UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT
New Haven Division

CHRISTOPHER A. AMBROSE, Plaintiff, v. BANDY X. LEE, Defendant.	)))))))))	Case No. 3:25-cv-00398-SVN

DEFENDANT BANDY X. LEE'S SUPPLEMENTAL MOTION TO DISMISS WITH PREJUDICE (Fed. R. Civ. P. 41(b); 28 U.S.C. § 1915(e)(2)(A))

I, Bandy X. Lee, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

Introduction

Defendant Bandy X. Lee, proceeding *Pro Se*, respectfully moves for dismissal of this action with prejudice pursuant to Fed. R. Civ. P. 41(b) and 28 U.S.C. § 1915(e)(2)(A). Dismissal is warranted because Plaintiff Christopher Ambrose secured in forma pauperis ("IFP") status in bad faith through deliberate fraud on the Court. As detailed below, Mr. Ambrose's IFP application was rife with material falsehoods and omissions regarding his finances and dependents. His misrepresentations strike at the core of the Court's evaluation of indigence, warranting the harsh sanction of dismissal with prejudice.

Mr. Ambrose portrayed himself as destitute to avoid paying the filing fee, yet evidence shows his claim of poverty was patently untrue. For example, his alleged indigence was belied by extravagant living arrangements and undisclosed assets, including: a $3,750/month waterfront home lease, a pending inheritance exceeding $800,000 in probate, ongoing SNAP benefits (food assistance), an active production company generating income, and no financial support obligations for adult children.

The Court unsealed Plaintiff's financial affidavit and discovered a "misleading financial narrative" orchestrated by Mr. Ambrose to obtain cost-free access to the courts. Indeed, after filing this case IFP, Mr. Ambrose promptly initiated multiple other federal lawsuits without seeking IFP status – and paid the filing fees in full – underscoring the falsity of his prior poverty claims. Such abuse of the IFP privilege is precisely what § 1915(e)(2)(A) was designed to prevent.

Accordingly, and as further supported by the Declaration of Mia Ambrose and exhibits, the Court should dismiss this action *with prejudice*. The integrity of judicial proceedings demands no less in the face of willful fraud on the court. Mr. Ambrose's bad-faith conduct – falsifying his indigency to dodge fees – forfeits his privilege to proceed in forma pauperis. The Court should also exercise its discretion to sanction this misconduct by referring Mr. Ambrose for investigation of federal offenses committed in the course of this litigation, and by awarding Defendant her attorney's fees and any further relief deemed proper.

Factual Background: Plaintiff's Misrepresentations and Omissions

Plaintiff's IFP Filing: On March 16, 2025, Plaintiff filed this suit along with a sworn IFP application and financial affidavit. In those filings, he claimed extreme financial hardship: reporting essentially no income, no assets, and minimal expenses, while asserting he supported two 18-year-old "dependent" children in school. Plaintiff even moved to seal his affidavit, but the Court denied sealing, allowing scrutiny of his claims. Upon review, the affidavit revealed a pattern of material falsehoods and omissions calculated to mislead the Court.

Evidence of Fraud: The following false statements and concealed facts illustrate Plaintiff's abuse of the IFP process:

- **Underreported Rent:** Plaintiff understated his monthly rent by over $1,200. He swore his rent was $2,450, when in fact he has leased a luxury beachfront home at 153 Middle Beach Rd., Madison, CT, for $3,750 per month since September 2024. The rental property is valued at over $2.2 million, and Plaintiff's lease confirms the higher rent. This sizeable expense was concealed to exaggerate his poverty. This and other facts raising serious questions about Plaintiff's dishonesty are detailed in reports by journalist Frank Parlato, Jr. (**Exhibit A**).

- **Falsified Dependent Children:** Plaintiff falsely claimed two 18-year-olds as dependents and full-time students. In reality, neither child was a full-time high school student at the time. Mia Ambrose, Plaintiff's daughter, has not resided with him or received any support from him since August 2024. She is independent, and Plaintiff's continued portrayal of her as a dependent is false. Mia's sworn declaration (**Exhibit B**) confirms that Plaintiff even refused to return her clothing, ID, and personal documents, and misrepresented her residency to authorities to continue receiving benefits and bolster his IFP claim. Plaintiff's son Matthew Ambrose does live with him, but was not enrolled in school – records show Matthew withdrew from high school on March 12, 2025, just four days before Plaintiff falsely swore that both children were full-time students. Plaintiff's dependent children's claims were deliberately misleading.
- **Omitted Public Assistance:** Plaintiff failed to disclose government benefits that undercut his claim of poverty. He has been receiving Supplemental Nutrition Assistance Program (SNAP) benefits continuously since at least late 2024. On information and belief, Plaintiff likely qualified for SNAP by misrepresenting his household size (for instance, by claiming three children at home) – inconsistent with the *actual* household composition and with the inflated grocery expenses he listed in his affidavit. Plaintiff also receives utility assistance from Eversource under a hardship program, which he did not report. These undisclosed benefits further indicate that his affidavit did not fully or honestly portray his resources.

- **<u>Concealed Assets and Income</u>:** Perhaps most egregiously, Plaintiff hid substantial assets and income streams in his sworn affidavit:
  - He failed to report recent withdrawals from a Fidelity 401(k) retirement account, which provided him with cash income.
  - He checked "no" to owning any stocks, yet he holds stock investment accounts (e.g., with Fidelity and Bank of America) and regularly sells stocks for funds. His claim of owning zero stocks was plainly untrue.
  - He never mentioned a large inheritance in progress. In fact, Plaintiff has been actively participating in probate court proceedings for many months regarding an estate from which he stands to inherit hundreds of thousands of dollars (estimated $800,000+). This imminent windfall was knowingly omitted from his IFP disclosures.
  - He concealed business income tied to his company, *Eyes Above Productions, Inc.* Although Plaintiff reported no business or self-employment income, he receives regular royalty/residual checks from the Writers Guild of America West ("WGA West") through this company. Eyes Above Productions (registered in California, ostensibly as a barber/beauty business) serves as Plaintiff's vehicle to collect entertainment industry residuals. Evidence shows Plaintiff receives checks payable to "Eyes Above Productions, Inc. FSO (for the benefit of) Chris Ambrose" at a Beverly Hills address. These WGA residual payments arrive roughly quarterly and constitute real income; yet Plaintiff omitted them entirely from his affidavit. Despite this ongoing business activity and revenue, Plaintiff swore under penalty of perjury that he had "$0.00" income and no business interests – a blatant falsehood.

Each of these assets or income sources was material to Plaintiff's financial picture and should have been disclosed. Their omission violated the sworn disclosure obligations of the IFP affidavit and falsely inflated Plaintiff's portrayal of poverty.

- **Ability to Pay Shown by Subsequent Filings:** Plaintiff's conduct after initiating this suit further exposes his bad faith. After gaining IFP status in this case, Plaintiff filed at least two additional federal lawsuits in 2025 – one against Frank Parlato Jr., and one against Tina Swithin – without seeking IFP in those cases. In each, he paid the full filing fee of approximately $400, evidencing his ability to fund litigation when it suited him. These later filings (documented in Exhibit J) directly contradict Plaintiff's claim that he lacked $402 to pay this Court's fee. In other words, Mr. Ambrose had the financial means to litigate, but he chose to misrepresent his finances to avoid the fee in this particular case, thereby abusing the IFP privilege.

Collectively, the above falsehoods and omissions paint a stark picture: Plaintiff deliberately lied about his finances to obtain a fee waiver. This was not a matter of minor inconsistencies or good-faith error. It was a fraudulent scheme to "weaponize poverty" – to secure subsidized access to the courts while secretly holding significant assets and income. Indeed, Plaintiff went so far as to take steps to perpetuate the fraud, such as holding onto Mia Ambrose's personal documents to falsely claim her as a dependent. Such conduct demonstrates willful bad faith.

In light of these facts, Mr. Ambrose's IFP application was not merely incomplete – it was intentionally deceptive, constituting a fraud on the Court. Plaintiff constructed a false narrative of indigence to gain an unwarranted litigation advantage. The privilege of proceeding IFP was never meant to shelter those who conceal luxury assets or litigation war chests behind a facade of poverty.

Notably, the same deceptive IFP affidavit that Plaintiff submitted in this case has already drawn judicial scrutiny in a related case in this District. In *Ambrose v. Parlato*, No. 3:25-cv-01151-SVN, Defendant Frank Parlato Jr. moved for sanctions and alerted the Court to Mr. Ambrose's financial misrepresentations. Parlato's filings (including an affidavit with supporting exhibits) corroborate and amplify the evidence of Plaintiff's fraud presented here. For example, Parlato identified Plaintiff's undisclosed income from Eyes Above Productions at the Beverly Hills address and detailed the pattern of false statements in Plaintiff's IFP affidavit. Thus, the Court is already on notice – through the Parlato case – of Mr. Ambrose's bad-faith conduct regarding IFP status. This Supplemental Motion now brings those issues squarely before the Court in *this* case, on behalf of Dr. Lee, and seeks the appropriate remedy: dismissal with prejudice.

Legal Standard

Congress enacted 28 U.S.C. § 1915 to ensure indigent litigants have access to the courts, but with that privilege comes an expectation of honesty. Under 28 U.S.C. § 1915(e)(2)(A), "the court shall dismiss the case at any time if the court determines that the allegation of poverty is untrue." This mandatory dismissal provision exists to prevent abuse of the IFP privilege and deter fraud on the court. In other words, if a plaintiff's claim of indigence is found to be false, the court must terminate the action – even if filing fees were initially waived.

Importantly, courts have made clear that dismissal under § 1915(e)(2)(A) may be ordered with prejudice when the falsification was in bad faith or part of a deliberate effort to mislead. The Second Circuit and other courts hold that material lies in an IFP affidavit warrant the harsh sanction of dismissal with prejudice, because "permission to proceed in forma pauperis is a privilege, not a right". The integrity of the judicial process demands that those who "falsely understate their net worth in order to obtain in forma pauperis status" be weeded out and denied the benefit of proceeding further. In a summary order, the Second Circuit affirmed dismissal where a litigant omitted significant funds from an IFP application, emphasizing that § 1915(e)(2)(A) is meant to weed out litigants who misrepresent their financial status to gain undue advantage. Even an omission or minor falsification can trigger dismissal; for instance, failure to disclose assets or inflating expenses falls within the statute's scope (the statute is not limited to outright perjury about income).

Apart from § 1915, federal courts possess inherent authority (and under Fed. R. Civ. P. 41(b)) to sanction bad-faith litigation conduct, including fraud on the court. Rule 41(b) authorizes involuntary dismissal with prejudice for failure to comply with court rules or orders, and submitting a false financial affidavit is a prime example of failing to comply with the obligation of candor in court filings. Courts also invoke their inherent powers to protect the judicial process from fraud and bad faith conduct. As the Supreme Court noted, the court's inherent power extends to dealing with fraud that attempts to subvert the integrity of proceedings (citing *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44 (1991)). Here, Plaintiff's misuse of IFP status is a willful abuse of the judicial process, which this Court has the power and duty to redress.

Argument

I. Bad-Faith IFP Fraud Requires Dismissal with Prejudice

Under 28 U.S.C. § 1915(e)(2)(A), if a court finds that a plaintiff's allegation of poverty was untrue, dismissal is mandatory. The statute says the case "shall" be dismissed as soon as the falsity is discovered. This harsh outcome reflects the policy that fraudulently obtaining IFP status is a serious abuse that warrants immediate termination of the suit. Here, there is no question that Mr. Ambrose's allegation of poverty was false. He misrepresented or concealed virtually every aspect of his financial condition – from income, to assets, to expenses and dependents – in order to appear indigent. The breadth and materiality of these falsehoods take this case well beyond the realm of excusable mistake or misunderstanding. This was a calculated fraud.

Courts have consistently held that when a litigant tells material lies to qualify for IFP status, the case must be dismissed *with prejudice*. Dismissal with prejudice is appropriate because it serves as a deterrent to others who might be tempted to "take advantage of the system through lies or fraud", and it prevents the litigant from benefiting from the deception. For example, in *Mathis v. N.Y. Life Ins. Co.*, 133 F.3d 546, (7th Cir. 1998), the Seventh Circuit affirmed dismissal with prejudice where the plaintiff failed to disclose pension income on her IFP application. In *Thomas v. Gen. Motors Acceptance Corp.*, 288 F.3d 305, (7th Cir. 2022), the same court flatly stated: "Because [the plaintiff] made false statements in her IFP affidavit, the suit had to be dismissed; § 1915(e)(2)(A) says so." While those are Seventh Circuit cases, the principle is universal – and the Second Circuit has voiced full agreement. In *Vann v. Comm'r of N.Y.C. Dep't of Correction*, 496 F. App'x 113 (2nd Cir. 2012), the Second Circuit upheld dismissal where an inmate omitted significant deposits from his IFP affidavit, noting that the statute's purpose is to prevent abuse by those who misrepresent their financial resources. District courts within this Circuit likewise hold that materially false IFP statements mandate dismissal, especially when made in bad faith (even if the case has merit otherwise).

Mr. Ambrose's misstatements here were indisputably material. The false information pertained to core elements of the Court's IFP determination: monthly housing cost, number of dependents, receipt of public assistance, and available assets. Any one of these, if truthfully disclosed, could have influenced the Court's decision on whether he qualified for a fee waiver. Taken together, these falsehoods painted a wholly distorted picture of Plaintiff's finances. If the Court had known that Mr. Ambrose lived in a costly beachfront property, had substantial investments and an impending inheritance, and no actual dependent children in school, it almost certainly would have denied IFP status. Thus, the misrepresentations were material to the IFP determination.

Moreover, the evidence shows these misrepresentations were made willfully and in bad faith, not by mistake. Plaintiff did not simply forget a minor asset or miscalculate an expense; he engaged in a pattern of deception: undervaluing expenses, overstating obligations, and omitting entire categories of income/resources. He even attempted to keep his affidavit sealed, which suggests he knew that disclosure of his finances would reveal inconsistencies. This conduct mirrors the kind of deliberate deceit that courts have said warrants the harshest sanction. The Second Circuit has observed that to justify dismissal under § 1915(e)(2)(A), the falsehoods should be material and made in bad faith. Here, both criteria are met in spades. Mr. Ambrose's false statements directly influenced the IFP ruling (satisfying materiality) and were strategically calculated to mislead (demonstrating bad faith).

Accordingly, dismissal with prejudice is not only justified – it is necessary to protect the integrity of these proceedings. Mr. Ambrose's abuse of the Court's generosity has already consumed judicial time and resources under false pretenses. To allow him to continue litigating (now as a paying litigant) would reward deception and encourage future abuse of the IFP system. Dismissal with prejudice serves as a stern warning that litigants who "forfeit the privilege" of IFP by lying will not be given a second chance. It also spares Defendant Dr. Lee from expending further resources defending a case founded on fraud. In short, the only appropriate remedy is to terminate this lawsuit permanently.

II. The Court Should Refer Plaintiff for Investigation of Perjury and Fraud

Plaintiff's conduct in procuring IFP status was not just a civil wrong; it may well amount to criminal violations of federal law. Mr. Ambrose signed his IFP affidavit under penalty of perjury, yet much of its content was knowingly false. Title 18 of the United States Code provides for criminal penalties in such circumstances. In particular:

- **18 U.S.C. § 1621 (Perjury):** makes it a felony to willfully state under oath (or by declaration under penalty of perjury) any material matter which the person does not believe to be true. Mr.

Ambrose's false statements about his income, assets, and dependents, made in a sworn affidavit, fall within the scope of perjury.

- **<u>18 U.S.C. § 1001 (False Statements)</u>:** criminalizes knowingly making false statements in any matter within the jurisdiction of the executive, legislative, or judicial branch of the United States. Submitting a false IFP application to a federal court is a false statement in a judicial matter. This statute could apply both to the misrepresentations to this Court and any false information Plaintiff provided to federal agencies (e.g., in obtaining SNAP or other federal benefits).
- **<u>18 U.S.C. § 1343 (Wire Fraud)</u>:** prohibits schemes to defraud or obtain money or property by false pretenses via interstate wires. If Plaintiff used email or other interstate communications in furtherance of his fraudulent IFP scheme (for example, electronically filing the false affidavit, or misrepresenting facts in online benefit applications), wire fraud may be implicated. Moreover, the benefit he obtained – a waived $402 filing fee – constitutes "property" or a thing of value obtained by fraud, which courts have recognized can support a wire fraud charge in the context of fraudulent fee waivers.

This Court possesses the authority to refer potential criminal misconduct to the United States Attorney for investigation. Given the clear evidence that Mr. Ambrose lied under oath to a federal court, a referral is warranted here. The deterrent effect of dismissal will be enhanced if accompanied by the possibility of prosecutorial action. At a minimum, a referral would signal that litigants cannot exploit judicial resources through perjury without consequence. Mr. Ambrose is a former attorney, which heightens the seriousness of his actions – he was certainly aware of the illegality of false statements under oath, yet proceeded regardless. The Court should therefore refer this matter to the

U.S. Attorney's Office to evaluate charges for perjury, false statements, and wire fraud arising from Mr. Ambrose's IFP fraud and related misrepresentations.

III. Attorney's Fees and Any Other Appropriate Relief

Finally, Defendant requests that the Court award attorney's fees and costs incurred as a result of Plaintiff's bad-faith litigation conduct. Courts have inherent power to award fees when a party has "acted in bad faith, vexatiously, wantonly, or for oppressive reasons" (see *Chambers v. NASCO*, 501 U.S. at 45-46). Here, Mr. Ambrose's fraud on the court forced Dr. Lee to litigate a motion to dismiss on grounds that should never have arisen. He gained admission to federal court under false pretenses, burdening Defendant and the Court with a case that *should not have been* filed without payment of fees (and arguably might not have been filed at all if he had to pay up front). An award of fees would compensate Defendant for expenses unnecessarily incurred and serve to further deter such misconduct.

Defendant also seeks such other and further relief as the Court deems proper. This may include, for example, an order in the related *Ambrose v. Lee* family court matter (if any) or any other sanction the Court finds just. At minimum, dismissal with prejudice, a criminal referral, and attorney's fees are merited to do justice in response to Plaintiff's egregious behavior.

WHEREFORE, Defendant Bandy X. Lee respectfully requests that this Court:

1. Dismiss the Complaint with prejudice pursuant to 28 U.S.C. § 1915(e)(2)(A) and Fed. R. Civ. P. 41(b), due to Plaintiff's fraud on the Court in obtaining IFP status;
2. Refer Plaintiff Christopher Ambrose to the United States Attorney for the District of Connecticut for investigation of potential violations of 18 U.S.C. § 1621 (perjury), 18 U.S.C. § 1001 (false statements), 18 U.S.C. § 1343 (wire fraud), and any other applicable federal statutes, arising from his conduct in this case and related court filings;

3. **Award Defendant her attorney's fees and costs**, as sanctions for Plaintiff's bad-faith litigation and misrepresentations; and

4. Grant **such other and further relief** as the Court deems just and proper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this
26th day of January, 2026,
in New York, New York.

Respectfully submitted,

Bandy X. Lee, M.D., M.Div.
1918 1st Avenue, Apt 516
New York, NY 10029
Tel: (917) 328-2492
Email: bandyleemd@gmail.com

CERTIFICATION OF SERVICE

This is to certify that a copy of the foregoing SUPPLEMENTAL MOTION TO DISMISS WITH PREJUDICE has been filed with the CM/ECF system and will be sent via electronic mail to:

Christopher A. Ambrose
153 Middle Beach Rd.
Madison, CT 06443
ca0515@aol.com

Dated: January 26, 2026

Respectfully submitted,

Bandy X. Lee, M.D., M.Div.

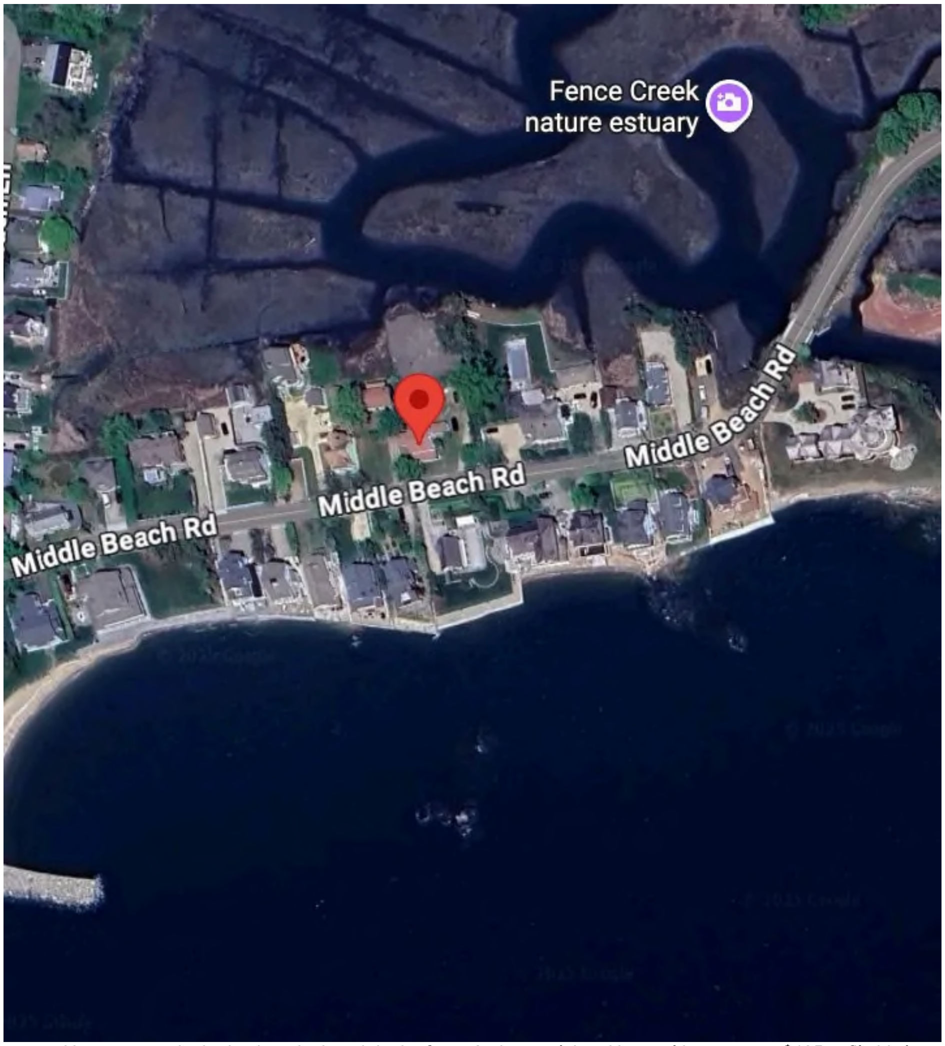
FAMILY COURT

Claiming Poverty From a $2.2M Beach House: The Ambrose Affidavit Story

EXHIBIT

A-1

August 17, 2025by Frank Parlato



Poverty with an estuary in the back and a beach in the front, Ambrose claimed he could not muster $405 to file his lawsuit against Dr. Lee.

In March 2025, former television writer Christopher Ambrose filed a federal defamation lawsuit against Dr. Bandy X. Lee, a psychiatrist and author. Ambrose claims Lee defamed him by publicly accusing him of child abuse. Lee previously said her application of the Hare Psychopathy Checklist scored Ambrose 32 out of 40—two points above the clinical threshold for psychopathy.

Attempt to Waive Court Fees

Seeking to avoid a $405 filing fee, Ambrose applied to the court to proceed in forma pauperis (IFP). Federal law allows waivers of filing fees if paying would cause hardship.

To qualify, applicants must disclose their finances under oath. A false affidavit requires dismissal under 28 U.S.C. § 1915(e)(2)(A) and possible referral for perjury charges.

Ambrose asked to seal his affidavit, but the judge refused, ruling the public has a right to examine such claims.

Affidavit Filed March 16

Ambrose's March 16 affidavit, now public, includes:

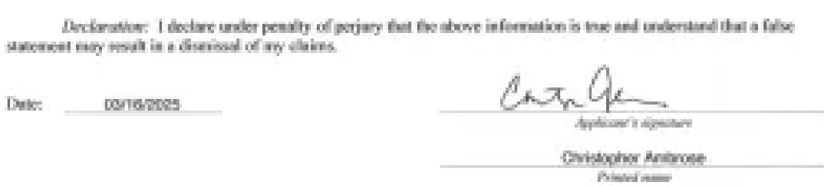
> "I am not employed. My gross pay or wages are: $0.00. My take-home pay or wages are: $0.00….
>
> "I have been unemployed for three years and unable to find work. I support the kids and myself by invading my modest 401(k), already depleted by enormous divorce expenses. My kids and I are on Medicaid (Husky Health). I just learned I am eligible for SNAP."
>
> Under "dependents," Ambrose stated:
>
> "I have sole legal and physical custody of our three children: our younger son, SA, is 14; our older son, Matthew, and daughter, Mia, are 18 but full-time high school students. I provide all their financial support."

Reported Expenses

> Ambrose reported his monthly expenses:
> Rent: $2,450
> Utilities: $750
> Groceries: $750
> Car Insurance: $221.37
> Cell Phones: $132 (for "four lines")
> Credit Card (Visa): $440/month (on a balance of $21,954.64)

Declared Assets

He declared that he had $294.98 in cash or bank accounts.
A 2015 Audi Q5, which he said had a value of $4,539 based on Kelly's Blue Book.
Household furniture, valued at about $3,000.
He reported owning no stocks, bonds, art, jewelry, or anything else of financial value.



Declaration: I declare under penalty of perjury that the above information is true and understand that a false statement may result in a dismissal of my claims.

Date: 03/16/2025

Applicant's signature

Christopher Ambrose
Printed name

At the bottom of the form:
"I declare under penalty of perjury that the above information is true and understand that a false statement may result in dismissal of my claims."

Signed: Christopher Ambrose

Date: March 16, 2025

Rent Discrepancy

In his affidavit, Ambrose reported paying $2,450 per month in rent. He lists his residence as 153 Middle Beach Road in Madison, Connecticut—a four-bedroom, two-bath home on Fence Creek estuary, across from East Wharf Beach Park on Long Island Sound. Real estate site Redfin estimates the property's market value at about $2.26 million.

A 2024 online listing advertised the Middle Beach Road property at $3,750 per month. Frank Report obtained a copy of the lease signed by Ambrose, confirming the $3,750 rent —$1,350 more than the $2,450 Ambrose reported in his affidavit.

Ambrose misstated his rent for this $2 million home he rents He pays $3750 but told the court he pays $2400

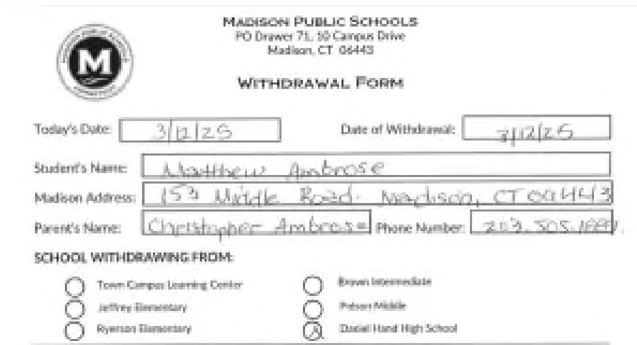
While he may not be able to pay the $405 filing fee he can console himself with a spacious porch overlooking the Fence Creek Estuary

East Wharf beach across the road from Ambroses house

Dependent Claims

In his March affidavit, Ambrose listed his daughter Mia, 18, as a dependent and full-time high school student. But Mia told Frank Report she left his home in July 2024, lives in another state without his support, and is no longer in school.

Ambrose reported that his son Matthew, 18, was still in high school. [Records show](#) Matthew formally withdrew on March 12, four days before the affidavit.



MADISON PUBLIC SCHOOLS
PO Drawer 71, 10 Campus Drive
Madison, CT 06443

WITHDRAWAL FORM

Today's Date: 3/12/25 Date of Withdrawal: 3/12/25

Student's Name: Matthew Ambrose

Madison Address: 153 Middle Road. Madison, CT 06443

Parent's Name: Christopher Ambrose Phone Number: 203.505.1889

SCHOOL WITHDRAWING FROM:

- Town Campus Learning Center
- Jeffrey Elementary
- Ryerson Elementary
- Brown Intermediate
- Polson Middle
- Daniel Hand High School

Despite Ambrose claiming Matthew 18 was in high school he had withdrawn days earlier

SNAP Filing

In his March 16 affidavit, Ambrose wrote, "I just learned I am eligible for SNAP." Yet state electronic benefit records show he had been receiving SNAP benefits since December 2024.

Ambrose listed $750 in grocery costs but did not disclose SNAP. He reported a four-person household to the federal court, including Mia, who says she does not live with him. Whether counted as three or four, the SNAP benefit would exceed his stated grocery costs.

He just learned he was eligible He just did not tell the judge he was already on SNAP

More significantly, Mia has contacted the Connecticut Department of Social Services and the U.S. Department of Agriculture's Office of Inspector General to investigate whether her father fraudulently listed her as part of his household on his SNAP application. If confirmed, misrepresentation on federal benefits forms can carry both civil and criminal penalties.

Cell Phone Claims

Ambrose reported paying $132 for four phone lines. But billing records show he canceled his children's lines in 2023, with relatives now paying for their three phones. He did not clarify which four lines he was referring to.

Car Valuation

Ambrose valued his 2015 Audi Q5 at $4,539 — a low-end trade-in figure. Fair-market estimates run from $7,000 to $11,000, meaning his affidavit understated the car's value by roughly 35 to 60 percent.

Assets and Accounts

Ambrose wrote that he had had zero income and that he was "invading [his] modest 401(k)." He did not report a balance on his account. He also did not report the withdrawals from his retirement accounts as income as required by federal law.

Family court records, however, show he assumed control of joint assets and moved funds into various Fidelity Investments accounts.
Records reviewed by Frank Report reveal he is managing more than one account and employs advanced strategies like stock/bond allocation, tax-loss harvesting, and legacy planning — consistent with a seven-figure retirement and not a single account.

Inheritance Omitted

Ambrose also did not disclose an expected inheritance of about $800,000 from his parents' $2.5 million estate, now in probate. Court filings show he is suing his brothers, Neil and Colin Amborse, over access to a Fidelity account and proceeds from the family home. Federal courts generally consider a pending inheritance a financial resource that Ambrose must report.

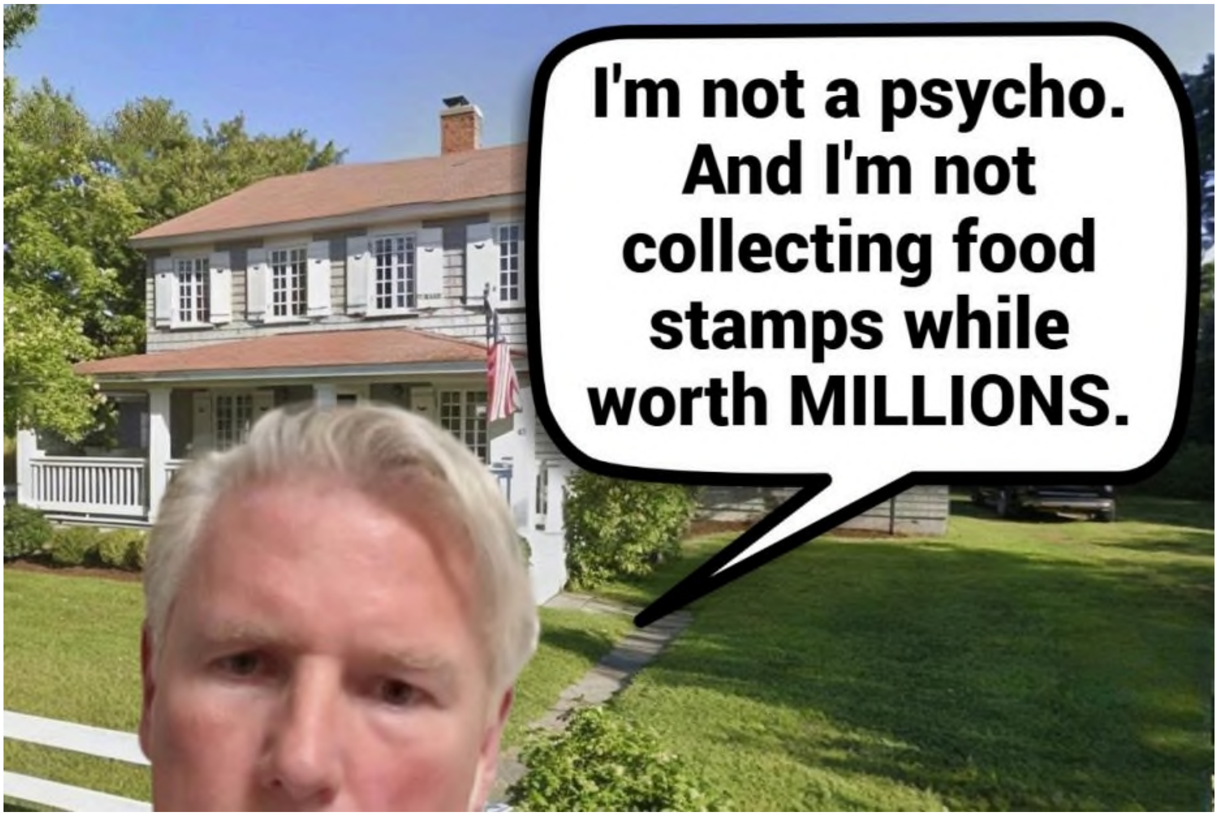
Attorney Neil Ambrose is being sued by his older brother Chris Ambrose Chris wants control of his parents estate according to court records

Multiple Inconsistencies

Court filings reveal multiple inconsistencies: understated rent, SNAP benefits undisclosed, dependents misrepresented, a car undervalued, retirement assets blurred, and an inheritance omitted. If the court finds Ambrose's affidavit materially untrue, it must dismiss his case under 28 U.S.C. § 1915(e)(2)(A) and may impose further sanctions. His defamation suit against Dr. Lee may hinge less on her words than on the accuracy of his own.

Frank Parlato

Frank Parlato is an investigative journalist, media strategist, publisher, and legal consultant.



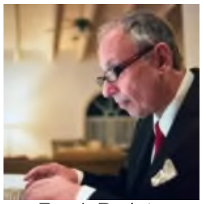
The $405 Lie: How a Fallen TV Writer Exposed His Own Psychopathy

EXHIBIT
A-2

October 25, 2025

Abuser Chris Ambrose Claims Poverty While Living in a $2.4 Million Mansion

NOTE: This piece first appeared on FrankReport.com.


Frank Parlato

By Frank Parlato

When Hollywood writer Christopher Ambrose returned home to Connecticut after being caught plagiarizing on Bones in 2018, he was unemployable but sitting on $2 million in marital assets.

He then weaponized a controversial legal theory—"parental alienation"—to flip the script. He documented ordinary family conflict, enlisted paid professionals, and built a case that his wife was turning the children against him.

Ambrose retained Attorney Nancy Aldrich, a political insider whose son sat on the state's judicial reappointment committee. She and court-appointed Guardian ad Litem Jocelyn Hurwitz steered the case to Judge Jane Grossman — then seeking reappointment and known for separating mothers from children under the alienation doctrine.


Family Court Judge Jane Kupson Grossman was seeking reappointment at the time of Ambrose's case and was known for separating mothers from children under the alienation doctrine

The Custody Reversal

On a Friday night, the court ordered the three children—then 13, 13, and 9—removed from the home where they had lived with their mother their entire lives and sent to live with the father they feared.
Hurwitz billed over $200,000; Aldrich, more than $500,000. The mother was silenced—barred from testifying, denied access to the custody report, and cut off from her own children.

Riordan, a stay-at-home mother of thirteen years with no record of abuse or neglect, lost everything: her children, her home, and her life savings. Ambrose kept the marital assets and even seized her $150,000 inheritance. He now lives in a $2.4 million beachfront home, while the mother he branded an alienator, lives without her children and is homeless.

In time, the children's distress became public—videos, hospital visits, police calls—all ignored by a court system that had already chosen its narrative. Ambrose had won.

Despite the court's order, the children repeatedly tried to escape to their mother. Ambrose pursued them, using restraining orders and police intervention to forcibly return them to his home, eventually outfitting the home with locks, bars, cameras, and alarms to keep them from escaping.
Finally, Mia escaped at 17, and is now 18 and beyond his legal control.

The Psychiatrist's Warning

Dr Bandy X Lee

In a May 3, 2023, letter addressed to Ambrose's ex-wife, Karen Riordan, forensic psychiatrist Dr. Bandy X. Lee, M.D., M.Div. — a nationally recognized violence expert and former Yale Law and Psychiatry faculty member — [reported her preliminary findings](#) after nine hours of review and interviews.

Dr. Lee wrote that, based on Ambrose's written communications, review of case materials, interviews, and collateral evidence, she found "critical evidence of potential danger to the children, pointing to the need for a diagnostic evaluation."

"I believe I have enough information to make a preliminary assessment of your ex-husband's personality configuration—with an emphasis on the extent to which he may manifest characteristics of psychopathic personality."

Using the Hare Psychopathy Checklist–Revised (PCL-R) — the standard diagnostic tool for psychopathy — Dr. Lee concluded:

"Mr. Ambrose's score adds up to 32. This is strongly suggestive that a diagnosis of psychopathy is present and justified—or, at the very least, that disturbing levels of psychopathic features are present."

A score of 30 or higher constitutes "full-blown psychopathy."

Dr. Lee noted hallmark features, including pathological lying, a lack of empathy, a failure to accept responsibility, and poor behavioral controls. She wrote that such individuals often exhibit a "manipulative and predatory relational style" and can "mislead, cheat, or otherwise violate the rights of other people."

Hare Psychopathy Checklist Revised (PCL-R)

		0 (definitely not present)	1 (somewhat present)	2 (definitely present)
1	Glibness/superficial charm			X
2	Egocentricity/grandiose sense of self-worth			X
3	Proneness to boredom/low frustration tolerance			X
4	Pathological lying and deception			X
5	Conning/lack of sincerity			X
6	Lack of remorse or guilt			X
7	Lack of affect and emotional depth			X
8	Callous/lack of empathy			X
9	Parasitic lifestyle			X
10	Short-tempered/poor behavioral controls			X
11	History of promiscuous sexual relations		X	
12	History of early behavior problems	X		
13	Lack of realistic, long-term plans			X
14	Impulsivity			X
15	Irresponsible behavior			X
16	Frequent marital relationships	X		
17	History of juvenile delinquency	X		
18	Revocation of conditional release	X		
19	Failure to accept responsibility for own actions			X
20	Many types of offense			X
Total number of points		32 (prorated from 31) / 40		

> *"They, through a superficially charming presentation, are often capable of eliciting exceptional levels of sympathy from others as an effective means of escaping accountability for their violence… They may recruit others as 'patrons' or 'pawns' to help them turn the narrative around to incriminating their victims instead."*

Dr. Lee also warned that

> *“Separating growing children from their mother and primary caregiver is one of the worst forms of abuse… and can be a sign of this dangerous personality disorder.”*

Dr. Lee recommended that a forensic court-ordered evaluation be conducted to confirm her findings:

> *“This potential for Mr. Ambrose’s dangerousness, especially where children are involved, should not be overlooked.”*

Ambrose’s response was to sue Dr. Lee for defamation.

The $405 Lie: The Affidavit That Gave Him Away

When he filed his lawsuit, Ambrose filed in forma pauperis, allowing him to sue without paying the $405 fee if he could show financial hardship.

He submitted an affidavit describing his financial circumstances.

In his March 2025 affidavit, Ambrose claimed:

> *“I am not employed… My gross pay or wages are $0.00… I support the kids and myself by invading my modest 401(k).”*

Ambrose also claimed he had “no income” — yet acknowledged he was “invading [his] modest 401(k)” to support himself and his children. That statement alone acknowledges taxable income.

Ambrose described the account as “modest,” but family members, including his daughter, say it holds roughly $1 million. Family members describe him discussing tax-loss harvesting, Roth conversions, and outside accounts—hardly the language of financial distress.

Ambrose is in an active lawsuit against his brothers, Neil and Colin, over their parents’ $2.5 million estate, with his share estimated at $800,000. Even though the inheritance had not yet been paid out, federal disclosure rules (28 U.S.C. §1915) required him to report it as an expected asset. He did not.

The $405 Lie: The Pattern of Deceit

In his sworn affidavit, Ambrose wrote:

> *“I have been unemployed for three years and unable to find work, mainly because my ex-wife has waged a vicious, very public online smear campaign against me.”*

Ambrose has been unemployed for seven years, since 2018, when his career as a television writer ended following a plagiarism scandal that preceded the online accusations he now cites.
By stating he had been unemployed for “three years,” Ambrose shifted the timeline to imply that his job loss was caused by the alleged defamation rather than by his professional misconduct.
It conceals the true cause of his unemployment — a reputational scandal unrelated to Dr. Lee — which is directly relevant to whether she caused any harm.

In his in forma pauperis affidavit, Ambrose wrote:

> *"I have sole legal and physical custody of our three children: our younger son, SA, is 14; our older son, Matthew, and daughter, Mia, are 18 but full-time high school students. I provide all their financial support."*

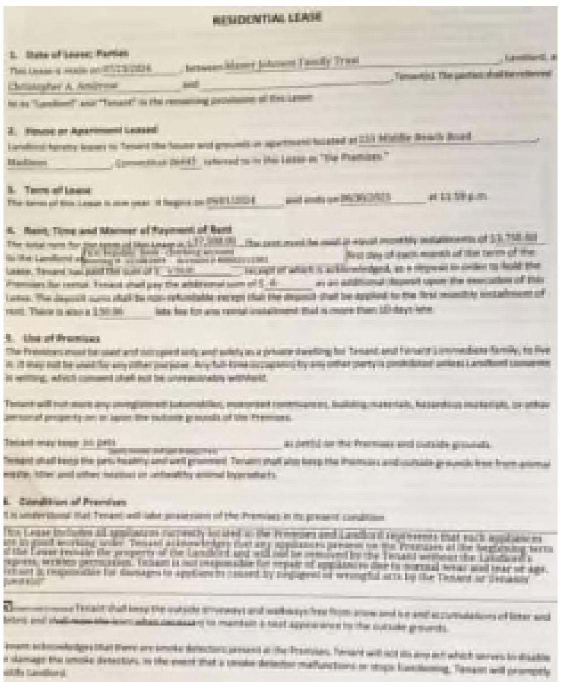
This statement was false:

Mia Ambrose, age 18, no longer lived with him at the time of the affidavit (March 2025). She left his home in July 2024, lives in another state, and has no financial support from him.

Matthew Ambrose, also 18, [had withdrawn from high school] on March 12, 2025 — four days before Ambrose signed the affidavit.

Ambrose rents and resides at 153 Middle Beach Road, Madison, Connecticut — a four-bedroom, waterfront property overlooking the Fence Creek Estuary, directly across from East Wharf Beach Park.
The home's estimated market value is approximately $2.4 million, and his lease lists rent at $3,750 per month.

In his affidavit, however, Ambrose told the court he paid $2,450 in rent — $1,300 less than the actual figure.


RESIDENTIAL LEASE

1. Date of Lease; Parties

2. House or Apartment Leased

3. Term of Lease

4. Rent, Time and Manner of Payment of Rent

5. Use of Premises

6. Condition of Premises

Ambrose said he paid $2450 in rent but the lease said he pays $3750

In his sworn affidavit, Christopher Ambrose claimed: "Groceries approximately $750 per month."

He did not disclose that he was already receiving federal SNAP benefits, which he falsely described as something he "just learned [he was] eligible for."

State records show he had been collecting SNAP since December 2024—four months before he filed the affidavit.

The $405 Lie: Ambrose began receiving SNAP benefits in December 2024

Failing to list it — while presenting grocery costs as though he paid them out of pocket — misleads the court about his true financial condition.

Had Ambrose accurately reported his benefits, the $750 “expense” would be offset or eliminated.

For a four-person household with no income, Connecticut’s SNAP allotment is about $740 to $770 per month, almost identical to the figure he listed as a personal expense. By omitting that he was on SNAP, Ambrose effectively billed the government twice — once for groceries, and once to the court.

The $405 Lie: The Clinical Match

Ambrose’s affidavit reveals pathological lying and deception, beginning with misstating his rent by more than a thousand dollars, concealing months of SNAP benefits, and claiming a dependent who no longer lived with him. He understated his assets, downplayed his retirement funds, and misrepresented the reason for his unemployment.

Ambrose did not deny the truth outright—he phrased it artfully, telling the court he had “just learned” he was eligible for food stamps, a half-truth designed to evoke sympathy while obscuring that he had already been receiving them for months.

It was a calculated deceit — manipulative by design.

Threaded through the document is the tone of egocentricity and grandiosity—the man as misunderstood martyr, the sole provider heroically supporting his children, even as he falsifies their circumstances to preserve his narrative. Nowhere does he acknowledge having deprived his ex-wife of marital assets or misled the court; instead, he recasts himself as the casualty of a “vicious smear campaign,” claiming that others’ cruelty—not his own conduct—left him destitute.

His callousness and lack of empathy show in his willingness to use those children as props in litigation, invoking their names and alleged dependence while knowing at least one had fled his home and disavowed his support.

Finally, there is the irresponsibility of a man who claims poverty while living in a multimillion-dollar beach house, failing to disclose income sources, benefits, and control of family assets.

The $405 Lie: Ambrose’s Multi Million Beach Home

The four bedroom waterfront property on Middle Beach Road overlooks the Fence Creek Estuary and East Wharf Beach Park Ambrose told the court he paid $2450 in rent but the lease lists $3750.

Usually a man who lives in a home like this is not living in actual poverty. Ambrose says he is.

The $405 Lie: The View from the Breakfast Room.

Despite claiming poverty Ambrose rents a multimillion dollar home with ocean and estuary views.

The $405 Lie: The Proof in Writing

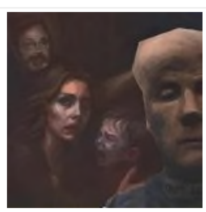
If Ambrose lied on his in forma pauperis affidavit, he faces serious legal consequences: the court must dismiss his case under §1915(e)(2)(A) and may refer the matter for perjury.

The affidavit reads less like a plea for relief than an exhibit of the disorder Dr. Lee diagnosed — a document of manipulation, deceit, and self-justification that seems to prove her point more clearly than any test score could. By lying, omitting, and manipulating in a sworn federal filing, he demonstrates the pathological deceit, self-justification, and absence of conscience that define the psychopathic personality Dr. Lee described.

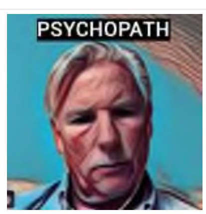
A psychologically healthy person would not risk felony perjury to save $405. A psychopathic personality might — because the impulse to deceive, to control the narrative, and to elicit sympathy overrides rational self-interest.

The man who sued to prove he wasn't a psychopath proved it himself, in writing, for $405.

Related Posts:



Christopher Ambrose's Fraudulent Script: Family…



Psychopath Or Just Broke?

Unhinged Ambrose Floods Courts with Baseless Lawsuits

Fraud Pauper Chris Ambrose

Ambrose Fails

Chris Ambrose Abused Me: Daughter Mia Speaks, Courts…

Tags: AFFIDAVIT FRAUD BANDY X. LEE BEACHFRONT MANSION BONES TV SHOW CHRISTOPHER AMBROSE CONNECTICUT JUDICIARY CUSTODY REVERSAL DR. LEE DIAGNOSIS FAMILY COURT CORRUPTION HOLLYWOOD WRITER IN FORMA PAUPERIS JOCELYN HURWITZ JUDGE JANE GROSSMAN KAREN RIORDAN NANCY ALDRICH PARENTAL ALIENATION PERJURY PLAGIARISM SCANDAL PSYCHOPATHY SNAP FRAUD

PREVIOUS
Black Widow Lawyer Seductress and Destroyer

NEXT
Stalking Zealots

EXHIBIT

A-3

FAMILY COURT

A $405 Filing May Finally Expose Christopher Ambrose — His Daughter Just Blew the Case Open

December 2, 2025by Frank Parlato

Christopher A. Ambrose

Christopher Ambrose, a suspended attorney and former Hollywood TV writer, has always sought to control the narrative. In Connecticut family court, where secrecy is the rule, not the exception, and court-appointed "experts" can be bought by the hour, he always succeeded.

He took his three adopted children from their mother and kept all the marital funds. He had won every motion. He silenced every outcry from his grieving children, deprived of their mother – made.

Victory was sweet.

Or was it?

In federal court — where filings are public, and perjury has consequences — his control slipped a little. All it took was $405 and a judge who refused to seal his sworn financial affidavit.

That refusal detonated the long, quiet war Ambrose has been waging against the mother of his children and his children for six years. Once that affidavit hit the public docket, his 18-year-old daughter, Mia, saw what her father had been telling a federal judge about her.

She decided to hold him accountable.

$405 MISTAKE THAT BLEW OPEN THE DOOR

Ambrose is a plaintiff in three federal defamation cases in the Connecticut District Court, with the same judge.

One of them is against me for reporting on his divorce and custody successes.

One is against psychiatrist Dr. Bandy X. Lee for her disclosure that she diagnosed him with psychopathic traits that make him positively dangerous to his children, a conclusion Ambrose claims is defamatory.

The third is against blogger Tina Swithin, who publishes a website called One Mom's Battle and once wrote an article about him, saying his children and their mother said he was extremely abusive to them. Her defense is the truth. His children and their mother say he was savagely, ruthlessly abusive, in fact criminally abusive.

In the Lee case, Ambrose stumbled. He attempted to avoid the $405 filing fee by submitting an *in forma pauperis* affidavit claiming poverty. He then asked the Court to seal it.

Judge Sarala V. Nagala refused. In her order, she wrote that IFP affidavits carry a "strong presumption of public access."

As a side note, in his subsequent lawsuits against Swithin and this writer, he paid the fee.

Mia Ambrose, now 18, read her father's affidavit – the one he signed in March. She saw that he claimed she lived in his home, that he supported her financially, he bought her food and paid her phone bill, and counted her as part of a four-person household.

Mia — safe from his abuse, safely outside his control — made her own sworn affidavit that flatly contradicts what Ambrose swore before the court.

Mia Ambrose

"I have not lived with him since August 2024." — Mia

Not lived with him since 2024? But Ambrose swore she was there with him in Connecticut – there on Beach Road, living in near poverty with him, with him paying all her bills, as he drained his modest retirement account, as she dutifully attended high school.

It was a pretty scene of a loving, self-sacrificing father.

Mia's federal affidavit is Exhibit H in a sanctions motion, a point-by-point rebuttal of her father's sworn statements.

Her very first declaration is decidedly unambiguous:

> **"I have not resided with Christopher Ambrose since August 2024."**

She followed it with:

> **"Since my departure, Christopher Ambrose has provided no support of any kind — financial, material, or educational."**

And then:

> **"He withheld my identification documents — my birth and adoption records, Social Security card, and passport — to maintain control and prevent my independence."**

Ambrose told the court he supported three children – and named her in his affidavit.

Mia responded:

> **"Every statement or filing in which he claims to support three children is false as to me."**
>
> **"I have lived independently in another state at a confidential address known to law enforcement for my protection."**

The protection she speaks about is not from some random stalker. It is from him.

He told the court she was a full-time student he was supporting.

Mia wrote:

> **"His conduct prevented me from completing high school."**

These aren't minor discrepancies. They are direct reversals under oath.

And we haven't even started with his other sworn statements. Some would call them lies. A judge would call them perjury.

When you lie on a federal affidavit to avoid a $405 filing fee, that's perjury. The penalty, at minimum, is dismissal of his case against Dr. Lee. Under 28 U.S.C. § 1915(e)(2)(A), dismissal is mandatory.

It is up to the judge to refer the case for criminal prosecution.

Stay tuned for part 2.

Frank Parlato

Frank Parlato is an investigative journalist, media strategist, publisher, and legal consultant.

Frank Parlato

Frank Parlato is an investigative journalist, media strategist, publisher, and legal consultant. See Full Bio

EXHIBIT
B

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

NEWHAVEN

CHRISTOPHER A. AMBROSE,	)	Case No. 3:25-cv-00398-SVN
Plaintiff,	)	
v.	)	
BANDY X. LEE,	)	
Defendant.	)	25 January 2026

DECLARATION OF MIA CATHERINE AMBROSE IN SUPPORT OF SUPPLEMENTAL MOTION TO DISMISS PURSUANT TO 28 U.S.C. § 1915(e)(2)(A) AND FED. R. CIV. P. 41(b)

I, **Mia Catherine Ambrose**, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

A. Identity of Declarant:

1. I am over the age of eighteen and competent to make this declaration. I submit this declaration in support of Defendant Dr. Bandy X. Lee's motion to dismiss based on the false in forma pauperis ("IFP") application filed by Chris Ambrose. The facts stated herein are based on my personal knowledge, through firsthand observation and review of records. If called as a witness, I could and would testify competently thereto.

2. I am an adopted daughter of Chris Ambrose. I have personal knowledge of my residence, educational status, financial support, and his actions toward me during the period relevant to his March 16, 2025 IFP filing.

B. Residence and Support Since August 2024

3. I did not reside with Chris Ambrose after August 2024. From that date forward, I lived independently and received no financial, housing, or material support from him. Chris Ambrose was aware that I no longer resided with him.
4. After I left his residence, Chris Ambrose contacted the Madison and Middletown Police Departments and filed motions in family court asserting that I had disappeared. These filings omitted text communications in which I explained why I could not return to his home and requested to complete my senior year in Middletown. Police records and testimony from a Madison Police Sergeant will confirm that Chris Ambrose demanded investigations and sought issuance of a Silver Alert in an effort to compel my return (text messages from August 2024 available upon request). In September and October 2024, Chris Ambrose repeatedly contacted my friends and their families, including showing up at their homes, confronting them at work, and conveying he was contacting the university a friend attended (witnesses and police report available upon request). While Chris Ambrose utilized the police and the courts to compel in my return, he did not inform or seek intervention from DCF regarding my departure. School records confirm Chris Ambrose did not alert or describe to Daniel Hand High School (DHHS) that I was

"missing," but told them he was uncertain when I would return to school; DHHS records show they did not file a truancy report with DCF despite months of absences.

5. After learning the police were seeking me, I contacted and spoke to the Madison Police to inform them I was safe and that I could not return to his home. Given Chris Ambrose's documented pattern of using every means available to force our return to his custody, I left the state, cut off all contact with friends and my brothers to keep them out of harm's way, and did not resurface until I was 18. I learned the Madison Police refused Chris Ambrose's demand for a silver alert and the court took no action. (Documentation and records can be provided upon request).

C. False Claims of Dependency and Misrepresentation of School Status

6. Despite knowing I no longer lived with him or attended school, on March 16, 2025 Chris Ambrose submitted an IFP application in which he represented under oath:

   "Our older son Matthew and daughter Mia are 18 but full-time high school students. I provide all their support."

   This statement is false. I had not been enrolled in school or residing with him since August 2024, and Chris Ambrose knew this as seen through his documented actions.

7. In August 2024, I texted Chris Ambrose requesting to remain and complete my senior year in Middletown, where I resided most of the summer. Within 24 hours he contacted the Madison Police, demanded a silver alert, and filed family court motions where he omitted essential information (text messages, court motions, and police records available

upon request). I left the state and cut off all contact with friends and my brothers to make certain I could not be detected by anyone and forced back into his home.

8. My sibling, Matthew Ambrose, formally withdrew from DHHS on March 12, 2025, four days before Chris Ambrose signed his IFP affidavit claiming he supported Matthew as a full-time student. I have reviewed the withdrawal form signed and dated by Matthew and DHHS (available upon request). Matthew has not been enrolled in any school since that date. Chris Ambrose's statement on the IFP, "Our older son Matthew and daughter Mia are 18 but full-time high school students," was knowingly false.

D. Withholding of Possessions and Government Documents

9. Chris Ambrose has withheld my personal belongings and government-issued identification documents, including my Social Security card, passports, and Guatemalan birth information, dossier, and adoption papers (emails, text messages, and police reports available upon request).
10. Given the political climate, as a young Guatemalan woman these documents are essential to prove United States citizenship and lawful status. Chris Ambrose's refusal to provide my identification documents thwarted my independence; creating significant barriers to housing, employment, education, medical care, and other administrative processes, all the while maintaining to this court and government agencies that I am his dependent, reside with him, and attend school full time.
11. Once 18, in February 2025, I respectfully requested via emails a short list of my belongings and the identification I needed. With no response, I returned to Connecticut to

ask the Madison Police for assistance. Just minutes down the road from his residence at the Madison Police Station, the officer placed a call on speaker phone to assist in the retrieval of my possessions and government ID. Evidence confirms: Chris Ambrose admitted he received and read my multiple emails, chose not to respond, and refused the many proposed retrieval options suggested by me and the Madison Police (videos, audios, emails, and police reports available upon request).

12. Chris Ambrose's claim in his IFP that, "I provide all their support," is directly contradicted by his actions.

E. Misrepresentation of Household, Rent, Income, Assets and Inheritance.

13. Chris Ambrose misrepresented his household composition and expenses in the IFP. For example, he listed his monthly rent as $2,450 (the amount for a prior residence at 381 Horsepond Rd.) while actually paying $3,750/month for a furnished beachfront rental (231 Middle Beach Rd.). Since it was furnished, he told us our property would be put into storage, where he pays months fees. He did not include monthly storage fees on his IFP. Chris Ambrose moved to a more costly rental for the 2024-2025 year, and renewed his lease at $3750/mo. Plus storage fees for the 2025-2026 year, (lease agreement and photos of listing with price of rental available upon request).

14. Chris Ambrose also indicated on #3 his IFP that he had no income, no stocks, and no assets. This is false. I am aware that Chris Ambrose has sources of income that he did not disclose in his sworn affidavit. In particular, until 2018, Chris Ambrose wrote shows of legal fiction in the television and film industry and is a member of the Writers Guild of America West. Based on

my knowledge of his career and our family finances, I know that he periodically receives royalty and residual checks for past writing projects. These payments are not issued in his name, but in the name of his company, *Eyes Above Productions, Inc,* and are delivered to him via his WGA-West account, which is under the name of Christopher Ambrose. I have also seen checks and mail addressed to "Eyes Above Productions, Inc., FSO Chris Ambrose, 151 El Camino Drive, Beverly Hills, CA." Chris Ambrose continues to receive residual checks from the WGA (Writers Guild) regularly (approximately quarterly), paid to his company.

15. Under the explanation for #3 responses, he wrote, "I have been unemployed for three years and unable to find work…" Evidence will show Chris Ambrose has not been employed for eight years--since 2018, when his professional conduct was discovered and widely reported in several mainstream media outlets, and representation by his Hollywood agents was terminated (Evidence of this can be provided to the court).

16. On #4 of his IFP Chris Ambrose states, "Amount of money I have in cash or in a checking or savings account: $294.98." That balance may or may not be accurate for a personal checking account under the name of Christopher Ambrose from Bank of America. But Chris Ambrose conceals from this court a second checking account under the name of *Eyes Above Productions, Inc*. He also uses checks in the name of Eyes Above Productions, Inc. from Bank of America to pay bills and make purchases.

17. Chris Ambrose maintains a stock portfolio with Fidelity, has a 401K, has accounts with both Bank of America and Fidelity, has accrued income through account withdrawals, liquidating stocks, and earning dividends, but he falsely claims on his IFP that he has received no income, owns no stocks, and received no dividends. While his younger brother is the executor of my

grandparents estate, Chris Ambrose has participated in ongoing CT Probate hearings throughout the 2025-2026 year and will receive a substantial inheritance of hundreds of thousands of dollars, which includes the sale of their home in Wethersfield, CT. Chris Ambrose omitted his anticipated inheritance from his IFP.

18. Chris Ambrose maintained SNAP benefits for 2024–2025, but stated on March 16, 2025 that "I just learned I am eligible for SNAP." He concealed that he already received thousands of dollars in SNAP benefits and omitted from the court the monthly payments he receives from SNAP, presumably based on a household of 4, as he has presented to this court. He claims that "My kids and I are on Medicaid (Husky Health)" demonstrating he has me listed as a dependent in his household and maintains me on his requests for state benefits. It is my understanding that he also applied for and was granted a monthly discount from Eversource's hardship program, to reduce monthly electricity payments, but he listed utility payments as $750 per month which is excessive. (SNAP card ID number and issuance date of issuance available upon request).

F. Pattern of Misrepresentation

19. Based on my personal observations and knowledge, I can confirm that Christopher Ambrose, has consistently concealed sources of income and misrepresented the composition of his household both to this Court and to various government agencies. He overstated his expenses and dependents while understating or omitting his assets and income to appear impoverished. His actions were deliberate and documented, not accidental.

20. Chris Ambrose's sworn representations in his IFP regarding dependents, support, income, and expenses are demonstrably false.

G. Conclusion

21. I submit this declaration solely to provide the Court with accurate information relevant to the truthfulness of Chris Ambrose's IFP application and to assist the Court in its review under 28 U.S.C. § 1915(e)(2)(A).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 25th day of January, 2026,

In Tallassee, Florida (Confidential address provided by the FL Office of the AG).

Mia Catherine Ambrose

MIA CATHERINE AMBROSE

COMMONWEALTH OF VIRGINIA • ELECTRONIC NOTARY PUBLIC •
N

Alyesha Marinia Elliott

REGISTRATION NUMBER
8099838
COMMISSION EXPIRES
July 31, 2028

Commonwealth of Virginia

County of Virginia Beach City

The foregoing instrument was subscribed and sworn before me on 01/25/2026 by Mia Catherine Ambrose.

Alyesha Marinia Elliott
Electronic Notary Public

Alyesha Marinia Elliott

Notarized remotely online using communication technology via Proof.