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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

CHRISTOPHER A. AMBROSE,
Plaintiff

Case No.: _____

v.

**COMPLAINT AND DEMAND
FOR A JURY TRIAL**

BANDY X. LEE,
Defendant

COMPLAINT

1. This is a civil action for damages the defendant Bandy Lee ("Lee") has intentionally inflicted on the plaintiff Christopher Ambrose ("Ambrose") by maliciously publishing dozens of articles that falsely state that he sexually abuses his children and commits other heinous crimes.
2. Lee's falsehoods parrot the narrative that Ambrose's ex-wife, Karen Riordan ("Riordan"), has perpetuated since he filed for divorce in 2019.
3. Before Lee published a word about Ambrose, she had read the 40-page divorce decision stating that DCF, the police, court-appointed custody evaluator, guardian ad litem, children's therapists, Yale New Haven Hospital, and Connecticut Children's Medical Center had investigated all Riordan's allegations and determined every one baseless. *Every. Single. One.*
4. Moreover, before she began publishing Lee also knew that multiple courts - after hearing months of testimony - had awarded Ambrose sole legal and physical custody since April 2020 and that Riordan was not even permitted supervised visitation unless she underwent a complete psychiatric evaluation and intensive, court-monitored therapy, which she repeatedly refused.

5. Lee ignored this overwhelming evidence, developed and presented by public authorities, and relied on her paying client, Riordan, a deeply disturbed, scorned ex-spouse, and set out on a very public smear campaign intended to destroy Ambrose.
6. A psychiatrist, Lee holds herself out as an expert in domestic violence, but Yale University fired her from an *unpaid* position because they believed she lacked medical knowledge and an understanding of crucial ethical and legal principles of psychiatry.
7. Nevertheless, Lee repeatedly announced that she "duly diagnosed" Ambrose, publicly branding him a "dangerous psychopath," though she has never met let alone examined him.
8. Lee is also a zealous conspiracy theorist who insists the family courts are "centers of serial kidnapping, serial murders, and a modern-day child slave trade...[run by] the worst criminals in society...and the epicenter of human rights violations, including human trafficking, pedophilic sex rings, and child pornography production." (From a September 29, 2024 article entitled "Cease and Desist Letter," written and published by Bandy Lee on her [medium.com](https://bandyxee.medium.com/cease-and-desist-letter-fc7a475ebd81) profile page. <https://bandyxee.medium.com/cease-and-desist-letter-fc7a475ebd81>).
9. Lee, who aspires to be an Internet personality, has maliciously amplified and embellished Riordan's relentless falsehoods about Ambrose across multiple social media platforms, websites, and podcasts. Using her professional title to confer credibility on her lies, she relentlessly attacks him, ignoring evidence and court decisions that exonerate him and encouraging her followers to harass him, heap scorn, and worse.
10. With her lies, Lee has deliberately destroyed Ambrose's reputation and quality of life; worse still, she has exposed his three minor children to intense public scrutiny, searing

ridicule and painful humiliation. Every one of Lee's lies remains on the Internet, permanently available to the world to haunt Ambrose and his children for the rest of their lives.

11. Because Lee's defamation and harassment are so enmeshed with Riordan's narrative, some context is required.

ESSENTIAL CONTEXT

12. Ambrose and Riordan were married in 2004. They adopted three children: a daughter and two sons (collectively, the "children"). Riordan was a "stay-at-home" mother; Ambrose, the family's sole financial support, was a very involved father, rarely missing Little League game or a dance recital (Riordan cannot make the same claim).
13. The family resided together in Westport, CT, except for 16 months (from mid-2010-2011) when Ambrose got a job in Los Angeles. *Riordan refused to relocate* from Connecticut, though the children were only in pre-school, so *he commuted cross-country every weekend* to remain as present as possible for them and Riordan. Riordan and the children also stayed for weeks at a time in Los Angeles.
14. After 15 years, the parties agreed the marriage was irreconcilable. Ambrose filed for divorce in July 2019, requesting shared custody and a 50-50 financial split. Riordan did not respond.
15. Instead, she immediately took the children out of state and began making false allegations that Ambrose sexually and emotionally abused the children. There were never allegations of any kind before he filed for divorce.
16. Riordan did not allege that Ambrose abused her in any way.

17. Riordan continued her allegations for years (2019-present). The Connecticut Department of Children and Families ("DCF"), the Madison (CT) Police Department, Yale New Haven Hospital, and Connecticut Children's Medical Center conducted multiple investigations over the years and found every allegation to be false.
18. During the investigations, the authorities examined Riordan's texts to the children, overheard conversations between the children, and elicited statements from them proving that *Riordan had coached them to falsely accuse their father of abuse*.
19. Based on Riordan's alarming conduct, the Court ordered an in-depth custody evaluation and appointed a *guardian ad litem* ("GAL").
20. In April 2020, before the divorce trial started, the GAL and the custody evaluator, who had prepared a 100+ page evaluation, gave extensive testimony at a hearing. The Court (Grossman, J.) awarded Ambrose temporary sole legal and physical custody and required that Riordan's visitation had to be supervised because of her on-going efforts to turn the children against their father.
21. Stunning everyone, Riordan adamantly refused this condition, a position she has maintained for five years, even as it means she cannot see the children.
22. During the subsequent 28-day divorce trial (spread over a calendar year), Riordan made additional false allegations against Ambrose - all disproved - including, but not limited to, that he produced pornography and "stole" a modest inheritance (the amount of which she inconsistently reported).
23. At the trial, one of Riordan's psychiatrists (she had several) testified that she was a competent mother; however, cross-examination revealed that Riordan had not shared with her doctor significant material information, including that she coached the children to

falsely accuse their father of sexual abuse and sent texts ordering them to delete incriminating evidence against her.

24. Riordan's conduct was egregious throughout the year-long proceedings, including filing false affidavits, destroying material evidence, intimidating multiple witnesses, and repeatedly violating direct court orders.
25. On April 26, 2022, the Court (Adelman, J.) published a 40-page Memorandum of Decision (the Decision").¹
26. Ambrose was awarded permanent sole legal and physical custody; Riordan was permitted supervised visitation only if she had a complete psychiatric examination by a pre-approved psychiatrist and entered "a therapeutic course of treatment with the goal of minimizing or eliminating [her] negative behaviors that have had a negative impact on the minor children and their relationship with their father [Ambrose]." (The Decision, p. 37).
27. As with the temporary custody orders, Riordan inexplicably refused to comply with the Court's required evaluation and therapy, again choosing not to see the children for years, leaving them feeling abandoned, confused, and hurt.
28. Unable to accept responsibility for her choice, Riordan publicly blamed Ambrose for keeping her (and her family) away from the children, straining the children's relationship with him, which is precisely the conduct that led the Court to order her to get psychiatric help.

¹ CT Superior Court Docket No.: FBT-FA19-6088163-S. The Decision is Entry #520.10.

29. Once Ambrose had custody, he encouraged Riordan to comply with the Court ordered therapy because the children missed her and were struggling with her absence. She never responded to his written pleas.
30. Ambrose attempted to keep the children connected to Riordan's family, hosting her sister and her children, as well as her cousin and aunt, at Christmastime in 2021, 2023, and 2024. None of Riordan's family members ever invited the children to visit them once Ambrose was awarded custody in 2020.
31. The children never reported that Ambrose had abused or otherwise mistreated them, including by threatening, intimidating, yelling, punishing, locking them in rooms, hurting their pets, or any other conduct.
32. However, each of the children's therapists squarely blamed Riordan's abandonment and her relentless public maligning of Ambrose for the emotional trauma the children suffered and struggled to navigate.
33. The Decision also states Riordan "consistently refused to obey any and all orders of the court" (The Decision at, e.g., p. 16). She was found in contempt and severely sanctioned several times, both before and after the divorce. On the other hand, the Court noted, Ambrose was always "cooperative" and never sanctioned during the entire five years of litigation.
34. The Decision documented Riordan's "need to challenge and create conflict with others, including professionals," and noted she "demonstrated many features of a borderline personality disorder." (The Decision at p. 11). A definitive psychiatric diagnosis was not made because Riordan had not submitted to psychiatric testing with a court-approved doctor.

35. The Decision also extensively documents that public authorities determined Riordan had coached the children to accuse their father of abuse and tell other horrific lies about him. (The Decision at, e.g., p. 11, 19).
36. The Decision stated that Riordan relentlessly interfered with Ambrose's custody of the children. For instance, in 2020, she got an emergency TRO against him based on a false affidavit, took custody of the children from school, and left them alone in a hotel room with her private investigator, who had been accused of strangulation and had an extensive history of domestic violence. He then staged “interviews” with the children, recording them saying their father abused them.
37. Professionals at the Connecticut Children's Medical Center overheard conversations among the children indicating Riordan had coached them, as did a DCF investigator. (The Decision, p 19).
38. The Decision also noted that several witnesses testified that Riordan and her hired third parties attempted to intimidate them (The Decision, p. 22). No one ever accused Ambrose of intimidation or any untoward conduct.
39. Riordan has publicly insisted that Ambrose hid marital assets and did not provide a complete financial accounting. However, the Court determined that it was Riordan who did not give a full report, and what she offered was wildly inconsistent. For instance, she claimed different sums for the amount of her inheritance (never more than \$150,000), ignoring that under Connecticut law, inheritance is marital property and subject to divorce distribution. Riordan also admitted to covertly liquidating her 401K account, providing hundreds of thousands of dollars she didn't report.

40. The Decision describes Riordan's intense efforts to destroy Ambrose's reputation by working with third parties to publish hundreds of defamatory articles against him online in a sustained campaign beginning in December 2020 and continuing through the present, with Lee's active participation. Riordan's associates also published the children's most confidential records, including the entire custody evaluation.
41. During the remote divorce trial, Riordan had secretly moved to Florida to live with Frank Parlato, Jr., who was under a 19-count federal indictment for fraud, money laundering, and tax evasion. Riordan has repeatedly denied her relationship with Parlato; however, she referred to him as her "intimate partner" on body cam footage recorded by three deputies after a domestic violence incident on November 9, 2021, as reported in the deputies' police report with the Monroe County (FL) Sheriff's Office (Report #MCSO210FF008178(01)). Ambrose did not learn about Riordan's relationship with Parlato or that she moved to Florida with him until 2023.
42. According to the US Attorney's Office for the Eastern District of NY, Parlato runs "smear" campaigns for pay against targeted individuals on his notorious website, frankreport.com, which he amplifies by republishing on other sites.
43. Within weeks after Riordan moved in with him in September 2021, Parlato began publishing her false narratives against Ambrose. To date, he has written over 250 articles (and counting), all maligning Ambrose with the identical false narrative Riordan told during the divorce, including that he sexually abused the children, produced pornography, and stole her modest inheritance. Parlato also violated the children's privacy by publishing their most confidential records that only Riordan could have provided.

44. Riordan used additional third parties to publish defamatory content about Ambrose and others she disliked, including the GAL, custody evaluator, children's therapists, reunification specialist, DCF investigators, police detectives, Ambrose's attorney, his brothers and extended family members, several of her attorneys (she had five), and nearly every judge involved in the case.²
45. Ambrose never published anything about Riordan, the children, or anyone associated with the case.
46. In January 2023, Riordan secretly returned to Connecticut from Parlato's in Florida, rented a house 10 minutes from Ambrose, and covertly began seeing the children, intensely grooming them to turn against him - *precisely the conduct the custody orders intended to prevent*.
47. On April 22, 2023, almost one year to the day after The decision was published, Riordan coaxed the parties' daughter to "run away" to her house and immediately drove her to file sexual abuse and other allegations against her father at the Juvenile Court.
48. Over the next few months, Riordan used third parties to take the two sons and *immediately* had similar false abuse allegations filed at the Juvenile Court - *before the boys were even brought to her house*.³

² Riordan initiated her smear campaign in 2020 with Paul Boyne, publisher of the racist/antisemitic/homophobic familycourtcircus.com, who posted hundreds of articles attacking Ambrose, the judges, and others. Boyne was indicted in July 2023 for felony stalking and threatening CT Superior Court judges, including several affiliated with the Ambrose case. Later, Riordan used other bloggers, like her intimate partner, felon Frank Parlato, Jill Jones Soderman, who lost her social worker's license due to ethical misconduct, and violent felon Richard Luthmann, recently released from four years in federal prison for extortion.

³ Generally, the Juvenile Court only receives petitions from DCF; private citizens reporting abuse do so through DCF. Riordan had the abuse allegations filed directly with the Superior Court for Juvenile Matters because she said she "didn't trust" DCF. The Juvenile Court accepted the children's petitions and appointed counsel for them. The children voluntarily withdrew their petitions in January 2024.

49. The children had cell phones that Riordan controlled, and they were in individual therapy since Ambrose had custody; in other words, they had constant, private access to many trusted adults, including Riordan's relatives. Yet, while Riordan was out of the picture, the children never reported any abuse to a therapist, teacher, coach, family member, or anyone else. Only when Riordan took custody were there allegations.
50. DCF and the Madison Police Department investigated the allegations. Yet Riordan aggressively interfered with their efforts by refusing to admit officers to her home, prohibiting them from interviewing the children privately, recording every encounter with the children, etc. As always, the authorities determined all allegations against Ambrose were baseless.

BANDY LEE ENTERS THE CASE

51. Just before she took unlawful custody of the daughter on April 22, 2023, Riordan hired Bandy Lee, ostensibly to do the psychiatric evaluation ordered in The Decision.
52. However, the Court had ordered the evaluation to start within 60 days of April 26, 2022, so Riordan was a full year late. Moreover, she did not bother to have Lee approved by the Court or comply with any of the other requirements specified in The Decision.
53. A conspiracy theorist and aspiring Internet personality, Lee obsessively cultivates her profile online and on podcasts and broadcasts.
54. She identifies herself as a preeminent expert in divorce and custody cases and domestic violence; however, she has stated in testimony ⁴ and articles that courts routinely deny her "expert" witness status because, she insists, courts qualify "only fraudulent witnesses with a master's degree and sometimes no license are elevated to 'expert' status in Family

⁴ Lee gave this testimony in Bridgeport (CT) Superior Court before Judge Thomas O'Neill on September 23, 2024. Docket # FBT-FA-5054919-S.

Court... while psychiatrists such as myself are shunned." <https://bandyxlee.medium.com/cease-and-desist-letter-fc7a475ebd81>.

55. Lee routinely highlights her affiliation with Yale, where she worked as an unpaid volunteer. However, her Yale colleagues decided her repeated misconduct "raised significant doubts about [her] understanding of crucial ethical and legal principles in psychiatry." *Lee v. Yale*, 624 F. Supp. 3d at p. 131.. *Lee v. Yale Univ.*, 624 F. Supp. 3d 120 (D. Conn. 2022) at p. 130.
56. Among the disturbing behaviors the Yale doctors identified about Lee was her publicly diagnosing people she had never examined with personality disorders and/or psychosis - precisely what she has done to Ambrose. More alarming still, the Yale doctors stated Lee's diagnoses and proposed treatment plan were alarmingly inaccurate.
57. Lee's status as an "expert" was dealt a potentially lethal blow when Yale Medical School fired her from her unpaid position after an extensive review by the Executive Committee of the Psychiatry Department determined that she lacked three critical competencies: medical knowledge, interpersonal and communication skills, and professionalism. Lee appealed her termination, but the Court of Appeals for the Second Circuit upheld her termination. *Lee v. Yale Univ.*, No. 22-2634 (2d Cir. June 20, 2023).
58. On April 23, 2023, the day after Riordan unlawfully took custody of the daughter, Lee met and "interviewed" her at Riordan's house in Madison, CT.
59. In late May 2023, Ambrose inadvertently learned that Riordan had hired Lee. He immediately emailed Lee, explaining that he was the children's sole legal guardian and she was not to speak to them without his written consent.

60. Ambrose also sent Lee a copy of The Decision, as the Court ordered because of Riordan's history of withholding and misrepresenting material information to mental health professionals.
61. Lee did not respond to Ambrose's email; however, she later testified that she read The Decision when she received it on May 30, 2023.⁵
62. Lee said that upon meeting the daughter, she switched her focus from Riordan to Ambrose, though she had never met or attempted to contact him, his family, friends, colleagues, or neighbors, which she acknowledged was standard protocol.
63. Lee admitted she based her analysis entirely on unidentified writings of his and statements from Riordan and the daughter. The Decision states that Riordan and the daughter have a documented history of lying about Ambrose and that Riordan exerts significant control over the girl, who also has told her brothers to lie about Ambrose "at the direction of [Riordan]." (The Decision, e.g., p. 19).
64. Lee's failure to follow basic protocols when making - *and publicizing!* - a life-altering diagnosis of someone she never met is another example of the reckless medical conduct that had so alarmed her Yale bosses.
65. To be clear, by May 30, 2023, Lee had read The Decision, so she knew of Riordan's disturbing misconduct during the marriage and divorce, including that numerous public authorities had determined she had coached the children to falsely accuse Ambrose of abuse, that public authorities had investigated all allegations against him and determined them baseless, and that multiple Courts had awarded him sole custody and prohibited

⁵ Lee provided this testimony in Bridgeport Superior Court before Judge Thomas O'Neill on September 23, 2024. Docket # FBT-FA-24-5054919-S.

Riordan from even contacting the children unless she received intensive psychiatric intervention, which she had declined.

66. *Nevertheless, Lee ignored all evidence and relentlessly publicly attacked Ambrose based on Riordan's false narrative.*

67. On August 4 and 7, 2023, the Superior Court in Bridgeport (O'Neill, J.) held a hearing regarding Riordan's unlawful taking of the children and her refusal to return them.

68. DCF testified that it investigated the abuse allegations with the police, found them all false, and was alarmed by Riordan's frequent misconduct. By contrast, they said, Ambrose was fully cooperative. They supported his sole custody "without reservation."

69. Lee later testified that she was aware of DCF's testimony.

70. On August 7, 2023, Lee appeared at the restraining order hearing without warning, demanding that she be permitted to testify for Riordan. The Court refused because she hadn't provided the documents required by statute.

71. Not to be deterred, Lee ignored the judge's decision and sent him an *ex parte* letter declaring she had diagnosed Ambrose to be a psychopath and dangerously mentally ill. However, *she based this conclusion on allegations she knew public authorities had investigated and determined to be false and on information provided by Riordan, who she knew the Court found frequently lied about Ambrose.*

72. On August 8, 2023, the Court issued restraining orders against Riordan on behalf of all three children.

73. Riordan did not appear in Court that day. When the marshal arrived at her house to serve the restraining orders, she and the children were gone. Police eventually discovered that she sent them out of state and disappeared herself.

74. For the next three months, in brazen defiance of the restraining orders, Riordan used third parties to move the kids across three states to keep Ambrose from regaining custody. Every day, he struggled to reconcile with the loss of his beloved children, unsure if he'd ever see them again.
75. After incurring enormous legal/investigative fees and with significant assistance from child protective services, police departments, and courts in CT, RI, and NY, the children were located and returned home to Ambrose on October 23, 2023.
76. Throughout this ordeal, Riordan's third parties - including Lee - continued publicly spreading her false narrative that Ambrose was violent, dangerous, sexually abused and mistreated the children, engaged in an unlawful conspiracy with the courts, and committed other crimes.
77. Lee joined Riordan's very public online smear campaign in July 2023 and continues to propagate these false claims about him that she has *acknowledged DCF, police, hospitals, and courts have investigated and determined to be utterly untrue.*
78. In her many published pieces, Lee embellished Riordan's false narrative with graphic allegations, publicly "substantiating" her claims by publishing her diagnostic tests, her "private" correspondence, "confidential" complaints to DCF and the police, and even her psychiatric notes.
79. Lee expanded the reach of her defamatory damage by sharing her professional files with Riordan's cadre of bloggers, including felons Frank Parlato and Richard Luthmann, with whom Lee frequently collaborates.

80. Lee also gave interviews, quotes, correspondence, and confidential tests and reports about Ambrose to sensationalist sites like newsbreak.com and insideinvestigator.com and other platforms like substack.com.
81. Lee has emerged as the most damaging of those defaming Ambrose on behalf of Riordan because she does not make statements as a layperson offering a judgment; *she makes them explicitly in her professional capacity as a "renowned Yale psychiatrist," which conveys enormous credibility to her lies and exacerbates the damage these lies do.*⁶
82. For instance, Lee has published on many sites stating as a psychiatrist, she "duly diagnosed" Ambrose to be a "psychopath" and danger to his ex-wife and children, and even posted her supporting diagnostic test and notes— *though she has never examined or even met him.*⁷
83. To add even greater authority to her lies, Lee claimed to hold positions at prestigious institutions like Union Theological Seminary, Columbia, and Harvard Medical School, all of which have distanced themselves from her, saying the institute she claims to have founded and led at these universities does not exist. Some of the schools even sent her cease and desist letters.
84. Through various podcasts, online platforms, and media outlets, Lee has spread her falsehoods about Ambrose, reaching a potential audience of hundreds of millions; worse still, her damning material will be available online in perpetuity.

⁶ Lee's supervisor at Yale, Dr. John Krystal, notified her in writing that he was concerned that she used her professional title to harm reputations and that her conduct was "self-serving" and seemed designed to further her "personal aspirations" (i.e., Internet fame). See, *Lee v. Yale* at p. 129.

⁷ Professional medical ethics prohibit physicians from publicly diagnosing individuals, especially those they have not examined. The NYS Board of Health Office of Professional Medical Conduct ("OPMC") is conducting a "priority investigation" of Lee's conduct toward Ambrose. OPMC case # CR-23-10-5620.

85. On October 17, 2023, Ambrose emailed Lee a "cease and desist" letter detailing her lies, demanding she acknowledge that her statements were false and retract them (the "Cease and Desist Letter"). He also provided her with over a dozen court documents proving that public authorities had investigated and determined Riordan's narrative - which Lee was repeating - to be false.
86. Lee did not respond but testified on September 23, 2024, in Bridgeport Superior Court before Judge O'Neill that she read the Cease and Desist Letter when she received it.
87. She also testified that the Cease and Desist Letter and the May 30, 2023 email are the only communication Ambrose ever had with her. There are no texts, calls, or conversations; in fact, the two have never seen each other outside the courthouse or its immediate vicinity.
88. However, Lee repeatedly claims Ambrose "stalks" her and that she has reported him to various police departments. None of the police departments Lee mentioned have any record of a report made against Ambrose by Lee or anyone else.
89. The day after she received the Cease and Desist Letter, Lee removed articles from her [medium.com](https://www.medium.com) site. Yet she defiantly published new commentary, brutally defaming Ambrose.
90. For instance, she stated the Cease and Desist Letter was "not the issuance of a healthy individual" but the work of someone who poses "extreme dangers." And, again invoking the authority conferred by her professional degree, she wrote that Ambrose was "*duly diagnosed of psychopathy, [and] has committed unspeakable crimes against his ex-wife and children, including keeping them locked in the basement and trafficking them to pedophilic sex gangs.*" So, Lee removed an article filled with falsehoods but immediately

replaced it with another that repeated - and *embellished!* - her incendiary lies. She also published the Cease and Desist Letter in its entirety.

91. All other offending articles Lee wrote or was involved with remain on multiple sites. As recently as September 29, 2024, on her medium.com page, she maliciously attacked Ambrose, branding him a dangerous psychopath and encouraging public scorn.
92. Lee's deluge of public lies has incited her readers and publishing partners to harass Ambrose and barrage him with verbal assaults and threats.
93. Moreover, Lee (falsely) identified the children as victims of sexual assault by Ambrose, violating their privacy in a way that the legitimate media spares even adult victims of such alleged crimes.
94. Lee even published confidential statements the children supposedly made to her as a professional, including that the daughter was raped three times; the children were minors and unable to consent to such violations of their privacy, which Lee knew when she published.
95. Lee's publications have subjected the children to intense public scrutiny and searing ridicule. For the rest of their lives, her articles will appear whenever a college admissions officer, employer, friend, neighbor, romantic partner, and their own future children Google their names.
96. Lee's often salacious lies about Ambrose, often expressed in graphic language, are intended to shock, titillate, and outrage and drive traffic to her sites in a craven grab for "clicks," generating publicity and economic gain for her.

97. Lee has also deployed her false narrative against Ambrose to generate publicity for her crusade against the family courts, about which she is publishing a book featuring the Ambrose family, among others.
98. Lee claims the courts are corrupt "centers of serial kidnapping, serial murders, and a modern-day child slave trade...[run by] the worst criminals in society... including human trafficking, pedophilic sex rings, and child pornography production." <https://bandyxee.medium.com/cease-and-desist-letter-fc7a475ebd81>
99. While Lee blasts the family court judges as "incompetent," she paradoxically insists they run a sophisticated, diabolical conspiracy that - for unexplained reasons - rewards abusive fathers like Ambrose by granting them custody.⁸
100. Lee has also parlayed the attention generated by her salacious lies about Ambrose to finesse appearances on podcasts.
101. The plaintiff brings this action to defend the values protected by the First Amendment to the Constitution, not in derogation of them.
102. The First Amendment has never protected demonstrably false, malicious statements like the defendant's because "there is no constitutional value in false statements of fact. Neither the intentional lie nor the careless error materially advances society's interest in 'uninhibited, robust and wide-open' debate on public issues." ⁹

⁸ Lee advanced her conspiracy theory in her Report of Abuse filed with DCF on May 24, 2023, in testimony in Bridgeport Superior Court on September 23, 2024 (Docket # FBT-FA24-5054919-S), before at least four state legislatures, the US Senate, and many other places.

⁹ *Gertz v. Robert Welch, Inc.*, 418 US 323, 340 (1974) quoting *NY Times Co. v. Sullivan*, 376 US 254, 270 (1964)). While the Supreme Court has afforded "a measure of strategic protection" to certain kinds of falsehoods to ensure that speech protected by the First Amendment has "the breathing space to survive," it has never wavered in its determination that falsehoods have no First Amendment value. *Id.* at 342. None of the Court's protective doctrines interfere with the plaintiff's claims.

103. This lawsuit is about holding Lee accountable for her deliberate, outrageous, and malicious lies that have destroyed Ambrose's reputation, emotional health, and quality of life.

THE PARTIES

104. The plaintiff is Christopher Ambrose, who resides in New Haven County, Connecticut.

105. The defendant is Bandy Lee, a New York County, New York resident.

106. The amount in dispute, exclusive of interest and costs, is greater than \$75,000.

107. The plaintiff respectfully invokes the jurisdiction of this court under the provisions of Title 28, Section 1332 of the US Code.

LEE'S KNOWLEDGE, ASPIRATIONS, AND INFLUENCE

108. Lee has established an online presence across multiple social media platforms to ensure her access to an Internet audience of hundreds of millions. She has her own website, bandylee.com, and maintains profile pages on medium.com, substack.com, X, BlueSky.com, LinkedIn, and Instagram.

109. She reaches potentially millions more through her business, World Mental Health Coalition, which has its own YouTube, Facebook, Instagram, and X profile pages.

110. Moreover, Lee cross-posts content and provides information and interviews to multiple third-party sites, including frankreport.com, newsbreak.com, insideinvestigator.com, and others.

111. In short, Lee works very hard to reach as broad an audience as possible and publicizes her professional degree to lend credibility to her claims.

112. Lee has leveraged her online profile and professional associations (although often exaggerated or wholly false) to gain the opportunity to testify before the US Senate and several state legislatures.
113. She solicits appearances on third-party podcasts, broadcasts, and websites to broaden her audience, expanding her reach to millions more. For instance, on September 28, 2024, she appeared on felon/extortionist Richard Luthmann's podcast, where she again attacked Ambrose as a dangerous man who stalks her and conspires with the family courts, enabling him to abuse his children and his ex-wife.
114. Lee has also appeared in mainstream publications like *New York Magazine* to generate more publicity for herself and propagate her various falsehoods.
115. Lee's reach extends beyond the US, as she acknowledged on January 14, 2024, on her medium.com site.
116. She uses this reach to propagate her conspiracy theories about the nation's family courts, which she insists reward abusive fathers, supposedly including Ambrose, to the detriment of victimized children and "protective mothers." Lee now has a GoFundMe page begging her followers to send her money so she can publish a book about theories. <https://www.gofundme.com/f/help-us-to-expose-the-dangerous-case-of-family-courts>¹⁰
117. Lee encourages her followers to take action against her targets. She has been successful: many people who have attacked Ambrose have been motivated and/or influenced by Lee's published exhortations.

¹⁰ Given that Lee had a best-selling book, it is curious that she doesn't seem to have a publisher for her current work; perhaps her conspiracy theories are too bizarre to be substantiated so no legitimate publisher will take her on.

118. To cite one example, online publisher Tina Swithin mentions Lee as a key source in her denigration of Ambrose on her blog, *One Mom's Battle*. In an article, "Rebranding Parental Alienation into Coercive Control," Swithin quotes Lee as saying, "[Ambrose] abused Ms. Riordan's children...[and] has made countless false claims about Riordan's fitness as a mother while perpetrating abuse – verbal, emotional, and sexual – against their three children."
119. Similarly, Lee has appeared on podcasts with and in articles written by Jill Jones Soderman, who lost her social work license for cause and was hired in 2020 by Riordan to vilify Ambrose in online articles and private texts to his children. Soderman wrote online that she "sat down with Lee" to discuss how Ambrose abused his children and has "gone after witnesses, lawyers, and even DCF workers. He won't stop until he's destroyed everyone in his path... [D]espite overwhelming evidence of abuse, the family court system has consistently ruled in Ambrose's favor... [the court] system too often sides with abusers." In another article, Soderman uses Lee's professional authority to suggest that "[H]ad Ms. Riordan taken lethal action against Christopher Ambrose, it might have been seen as a case of involuntary manslaughter."¹¹
120. Lee has repeatedly urged her followers to take action in support of her false claims, even implicitly encouraging them to ignore facts established by public authorities and in judicial verdicts, just as she does.

¹¹ Lee and Soderman share a history of brazenly exaggerating professional accomplishments, including an affiliation with Columbia University. For years, Lee claimed to be the founder and executive director of the Institute for the Prevention of Violence at Columbia and Harvard Medical School (and, she sometimes adds, UPenn and NYU). However, the schools deny any such institute exists, let alone that Lee ran it. Soderman also claimed a counterfeit affiliation with Columbia. Lee has since scrubbed references to Columbia and the imagined Institute from her online CV.

121. In response to Lee's published statements, her followers have relentlessly harassed Ambrose in comments to her articles and interviews, viciously excoriating him: "All your actions support Dr. Lee's diagnosis." "CHRIS, YOU BETTER SLEEP WITH ONE EYE OPEN" [emphasis in the original]. "You are sick. Chris, you are going to get your punishment."" One day you'll get what's coming to you Chris and it can't be soon enough!!" "It's about to blow up in that psychopaths face." "Ambrose should be in jail." "You will answer to someone in the end.." "Ambrose is dangerous...He must be stopped. People will die." "Why don't you... die." "Ambrose needs to be arrested." "You're a goddamn pedo. Sick fuck!!!" "Time for some pigs to get roasted." "Game over. Ambrose is a twisted fuck." "He needs to be incarcerated immediately." "You are shit. You are nothing." "Until this creep is in jail, he is a threat." "[Ambrose] has the personality profile of a serial killer." And from felon extortionist Richard Luthmann, on whose sites Lee frequently posts her attacks of Ambrose: "Hugs and kisses, Christopher...I do enjoy a good kiss of death." "Eat a dick, Chris." "Chris, I'll see what I can do about getting you a job at a dildo factory. You can play with the little brown ones all day and be in your glory. Fucking CHOMO." (CHOMO is prison slang for "child molester") Luthmann, Lee's frequent collaborator and one of Riordan's closest associates, was incarcerated in federal prison for 4 years for extortion and fraud.

122. In short, Lee publishes and publicizes her claims against Ambrose to as broad an audience as possible. Using her professional degree to confer credibility on her false assertions, she has persuaded many to believe her lies, harass him and his children, and destroy his reputation and quality of life.

LEE'S MALICIOUS, DEFAMATORY SMEAR CAMPAIGN

123. Bandy Lee's campaign of public abuse began a few months after Riordan hired her in April 2023.
124. As explained, Lee amplifies the reach of her defamatory attacks against Ambrose by cross-posting her articles on multiple sites. She also embeds links to other articles that malign him in her articles, implicitly endorsing those attacks against him and lending them her authority as a mental health professional.
125. Lee's sites and those on which she cross-posts focus on her unsubstantiated theories that the nation's family courts are corrupt and conspire with abusive fathers to kidnap, sex traffic, and even murder children. So, Lee preys on an audience predisposed to agree with her outlandish claims against the "abusive father" Ambrose, manipulating them to heap scorn on him.
126. By targeting a sympathetic audience, Lee's posts generate more "clicks," so she reaps social media "clout," providing her potential economic enrichment.¹²
127. Lee made each of the following statements to appeal to her targeted audience; she knew or should have known that these statements were false or wildly misleading and would destroy Ambrose's reputation and/or invade his privacy by false light, harassing and causing him massive harm:

¹² "Clout" is a term associated with individuals who have a large number of followers, receive high levels of engagement (such as likes, comments, and shares) on their posts, and are considered influential within their respective fields. . . . Gaining clout is seen as desirable for individuals aspiring to build a personal brand or pursue opportunities within the digital realm. However, the pursuit of clout can also lead to performative behavior, seeking attention for attention's sake, or engaging in activities solely to increase one's online visibility." (<https://later.com/social-media-glossary/clout/>).

July 20, 2023

128. On July 20, 2023, Bandy Lee first published false, derogatory information about the plaintiff in two articles in frankreport.com, a sensationalist "news site" run by Riordan's live-in boyfriend, federal felon Frank Parlato, Jr., under the headings "The Great Escape: Ambrose's Kids Leave His Home Cite Abuse; Ambrose Seeks Mother's Arrest" <https://frankreport.com/2023/07/20/part-1-the-great-escape-ambroses-kids-leave-his-home-cite-abuse-ambrose-seeks-mothers-arrest/> and "Innocence Lost in Father's House of Fear: Mia Speaks Out Against Chris Ambrose" <https://frankreport.com/2023/07/20/innocence-lost-in-fathers-house-of-fear-mia-speaks-out-against-chris-ambrose/>

129. In each article, Lee puts the plaintiff in a false light by blaming him for keeping the children from their mother, "Separating growing children from their mother and primary caregiver is one of the worst forms of abuse, which can have lifelong ramifications, as well as decades of loss of life for each child."

130. Lee acknowledged that she knew multiple courts - not Ambrose - had prevented Riordan's access to the children.¹³

131. Lee published her comments online, accessible to an audience of hundreds of millions in perpetuity.

132. Each article elicited 119 published "reader comments," virtually all attacking Ambrose.

August 3, 2023

¹³ On September 23, 2024, in Bridgeport Superior Court (FBT-FA 24-5054919-S), Lee testified that she had read The Decision when Ambrose emailed it to her in May 2023.

133. On August 3, 2023, Lee published more false statements against Ambrose on frankreport.com, under the heading "Ambrose Continues to Terrorize His Teenage Children — His Crimes and Lies Exposed Part #1" <https://frankreport.com/2023/08/03/ambrose-continues-to-terrorize-his-teenage-children-his-crimes-and-lies-exposed-part-1/>
134. The article identifies Lee as "one of the premier psychiatrists in custody and divorce cases." It states, "Lee had a view of Ambrose that warrants our fullest attention if we value the safety of the three teenage children who are the targets of Ambrose."
135. Lee, *who never met Ambrose*, insists, "I have enough information to make a preliminary assessment of [Ambrose's] personality configuration—with an emphasis on the extent to which he may manifest characteristics of psychopathic personality," assigning him a diagnostic score of 32, which "is strongly suggestive that a diagnosis of psychopathy is present and justified - or, at the very least, the disturbing levels of psychopathic features are present."
136. Continuing to point this damning false light at the plaintiff, Lee says that "there should be an attempt to interview Mr. Ambrose, as well as additional collateral interviews. An arrangement through criminal, domestic violence, or juvenile court to this end would best help protect you as well as the evaluator... this potential for Mr. Ambrose's dangerousness, especially where children are involved, should not be overlooked."
137. In addition, without explanation, Lee blames Ambrose for Riordan not seeing the children for three years, claiming it is further evidence of his psychosis, "Separating growing children from their mother and primary caregiver is one of the worst forms of abuse,

which can have lifelong ramifications as well as decades of loss of life for each child—and can be a sign of this dangerous personality disorder."

138. The article continues, "Dr. Lee wrote in a letter addressed to Karen Riordan and submitted to law enforcement that the mentally ill person is not Riordan, but very likely Ambrose."

139. The letter, dated May 3, 2023, and printed on Lee's stationery, identifies Lee as a "forensic psychiatrist and violence expert" (the "Riordan Letter").¹⁴

140. The article quotes the Riordan Letter extensively and embeds a link to it.

141. In the published Riordan Letter, Lee alleges it is "highly likely" that Ambrose "suffers from psychopathy" and "the potential for Mr. Ambrose's dangerousness, especially where children are involved, should not be overlooked."

142. In the Riordan Letter, Lee also states that she "used the most highly-regarded and widely-used instrument for making such a determination...the Psychopathy Psychopath Checklist..."

143. Lee writes that she diagnosed Ambrose to fit the profile of a "psychopath," claiming he has "taken advantage of or 'conned' [relatives, friends, neighbors, co-workers, business associates, or other people] — since it is a common characteristic of psychopathic individuals to mislead, cheat, or otherwise violate the rights of other people. 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

¹⁴ Lee may claim her communications to Riordan, DCF, and the police are privileged; however, there is no protection when she publishes such information to the public online, especially when she knows official investigations have determined her claims to be untrue.

violence—for example, they may recruit others as "patrons" or "pawns" to help them turn the narrative around to incriminating their victims instead)."

144. Lee also states that persons "afflicted with Psychopathy [as she identified Ambrose to be] are prone to lying, deceiving, and beguiling whoever is in their presence."

145. Lee goes on to say that psychopaths like Ambrose "can be very destructive to society and to human beings they come in close contact with, such as family members." She writes that her psychiatric evaluation of Ambrose, "as expected, yielded results that make it highly likely and reasonably reliable that your ex-husband suffers from psychopathy...A 'full' diagnosis of psychopathy—a score above 30—raises many alarms and could be a contraindication to parenting... 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."

146. The embedded link also includes a screenshot of the "Hare Psychopathy Psychopath Checklist" Lee says she completed to "diagnose" Ambrose as a psychopath (the "Psychopath Checklist").

147. In addition, the embedded link includes a Report of Suspected Child Abuse or Neglect that Lee filed with DCF on May 24, 2023 ("Lee's DCF Report"), accusing Ambrose of horrific mistreatment of his children and stating he also abused Riordan.¹⁵

148. Curiously, Lee notes in the Riordan Letter that reports of abuse to DCF are confidential because *the accused* "must be protect[ed] from an erroneous psychopathic diagnosis."

¹⁵ Lee writes in the Riordan Letter that she became aware of this allegedly ongoing abuse on April 23, 2023; yet, she waited until May 24, 2023 - a whole month - to alert authorities to this emergency, though she is a mandated reporter.

Yet, she published her Report and made her accusations against Ambrose available to hundreds of millions of readers on the Internet, brutally violating his privacy, putting him in a devastating false light, subjecting him to scrutiny and ridicule, and causing extreme emotional distress.¹⁶

149. Virtually everything Lee states in her published DCF Report puts Ambrose in a horrific false light:

150. Lee states that Ambrose committed "[s]exual, psychological, emotional, verbal, and physical abuse, coercive control, and neglect worsened from multiple years of impunity. Three years ago, he abducted and separated the children from their mother through litigation abuse."

151. Lee claims that "interviews of victims, reliable reports, voice recordings, video recordings, and perpetrator's prolific documentation of his threats, psychological manipulation, and coercive control indicate a DANGEROUS PERSONALITY DISORDER." (*Emphasis in the original*).

152. "The remaining two sons, however, were experiencing an escalation of abuse and verbal threats from the father. Now, the 12-year-old son remains, afraid for his safety."

153. "[Ambrose] controlled the Courts – Family Court corruption is an international crisis – and threatened and penalized the children behind the scenes."

¹⁶ Worse still, Lee, a mandated reporter familiar with such protocols, also publicly identified the children for all the world - with photos -violating their privacy and subjecting them to scrutiny, ridicule, and bullying.

154. Implying the plaintiff prevented Riordan's access to the children, Lee wrote, "The mother was [sic] not been able to see her children for three years, despite having a clean background and having successfully raised the children before the father's intervention."

155. "All the children are adopted, and the two older children are Hispanic, subject to the father's racial slurs."

156. Lee also published her salacious, graphic allegations of sexual and other abuse for which *she claims to have evidence she has never produced*, "I have reviewed copious video, audio, and photographic documentation of Mr. Ambrose's abuse: inappropriately touching all children in sexual ways, penetrating or threatening to penetrate them, bringing in adult men to sleep in their bedrooms without clothes, having adult men have intercourse with underage girls in their bedrooms, permitting drugs and alcohol in their rooms, yelling and screaming at them, threatening and demeaning them, stalking and terrorizing them, and forcing the 12-year-old to drive."

157. "It is remarkable how Mr. Ambrose managed to weaponize the Court system, which is why his very overt patterns of having a serious and dangerous personality disorder must be examined."

158. "I had enough information to perform the widely-used and highly-respected Hare Psychopathy Psychopath Checklist-Revised (PCL-R) on him, based on collateral information and his own written communications, I found that he met criteria for psychopathy - which is a contraindication to parenting."

159. "Indeed, under [Ambrose's] 'care,' [the older son] is said to have missed numerous days of school, abused [sic] substances, and been suicidal and injuring himself. Mr. Ambrose has

been preoccupied with accusing the mother of being mentally unwell (common with psychopathic individuals trying to deny their own illness), but the mother is healthy and psychologically well-developed."

160. "There is an international crisis of the Family Courts, which are authorized and yet ill-equipped to deal with dangerous personality disorders as Mr. Ambrose exhibits.

Individuals showing signs of these disorders disguise themselves and manipulate the legal system to further their abuse and to reverse victim and offender in a way that acutely endangers especially women and children."

161. "Consistent with this abuse, all three children have been depressed, engaging in self-injurious behavior, and [the older son] had been suicidal. This is why I performed the PCL-R, on which Mr. Ambrose scored 32/40 (30 is cutoff for psychopathy) – this is a score indicating EXTREME POTENTIAL DANGER [*Emphasis in the original*] for the children and the mother, and almost all decisions by the Family Court need to be reexamined, as well as his diagnosis confirmed by a forensic psychiatrist or forensic psychologist with requisite experience and training to perform the PCL-R – all others are too vulnerable to being manipulated into making opposite conclusions."

162. "That Mr. Ambrose has had custody of these children for so long is alarming – and the extreme signs of abuse and deterioration under him MUST BE RESPONDED TO.

(*Emphasis in the original*). That the mother, who singlehandedly raised these children before their abduction, has been denied access to her children for three years. This level of separation of children from their primary caregiver – especially the 12-year-old –

portends serious, lifelong psychological and physical problems, as well as loss of possibly decades of life, on the part of the children if not intervened with rapidly."

163. "All indications are that [the children] were happy and thriving under their mother but have sharply declined academically and medically under Mr. Ambrose's 'care'."

164. "Mr. Ambrose appears to have had a pattern of abuse, neglect, and coercive control of the children all their lives, which the mother failed to recognize earlier, as she is a victim of domestic violence and psychological abuse herself."

165. Lee published that Ambrose was "stalking them [Riordan and the children], and chasing [the daughter's] car and almost causing her to have an accident on 5/18/23."

166. "[Riordan] also plans to report Mr. Ambrose's rageful verbal attacks against [the older son], following [the daughter's] escape." ¹⁷

167. The embedded link also includes a full page of Lee's alleged "qualifications" (the "**Qualifications**"), which she references in the DCF Report. ¹⁸Such professional credentials would cause a reasonable person to give her life-destroying allegations against Ambrose significant credibility.

168. Lee published her comments, including the Riordan Letter, the DCF Report, the Psychopath Checklist, and the Qualifications, online, accessible to an audience of hundreds of millions in perpetuity.

¹⁷ The law encourages reports of suspected abuse; however, it requires such reports to be made in good faith and based on reasonable concerns. As explained, Lee based her report on the narrative of a scorned ex-spouse, who she knew multiple courts had determined was so unreliable and troubled she could not have supervised visitation until she had a complete psychiatric evaluation and court-monitored therapy. Moreover, even if Lee believed the allegations she reported to DCF, publicizing these allegations is not protected speech.

¹⁸ As explained above, Lee has a well-documented history of misrepresenting and even flat-out fabricating her professional associations and accomplishments, including in the Qualifications.

169. The article generated 92 published "reader comments," virtually all of which attack Ambrose as a sick, dangerous pedophile.

170. The article also includes photos of Ambrose and the children, identifying them by name as victims of sexual assault, a violation of privacy that even adult alleged victims of such a crime are spared.

171. Lee published her comments online, accessible to an audience of hundreds of millions in perpetuity.

172. This article elicited 92 published "reader comments," virtually all attacking Ambrose.

August 5, 2023

173. Two days later, on August 5, 2023, Lee amplified her claims, re-publishing the Riordan Letter, DCF Report, Psychopath Psychopath Checklist, and her specious Qualifications on frankreport.com under the title "Ambrose's Attorney Withdraws, as National Media Outlet Looks at Ambrose CT Custody Case." <https://frankreport.com/2023/08/05/ambroses-attorney-withdraws-as-national-media-outlet-looks-at-ambrose-ct-custody-case/>

174. The article states, "Dr. Bandy X. Lee has identified Ambrose as a psychopath who, she says, scores dangerously high at 32 on the Hare Psychopathy Psychopath Checklist."

175. The article embeds a link to the Riordan Letter, DCF Report, Psychopath Checklist, and Qualifications.

176. The article also published photos of Ambrose and the children, as well as their names, subjecting them to scrutiny, ridicule, emotional duress, and further violating their privacy.

177. The article generated 96 reader comments, most maligning Ambrose as sick, a predator, and deserving of incarceration or worse.

August 8, 2023

178. On August 8, 2023, Lee published more comments against Ambrose on frankreport.com under the heading "CT Judge Orders Teens Away From Mother; Ignores Claims of Father's 'Abuse'; Ambrose Teens Homeless." <https://frankreport.com/2023/08/08/ct-family-court-judge-thomas-oneill-orders-ambrose-teens-away-from-mother-bars-riordans-contact-with-mia-matt-and-sawyer-for-one-year/#>

179. The article states, "Psychiatrist Bandy X. Lee, a noted expert in child abuse and psychopathy who, interviewed the eldest child and Riordan at length. Dr. Lee refers to Ambrose as the children's violent abuser and claims there is ample evidence that he is a psychopath."

180. The article also embeds links to The Riordan Letter, DCF Report, Psychopath Psychopath Checklist, and Qualifications, *so Lee published these documents three times in five days.*

181. The August 8, 2023 article also includes the full text of the August 8, 2023 letter Lee inappropriately sent *ex parte* to Judge Thomas P. O'Neill of the Connecticut Superior Court at Bridgeport (the "O'Neill Letter"), who issued restraining orders on behalf of the children against Riordan (and subsequently found Riordan in contempt of those order).¹⁹

¹⁹ Lee was desperate to testify as an expert witness for Riordan and even appeared in the courtroom, interrupting the hearing. The Court declined to qualify her. Undeterred, she ensured the Court "heard" her by sending the O'Neill Letter. Lee says she's been involved in dozens of family court cases; therefore, she knows that privately contacting a judge about a case over which he presides is unethical and has potentially severe consequences.

182. *Lee's statements in the O'Neill Letter are abjectly false or so twisted that they put Ambrose in a horrible false light:*
183. "I must warn against your sending Ms. Karen Riordan's children to Mr. Christopher Ambrose. He is no ordinary violent man."
184. "I have heard recordings of Mr. Ambrose's threatening the daughter with vaginal penetration as punishment for minor misbehavior."
185. "All three children have reliably reported sexual abuse, and no one has believed them, frankly, because the father is so threatening, he has intimidated all witnesses (he has already been threatening to me, which I had to report to local police)."
186. "The 12 (now 13)-year-old recently reported anal penetration."
187. "Even if none of this occurred, their lives seem to have been living 'hell' from his coercive control, verbal, emotional, and psychological abuse, and isolation from the mother who raised them (the father did not raise them) for over three years, which is abundantly and clearly recorded."
188. "[Ambrose's] aggression is such that, immediately after the first child ran away, he found out their address from the Connecticut Address Confidentiality Program, hunted her down, and stalked her everywhere in his car, almost causing her to have an accident."
189. "As expected from his coercion, these children exhibit objective signs of severe trauma: resorting to substances, self-harm, and suicidal thoughts while living with him, as well as going from normal weight to morbid obesity, as you have heard."
190. "Child protective services investigations were noted, but as a violence expert of twenty-five years' experience, I can tell you that I have found them to be too frequently wrong to

be solely relied upon. Individuals of the most dangerous personality disorders go undetected... I told this to one of the supervisors at the Department of Children and Families, as Mr. Ambrose is just such an individual, but they have not followed up, which shows that they are not only ineffective, they are also insincere: these are children who have reported being severely punished if they ever gave a true report of Mr. Ambrose's abuse against them, and DCF should know that this threatening behavior is common among the most dangerous individuals."

191. Lee refers to Ambrose as Riordan's "violent abuser" and claims "he was able to hire [his "high-powered attorney"] only because he embezzled [Riordan's] inheritance and stole everything she had."

192. A reasonable person would understand that a renowned psychiatrist specializing in domestic violence determined Ambrose to be a violent, dangerous psychopath who committed the most horrific sexual abuse against his children, abused and stole from his wife, leaving her homeless, that he lost his law license was lost and was fired multiple times for cause.

193. Since the article identifies Lee as an "expert in child abuse and psychopathy," a reasonable person would give these statements greater credibility.

194. The audience for Lee's statements is the entire Internet, potentially hundreds of millions of people, and will be available in perpetuity.

195. The article provoked/elicited 83 comments, nearly all denigrating Ambrose.

August 9, 2023

196. On August 9, 2023, Lee's claims were referenced in frankreport.com under the heading

"Why Was 'Rookie' CT Judge Called in to Make Significant Jennifer's Law Distortion?

Judge O'Neill Took Three Teens From Mother Against Their Wishes." [https://](https://frankreport.com/2023/08/09/why-was-rookie-judge-called-in-to-make-significant-jennifers-law-distortion-judge-oneill-took-three-teens-from-mother-against-their-wishes/)

[frankreport.com/2023/08/09/why-was-rookie-judge-called-in-to-make-significant-](https://frankreport.com/2023/08/09/why-was-rookie-judge-called-in-to-make-significant-jennifers-law-distortion-judge-oneill-took-three-teens-from-mother-against-their-wishes/)

[jennifers-law-distortion-judge-oneill-took-three-teens-from-mother-against-their-wishes/](https://frankreport.com/2023/08/09/why-was-rookie-judge-called-in-to-make-significant-jennifers-law-distortion-judge-oneill-took-three-teens-from-mother-against-their-wishes/)

197. The article states, "respected psychiatrist Dr. Bandy Lee, M.D., identified Ambrose

as likely psychopathic."

198. The article also embeds links to The Riordan Letter, DCF Report, Psychopath Psychopath

Checklist, and Qualifications, so *Lee repeated these damning comments four times in six days.*

199. Lee published her comments, including all those she made in the Riordan Letter, the DCF

Report, the Psychopath Psychopath Checklist, and the Qualifications, online, where they are accessible to an audience of hundreds of millions in perpetuity.

200. The article elicited 34 reader comments, nearly all attacking Ambrose.

August 13, 2023

201. On August 13, 2023, Lee's statements were quoted in an article published on

[substack.com](https://luthmann.substack.com/p/connecticut-court-cash-for-kids-scheme?utm_source=publication-search) under the headline, "Connecticut Court 'Cash For Kids' Scheme Services

Pedophiles?" [https://luthmann.substack.com/p/connecticut-court-cash-for-kids-scheme?](https://luthmann.substack.com/p/connecticut-court-cash-for-kids-scheme?utm_source=publication-search)

[utm_source=publication-search.](https://luthmann.substack.com/p/connecticut-court-cash-for-kids-scheme?utm_source=publication-search)

202. The article was published by Lee's frequent collaborator (and Riordan's close associate), Richard Luthmann, a disbarred attorney with a long history of drug and alcohol abuse and mental health issues who was recently released from four years in federal prison for extortion and fraud. Lee and Luthmann publish each other's work on their respective sites (e.g., on January 12, 2025, Lee published a piece by Luthmann on her substack.com site in which he refers to her as "my friend Dr. Bandy X. Lee." <https://bandyxlee.substack.com/cp/154760075>).
203. The article identifies Lee as a noted expert in child abuse and psychopathy and provides a link to her Qualifications.
204. The article states, "Dr. Lee refers to Ambrose as the children's violent abuser and claims there is ample evidence that he is a psychopath. She is secure in her medical opinion, having never met Ambrose, **which shows how dangerous he is.**" [Emphasis in the original].
205. Lee's myriad accusations against Ambrose are included in the article as the O'Neill Letter is published in full, so *Lee repeated these damning comments five times in ten days.*
206. Lee published her comments online, where they are accessible to an audience of hundreds of millions in perpetuity.
207. *This article was re-published one year later, on August 13, 2024 to amplify Lee's comments.* https://luthmann.substack.com/p/connecticut-court-cash-for-kids-scheme?utm_source=publication-search.

August 17, 2023

208. On August 17, 2023, an article in [frankreport.com](https://frankreport.com/2023/08/17/ashley-deckert-director-of-rhode-island-department-of-children-youth-families-responds-to-concerns-about-ambrose-children/) references statements Lee made under the heading “Ashely Deckert Director of Rhode Island Department of Children Youth and Families Responds to Concerns About Ambrose Children.” <https://frankreport.com/2023/08/17/ashley-deckert-director-of-rhode-island-department-of-children-youth-families-responds-to-concerns-about-ambrose-children/>
209. The article states, “Bandy Lee, MD, MDiv, [warns] of Christopher Ambrose’s dangerousness where his children are involved.”
210. The article embeds a link to the Riordan Letter, DCF Report, Psychopath Checklist, and Qualifications. So, *Lee’s damning falsehoods are published yet again.*
211. Lee published her comments, including all those she made in the Riordan Letter, the DCF Report, the Psychopath Checklist, and the Qualifications, online, where they are accessible to an audience of hundreds of millions in perpetuity.
212. The article elicited 56 reader comments, nearly all attacking Ambrose.

September 3, 2023

213. On September 3, 2023, Lee is quoted in [frankreport.com](https://frankreport.com/2023/09/03/luthmann-kids-can-be-sold-to-anyone-if-the-buyer-has-money-in-family-court-in-gov-lamonts-ct/) under the headline, “Luthmann: Kids Can Be Sold to Anyone, If the Buyer Has Money in Family Court in Gov. Lamont’s CT.” <https://frankreport.com/2023/09/03/luthmann-kids-can-be-sold-to-anyone-if-the-buyer-has-money-in-family-court-in-gov-lamonts-ct/>
214. The article identifies Lee as a doctor and quotes her, “This potential for Mr. Ambrose’s dangerousness, especially where children are involved, should not be overlooked.”

215. The article states, “Dr. Lee refers to Ambrose as the children’s abuser” and “a psychopath,” and offers as “evidence” the Riordan Letter, DCF Report, Psychopath Checklist, and Qualifications, which can be reached by an embedded link, repeating all the damning falsehoods/false lights detailed above.
216. A reasonable person would understand Lee’s statements to assert that a mental health professional believes Ambrose is an imminent danger and predator, particularly to his children.
217. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.
218. The article elicited 88 comments, most attacking Ambrose.

September 13, 2023

219. On September 13, 2023, the frankreport.com states “psychiatrist Bandy Lee... believes Ambrose is a dangerous psychopath,” in an article published under the heading, “Money Talks in Family Court: How Christopher Ambrose Bought His Kids and Their Futures – And Turned Maternal Love into a Liability.” <https://frankreport.com/2023/09/13/money-talks-in-family-court-how-christopher-ambrose-bought-his-kids-and-their-futures-and-turned-maternal-love-into-a-liability/>
220. A reasonable person would understand this statement to assert that a mental health professional believes Ambrose is a diagnosed psychopath.
221. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

September 25, 2023 (first article)

222. Lee is quoted extensively in a September 25, 2023 frankreport.com article entitled, "Family Court Gave the Kids to a Psychopath? Chris Ambrose Scores 32 on Psychopathy Psychopath Checklist." [https://frankreport.com/2023/09/25/family-court-gave-the-kids-to-a-psychopath-chris-ambrose-scores-32-on-psychopathy-Psychopath Checklist/](https://frankreport.com/2023/09/25/family-court-gave-the-kids-to-a-psychopath-chris-ambrose-scores-32-on-psychopathy-Psychopath-Checklist/)
223. The article states -
224. "Karen Riordan, the children's mother, turned to Dr. Bandy Lee, MD, MDiv, a forensic psychiatrist and expert on violence, in a bid to protect her children from their father...Upon examining the situation, Dr. Lee came to believe that Ambrose exhibited psychopathic tendencies."
225. After identifying the plaintiff as having psychopathic tendencies, the article states, "Dr. Lee employed the Hare Psychopathy Psychopath Checklist–Revised (PCL-R), the gold standard for diagnosing psychopathy. This condition is defined by a lack of empathy, a conscience deficit, cruelty, deceit, and anti-social actions. Psychopaths have a predatory and manipulative approach in relationships, causing widespread harm to those they encounter."
226. "On May 3, 2023, Dr. Lee conducted the PCL-R test on 61-year-old Christopher Ambrose." *It is important to note that Lee never met, let alone examined, Ambrose, and he never heard her name until May 30, 2023.*
227. "According to Dr. Lee, Ambrose's score was 32, placing him firmly within the psychopathy range."

228. "Dr. Lee said, 'It is a common characteristic of psychopathic individuals to mislead, cheat, or otherwise violate the rights of other people. 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—for example, they may recruit others as 'patrons' or 'pawns' to help them turn the narrative around to incriminating their victims instead.'"
229. "Dr. Lee highlighted that a PCL-R score of 30 or more is alarming and may even contraindicate parenting. Ambrose's score of 32 suggests a psychopathic diagnosis or, at the least, alarming psychopathic traits." Lee provided a screenshot of her completed evaluation.
230. "Dr. Lee pointed out once [sic] of Ambrose's traits: Separating growing children from their mother and primary caregiver (which Ambrose did) is one of the worst forms of abuse, which can have lifelong ramifications as well as decades of loss of life for each child—and can be a sign of this dangerous personality disorder."
231. "Dr Lee wrote: 'The family court system or child protection services are often ill-equipped to deal with 'successful' psychopaths, such that their litigation abuse has amounted to an international crisis...'"
232. The article continues, "But now the violence prevention Dr. Lee is concerned about involves three teenagers from Connecticut, banned from their protective mother, and now fled to an undisclosed location in NY to avoid their father, who is hunting them from place to place."

233. "Dr. Lee warned, 'This potential for Mr. Ambrose's dangerousness, especially where children are involved, should not be overlooked.'"
234. The article embeds links to the Riordan Letter, DCF Report, Psychopath Checklist, and Qualifications and to another Report of Suspected Abuse or Neglect to DCF Lee filed on August 9, 2023 (the "Second DCF Report"), repeating the claims of her May 24, 2023 Report.
235. The article also published photos of Ambrose and the children, as well as their names and ages, subjecting them and him to scrutiny, ridicule, emotional duress, and further violating their privacy.
236. A reasonable person would understand these statements to assert that a mental health professional with "accolades," albeit partly counterfeit, diagnosed Ambrose as a dangerous psychopath.
237. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.
238. The article inspired 46 comments, most against Ambrose.

September 25, 2023 (second article)

239. The article identifies Lee as "a prominent figure in forensic psychiatry" and states she "closely examined Ambrose's behavior and communications. In a detailed report intended for the court, Dr. Lee labeled Ambrose with 'characteristics of psychopathic personality,' emphasizing his predisposition to deceive and manipulate. Her analysis portrayed

Ambrose as someone who could attract immense sympathy, leveraging it as a tool to evade responsibility for his wrongdoings."

240. "[Lee] said the separation of children from their primary caregiver, as Ambrose had achieved through family court, 'is one of the worst forms of abuse, which can have lifelong ramifications, as well as decades of loss of life for each child.'"

241. "In a significant twist, Dr. Bandy Lee... duly notified the CT Department of Children and Families on August 9." The article embeds a link to the Second DCF Report.

242. The article quotes - yet again - Lee's most vile accusations against Ambrose, repeated in the Report and Second Report, "I have heard recordings of Mr. Ambrose threatening the daughter with vaginal penetration as punishment for minor misbehavior. All three children have reliably reported sexual abuse, and no one has believed them. Frankly, because the father is so threatening, he has intimidated all witnesses (he has already been threatening to me, which I had to report to local police). The 12 (now 13)-year-old recently reported anal penetration."

243. The article also published photos of Ambrose and the children, as well as their names and ages, subjecting them - and Ambrose - to scrutiny, ridicule, emotional duress, and further violating their privacy.

244. A reasonable person would understand these statements to assert that a mental health professional with impressive, albeit partly counterfeit, qualifications diagnosed Ambrose as a dangerous psychopath.

245. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

246. This article elicited 46 comments, most of them attacking Ambrose.

October 7, 2023

247. On October 7, 2023, Bandy Lee posted an article on her [medium.com](https://bandyxee.medium.com/an-alternative-court-of-unspeakable-criminality-violence-and-abuse-75c6244f71fc) site entitled “The Anatomy of a Family Court Case against a Loving Mother and Her Innocent Children,” in which she brutally attacked Ambrose on her [medium.com](https://bandyxee.medium.com/an-alternative-court-of-unspeakable-criminality-violence-and-abuse-75c6244f71fc) site. <https://bandyxee.medium.com/an-alternative-court-of-unspeakable-criminality-violence-and-abuse-75c6244f71fc>.

248. Lee removed the article after Ambrose sent a cease and desist letter on October 17, 2023, and posted a statement, referencing Ambrose to be a “dangerous perpetrator.”

249. A reasonable person would understand this statements to assert that a mental health professional has called Ambrose a dangerous perpetrator.

250. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

October 8, 2023

251. On October 8, 2023, Lee wrote an article published in the [frankreport.com](https://frankreport.com/2023/10/08/famed-pyschiatrist-dr-bandy-x-lee-the-egregious-case-of-christopher-ambrose-how-ct-family-court-failed-karen-riordan-and-her-children/), naming herself in the heading, "Famed Psychiatrist Dr. Bandy X Lee: The Egregious Case of Christopher Ambrose: How CT Family Court Failed Karen Riordan and Her Children" <https://frankreport.com/2023/10/08/famed-pyschiatrist-dr-bandy-x-lee-the-egregious-case-of-christopher-ambrose-how-ct-family-court-failed-karen-riordan-and-her-children/>

252. The article includes a preamble: "Dr. Bandy X. Lee, a distinguished American psychiatrist renowned for her expertise in forensic psychiatry and violence studies, delves

into the life of Christopher Ambrose, a man she suggests exhibits psychopathic tendencies. Her report aims to uncover how Ambrose allegedly manipulates the Connecticut Family Court system to devastate the lives of his teenage children and their mother. Dr. Lee's analysis also explores the unsettling enjoyment such individuals derive from these destructive actions."

253. Lee writes in the body of the article, "Never in my 25 years of practice did I imagine there would be an 'alternative court,' that deals in criminal child trafficking, where an alternative 'law' reigns, and not even the rules of human decency apply. Indeed, through family court, Christopher Ambrose, who would have been held accountable in any other setting, was able to devastate the life of a client I evaluated, Karen Riordan, and of her children and emerged as 'the innocent one.'"

254. "The absentee father [Ambrose] seized the opportunity to marry her [Riordan] in the midst of suddenly losing her mother, in retrospect, as a predatory move to steal her inheritance and hide his homosexuality, among other things."

255. "Even though he abruptly stopped being intimate with her as soon as they married, Riordan tolerated his 'quirks' — even though he immediately decided to leave for work in Hollywood and was hardly ever around."

256. *"In a twisted game of manipulation, Ambrose disrupts the tranquility and joy of his teenage children. Does he take perverse pleasure in the turmoil he instigates? His abusive and exploitative personality emerged, and the children began screaming for help. Riordan initially tried to reconcile everyone, but his actions were outside the bounds of anything she had previously known or even imagined."*

257. Under the heading, "A Psychopathic 'Father,'" Lee writes, "Being so caught off guard as the afflicted person wreaks havoc in your life is a common experience of those unfortunate enough to deal with a psychopathic personality. Christopher Ambrose exhibited extremely characteristic patterns, and given that high levels of the disorder are strongly correlated with dangerousness, I interrupted my evaluation of Riordan to perform the Hare Psychopathy Psychopath Checklist (PCL-R) on him."
258. "The highly-regarded and widely-used PCL-R requires doctorate-level education in psychology or psychiatry, forensic training and clinical experience with dangerous personalities, and additional instruction specific to administering the scale... [P]sychopathic individuals' pathological lying, conning, and superficial charm can 'beguile' even the most seasoned clinicians into *losing* the accuracy of diagnosis during a personal interview."
259. "Already, from what I had, [Ambrose] reached a full diagnosis of psychopathy — a score of 32/40 (at least 30/40 is required for 'caseness') — which should raise many alarms and possibly be a contraindication to parenting."
260. "Psychopathy is a disorder of empathy and conscience, where an individual is incapable of loving emotions but is driven to harm living beings, including one's own children. [Ambrose] already showed himself to be racist, taunting these children, the older two who are Guatemalan and the youngest half-Mexican, for their heritage. He also showed himself as a sadist, deliberately causing the family dog's death and killing the children's pet crabs." These are all outrageous lies. Ambrose is not racist and never taunted his own

children about their ethnicity. The older son accidentally let the dog, still a puppy, out of the house. The animal ran into a busy street and was hit by a car.

261. "In a chilling act, Ambrose orchestrated the demise of the children's beloved dog, Cody.

This cruel strategy not only deepened the children's disdain for him, but also served his ulterior motive of demonstrating parental alienation."

262. "I recommended the Court appoint its own expert with requisite training if it did not wish to heed my warnings, but of course, this never happened. I also reported to Child Protective Services (CPS), advising that psychopaths are 2.5 times more likely to evade the criminal justice system in criminal courts than those without the diagnosis, despite their crimes being generally more serious and more likely to repeat. My cautioning fell on deaf ears, confirming my fears (since my experience with Family Courts) that the errors of CPS are not just from incompetence but an intentional subversion of their role."

263. "Christopher Ambrose first attempted to cover up his emotional, psychological, physical, and sexual abuse of the children by counter-accusing the mother of abuse. But, when that did not work, he turned to the 'parental alienation' theory."

264. "'Parental alienation' is a buzz phrase, or formula, used only in Family Court to turn the tables on abuse victims. No doubt, as a former lawyer, he recognized that this was the key to his ability to continue his abuse with impunity and even to turn it into a money-making enterprise by holding the children hostage — the children Karen Riordan adopted without his help — and demanding child support.

265. "In 2020, Family Court transferred Riordan's three children, ages 9 to 13, to their father with a "no contact" order against the mother, and what was supposed to be a week's

separation until trial extended into a month, a year, and eventually three years — the typical abuse of process by which Family Courts engage in the *predatory alienation* of children."

266. "The oldest and youngest immediately started cutting themselves, and the middle child became suicidal and missed almost half a year of school."

267. "The oldest went from being an international gymnast and athlete to becoming morbidly obese. They ceased all activities and were confined in their rooms, if not constantly harassed, without privacy, even in the bathroom."

268. "The father took the doorknobs off the doors to ensure the children could not bar him from their bedrooms."

269. "When the children tried to report their sexual abuse to medical providers, Ambrose took away their phones and Internet access and constantly threatened them."

270. "In my investigation, I heard recordings of Ambrose threatening the daughter with vaginal penetration as punishment for minor misbehavior."

271. "The 12-year-old's sexual assault was documented in a recording of his screams."

272. "Video Above: In this video captured by Mia, shows her reaction to the chilling screams of a child echoing in the background. Mia identifies the voice as her younger brother, Sawyer, then merely 11 years old, reacting to an undisclosed situation involving their father inside his room."

273. "Audio Below: Listen closely to the ominous undertones in this audio clip. Here, we hear Ambrose threatening Mia, suggesting a harsh punishment for an unacceptable action. His

parenting style leans towards aggression, possibly even crossing legal boundaries. The phrase ‘dig it in deep’ leaves us questioning its underlying meaning.”

274. “Adult men were invited to sleep in the 16-year-old daughter’s room, bringing drugs and engaging in intercourse with other underage girls.”

275. “All three children articulately and reliably reported this abuse to multiple adults, consistently including hospital personnel, school officials, and the police, but all eventually deferred to Family Court.”

276. “These children thus had to endure a ‘living hell’... Still, Ambrose hunted [the daughter] down over the Connecticut confidential address program Riordan enrolled in and stalked her with a car, almost getting her into a serious accident.”

277. Lee embeds audio/video links in the article under the caption, “In this video captured by Mia, shows her reaction to the chilling screams of a child echoing in the background. Mia identifies the voice as her younger brother, Sawyer, then merely 11 years old, reacting to an undisclosed situation involving their father inside his room.”

278. Lee published photos of Ambrose, the children, and their dog, further violating the family’s privacy and subjecting all - including the minor children - to scrutiny, ridicule, emotional duress, and further violating their privacy.

279. After creating this sordid false impression that destroys the plaintiff’s reputation, Lee cravenly attempts to drive traffic to her sites, embedding links to her social media platforms, including bandylee.com, and medium.com, as well as her profiles in Wikipedia, LinkedIn, Amazon, and other sites.

280. A reasonable person would understand these statements to assert that a mental health professional with impressive, albeit partly counterfeit, qualifications diagnosed Ambrose as a dangerous psychopath.
281. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.
282. Lee's article elicited 82 reader comments, most denigrating Ambrose.

October 10, 2023

283. On October 10, 2023, the frankreport.com published that Lee claims to have damning evidence against Ambrose in an article under the heading, "Ambrose Case Sparks Alarm in Rockland County – Authorities Launch Investigation" <https://frankreport.com/2023/10/10/ambrose-case-sparks-alarm-in-rockland-county-authorities-launch-investigation/>
284. "Dr. Bandy X. Lee, a reputed [sic] psychiatrist, revealed recordings she'd obtained that... contained threats from Ambrose to [his daughter], using sexually explicit language to control and intimidate her for seeking help."
285. The article also published photos of Ambrose and the children, as well as their names and ages, subjecting them - and Ambrose - to scrutiny, ridicule, emotional duress, and further violating their privacy.
286. A reasonable person would understand these statements to assert that a reputable mental health professional has audio of Ambrose threatening and intimidating his daughter.

287. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

288. "Dr. Bandy X. Lee, a reputed [sic] psychiatrist, revealed recordings she'd obtained that... contained threats from Ambrose to [the daughter], using sexually explicit language to control and intimidate her for seeking help."

289. The article also published photos of Ambrose and the children, as well as their names and ages, subjecting them - and Ambrose - to scrutiny, ridicule, emotional duress, and further violating their privacy.

290. A reasonable person would understand these statements to assert that a reputable mental health professional has audio of Ambrose threatening and intimidating his daughter.

291. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

292. The article elicited 88 comments, many attacking Ambrose.

October 17, 2023

293. On October 17, 2023, Bandy Lee wrote an article she published on her [medium.com](https://bandyxee.medium.com) site under the heading, "A Corrupt Family Court-Protected Perpetrator's Cease-and-Desist Letter" with a sub-heading, "A Dramatic Case of Projective Identification and Victim-Offender Reversal." <https://bandyxee.medium.com/a-corrupt-family-court-protected-perpetrators-cease-and-desist-letter-3b7a5c2b479d>

294. Earlier that day, Ambrose had emailed Lee asking her to stop publishing falsehoods about him and violating his - and his minor children's - privacy. Lee responded by publishing an article attacking Ambrose and publishing his email.²⁰

295. In the body of her article, Lee states, "Any emotionally-balanced person will be able to recognize that [Ambrose's cease and desist letter] is not the issuance of a healthy individual (it also comes with 108 pages of exhibits)."

296. "Those with a forensic background will find a treasure trove of relentless deflection, obsessive control, aggressive victim-offender reversal, and delusional-level projective identification. Those with experience managing violent perpetrators will be able to assess what extreme dangers [Ambrose] poses."

297. "I will be contacting the local police, the state police, the district attorney's office, and the FBI. Shame on Family Courts for enabling such dangerous personalities to become exponentially more dangerous, for capitalizing on their extreme aggression and manipulative 'skill' to endanger innocent children, loving parents, and those who would protect them — leaving no option for safety but sunlight. Sunlight will also be the disinfectant for dangerous personalities' use of threats, intimidation, and abuse of corrupt courts: one day, their own litigiousness will land them in actual discovery, and accountability."

²⁰ Ambrose's email was a detailed narrative supported by over a dozen court documents, most of which were judicial decisions. Though she had not attended the hearings, heard the testimony, or seen the evidence presented to those courts, Lee attacked these court findings, relying on statements by Riordan, who courts have universally called an unreliable witness since 2019.

298. Lee ends the article, "[W]arning: if you find yourself sympathizing with [Ambrose] duly-diagnosed of psychopathy, who has committed unspeakable crimes against his ex-wife and children, including keeping them locked in the basement and trafficking them to pedophilic sex gangs, then his emotional manipulation is probably working on you, and you may wish to stop reading." (*Emphasis in the original*).

299. In her response to a reader's comment, Lee wrote, "I appreciate your effort to be careful, but this illustrates how effective psychopathic lying is. When every word is a lie, and nothing inhibits those lies because there is no core, then one can be completely convincing. At the same time, however, such persons are extremely dangerous. Psychopathy is the diagnosis of serial rapists and mass murderers, and the actual deeds of this man would match. Remember that I have seen the objective evidence, and his three children have seen and suffered the most unspeakable things (not to mention reach the brink of death numerous times). This is why Family Courts making a 50- to 175-billion-dollar business out of covering for psychopathic abusers creates a society that no longer functions properly. If you think criminals would have been held accountable somewhere, you do not recognize the power courts can wield over the police, schools, pediatricians, and Child Protective Services. This is also not a gender issue, except psychopathy is much more common in men, and Family Courts are still in medieval times with respect to level of patriarchy."

300. A reasonable person would understand these statements to assert that a supposedly reputable mental health professional has "duly-diagnosed [Ambrose] of psychopathy,"

labeled him "delusional," "violent," and "perpetrator" who is so "dangerous" she will contact the authorities, and that he committed horrific acts of abuse against his children.

301. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

October 21, 2023

302. On October 21, 2023, Lee wrote an article published in frankreport.com under the headline "Forensic Psychiatrist Bandy Lee Faces, Threats, Slander for Advocating for Ambrose Teens." <https://frankreport.com/2023/10/21/forensic-psychiatrist-bandy-lee-faces-threats-slander-for-advocating-for-ambrose-teens/>

303. In the article, Lee claims, "I have written about Karen Riordan, because I know the case in detail as an expert witness and yet have been prevented from testifying on it (my experience of Family Courts is that they keep tightly to their pool of poorly qualified 'experts' who have the potential to be bought)."

304. Lee states the three children "suffer[ed] three years of unspeakable abuse."

305. "I interviewed the daughter within 24 hours of her running away from her violent abuser-father."

306. Under the subheading "Abusers Turn Tables on Victims," Lee wrote, "If not contained, abusers become more entitled and violent... The abuser, in this case, Christopher Ambrose, not only discovered the location of his daughter within an hour of the mother notifying the police, but also looked up my contacts to write a threatening letter to me that I should never interview his daughter without his consent. Fortunately, based on the teen's disclosures, I had become a mandated reporter by the time he wrote to me."

307. "I even followed up with the 16-year-old when she interviewed for my book and documented how dramatically she improved in the four months of leaving her abuser... experiencing the calm of a non-threatening environment for the first time in years — even though she had been forced to leave."

308. "Since I immediately reported Ambrose's threats to the police, he could not write to me again. Still, he has been slandering me, fabricating false stories."

309. "Significantly, I have studied how dangerous personalities operate, and his obsession with researching all the different states in which I held licenses, his veiled threats, and his aggressive weaponisation [sic] of courts to reverse the narrative are signs of psychopathy."

310. "All three children, who eventually fled from their violent abuser, Ambrose."

311. "Their mother...singlehandedly raised them all their lives."

312. "Ambrose hunted them down and either sent the police or tried to manipulate their guardian into releasing them."

313. "Ambrose visited [the children] with police and executed a four-hour standoff, threatening the children that if they did not return to their father, they would go to a juvenile facility."

314. Under a photo of the three children, Lee wrote, "The three teens were happy and healthy away from their father." Under a photo of the plaintiff, Lee wrote, "Chris Ambrose won't let his children live with their mother or allow them to be happy anywhere."

315. Lee also embedded a link to an article, "An 'Alternative Court' of Unspeakable Criminality, Violence, and Abuse," posted on her medium.com site on October 7, 2023.

316. A reasonable person would understand Lee's published comments to be those of an "expert witness who knows the case in detail."

317. Lee posted this article, which remains online, where the audience includes hundreds of millions in perpetuity.

318. This article elicited 23 reader comments, most attacking Ambrose in graphic, vile terms.

October 23, 2023

319. On October 23, 2023, frankreport.com published an article quoting Lee under the heading, "Family Court Mastery Secures Ambrose's Return of His Teenagers Amidst Abuse Claims" <https://frankreport.com/2023/10/23/ambroses-legal-mastery-secures-return-of-his-teenagers-amidst-abuse-claims/>

320. Under the sub-heading, "Ambrose Threatens Dr. Lee," the article has Lee saying an "article on the victimization of Karen Riordan and her children has been removed [from Lee's medium.com site] because of the threats of Christopher Ambrose. Family Courts must recognize that threats and intimidation only increase when they enable dangerous perpetrators."

321. The article goes on to say, "Ambrose is a dangerous psychopath, according to Dr. Lee's clinical medical opinion. Using the Hare Psychopathy Psychopath Checklist, Dr. Lee evaluated Ambrose. Her report was unequivocal."

322. Quoting Lee further, "A 'full' diagnosis of psychopathy—a score above 30—raises many alarms and could be a contraindication to parenting. I have also affixed my score of the twenty items of the PCL-R, along with the final score (which can be prorated in the case of non-incarcerated persons). 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.”

323. “Dr. Lee fears what Ambrose is capable of and knows he is ‘extremely dangerous.’”

324. “I have met individuals more dangerous than Christopher Ambrose in my clinical work. Every single one of them is currently housed in a maximum-security institution.”

325. The article also published photos of Ambrose and the children, including their names, subjecting them - and Ambrose - to scrutiny, ridicule, emotional duress and further violating their privacy.

326. A reasonable person would understand these statements to assert that an experienced mental health professional has duly diagnosed Ambrose to be a “psychopath” who is “extremely dangerous” and belongs in prison.

327. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

328. This article elicited 62 reader comments, most attacking Ambrose in graphic, vile terms.

December 15, 2023

329. On December 15, 2023, frankreport.com published an article, “Nusbaum’s Actions Under the Microscope in Ambrose Riordan Case,” stating that “noted psychiatrist Dr. Bandy Lee labeled [Ambrose] potentially psychopathic.” <https://frankreport.com/2023/12/15/nusbaums-actions-under-microscope-in-ambrose-riordan-case/>

330. The article embeds a link to Lee's October 8, 2023 frankreport.com article attacking Ambrose.

331. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

332. This article elicited 185 reader comments, many lambasting Ambrose.

January 17, 2024

333. Bandy Lee is quoted extensively in an article written and published by Richard Luthmann on January 17, 2024 on [substack.com](https://luthmann.substack.com/p/the-tragic-tale-of-jennifer-dulos) entitled, "The Tragic Tale of Jennifer Dulos and the Connecticut Law That Bears Her Name." <https://luthmann.substack.com/p/the-tragic-tale-of-jennifer-dulos>.

334. Lee frequently collaborates with Luthmann, a disbarred attorney with a long history of drug and alcohol abuse and mental health issues who was recently released from four years in federal prison for extortion and fraud. Lee and Luthmann publish each other's work on their respective sites (e.g., on January 12, 2025, Lee published a piece by Luthmann on her [substack.com](https://bandyxlee.substack.com/cp/154760075) site in which he refers to her as "my friend Dr. Bandy X. Lee." <https://bandyxlee.substack.com/cp/154760075>).

335. The article identifies Lee as "a prominent American psychiatrist" who "emphasized the unique severity of [the Ambrose] case. She observed that Ambrose, using the Connecticut Family Court system, was causing significant harm to his ex-wife Karen Riordan and their children."

336. The article said, "Dr. Lee... felt compelled to speak out due to the Court's refusal of her testimony, the client's permission, and the active danger to the children."

337. According to Lee, Ambrose "unfairly victimized" Riordan, and "Lee diagnosed Ambrose's actions as "psychopathic" based on the Hare Psychopathy Psychopath

Checklist, where Ambrose scored 32/40, indicating a HIGH RISK of harmful behavior."

The article embeds the link to a lengthy article in which Lee viciously maligns Ambrose.

338. "Dr. Lee's investigation uncovered Ambrose's manipulative and abusive actions, including emotional, psychological, physical, and sexual abuse towards his children. This abuse was so severe that it led to significant behavioral and psychological changes in the children.
339. "Dr. Lee criticized the Family Court for its handling of the case, highlighting the misuse of the 'parental alienation' theory by Ambrose to continue his abuse and evade accountability."
340. "[A]ccording to Dr. Lee," the article states, "Ambrose has engaged in serious abuse in many ways:
341. "Litigation abuse and abuse of power - Riordan has no money or lawyer and is being beaten into submission. The children have no meaningful voice in the process.
342. "Authority Bias - Racism, sexism, and classism. The poor mother and her brown-skinned children are at the mercy of the white, wealthy authority structures.
343. "Witness Intimidation - Ambrose regularly and psychopathically intimidates witnesses, the press, and anyone he believes may reveal facts contrary to his spun narrative. This includes Dr. Lee, journalist Frank Parlato, and others."
344. "Victim Reversal - Christopher Ambrose was never a victim. He uses the courts and his lawyers to victimize the real victims further, the Ambrose teenagers and their mother, Riordan."

345. "Scapegoat - The lawyers, GALs, DCF workers, and other participants involved have allowed Christopher Ambrose to spin the tale that Riordan represents everything that is "wrong" with the CT Family Court system when, in fact, Ambrose is the physical embodiment of the problem."

346. "Dr. Bandy Lee raised the sirens about the sexual abuse of the Ambrose teenagers."

347. The article includes a lengthy quote from Lee's O'Neill Letter (there is also a screenshot of the two-page O'Neill Letter on Lee's letterhead):

348. "I have heard recordings of Mr. Ambrose's **threatening the daughter with vaginal penetration as punishment for minor misbehavior**. All three children have reliably reported sexual abuse, and no one has believed them, frankly, because the father is so threatening, he has intimidated all witnesses (he has already been threatening to me, which I had to report to local police). **The 12 (now 13)-year-old recently reported anal penetration**. Even if none of this occurred, their lives seem to have been living "hell" from his coercive control, verbal, emotional, and psychological abuse, and isolation from the mother who raised them (the father did not raise them) for three years, which is abundantly and clearly recorded. His aggression is such that, immediately after the first child ran away, he found out their address from the Connecticut Address Confidentiality Program, hunted her down and stalked her everywhere in his car, almost causing her to have an accident. As expected from his coercion, these children exhibit signs of severe trauma in their behavior: finding refuge in substances, self-harm, and suicidal thoughts while living with him, as well as going from normal weight to morbid obesity, as you have heard."

349. The article continues, "Dr. Lee, a trained medical doctor, also confirmed [the allegations of threats of vaginal penetration against the daughter and actual anal penetration against the 12 year old son.]

350. The article also includes a screenshot of Lee's Report of Suspected Abuse to DCF.

351. A reasonable person would understand these statements to assert that a "prominent American psychiatrist" has duly diagnosed Ambrose to be a "psychopath" and states that he sexually abused his children, is a racist, classist, and sexist, who conspires with the DCF, GAL, custody evaluator and the family courts to victimize his ex-wife and children.

352. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity. It is also linked to multiple articles to amplify the number of people it reaches.

September 28, 2024

353. On September 28, 2024, Lee published an article under the heading "Lying to the Feds? No Problem for CT Judge Thomas O'Neill in Ambrose Family Court Case," with the subheading, "Christopher Ambrose, a diagnosed psychopath, lied to federal agents and committed heinous crimes. Judge Thomas J. O'Neill blocked damning evidence from court. What's really going on?" <https://luthmann.substack.com/p/lying-to-the-feds-no-problem-for>

354. According to the byline, Lee wrote the article with her frequent collaborator, Richard Luthmann.

355. The article also embeds two audios (one 2 minutes 18 seconds, the other 12 minutes 40 seconds) on which Lee amplifies her false allegations in the article, specifically that

Ambrose repeatedly intimidated Lee and other potential witnesses to keep them from getting involved in the case and that he lied to federal authorities, enabling him to “orchestrate and FBI raid” against Riordan.

356. Lee published, "Connecticut Judge Thomas J. O'Neill refused to allow damning testimony about Christopher Ambrose's lies to federal agents and other heinous crimes into the record. Has the judge been hoodwinked by a dangerous psychopath, or is he exhibiting psychopathic tendencies himself?"

357. The article states, "According to Dr. Lee, [Ambrose] scored a 32 out of 40 on the Hare Psychopathy Psychopath Checklist, a score that places him in the highest category of danger. Psychopathy, as assessed through this Psychopath Checklist, is characterized by manipulateness, a lack of empathy, and an ability to lie without remorse."

358. "Ambrose's psychopathy was already a red flag, but Dr. Lee was prepared to testify about something even more shocking: Ambrose had lied to federal agents, orchestrating a false FBI raid based on fabricated accusations." The article goes on, "Ambrose lied to federal agents, leading to a SWAT team raid at the home of a friend of Karen Riordan," Dr. Lee explained in our conversation. "He claimed the children were there, which was completely false. This kind of manipulation of law enforcement is deeply dangerous and characteristic of someone with his psychopathy."

359. The article continues, "According to Dr. Lee, Ambrose's behavior follows a pattern of deception and abuse that puts everyone around him at risk."

360. "Every time I mentioned something incriminating about Ambrose, the judge struck it from the record,' Dr. Lee said. 'Ambrose's dangerousness, his lies to law enforcement, his abuse of the children—none of it was allowed to stay in the testimony.'"
361. The article contains screen shots of the first page of Lee's August 8, 2023 O'Neill Letter and her "confidential" Report of Suspected Abuse Lee made to DCF. The article notes that Lee' statements that Ambrose is a dangerous psychopathic abuser "are unequivocal."
362. Lee is quoted further," What I find most troubling is that [Judge O'Neill] seems to go out of his way to protect Ambrose, even though he has all the warning signs of a highly dangerous individual."
363. The article identifies Lee as "a forensic expert who has testified in high-stakes cases around the world" and claims she "was struck by how determined the judge seemed to protect Ambrose. She noted that [Judge O'Neill's] decisions consistently favor Ambrose, despite the overwhelming evidence of his psychopathy and dangerousness. 'I've seen judges make mistakes before, but this felt different. There was a deliberate effort to keep the truth about Ambrose from coming to light,'" Dr. Lee said."
364. "'Ambrose is a highly dangerous individual, but the court and DCF have turned a blind eye to his behavior,' Dr. Lee said. 'These children are trapped, and the system that is supposed to protect them has been completely co-opted by Ambrose'".
365. "As Dr. Lee put it, 'Either Judge O'Neill is being completely fooled by a dangerous psychopath, or he has his own issues that are clouding his judgment. Either way, it's a disaster for Karen Riordan and her children.'"

366. A reasonable person would understand these statements to assert that a licensed mental health professional has duly diagnosed Ambrose to be a "psychopath," who manipulates if not unlawfully conspires with the family courts, casting him in a horrific false light.

367. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

September 28, 2024

368. On September 28, 2024, Lee appeared the podcast of her frequent collaborator and Riordan's close friend, Richard Luthmann, a convicted extortionist and fraud recently released from four years in federal prison. <https://luthmann.substack.com/p/volpe-and-luthmann-the-unknown-podcast>.²¹

369. On the podcast, Lee states, Ambrose "has been stalking me...for a year and a half" by sending her emails, which she claims are "extremely threatening and intimidating" and she insists, "a form of witness intimidation."

370. Lee also states, Ambrose "has done this for every witness who came forward for Ms. Riordan. A couple of the people he caused them to be fired from their jobs whereas they would not have been fired without his relentless harassment."

371. Lee insists that Ambrose was "inundating and exhausting [Riordan's "supporters"] so they would never think to be involved again."

²¹ Also on the podcast was Jill Jones Soderman, a disgraced former social worker who lost her license for unethical conduct, who Riordan hired and paid five figures. In 2020-21, Soderman, using a pseudonym, texted the the daughter making defamatory allegations against Ambrose, which are referenced in The Decision.

372. Lee claims Ambrose “orchestrated an FBI raid against [Riordan’s] friend... There was a SWAT team of 20 FBI agents raiding a friend’s home where she was staying, in fact hiding from [Ambrose] from him saying the children were there.”

373. Luthmann states Ambrose “lied and made false statements to federal authorities,” Lee adds, “Numerous times and to the police constantly.”

374. Lee claims Ambrose was protected by the family courts who “cover up for violent offenders” like him.

375. Lee claims Ambrose was responsible for the “brutal abuse and suffering of the children and [Riordan].”

376. She states she will make “citizens complaint against [Ambrose] because of his intimidation, his harassment, his stalking,” and claims she had already filed police reports in Bridgeport and NYC against Ambrose.

377. She states Ambrose “has an extremely dangerous personality disorder” and is “a dangerous person” based on the Hare Psychopathy Test.

378. A reasonable person would understand Lee’s statements to mean that a licensed mental health professional duly diagnosed Ambrose to have a “dangerous personality disorder,” who has stalked, harassed, and intimidated her and all of Riordan’s supporters with lengthy emails, even causing some to be fired.

379. Her statements also indicate that Ambrose somehow manipulates if not conspires with the family courts and specifically with Judge O’Neill to “delightedly” cause the suffering and abuse of the children and Riordan.

380. Her claims also alert the audience that Ambrose is such a threat to her safety she has reported him to two police departments and plans to make additional reports.

381. Lee's statements also indicate the Ambrose is an invert liar who has told falsehoods to federal authorities, including the FBI.

382. All of Lee's statements put Ambrose in a horrific false light and are defamatory.

383. This podcast was posted and remains available, where the audience includes hundreds of millions in perpetuity.

September 29, 2024

384. On September 29, 2024, Bandy Lee published an article entitled, "Cease and Desist Letter," subtitled, "Against Mr. Christopher Ambrose - but the Real Problem is the Family Courts." <https://bandyxee.medium.com/cease-and-desist-letter-fc7a475ebd81>

385. After putting forth her conspiracy theory that family courts "are centers of serial kidnapping, serial murders, and a modern-day child slave trade — not as accidental mishaps but as a regular, systematic practice and a culture," Lee launched into an attack against Ambrose.

386. Referencing her September 23, 2024 testimony in Bridgeport Superior Court, Lee wrote, "When I expressed my fear for my own life and pleaded with [Judge O'Neill] to issue a protective order against Mr. Christopher Ambrose — the violent father who was awarded

sole custody of his three children — for stalking and harassing me for almost a year and a half to intimidate me as a witness, it fell on deaf ears.”²²

387. Betraying her relentless crusade to amplify her "false light" presentations of Ambrose, Lee embeds links to at least three other sites, all excoriating Ambrose with specious, highly damaging claims: (i) the online tabloid "Inside Investigator" ("Twisted: Jennifers' Law gets turned on its head in chaotic family court case" <https://insideinvestigator.org/twisted-jennifers-law-gets-turned-on-its-head-in-chaotic-family-court-case/>. and [\(ii\) "One Mom's Battle," a blog \("Rebranding' Parental Alienation' into Coercive Control" \[www.onemomsbattle.com/blog/the-attempt-to-rebrand-parental-alienation-into-coercive-control\]\(http://www.onemomsbattle.com/blog/the-attempt-to-rebrand-parental-alienation-into-coercive-control\)\); and \(iii\) a 2020 \[change.org\]\(https://www.change.org/p/family-court-justice-for-the-ambrose-family-children-to-speak-on-court\) petition against Ambrose \(<https://www.change.org/p/family-court-justice-for-the-ambrose-family-children-to-speak-on-court>\).](https://)

388. At the end of the article, Lee publishes the cease-and-desist letter she sent Ambrose, stating she "will follow up on with a motion for a protective order, with criminal complaints, and with lawsuits if he makes another move (although he will likely be unable to help himself), until some mechanism outside of the dysfunctional Family Court system finally works.”²³

389. Lee states in her letter, dated September 29, 2024, "I demand that you *cease and desist* contacting, stalking, and/or harassing me or any of my past or present affiliates, be they colleagues, associates, or institutions."

²² As explained, the Court (O'Neill, J.) issued restraining orders against Riordan on behalf of the children on August 8, 2023. Riordan was found in contempt of those orders on September 15, 2023. After additional egregious misconduct, the Court held a second contempt hearing where Lee was permitted to testify as a "fact" witness but not an expert.

²³ To date, Ambrose has not been served with any motion or lawsuit by Lee or anyone else.

390. "As you are aware, I reported you to multiple police precincts because of your unsolicited contact of me ever since you learned that I was retained as an expert witness in your family court case."

391. "Even though I have no obligation to you and was fulfilling my duty as a mandated reporter of child abuse, you harassed me with letters consisting of dozens, if not hundreds, of pages of threatening and coercive content, in order to interfere with my fulfilling my professional duties."

392. "Now, you have heard me testify in court that I believe you are attempting to tamper with and intimidate me as a witness, since I have affirmed your extreme violence against your children and ex-spouse, as well as your preliminary diagnosis of a dangerous personality disorder."

393. "Yet, in less than a week since, you have contacted three dozen more of my affiliates, especially in relation to a major national conference I was organizing. I kept the identities of the presenters private, precisely so that you would not have an opportunity to harass them, and yet you managed to find them out anyhow. This would not have been possible without the kind of obsessive, pathological, and intense stalking of which I accused you but which you denied just recently in court on September 23, 2024."

394. "Now, you have proven that you are engaging in a campaign of stalking, harassment, spreading of fraudulent information, and targeted character assassination, because I am a witness against you."

395. "This would not be the first time. I am well aware of your extensive history of targeting, intimidating, and retaliating against witnesses by incessantly contacting their employers

and getting them fired — which has happened to two people so far — so that they would think twice about testifying against you."

396. "Your ex-wife has lost many witnesses and social supports as a result, for you did not stop until you exhausted or frightened every one of them."

397. "On one occasion, you manipulated the FBI and orchestrated a false SWAT raid, based on pathological lies."

398. "This is the very material I examined for your preliminary diagnosis of psychopathy"

399. "Against your ex-wife, you filed an astounding sixty motions, all in order to "DARVO" (deny, attack, and reverse victim and offender), so that you might deflect from charges against you — and have succeeded."

400. "In my case, I have counted up to almost fifty persons or departments you have contacted in order to harass me."

401. "Through these extreme actions, you are only confirming that you are dangerously disturbed, and that my diagnosis of your dangerous disorder is probably correct."

402. "Should you contact me or anyone connected to me ever again, I will move for your arrest."

403. The article also published photos of Ambrose and the children, including their names, subjecting them - and Ambrose - to scrutiny, ridicule, emotional duress, and further violating their privacy.

404. A reasonable person would understand these statements to mean that a renowned psychiatrist has "affirmed [Ambrose's] extreme violence against [his] children and ex-spouse" and diagnosed him as having "a dangerous personality disorder." And that he is

violent and stalked and harassed Lee and her colleagues, attempted to intimidate her as a witness, and is so unhinged he is "unable to help himself."

405. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

October 1, 2024

406. Lee's frequent collaborator, federal felon/extortionist/fraud Richard Luthmann quotes her extensively in an article on NewsBreak.com published on October 1, 2024 under the heading, "CT Psychopath's DARVO Abuse Tactics: Explained" (<https://www.newsbreak.com/richard-luthmann-1792610/3615699523478-ct-psychopath-s-darvo-abuse-tactics-explained>).

407. This article was republished on October 1, 2024 on [newsbreak.com](https://www.newsbreak.com/richard-luthmann-1792610/3615699523478-ct-psychopath-s-darvo-abuse-tactics-explained) by Luthmann to capture an even larger audience for Lee's false claims. <https://www.newsbreak.com/richard-luthmann-1792610/3615699523478-ct-psychopath-s-darvo-abuse-tactics-explained>

408. The article states that Jill Jones Soderman, a social worker who lost her license and, like Lee, was hired by Riordan, "sat down with Dr. Bandy Lee, a forensic psychiatrist who has diagnosed Ambrose, and testified on the alarming levels of psychopathy she observed in him."

409. Lee is quoted, "[Ambrose] scored 32 out of 40 on the Hare Psychopathy Psychopath Checklist. A score of 30 is the threshold for diagnosing someone as a psychopath. In my career, which includes working with maximum security inmates, Ambrose's score is higher than many serial killers I've evaluated."

410. The article states, "According to Dr. Lee... Ambrose's behavior aligns with DARVO.

Instead of accepting responsibility for the abuse allegations, Ambrose has turned the tables, accusing his ex-wife of brainwashing their children and manipulating the courts.

His legal knowledge has reportedly allowed him to exploit the system, frustrating efforts to hold him accountable."

411. The article continues, "Dr. Lee shared chilling details from her testimony in Connecticut's family court, and quotes Lee, 'Ambrose blocked my testimony multiple times,' she said.

'When I was finally allowed to testify, the judge, Thomas O'Neill, sustained every objection Ambrose made. When I spoke to the danger Ambrose posed to his children and society, the judge struck it from the record.'"

412. It quotes Lee: "Ambrose's eldest daughter, Mia, fled from him after three years of separation from her mother. When I evaluated them, the trauma was evident. This family has been through hell. He's been harassing me for over a year," Dr. Lee said. "He's contacted my affiliates at Columbia, Yale, and Harvard, trying to discredit me. This is witness intimidation, plain and simple."²⁴

413. The article continues, "Dr. Lee, who has worked extensively with violent offenders, remains committed to holding Ambrose accountable despite the personal cost. 'I won't be silenced,' she said. 'I've reported him to the police, and I've requested protective orders, but the court refuses to act.'"

414. The article embeds a link to Substack.com article, "' Child Molester' and 'Psychopath' Luthmann Submits Damning Evidence to CT Family Court About Christopher Ambrose"

²⁴ Ambrose never contacted Yale, which fired Lee for cause. Despite her claims, Ambrose contacted Columbia and Harvard to get information.

published by Luthmann on July 30, 2023 stating, "Dr. Lee's medical opinion on Christopher Ambrose 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.'" <https://luthmann.substack.com/p/child-molester-and-psychopath>

415. The article also published photos of Ambrose and the children, including their names, subjecting them all to scrutiny, ridicule, emotional duress and further violating their privacy.

416. A reasonable person would understand these statements to mean that a renowned psychiatrist labeled Ambrose a likely psychopath with a higher "psychopathy" score "than many serial killers" and that he has traumatized his children and ex-wife and harassed Lee "for over a year," so she needs a protective order against him.

417. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

October 25, 2024

418. On October 25, 2024, Lee further maligned Ambrose in an online article published on her friend, felon/extortionist/fraud Luthmann's substack page under the heading "Chilling Endorsement: Psychopath Backs 'Dead Duck' Divorce Strategy" with the subheading, "Allan Kassenoff's New Firm Boasts Chilling Endorsement from Psychopath Christopher Ambrose." (<https://luthmann.substack.com/p/dead-duck-divorce-strategy-allan>

419. This article was republished by Luthmann on [onewsbreak.com](https://www.newsbreak.com) on October 26, 2024, expanding the audience exponentially. <https://www.newsbreak.com/richard->

luthmann-1792610/3649288586406-chilling-endorsement-psychopath-backs-dead-duck-divorce-strategy.

420. The article states, "Diagnosed by forensic psychiatrist Dr. Bandy X. Lee, Ambrose's score on the Hare Psychopathy Psychopath Checklist—a score higher than some serial killers—paints a damning picture of a man who is dangerous and manipulative."
421. "Dr. Lee also filed a Report of Suspected Child Abuse or Neglect for each of the Ambrose children. Her statements are unequivocal."
422. The article contains screenshots of the first pages of Lee's August 8, 2023, O'Neill Letter and her "confidential" Report of Suspected Abuse Lee made to DCF.
423. A reasonable person would understand these statements to mean that a renowned psychiatrist has been "unequivocal" in her assertions that Ambrose is a dangerous child abuser who has a psychopath score higher than some serial killers.
424. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

November 7, 2024

425. On November 7, 2024, Dr. Lee made more statements against Ambrose in a [substack.com](https://luthmann.substack.com/p/ct-judges-misogyny-shines-as-he-twists) article published by her close collaborator/convicted extortionist Luthmann under the heading, "CT Judge's Misogyny Shines as He Twists Jennifer's Law to Favor Alleged Abuser Christopher Ambrose. Judge Thomas O'Neill's Decision Targets Karen Riordan's Emotions, Ignores Ambrose's Alleged Psychopathy and Abuse" <https://luthmann.substack.com/p/ct-judges-misogyny-shines-as-he-twists>

426. This article was republished by Luthmann on November 9, 2024 on [onewsbreak.com](https://www.newsbreak.com/richard-luthmann-1792610/3666179280728-judge-s-misogyny-undermines-jennifer-s-law-favors-abuser) where spreading Lee's false claims to an even wider audience. <https://www.newsbreak.com/richard-luthmann-1792610/3666179280728-judge-s-misogyny-undermines-jennifer-s-law-favors-abuser>
427. The article states that Lee documented "Christopher Ambrose's history of coercive behavior" and, "'Ambrose lied to federal agents, leading to a SWAT team raid,' recounted Dr. Lee.
428. The article also references "Dr. Bandy Lee's...clinical assessment of Ambrose's psychopathy and manipulation tactics" and embeds a link to another article detailing more of Lee's malicious statements against Ambrose.
429. "Dr. Lee's forensic evaluation indicated that Ambrose's behavior showed clear markers of DARVO (Deny, Attack, Reverse Victim, and Offender)—a manipulation strategy often employed by abusers to make themselves appear as victims."
430. The article also includes a screenshot of the first page of Lee's O'Neill Letter and her "confidential" Report to DCF, both viciously malign Ambrose.
431. The article embeds links to many other articles in which Lee denigrates Ambrose published by Luthmann on his substack.com site on August 10, 2023, August 13, 2023 (republished August 13, 2024), January 17, 2024, and on October 1, 2024. (This is not an exhaustive list of the links in this article).
432. The article contains screenshots of the first pages of Lee's August 8, 2023, O'Neill Letter and her "confidential" Report of Suspected Abuse Lee made to DCF.

433. A reasonable person would understand these statements to mean that a renowned psychiatrist has labeled Ambrose a manipulative child abuser and psychopath who has lied to law enforcement.

434. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

November 9, 2024

435. On November 9, 2024, Lee's collaborator, felon/extortionist/fraud Richard Luthmann, posted an article on [newsbreak.com](https://www.newsbreak.com/news/3666179280728-judge-s-misogyny-undermines-jennifer-s-law-favors-abuser) under the heading "Judge's Misogyny Undermines Jennifer's Law, Favors Abuser," referencing her derogatory statements against Ambrose. <https://www.newsbreak.com/news/3666179280728-judge-s-misogyny-undermines-jennifer-s-law-favors-abuser>.

436. The article quotes Lee saying, "Ambrose lied to federal agents, leading to a SWAT team raid."

437. The article goes on to say, "Dr. Lee's forensic evaluation indicated that Ambrose's behavior showed clear markers of DARVO (Deny, Attack, Reverse Victim, and Offender)—a manipulation strategy often employed by abusers to make themselves appear as victims. "When a judge fixates on the emotions of one party, especially when that party is a victim, it reflects a lack of psychological insight and an alarming judicial bias," Dr. Lee stated in previous assessments."

438. The article also re-published Lee's O'Neill Letter in which she says Ambrose violently abused Riordan and the children, that he treated his daughter with vaginal penetration and anally penetrated his younger son, all of which are falsehoods.

439. A reasonable person would understand these statements to mean that a forensic psychiatrist called Ambrose violent and abusive, including sexually abusive of children.

Moreover, Lee states that he lied to federal authorities

440. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

December 9, 2024

441. The article notes that “Forensic psychiatrist Dr. Bandy Lee... assessed Ambrose using the Hare Psychopathy Checklist, labeled him a high-risk individual” and that she “presented evidence of [his] coercive control.”

442. The article also quotes Lee, referencing Ambrose, “These courts are not just failing victims; they are actively enabling their abusers.”

443. A reasonable person would understand these statements to mean that a forensic psychiatrist called Ambrose is a high risk individual based on a formal diagnostic, and that he has practices coercive control. Moreover, the article further puts Ambrose in a false light by insinuating that he is an “abuser.”

444. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

“One Mom’s Battle”

445. On her “One Mom’s Battle” blog, Tina Swithin published “Rebranding ‘Parental Alienation’ into Coercive Control,” brutally attacking Ambrose and identifying Lee as “a world-renowned expert on violence.” Swithin quotes from a letter Lee wrote to the Chief of the Madison (CT) PD, in which she stated “extensive and reliable evidence as to why

any child should not be sent back to Mr. Christopher Ambrose, a man who has not only abused Ms. Riordan's children but has engaged in aggressive litigation abuse and seizure of these children."

446. A reasonable person would understand these statements to mean that a world renowned expert is convinced that Ambrose has abused and "seized" his children, and that the case requires intervention by law enforcement.

447. This article was posted and remains online, where the audience includes hundreds of millions in perpetuity.

COUNT I - INVASION OF PRIVACY BY FALSE LIGHT

Ambrose restates all assertions in this complaint as if fully set forth herein.

448. Under Connecticut law, to demonstrate invasion of privacy by false light, the plaintiff must show (a) the false light in which he was placed would be highly offensive to a reasonable person and (b) the defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the plaintiff would be placed.

449. Lee published false, defamatory, and misleading statements about Ambrose, including but not limited to those made in her many articles and interviews, "confidential" DCF Reports, Psychopath Checklist and other "diagnostic" notes, the O'Neill Letter, the Riordan Letter, and other "private" correspondence (collectively, her "Writings").

450. Lee knew that her statements and Writings were lies or acted with reckless disregard regarding the falsity of her statements and Writings and the false light in which they placed the plaintiff.

451. Lee's malicious, outrageous lies about Ambrose represented significant misrepresentations of his character, history, activities, or beliefs that a reasonable person may reasonably be expected to take serious offense.
452. The false light in which Lee's statements placed Ambrose subjected him to hatred, distrust, ridicule, contempt, harassment, potential violence, and/or disgrace, injuring him and his reputation.
453. Lee published her statements and made her Writings available on the Internet and podcasts where they could be, and were, accessed by citizens of the State of Connecticut and throughout the United States and the world.
454. Ambrose is a private individual, not a public official or public figure.
455. Lee's publications were not only individually defamatory but part of her continuous campaign of harassment and abuse, starting in July 2023 and continuing through the present, causing Ambrose emotional distress, reputational and other harm.
456. Lee's false publications have caused Ambrose actual and substantial damages.

COUNT II - DEFAMATION *PER SE*

457. All previous allegations in this complaint are incorporated as if fully set forth herein.
458. Connecticut recognizes defamation *per se* where a false statement is considered so offensive to a person's reputation that the law presumes the statement caused harm, so the plaintiff doesn't need to prove actual damages.
459. Connecticut law has established the following statements to be defamatory *per se*: (1) Accusing someone of a crime involving "moral turpitude," such as child abuse (2) accusing someone of a crime that results in an "infamous" penalty, such as a prison

sentence, and (3) accusing someone of improper conduct, lack of skill, or integrity in their profession.

460. Many of the statements contained in Lee's campaign of harassment and abuse constitute defamation *per se*, including but not limited to her false accusations that Ambrose (1) sexually molested the children, including that he committed "child rape," (2) emotionally, psychologically, and verbally abused the children and Riordan, (3) "hunted down" and stalked the children and Riordan, (4) permitted the children and their same-age peers to use alcohol and drugs in his house and be "statutorily raped" by adult males, (5) "embezzled" Riordan's inheritance and "stole everything she had," (6) lost his law license and was fired multiple times due to "plagiarism and fraud," (7) conspired with the family courts, particularly Judge Thomas O'Neill, to keep the children from Riordan unlawfully, (7) conspired with DCF and the police so he could continue to abuse the children, and (8) "lied to federal agents multiple times" and "fabricated a false FBI raid" against Riordan.

461. The harmful nature of these defamatory statements is self-evident. Lee's defamatory statements implicate Ambrose in heinous, morally offensive, and/or criminal conduct, representing classic defamation *per se*.

462. Lee published false, defamatory, and misleading statements and Writings about Ambrose, knowing that they were lies or acted with reckless disregard regarding the falsity of her statements and Writings and the harm they would bring to the plaintiff.

463. Lee's malicious, outrageous lies about Ambrose represented significant misrepresentations of his character, history, activities, or beliefs that a reasonable person may reasonably be expected to take serious offense.

464. Lee's malicious statements subjected Ambrose to hatred, distrust, ridicule, contempt, harassment, potential violence, and/or disgrace and injured him and his reputation.

465. Lee published her statements and made her Writings available on the Internet and podcasts, where they could be, and were, accessed by citizens of the State of Connecticut and throughout the United States and the world.

466. Ambrose is a private individual, not a public official or public figure.

467. Lee's publications were not only individually defamatory but part of her continuous campaign of harassment and abuse, starting in July 2023 and continuing through the present, causing Ambrose repetitional harm and emotional distress.

468. Lee's false publications have caused Ambrose actual and substantial damages.

COUNT III - GENERAL DEFAMATION

469. All previous allegations in this complaint are incorporated as if fully set forth herein.

470. In Connecticut, a defamatory statement, which may be made willfully, recklessly, or negligently, is false, is “published” to a third party, identifies the defamed party, and harms the defamed party’s reputation.

471. Lee has defamed Ambrose in statements and her Writings by knowingly, intentionally, willfully, negligently, and recklessly publishing statements about him that she knew or should have known to be false and misleading and/or were published with reckless disregard for the truth.

472. Lee’s false or misleading statements about Ambrose subjected him to hatred, distrust, ridicule, contempt, harassment, potential violence, and/or disgrace, injuring him and his reputation.

473. The defendant knew that her statements were lies, or she acted with reckless disregard as to the falsity of her statements and understood or should have reasonably understood the harm her statements created for the plaintiff.

474. Lee published her statements and made her Writings available on the Internet and podcasts, where they could be, and were, accessed by citizens of the State of Connecticut and throughout the United States and the world.

475. Lee's publications were not only individually defamatory but part of her continuous campaign of harassment and abuse, starting in July 2023 and continuing through the present, causing Ambrose repetitional harm and emotional distress.

476. The plaintiff is a private individual, not a public official or public figure.

477. These false publications have caused the plaintiff actual and substantial damages.

COUNT IV - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

478. All previous allegations in this complaint are incorporated as if fully set forth herein.

479. In Connecticut law, intentional infliction of emotional distress occurs when: (1) The actor intended to inflict emotional distress or that she knew or should have known that emotional distress was the likely result of her conduct; (2) the conduct was extreme and outrageous; (3) the conduct caused the plaintiff's distress; and (4) the emotional distress sustained by the plaintiff was severe.

480. The nature of the statements Lee made about Ambrose and the extent to which those statements were circulated, including in his home state and to the rest of the world, directly and proximately caused him to suffer significant damages, including humiliation, embarrassment, mental suffering, shame, emotional distress, and other harms, all of which are ongoing and will continue to cause suffering in the future.

481. Lee's conduct was extreme and outrageous, beyond all bounds of decency, and regarded as odious and utterly intolerable in a civilized community.

482. Lee acted knowingly, intentionally, willfully, wantonly, and maliciously, intending to harm Ambrose or in blatant disregard for the substantial likelihood of causing him harm. In publishing her outrageous and false statements about him, Lee intentionally and/or negligently inflicted emotional distress upon Ambrose when she knew, or should have known, that emotional distress was the likely result of her conduct.

483. As a direct and proximate result, Ambrose is entitled to recover compensatory, special, and punitive damages in appropriate amounts to be proven at trial.

COUNT V - HARASSMENT

484. All previous allegations in this complaint are incorporated as if fully set forth herein.

485. Under Connecticut General Statutes (2023) § 53a-183 (a), "a person is guilty of harassment in the second degree when with intent to harass, terrorize or alarm another person, and for no legitimate purpose, such person... (3) communicates or shares a photograph, video or words or engages in any other form of communication to a digital, electronic, online or other meeting space, in a manner likely to cause terror, intimidation or alarm."

486. Under Connecticut General Statutes (2023) § 53a-183 (b), "For the purposes of this section, such offense may be deemed to have been committed either at the place where the communication originated or at the place where it was received."

487. Under Connecticut General Statutes (2023) § 53a-183(c), "The court may order any person convicted under this section to be examined by one or more psychiatrists."

488. Lee relentlessly engaged in a course of conduct by communicating and/or causing falsehoods, harassing words, and images to be communicated to Ambrose via various social media platforms where statements and comments are exchanged.

489. Ambrose has suffered harm from Lee's persistent harassment.

490. Ambrose will continue to suffer irreparable harm if an injunction is not issued, for there is no other adequate remedy at law.

491. Ambrose has a substantial likelihood of success on the merits of his claim.

492. The threatened injury to Ambrose due to Lee's continued misconduct outweighs any possible harm resulting from the entry of an injunction.

493. The considerations of the public interest support the entry of an injunction.

494. There is no other cause of action currently pending between Ambrose and Lee.

495. Ambrose has not made any previous attempt to obtain an injunction for protection against Lee in this or any other court.

PRAYER FOR RELIEF

WHEREFORE, the plaintiff respectfully requests the following relief:

- A. An injunction temporarily and permanently restraining Lee from committing any acts of harassment against Ambrose, including but not limited to making and/or publishing any statements about Ambrose, including but not limited to her Writings, whether made by Lee or any third party on any site(s)/platform(s)/forum(s)/podcast(s) she controls and providing any terms the Court deems necessary for Ambrose's protection, including any injunctions or directives to law enforcement agencies;
- B. An order requiring the immediate removal of all Lee's statements/comments/Writings/photos/videos/audios about Ambrose from any site(s)/platform(s)/forums she controls;

- C. An order requiring Lee to publish a retraction of all defamatory statements, including but not limited to her false accusations that Ambrose (1) sexually molested his children, including that he committed "child rape," (2) emotionally, psychologically, and verbally abused the children and Riordan, (3) "hunted down" and stalked the children and Riordan, (4) permitted the children (and their same-age peers) to use alcohol and drugs in his house and be "statutorily raped" by adult males, (5) "embezzled" Riordan's inheritance and "stole everything she had," (6) lost his law license and was "fired multiple times due to plagiarism and fraud," (7) conspired with the family courts, particularly Judge Thomas O'Neill, to keep the children from Riordan unlawfully, (7) conspired with DCF so he could continue to abuse the children, and (8) "lied to federal agents multiple times" and "fabricated a false FBI raid" against Riordan. The retractions must appear on all the websites/platforms/podcasts and in a manner comparable to that of the original statements and disseminated to the same audiences. Stating that Lee is publishing the retraction due to litigation or that the plaintiff denied Lee's statements will not do. The retractions must be full and frank, and Lee must acknowledge all defamatory statements and harassment;
- D. A written letter to Ambrose from Lee apologizing for her many false statements, harassment, and the harm she caused him and his children on all her websites/podcasts in a manner comparable to her original publication. A weak, grudging, or half-hearted effort will not suffice. The apology must be full and frank and appear on all sites Lee controls;
- E. Monetary and punitive damages in an amount not less than \$5,000,000;
- F. Litigation costs, including all filing and service fees;
- G. Pre-judgement and post-judgment interest; and

H. All such other relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Ambrose requests trial by jury as to all issues and claims so triable.

Dated: 17 March 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Ambrose", with a stylized flourish at the end.

Christopher A. Ambrose, *Pro Se*
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