the State Marshal fees of \$85 to serve the defendant.
- Any other orders the Court deems fair and equitable.

THE PLAINTIFF,

/s/ 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 to Karen Riordan, 19 Lake
Dr., Madison, CT 06443, riordan.kmms@gmail.com

THE PLAINTIFF

/s/ Christopher Ambrose

Christopher Ambrose
381 Horsepond Rd.
Madison, CT 06443
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