

RETURN DATE: 17 October 2023

Civil Action No.

1. Mr. Ambrose graduated from New York University law school and was admitted to the New York bar on 30 October 1989.
2. Mr. Ambrose worked for a law firm in New York prior to his career as a writer and producer of TV shows.
3. The Defendant Christopher Ambrose, since at least 2010, was a TV writer and producer. He created content for such shows as *Family Law*, *Judging Amy*, *Law & Order*, *Bones*, and *Instinct*.
4. Mr. Ambrose took credit for a show aired in 2018 in the *Instinct* series titled *Secrets and Lies*, which received national press coverage for its likeness to a show aired years earlier in the *Bones* TV series titled *The Plain in the Prodigy*. After *Secret and Lies* aired, the producer of the show publicly apologized, Mr. Ambrose was accused in the press of plagiarism, and his career ended.

5. Mr. Ambrose entered a contested divorce after 2018 involving disputes with his wife Karen over property and custody of their adopted children.
6. Mr. Ambrose was the subject of a number of blogs and Internet postings generally disparaging him and his conduct in the divorce case with his wife.
7. A Mr. Frank Parlato posted a number of blog postings critical of Mr. Ambrose, and Mr. Ambrose sought to sue him, and later did so.
8. Prior to filing suit against Mr. Parlato, Mr. Ambrose concocted a plan using his creative intellect and legal background to have a strategic advantage against Mr. Parlato. His plan was to make it difficult for Mr. Parlato to find a lawyer to defend against his future action by creating conflicts of interest. That way his adversary would find it difficult if not impossible to obtain a competent attorney, and Mr. Ambrose could outmaneuver them legally with his superior legal experience pro se to pro se.
9. What Mr. Ambrose did was he contacted any Connecticut attorney that was likely to practice and/or advertised for defamation and infect them with enough confidential information so that these attorneys could not represent his future adversary. When Mr. Ambrose contacted these attorneys, his main intent was to supply confidential information to create a conflict of interest for that lawyer if and when the lawyer was contacted by his legal adversary, namely Mr. Parlato at that time.
10. Mr. Ambrose contacted lawyers about his potential claim against Frank Parlato and created an outline of subject matters he would cover in the communication. His intent was to use the written outline as evidence of the content and amount of information he shared in the communication to disqualify that attorney in the future if that attorney did end up representing Mr. Parlato.
11. Part of Mr. Ambrose's outline had a script that was 6 pages long.
12. One of those lawyers Mr. Ambrose contacted was the Plaintiff to the instant civil action. However, due to the Plaintiff's policy and customs, he was unable to infect the Plaintiff with confidential information, at least enough to trigger an obligation under ethics rules to not represent others.

13. Mr. Ambrose caused a call to occur on or about 21 December 2011 to the Plaintiff's office.
14. After December 2021, Ms. Pawlina, a friend of his and his wife's, gave an interview to Mr. Parlato, to which Mr. Ambrose took umbrage to.
15. Mr. Ambrose sued Ms. Pawlina in a civil action for the interview she gave to Mr. Parlato, *inter alia*.
16. The Plaintiff filed an appearance for Ms. Pawlina in Mr. Ambrose's case against her.
17. Mr. Ambrose attempted to implement his plan, originally intended to thwart Mr. Parlato's attempt to obtain an attorney, against Ms. Ms. Pawlina, by seeking to have the Plaintiff disqualified from representing her.
18. In his overexuberance to establish the conflict of interest, he defamed the Plaintiff, by publishing falsehoods to people unrelated and outside of the case in out-of-court statements, giving rise to the claim raised herein.

The Wrongdoing.

19. At some time between 15 August 2022 and 7 November 2022, but likely to be around early September 2022, the Defendant published orally, to a retired judge, that the Plaintiff had committed a violation of Rule 1.18(c) of the Rules of Professional Conduct. It was an out-of-court statement and it was false.
20. Upon information and belief, Defendant also published these falsehoods to others in out-of-court statements.

More Facts.

21. Rule 1.18(c) of the Rules of Professional Conduct prohibits an attorney from representing a client with interests materially adverse to those of a prospective client in the same or a substantially related matter if the lawyer received information from the prospective client that could be significantly harmful to that person in the matter. Defendant published to others that the Plaintiff represented a woman named Michelle Pawlina, despite having

sufficient information concerning the Defendant that would prohibit the Plaintiff from representing or continuing to represent her under Rule 1.18, and thus falsely stated the Plaintiff violated Rule 1.18.

22. Most specifically, Defendant published this falsehood to a retired judge, and likely others, stating that he shared a significant amount of confidential information with Plaintiff on a 9 to 10 minute telephone call that occurred on 21 December 2021, while he was looking to engage an attorney to sue Mr. Frank Parlato. And that having been privy to this information it rendered the Plaintiff incapable of representing an adversary to the Defendant, namely Ms. Pawlina, since the Plaintiff had so much confidential information that it would be harmful to him for the Plaintiff to represent her.
23. When the Defendant published this, he knew it was false. He knew he never shared any particular facts with the Plaintiff in his phone call, let alone the amount and character of information sufficient to disqualify an attorney to represent his adversaries in a substantially related matter. Instead, he falsely claimed to share confidential information to serve his own devious purposes, and slandered the Plaintiff maliciously.
24. In his publication to the retired judge and others, Defendant claimed he covered all the items in an outline he had that included one item being covering the subject matters in a script he prepared prior to the supposed phone call. This was false.
25. The problem with the Defendant's story, and why it cannot be believed, is that it is not possible that he shared all of this confidential information he claimed to have with the Plaintiff on this phone call 9 to 10 minute telephone call. In the Defendant's overemphasis and interest in trying to establish that the Plaintiff had enough confidential information, not just to represent the immediate adversary at the time, but any future adversary of his, the Defendant make the mistake of falsely claiming too much information was shared during the 9-10 minute phone call. He created and presented a vicious lie in an attempt to disqualify his opponent's attorney, and was caught by his own web of lies.

26. The Defendant is a sophisticated litigant. He is a devious liar and has the creative ability and intelligence to outmaneuver and deceive others in legal matters with his mix of truth with falsehoods. He created this long, contrived, and complicated story to create difficulty for his adversary to combat him legally, but it had a big problem, it was false and he couldn't make it believable because he was limited to nine to ten minutes of one phone call.

Parties.

27. The Plaintiff George E. Bourguignon, Jr. ("Plaintiff" or "Mr. Bourguignon") is an individual and holds a license to practice law in the State of Connecticut and the Commonwealth of Massachusetts. He has a law office at 37 Mechanic Street, Second Floor, Worcester, Massachusetts 01608. The Plaintiff is not a public figure.

28. The Defendant Christopher Ambrose is an individual and resides at 381 Horsepond Road, Madison, Connecticut 06443.

The damages.

29. The Plaintiff has suffered mental anguish and emotional distress upon learning that the Defendant published this falsehood to others in out-of-court statements.

COUNT ONE

[Slander per se]

30. The Plaintiff repeats, re-alleges and incorporates by reference all paragraphs above with the same force and effect as if fully set forth herein.

31. At some time between 15 August 2022 and 7 November 2022, but likely to be around early September 2022, the Defendant published orally, to a retired

- judge, that the Plaintiff had committed a violation of Rule 1.18(c) of the Rules of Professional Conduct.
32. Mr. Ambrose published to this retired judge that he conveyed confidential information to the Plaintiff that by nature and amount would be significantly harmful to Mr. Ambrose if shared and/or used by his adversaries in the same or a substantially similar matter, and that the Plaintiff continued to represent an adversary of his despite having this information and knowledge. This all being, a violation of Rule 1.18 of the Rules of Professional Conduct.
 33. Upon information and belief, Defendant also published these falsehoods to others in communications outside of court.
 34. Mr. Ambrose knew the Plaintiff was not in possession of any specific or confidential facts about him when he published that fact to third parties, his communications had an improper purpose, as they were made to cause the Plaintiff reputational harm and emotional harm, and were published with malice in fact. His statements were made with knowledge of their falsity and/or reckless disregard of the truth.
 35. Mr. Ambrose's slander and libel as described herein were made with "malice in fact" as is defined under Connecticut General Statutes § 52-237 and with "actual malice" as is defined under *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964) and its progeny. He had first-hand knowledge of his lies.
 36. Mr. Ambrose's slander of the Plaintiff was slander *per se* as the false statements he made imported the Plaintiff's inability, by way of incompetence, dishonesty, and unethical behavior, to perform his chosen profession, namely to practice law and to derive an income from same in the State of Connecticut and the Commonwealth of Massachusetts, as his statements conveyed the Plaintiff did not follow ethical rules applicable to the Plaintiff.
 37. Mr. Ambrose's communications injured the Plaintiff in his profession/vocation and calling as they damaged his reputation to others.
 38. Mr. Ambrose made his false statements concerning the Plaintiff with actual malice, in bad faith, and with ill-will; in the alternative, he made them recklessly.

39. Mr. Ambrose's defamatory statements stated herein concerning the Plaintiff tend to hold him up to scorn, hatred, ridicule, and contempt and discredits him in the minds of the community at large; and further, they harm his reputation as to lower him in the estimation of the community and to deter third parties, especially his fellow lawyers and members of the legal community, from associating or dealing with him. For this reason, the Plaintiff has been damaged.
40. The allegations herein are limited to out-of-court statements of Mr. Ambrose and by no means include any statements made during a hearing in a prior civil action or any written submission to a court in any prior civil action.

COUNT TWO

[Negligence]

41. The Plaintiff repeats, re-alleges and incorporates by reference all paragraphs above with the same force and effect as if fully set forth herein.
42. In the second alternative, Mr. Ambrose was negligent in publishing the falsehood to the retired judge and others and defamed him negligently.
43. The Plaintiff was damaged by the falsehood being published to others, including a retired judge, in terms of his reputation and with causing emotional distress.

WHEREFORE, the Plaintiff prays that judgment be entered against the Defendant respectfully as follows:

- (1) On count one, against the Defendant Christopher Ambrose, for actual damages, general damages, costs, punitive damages, injunctive relief narrowly drawn and in accordance with the United States and Connecticut constitutions, punitive damages, and such other and further relief as may be just and proper;
- (2) On count two, against the Defendant Christopher Ambrose, for actual damages, general damages, costs, punitive damages, injunctive relief

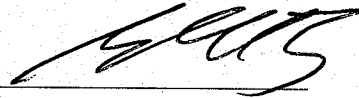
narrowly drawn and in accordance with the United States and Connecticut constitutions, punitive damages, and such other and further relief as may be just and proper.

Plaintiff seeks a jury trial on all counts so triable.

Respectfully submitted,
The Plaintiff,

Dated: 19 September 2023

By



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STATE OF CONNECTICUT
SUPERIOR COURT
JUDICIAL DISTRICT TO WINDHAM
AT PUTNAM

RETURN DATE: 17 October 2023

George E. Bourguignon, Jr,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No.
Christopher Ambrose.	)	
	)	
Defendant.	)	

STATEMENT OF AMOUNT IN DEMAND

The Plaintiff in the above-captioned civil action herein states that the amount in money damages based upon the foregoing complaint is more than Fifteen Thousand (\$15,000.00) dollars, exclusive of interest and costs, and claims other than relief in addition to or in lieu of money or damages.

Respectfully submitted,
The Plaintiff,

Dated: 19 September 2023

By



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