

RETURN DATE: : SUPERIOR COURT

KAREN RIORDAN AKA : J.D. OF HARTFORD

KAREN AMBROSE, PPA

MIA AMBROSE, PPA MATHEW AMBROSE

PPA SAWYER AMBROSE

V. : AT HARTFORD

GOVERNOR NED LAMONT,

JUDICIAL BRANCH OF THE STATE

: AUGUST 19, 2021

OF CONNECTICUT, DEPARTMENT OF

CHILDREN AND FAMILIES, OF THE STATE OF

CONNECTICUT, DEPARTMENT OF EMERGENCY

SERVICES AND PUBLIC PROTECTION

APPLICATION FOR EX-PARTE ORDER OF INJUNCTION

VERIFIED COMPLAINT

SEE ATTACHED VERIFIED COMPLAINT

WHEREFOR, THE UNDERSIGNED SEEKS:

1. An EX PARTE ORDER FOR INJUNCTIVE RELIEF issue ordering the defendants to immediately take all actions mandated by the laws of this State to Protect the moving party individually and the three minor children, by ordering the immediate issuance a Order of Protection pursuant to G.S. and immediately issue an ex parte restraining order pursuant G.S. 46b-15 transferring immediate custody of the three minor children to their mother and prohibiting all contact by Christopher Ambrose, Jocelyn Hurwitz, Deborah Gruen.
2. An EX PARTE ORDER FOR INJUNCTIVE RELIEF ISSUE ordering the defendants to restrain from all further actions of coercion, retribution, discrimination and harassment of the moving party, her minor children and the undersigned.

 L.S.
Attorney Nickola J. Cunha

ORDER TO SHOW CAUSE

Whereas, the foregoing motion by way of a verified complaint for a temporary injunction, duly verified, has been presented to the Superior Court, Judicial District of Hartford, the court not now being in session, and

Whereas, upon application of the plaintiff, it appears that an order should be issued directing the defendants in this action to appear before the court *[or]* undersigned to show cause why a temporary injunction should not issue.

Now therefore, it is ordered that the defendants be summoned to appear before the Superior Court for the Judicial District of HARTFORD at Hartford

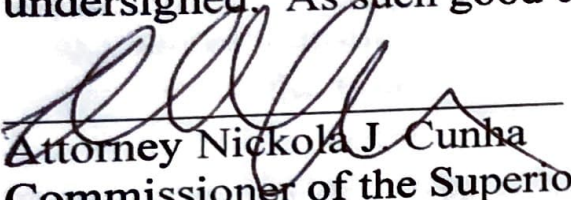
at 95 Washington Street, Hartford, CT on _____, 2021 court room _____ then
and there to show cause why a temporary injunction should not issue against him as prayed for in
the foregoing complaint and application.

Dated

BY THE COURT (_____, J.*[or]*)

NOTICE PURSUANT TO Rules of Court Sec. 4-5

The undersigned has not provided notice of this application for ex-parte for injunctive relief out of concern of the imminent harm to the moving party, the minor children and the undersigned. As such good cause exists to excuse notice of this ex -parte filing.



Attorney Nickola J. Cunha
Commissioner of the Superior Court

ORDER

TEMPORARY INJUNCTION

The plaintiff's motion with verified complaint and application for a temporary injunction having come before the Court is hereby ORDER:

GRANTED EX-PARTE UNTIL FURTHER ORDER OF THE COURT

OR

DENIED EX-PARTE AND SCHEDULED FOR A HEARING FOR FURTHER ORDER OF THE COURT

Dated .

BY _____

Judge/Clerk

VERIFIED COMPLAINT

AFFIDAVIT IN SUPPORT OF RELIEF FROM ABUSE FOR MYSELF, KAREN RIORDAN AKA KAREN AMBROSE, AND PPA FOR EACH OF MY THREE MINOR CHILDREN

I KAREN RIORDAN, AKA KAREN AMBROSE, a resident of the State of Connecticut, being over the age of eighteen, believe in the obligation of an oath, Hereby submits the following information and facts to the best of my knowledge and belief:

- a. To date my children and me have been denied relief that I should have been granted pursuant to the laws and rules of procedure of this state.
- b. The following venues, agencies have failed to Protect my children and I, in direct derogation to the actual evidence:

1. Docket No.: FBT FA 19 6088163 S

Christopher Ambrose v. Karen Ambrose

- a. Copies of the Civil Docket Sheet is attached hereto
- b. See pleading #222.00, no action to date
- c. See pleading #225.00 not acted on until trial 03/31/2021 #225.10
- d. See Pleading # 227.00 denied ex parte, then not acted on, refused scheduling
- e. See Pleading #235.00 not acted on until trial, Judge Grossman continued to make orders in derogation to the law and rules of practice
- f. See Pleading #236.00 Appellate Motion depicting attorney blocked from e-filing in the appeal
- g. See pleading #263, 264, 298.00, 299.00, 300.00, 304.00, 315.00, brief #352 all waiting for action
- h. Copy of List of Exhibits accepted as full to date is attached hereto
- i. Plaintiff's exhibits fully support the need for immediate help, wherein an OTC was recommended and ignored
- j. Defendant's exhibits support the need for immediate help

2. Docket No.: NNH FA20 5049348 S

K. R. aka K.A. v. C. A.

- a. Copies of the Civil Docket Sheet is attached hereto

- b. Copy of Family Relations Evaluation of Risk, deeming the respondent a "high risk" is attached hereto; This was accepted as a full exhibit in the trial GGG
 3. I have also tried to file Juvenile Petition of Neglect filed on behalf of all three children by me as the children's mother. Initially with the Middlesex Juvenile Court which rejected the filing and sent it to the New Haven Juvenile Court.
 4. The Department of Children and Families has been put on notice through multiple mandated reporters
 5. Madison Police Department, has received multiple reports and has violated all standards and procedures put in place to protect victims such as myself and my three children. Detective DeGoursey acknowledged under oath that my children and I are all victims pursuant to the laws of this state based on the crimes reported
 6. Guilford Police Department
 7. Westport Police Department
 8. State Police Department
 9. Myself and my attorney have been subjected to litigation abuse, retribution and coercive control by the professionals supporting Christopher Ambrose.
- c. I am in receipt of the following list 39 items depicted below of direct evidence of interactions between Christopher Ambrose, my husband and father of out three adopted children, daughter, M.A. present age 14, son, M.A. present age 14 and son, S.A. present age 11. There are several other identified adults herein such as, but not limited to (Zavondia Johnson, DCF, Stacey Falk, DCF, Jocelyn Hurwitz, GAL).
- d. I have been seeking the assistance from multiple venues, which to date has been blocked due to the political and financial strength my husband, Christopher Ambrose has in the State of Connecticut.
- e. On April 24, 2020 Judge Jane Grossman entered ambiguous and contracting orders placing the care of our three minor children in the sole custody of Christopher Ambrose isolating the children from me, their mother, who as been their primary care giver and psychological support since adoption. Solely based on the false narrative report authored by Dr. Jessica Biren-Caverly.
- f. The orders were based on limited evidence only submitted through Christopher Ambrose's case in chief, to date I have not been given an opportunity to present a defense.
- g. Immediately following the April 24, 2020 court orders, Christopher Ambrose violated the orders by discharging Jodi Eagan, LCSW that was working with Mia

- A. our daughter, and discharged Dr. Dorothy Stubbe, a highly credited psychiatrist who was a longtime establish mental health provider for our son, Mathew A.
- h. In direct violation of G.S. 46b -56c the Guardian Ad Litem, Attorney Jocelyn Hurwitz, Christopher Ambrose, and his attorney, Nancy Aldrich blocked my access to the children's education and medical records.
 - i. In direct violation of G.S. 46b-6 the Guardian Ad Litem, Jocelyn Hurwitz and Christopher Ambrose engaged services of Dr. William Horn to mental health care and treatment of our son, Mathew Ambrose, knowing that Dr. Horn was engaged in mental health treatment of Christopher Ambrose.
 - j. In direct violation of G.S. 46b-6 the Guardian Ad Litem Jocelyn Hurwitz and Christopher Ambrose engaged services of Dr. Deborah Gruen for mental health care and treatment of our daughter, Mia A.
 - k. Christopher Ambrose has isolated all known supports family, friends and me from our three children, resulting in extreme emotional harm.
 - l. On December 1, 2021 Judge Price Borland granted ex parte an application for a restraining order and granted temporary custody of all three minor children to me.
 - m. Upon information and belief, within less than twenty-four hours, Christopher Ambrose with the assistance of his Attorney Nancy Ambrose, the Guardian Ad Litem, Jocelyn Ambrose and Judge Jane Grossman engaging in ex parte judicial communication, manipulated the scheduling of a hearing before Judge Price Borland wherein the ex parties orders were vacated and the matter remained scheduled for a hearing. My attorney was not allowed to present any evidence, what was ordered on the record was different from what was written.
 - n. Judge Grossman further scheduled a 2:00 p.m. status conference, entered orders in direct conflict of a 96 hour hold put in place by the Department of Children and Families following the individual evaluation of each child at the Children's Hospital.
 - o. On December 3, 2021 Judge Jane Grossman entered orders once again in direct conflict with another 96 hour hold put in place by the Department of Children and Families and a Safety Plan entered into by Christopher Ambrose and myself.
 - p. On January 26, 2021 our daughter and youngest son were placed in Foster Care based on the findings of the Multi Disciplinary Task Force Team.
 - q. following a forensic evaluation, wherein it was established that the disclosures of our two children that were presented for an evaluation have been consistent, since September 3, 2020 when the same disclosures were made at Yale New Haven Hospital following the two oldest children being referred by Madison Police Department for a Peer, and all three children transported via ambulance to Yale, which resulted in a 96 hour hold. Again the disclosures were consistent with all three children's disclosures made at the Children's Hospital in Hartford on

December 1, 2020 when all three children were evaluated independently and placed on a 96 hour hold.

r. The children were returned to their father

1. Recording August 2021 Christopher Ambrose “*You’re PARANOID and DELUSIONAL*”

Summary of Recording:

- Mr. Christopher Ambrose often tells police his daughter is “crazy like her mother.”
 - On Friday August 13th, Mr. Ambrose told his daughter, “*You should just kill yourself.*”
 - **The evidence presented to the court has established that** daughter sleeps downstairs of a two-level home. The audio establishes the daughter is sitting at the top of the stairs at the entrance to the main level of the home from the refurbished basement the daughter has been placed.
- Christopher Ambrose’s voice is depicted as telling his daughter her behavior is *bizarre* for her age.
- Mia had already indicated she was just thinking.
 - Mia accuses father of recording her. He denies it.
 - Evidenced history Mr. Ambrose records his children via usb recorders.
 - Father tells her she is “*Paranoid and Delusional.*”

2. Christopher Ambrose to all three children “Huge Trials”

Summary of Recording:

- Ambrose promotes he has sole custody as an outcome of court trials.
- The trial began March 31, 2021 and is ongoing.
- Ambrose insists to his children that there were huge trials, and “*That’s why you are here.*”—indicating in his home and under his care.

Sample of recording content:

C. Ambrose: *You just don’t want to hear the truth*

Mia: *I’ve heard plenty of the truth*