

NO: FBT-FA19-6088163-S : SUPERIOR COURT
CHRISTOPHER AMBROSE : JUDICIAL DISTRICT
OF MIDDLESEX
v. : AT REGIONAL FAMILY TRIAL
DOCKET
KAREN AMBROSE : DECEMBER 1, 2021

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE THOMAS G. MOUKAWSHER, JUDGE

A P P E A R A N C E S :

Representing the Plaintiff:

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1 THE COURT: Good morning. In Ambrose versus
2 Ambrose, may I have the appearances of the parties
3 starting with the plaintiff, please?

4 ATTY. ALDRICH: Yes, Your Honor. Attorney Nancy
5 Aldrich for the plaintiff, Christopher Ambrose.

6 THE COURT: Good morning.

7 ATTY. ALDRICH: Good morning.

8 ATTY. CUNHA: Good morning, Your Honor. Nickola
9 Cunha on behalf of Karen Riordon also known as Karen
10 Ambrose.

11 THE COURT: Good morning. All right. So, we're
12 here on the motion to recuse. I've read the filings
13 from both sides on it.

14 It is your motion, Ms. Cunha. So, are you
15 planning to offer any testimony with respect to the
16 motion?

17 ATTY. CUNHA: Your Honor, I'm not planning to
18 offer testimony. I'm asking the Court to take
19 judicial notice of the record that is already in
20 place. And I could go through the dates and the
21 specific areas of the record both by way of exhibits
22 and by way of transcripts that I'd like the Court to
23 consider with respect to the motion.

24 THE COURT: Okay. So, if there are - if I'm
25 getting it right, then, are you saying there are
26 specific moments that would be in the - in the
27 transcript or proceedings that you want me to listen

1 to for a specific reason? Is that what you're
2 saying?

3 ATTY. CUNHA: Yes, Your Honor.

4 THE COURT: Okay. So, in other words, what
5 would be helpful to me is if you said on such and
6 such a date - and I don't know if you have times or
7 anything else; but if you don't, it's fine - but, on
8 such and such date, you want me to take notice that a
9 certain statement was made or something like that and
10 that you want me to go back and review that. I have
11 the ability to do that.

12 So, I'd want - what would be helpful to me is if
13 you gave me a date, said what the claim of bias was
14 about - about what happened on that date, and what
15 you want me to look (indecipherable). So, is that -
16 is that your intention?

17 ATTY. CUNHA: Yes, Your Honor.

18 THE COURT: All right. So - so - so transcript
19 references, references I assume to the - to the
20 docket, and then you have your affidavit. Is that -
21 is that the totality of what I should expect, then?

22 ATTY. CUNHA: Yes, Your Honor.

23 THE COURT: Okay. So, if you want to start by
24 going through specific dates that you want me to
25 examine a specific point of - of the transcript, go
26 ahead and begin.

27 ATTY. CUNHA: Thank you. So, Your Honor, I'd

1 bring the Court's attention to our first day of trial
2 in this matter which was March 31, 2021. At the time
3 of our first appearance, the parties were ordered to
4 appear at court I believe for 9 a.m. And the order
5 was issued by Judge Adelman based on Attorney
6 Aldrich's motion for order. And Attorney Aldrich was
7 seeking to have the plaintiff deposed and represented
8 to the court that the plaintiff had failed to comply
9 with Attorney Aldrich's subpoena and -

10 THE COURT: The plaintiff had failed to -

11 ATTY. CUNHA: Sorry. The defendant had failed
12 to comply.

13 THE COURT: And you're saying this was the first
14 day of trial or first -

15 ATTY. CUNHA: First day of trial -

16 THE COURT: Okay. So, this is about a
17 deposition request on the first day of trial, and
18 you're saying that Attorney Aldrich was saying the
19 defendant had failed to comply; is that right?

20 ATTY. CUNHA: Correct.

21 THE COURT: Okay. Go ahead.

22 ATTY. CUNHA: And so, we start our trial out
23 with argument before Judge Adelman. And I believe
24 that that first day in and of itself sets the stage
25 to the significant bias that Judge Adelman holds
26 against women, against individuals with disability,
27 against - my belief is there is significant evidence

1 that Judge Adelman also has a bias against anyone
2 that is not of the Jewish faith. And I base that on
3 a significant amount of information that has been
4 sent to me over the last several weeks. And it's
5 really distributing. And I have a number of
6 individuals that are available and on the call today
7 that are willing to share their experiences with the
8 Court in terms of -

9 THE COURT: Well, I thought you were not
10 planning to call individuals to testify. Is that -
11 are you changing that or...

12 ATTY. CUNHA: No. No. I'm leaving it up to the
13 Court's discretion. That's where I was going with
14 that, Your Honor. I don't believe that it will be
15 necessary.

16 But I'm just pointing out to the Court that my
17 belief that Judge Adelman also has a bias against
18 individuals that are not of the faith - of the Jewish
19 faith has - is a recent belief based on the enormous
20 amount of information and evidence that's come to me.

21 THE COURT: Well, I'm a little confused. I am
22 trying to follow your argument carefully. We started
23 on March 31, 2021, and you said that there was
24 evidence on that day of bias.

25 ATTY. CUNHA: Correct.

26 THE COURT: And you're saying it's women, the
27 disabled, and then you added anyone who is not

1 Jewish.

2 Is there something that you want me to listen to
3 - I'm just trying to get this sequentially. Is there
4 something you want to listen to me on that day that
5 you say shows bias against women, as you said, and
6 then against the disabled and then you said against
7 non - against non-Jews I think is what you said? Are
8 you - are you telling me that I'll find something in
9 the - by listening to it that would suggest any of
10 those three -

11 ATTY. CUNHA: No. I believe the record in its
12 totality will support that. But I start with March
13 31st and my position is this: On March 31st, we
14 arrived in court in person based on Judge Adelman's
15 order in response to Attorney Aldrich's motion. And
16 I filed a motion for sanctions and to have Attorney
17 Aldrich disqualified and recused based on the
18 material misrepresentations that Attorney Aldrich
19 made to both Judge Adelman in her request for relief
20 and she made to Judge (indecipherable) who -

21 THE COURT: Is there something -

22 ATTY. CUNHA: - was the original - Judge -

23 THE COURT: I'm sorry. Is there something on
24 the March 31st transcript? That's what I'm talking
25 about. That - was that argued then, this motion to
26 disqualify? Is that what I'd hear?

27 ATTY. CUNHA: Yes.

1 THE COURT: Okay. So, that motion -

2 ATTY. CUNHA: Yes. And -

3 THE COURT: - to disqualify was heard on March
4 31st?

5 ATTY. CUNHA: It was absolutely pointed out to
6 the court and representations were made to the court
7 to support it. And, to date, Judge Adelman has not
8 acted on it.

9 THE COURT: Okay. But, just to be clear, so, I
10 want to go back and listen to this -

11 ATTY. CUNHA: Yes.

12 THE COURT: - and you want - I'll hear there your
13 arguments about disqualifying Attorney Aldrich; is
14 that the point?

15 ATTY. CUNHA: Yes. And - and what's important
16 about that is the trial starts off on a complete
17 attack of my client with the notion that my client
18 had failed to comply with discovery. But yet, my
19 client is the only one in this case that ever
20 requested standard discovery and filed a motion
21 regarding same early on in October of 2020 which I
22 could not get the court to act on.

23 I then refiled a motion in January of 2021
24 seeking to have the court compel, and that's motion
25 number 266. Sorry. It was filed - it was efiled on
26 February 10, 2020 -

27 THE COURT: I'm sorry. I'm getting lost again.

1 In other words, I was focusing on March 31st. And
2 you claim that I would - I could listen to that and
3 hear Judge Adelman' bias. So -

4 ATTY. CUNHA: Yes.

5 THE COURT: - what did - what did - what should
6 I listen for to indicate that he was biased? Did he
7 say something that you want me to make a note of or
8 is it just that he didn't give you the relief that
9 you wanted even though you feel he should have? Did
10 he say something that - that I should particular note
11 on that date? That's what I'm - I'm wondering. Or
12 is it simply that he didn't give you the relief you
13 wanted?

14 ATTY. CUNHA: It was nothing to do with the
15 relief. If I was disappointed with the relief, then
16 I would - I would deal with the Appellate Court.

17 The issue here is that Judge Adelman took on the
18 same stance as Judge Grossman and failed to allow my
19 client any due process at all and violated her right
20 to access to the court. And -

21 THE COURT: And what did he specifically do
22 because there's the difference we're trying to make -
23 and I think you agree with me - there's a difference
24 with - between disagreeing with his ruling and now
25 you're saying denied her any due process whatsoever.

26 What is it specifically other than that you
27 didn't like his ruling that you claim violated due

1 process?

2 In other words, for instance - well, give me an
3 example on that date that I could listen to of him
4 denying due process because that's what I'm looking
5 for? I want to find the - the bias, the difference
6 between a person making a ruling you don't like and a
7 - and a person doing something that you believe is a
8 violation of - of -

9 ATTY. CUNHA: Sure.

10 THE COURT: - (indecipherable).

11 ATTY. CUNHA: Okay. So, on March
12 (indecipherable) 2021, item number 305 is a motion in
13 limine and that motion points out to the court
14 specifically that Judge Goodrow from New Haven
15 transferred an application for restraining order
16 after deciding that it would be mistrialed because
17 this matter has the same underlying facts and for
18 judicial economy it made more sense for Judge Adelman
19 to hear the evidence with respect to the application
20 for civil protection order than it did for a New
21 Haven Judge while a Middletown Judge was
22 simultaneously holding a trial in the matter.

23 THE COURT: Okay.

24 ATTY. CUNHA: So, I - I filed that motion to
25 seek clarification from Judge Adelman and to give the
26 judge alert that we have this application for a
27 restraining order pending which is how the trial

1 should have started based on statutory priority. And
2 Judge Adelman refused to hear anything of it and did
3 not allow me to proceed with the underlying claims
4 that were set forth in the application for
5 restraining order. He held that he was going to deal
6 with the trial in a normal sequence of evidence
7 wherein the plaintiff would - would put their case
8 on, and then, the - the defendant would proceed and
9 any evidence that came in during this course that
10 supported the application for relief from abuse could
11 be used.

12 That is a blatant violation of my client's due
13 process rights, a blatant violation of our domestic
14 violence laws. Judge Adelman took the law into his
15 own hand and refused my client the right to be
16 considered the protections under our statutes that
17 are granted upon domestic violence victims. And he
18 has a clear pattern of history of doing this.

19 THE COURT: Okay. So, let me - let me - let's
20 focus on that for a moment so I'll understand your
21 arguments. So, you - you believe because you had
22 this restraining order present that you should have
23 been able to immediately put on evidence about that.
24 And Judge Adelman ruled against you about that.

25 Now, you could say that it deprived you of
26 constitutional rights. You could say that it was
27 legally incorrect which is the same thing. In other

1 words, if you say it's a violation of due process, it
2 was incorrect as a matter of law in your view.

3 But tell me how it - what would take that beyond
4 simply a disagreement with his ruling towards
5 something that shows bias as you claimed against
6 women, the disabled, and people who aren't Jews? How
7 does that illustrate that?

8 ATTY. CUNHA: Sure. Because he has a clear
9 pattern of conduct that consistently establishes that
10 Judge Adelman ignores claims of domestic violence.
11 He is aggressively abusive in his demeanor and
12 application or failure to -

13 THE COURT: Let's take these one at a time
14 because the second thing you said is more serious.
15 But, because what I want to do is isolate or - or
16 look at it all together at various moments to
17 understand what you're claiming.

18 So, one of the things you're saying is that I
19 gather that he had a pattern of ruling in ways that
20 you considered unjustified as matters of law and
21 that -

22 ATTY. CUNHA: Yes.

23 THE COURT: So - so, let's just take that part
24 because I want to understand it because, obviously,
25 there's this issue of disagreeing with rulings and
26 then there's the issue of bias. If, for instance,
27 every time a certain party makes a motion, they lose.

1 You just lose. You don't get heard. You lose, lose,
2 lose, lose. Then you start looking for the reason
3 for it. And it may be a question of law that it just
4 - that's just a disagreement on the law, or it might
5 be connected in some way to wrongdoing. It's that
6 second part.

7 So, let's say that you disagree with many
8 rulings and that you feel like you didn't get a fair
9 hearing on many rulings, let's get to that second
10 part of what you said which is that you then claim
11 that further evidence of bias and prejudice came from
12 I think you were saying his demeanor so - and that,
13 therefore, in - you connect that you didn't like his
14 rulings with the way he behaved and that's you're
15 your second point.

16 So, what is it you're telling me about behavior?

17 ATTY. CUNHA: Sure. So, it wasn't that - it's
18 not - I want to be clear about this. This is not
19 about me being disappointed or unhappy with a judge's
20 rulings. Okay. That is -

21 THE COURT: (indecipherable).

22 ATTY. CUNHA: That - that - it's very important
23 for the Court to understand that from my perspective.

24 What I am very upset about and disappointed
25 about and what the problem is here is that we have a
26 judge that blatantly ignores the laws of our state.
27 He blatantly ignores the Practice Book. He allows

1 Attorney Aldrich, which there's a history of this in
2 other cases which I had no clue until this action to
3 recuse him started taking place, where he routinely
4 favors Attorney Aldrich in her - in her matters and
5 sides -

6 THE COURT: So - so let me stop there because
7 I'm trying - having some difficulty making - I want
8 to make the distinction with you so I understand your
9 argument.

10 You said that this isn't about being unhappy
11 with his rulings. But then, it sounds like that your
12 next point was that he's ruling the wrong way every
13 time. So -

14 ATTY. CUNHA: It's not -

15 THE COURT: - are you saying it's - it's that
16 you're unhappy or that you're really unhappy with his
17 legal rulings?

18 ATTY. CUNHA: I'm saying that as - as an
19 attorney -

20 THE COURT: Yeah.

21 ATTY. CUNHA: - and as a litigant, as a party,
22 we have the basic rights to come before any judge in
23 this state and have an expectation that a judge is
24 going to adhere to the rules of practice, to the
25 ethics of Canon, to the statutory criteria set forth.

26 Now, I understand that there are statutes that
27 allow for some disagreement and discretion. But

1 then, there are very clear-cut statutes. And Judge
2 Adelman has sat on the family bench for many years
3 and also practiced in family law. So, I know without
4 a doubt that he is an extremely intelligent
5 individual and that he is well versed in the area of
6 family law.

7 So, when I cite a statute to Judge Adelman and
8 then he tells me, for example, not only is he
9 familiar with the statute but he's familiar with the
10 history behind why the legislature made changes to
11 the statute which is specifically our guardian ad
12 litem statute 46b-54, I believe, wherein I say to the
13 judge at the beginning of trial I object to the
14 guardian ad litem sitting through the entire trial
15 because of the enormous amount of money that will
16 result in being expended upon her services to have to
17 sit through it and our legislator dealt with this in
18 a significant manner in 2014 and amended our statute
19 to allow a guardian to either sit at the beginning or
20 any time during the course of the trial to avoid the
21 enormous expenses that had been charged upon
22 litigants, Judge Adelman ignored that and his basis
23 was this, well, a guardian might hear evidence during
24 the course of a trial that would change her mind or
25 things of that nature; and based on my experience, I
26 think it's important for them to hear the evidence.

27 Well, you know what, respectfully - may I

1 continue?

2 THE COURT: Yeah. Just let me ask you - let me
3 just ask you two questions about that because I want
4 to understand what - what you're saying.

5 Is one of the things you're saying that the
6 statute, it clearly forbids him from doing that or
7 are you just unhappy that he allowed the GAL to sit
8 through that because it was in your view a waste of
9 money?

10 And I understand the argument, and I agree with
11 you that the legislature did act because they were
12 concerned about the GAL issue. But then, the
13 question becomes: Is this a disagreement with his
14 ruling that the GAL would be able to sit through the
15 trial or are you saying that there's something worse
16 about it? And, if so, what is the worst thing?

17 Because you agree with me that it can't be just
18 simply you don't like his rulings, so where does the
19 other part come in about this GAL thing? Is it - you
20 don't claim, I don't think, that it - that the
21 statute says a GAL may not be allowed to sit through
22 a trial, do you?

23 ATTY. CUNHA: No, I do not claim that.

24 THE COURT: So, then, he made this call, and you
25 think that it was a waste - waste of money, is that -

26 ATTY. CUNHA: I think it was an intentional
27 waste of money, and I think he -

1 THE COURT: Intentional -

2 ATTY. CUNHA: - has a history of doing that.
3 And I believe it's a RICO. And I put that on the
4 record multiple times. I -

5 THE COURT: A RICO?

6 ATTY. CUNHA: Yes.

7 THE COURT: As in a racketeering issue?

8 ATTY. CUNHA: Yes. Yes.

9 THE COURT: What - what - so - so, you're
10 claiming there's some sort of conspiracy or something
11 here?

12 ATTY. CUNHA: Oh. Absolutely. There's a
13 business going on. And what happens is, is that
14 Judge Adelman notoriously and consistently allows for
15 Attorney Hurwitz, of all people, and other guardian
16 ad litem to remain on the case throughout the trials
17 over objection where they end up raking in an
18 enormous amount of fees.

19 I believe Attorney Aldrich has - sorry -
20 Attorney Hurwitz has been paid over \$100,000 and her
21 bill is close to \$200,000. And she has met the
22 children in this case maybe four times since 2019.

23 THE COURT: Okay.

24 ATTY. CUNHA: She has not spoken to me about
25 anything with respect to their wellbeing. She has
26 not updated my client. She's blatantly refused to.
27 All of these issues have been brought before the

1 court. She has denied my client access to records,
2 to the medical records -

3 THE COURT: All right. Let's - let's back to
4 Judge Adelman because I understand - so, you - but
5 you - you just said that you're claiming here as an
6 officer of the court, then, that Judge Adelman is
7 engaged in racketeering?

8 ATTY. CUNHA: Yes. I believe that
9 wholeheartedly.

10 THE COURT: What evidence do you have to
11 support? Because, in other words, there's one thing
12 to say, alright, Judge Adelman shouldn't let GALs sit
13 through trials because it costs money unnecessarily.
14 And Judge Adelman says, as you just described, that
15 the GAL might - may change their views during the
16 course of the trial. So, there could be simply a
17 disagreement with Judge Adelman's philosophy about
18 letting the GAL do it.

19 But you're saying something more than that.
20 You're saying -

21 ATTY. CUNHA: I was -

22 THE COURT: - that Judge Adelman - just let me
23 get it out - Judge Adelman is in some form of illegal
24 conspiracy in which he - I don't know - are you
25 saying that he's in touch with these people and
26 arranges privately for them to make money in a
27 corrupt scheme? Let's get - let's get focused on

1 that because it's a very serious thing to say.

2 ATTY. CUNHA: It is.

3 THE COURT: What is the evidence -

4 ATTY. CUNHA: It is.

5 THE COURT: What evidence is it - other than he
6 does this all the time, what evidence is there that
7 this part of a conspiracy?

8 ATTY. CUNHA: Sure. In - in - when Judge
9 Adelman was up for reappointment, these issues were
10 the exact issues that were brought - were raised to
11 the judge and I believe it was Senator Wakefield
12 [sic] that actually objected to Judge Adelman's
13 reappointment because Judge Adelman had notably
14 blatantly lied as a - as an appointed judge under
15 oath to the review committee that was seeking to
16 whether or not reappoint him.

17 THE COURT: You mean the Judiciary Committee?

18 ATTY. CUNHA: Yes. And it is the record - the
19 transcript is alarming in terms of the number of
20 litigants that spent their life savings to pay
21 guardian ad items, all mothers who lost custody of
22 their children, all mothers who had the same elements
23 of some type of a disability whether it was a mental
24 health disability or a learning disability. In
25 cases -

26 THE COURT: Let's focus on one question at a
27 time because you started out by saying that Judge

1 Adelman lied to the Judiciary Committee. And, again,
2 this is a very serious thing to say. What is the
3 actual evidence?

4 You're a lawyer. You know I need to have
5 evidence. You can't just assert things. You have to
6 have the evidence. So, if you're going to claim that
7 one reason I should recuse him is that he lied, then
8 what's - what is the support for it? You can't just
9 say people say he lied.

10 ATTY. CUNHA: Yes.

11 THE COURT: Let me back up for a moment about
12 GALs, maybe I agree that there's a lot of money
13 that's spent on GALs that is not necessary, maybe
14 that's a differing judicial philosophy.

15 What you're saying is it's a matter of
16 corruption. And, if you're going to say that to me
17 as an officer of the court, I'd like to know what
18 your support is for it being corruption as opposed to
19 simply a judgment you disagree with and maybe even
20 sometimes I disagree with. So, it's a serious thing
21 to say as an Officer of the Court. We've got to talk
22 about what it is that supports that.

23 So, you've told me that people came to the
24 Judiciary Committee and had things to say and were
25 disappointed. But where is - where is the conspiracy
26 that you're -

27 ATTY. CUNHA: Senator Wakefield specifically

1 pointed out when he objected to the reappointment -
2 and this is part of the public transcript - when he
3 objected to the reappointment of Judge Adelman that
4 Judge Adelman was not honest in his questions when
5 responding to Senator Wakefield, and Senator
6 Wakefield had serious -

7 THE COURT: Wakefield or Winfield? I'm sorry.

8 ATTY. CUNHA: Winfield. I'm sorry. Winfield.
9 I apologize.

10 THE COURT: Is there some place - do you have a
11 copy of the transcript? Are you seeking to submit
12 something into evidence on the subject?

13 ATTY. CUNHA: I have a copy - I have a copy of
14 the vote when the nomination was coming up, and I
15 have the -

16 THE COURT: Let's assume - let's assume because
17 maybe it won't be disputed that Senator Winfield
18 voted no. That might show something, but -

19 ATTY. CUNHA: Well, it wasn't just that he voted
20 no. He publicly put on the record the reason -

21 THE COURT: Well, that's what I'm saying. Do
22 you have the have a transcript or something that
23 you're -

24 ATTY. CUNHA: I - I do have it, and I could
25 absolutely get it to the court today. It's
26 absolutely a -

27 THE COURT: It's a public - it's a public

1 record. Is there -

2 ATTY. CUNHA: Yes.

3 THE COURT: - some part of it that you want to
4 read that I should take notice of? Whether I can
5 make use of it as an evidentiary matter should be a
6 question in your mind too because it's obviously a
7 hearsay statement. But I - I can take notice of the
8 public record.

9 ATTY. CUNHA: Well, I think that because it is a
10 public hearing and that it's a hearing that's held
11 under oath, it probably falls within the category of
12 the Court's ability to take judicial notice. That
13 would be my position.

14 THE COURT: Well, I can take notice of what's in
15 the public record. The question is whether Senator
16 Winfield's comments might be indicative of - might be
17 a form of evidence that I can consider on the issue
18 of bias.

19 But, if you have some piece of the transcript
20 that you want to read, I'll reserve on - on what I do
21 with it. But I'll hear what you - what you have to
22 read it. So, go ahead and read it if there's
23 something you're - you're saying is - is evidence.
24 And then, I will reserve ruling on - on whether it's
25 actually evidence I can consider.

26 ATTY. CUNHA: Can I just -

27 THE COURT: Go ahead.

1 ATTY. CUNHA: Can I have a moment to see if I
2 can pull it up, Your Honor?

3 THE COURT: All right. You may have a moment.

4 ATTY. CUNHA: What I had in front of me is the
5 actual transcript of Chairman Tong and Chairman
6 Doyle, Judge Adelman and -

7 THE COURT: Well, you say Senator Winfield said
8 that he believed that Judge Adelman was dishonest.
9 And, if there's something in that that is evidence,
10 I'll consider it. I have to determine if it is
11 evidence. But -

12 ATTY. CUNHA: I have -

13 THE COURT: - read to me what - what Senator
14 Winfield said.

15 ATTY. CUNHA: I'm - yes. One moment. I'm
16 getting to it. Let's see.

17 THE COURT: And I assume this goes to your claim
18 of that there's some - that there's a conspiracy.

19 ATTY. CUNHA: Yes.

20 THE COURT: Because, again, it can't simply be
21 about philosophy about GALs. That would - you agree
22 that isn't the basis. It's got to be why is he doing
23 this. You're basically claiming that he's doing it
24 because he's in a corrupt conspiracy with the
25 lawyers.

26 ATTY. CUNHA: Yes.

27 THE COURT: All right. And then, that's, as you

1 know, a very serious thing to say so give me the
2 evidence and I'll consider it.

3 ATTY. CUNHA: Thank you. So, Your Honor,
4 Senator - it's quite long, but Senator Winfield -

5 THE COURT: Read me the part where he says he's
6 not telling the truth. That's the part that you said
7 I should know about or, as you say, he doesn't -
8 didn't tell the truth.

9 ATTY. CUNHA: Yes. One moment.

10 (Brief pause in the proceedings.)

11 ATTY. CUNHA: It's a very long transcript. I
12 know one of the issues was Judge Adelman specifically
13 indicated that he did not handle a case that, in
14 fact, he was the judge in.

15 THE COURT: But the issue is that you said
16 Senator Winfield accused him of lying.

17 ATTY. CUNHA: Yes.

18 THE COURT: That's the part that I'm - I've
19 offered to - to make a note of if you have it. If
20 you want to go onto something else rather, we can do
21 that.

22 But I - but the key is that you've made a very
23 serious claim. You've not only claimed bias and
24 prejudice, now you're claiming that he's been
25 involved in a civil conspiracy with lawyers to -
26 basically to defraud people, I guess, about the GAL
27 charges.

1 So - so, that's very different from saying I
2 don't like that Judge Adelman has the GAL sit through
3 the trials. Maybe it's a waste of money in your
4 view. Maybe it's a bad legal thing. You claim it's
5 because he is - I'm not sure what you're saying.
6 You're saying also that he's personally profiting
7 that he's getting kickbacks or something?

8 ATTY. CUNHA: I don't know that. I don't have
9 evidence -

10 THE COURT: You're not claiming that, though;
11 right?

12 ATTY. CUNHA: I - I don't know. Why would - why
13 would somebody go to the extent that he has gone
14 through, Judge Adelman - I don't know. I have - I
15 don't have the power or -

16 THE COURT: You're not -

17 ATTY. CUNHA: - resources to investigate that.
18 No.

19 THE COURT: My - my point is I need to know what
20 you're claiming because you're an officer of the
21 court and it matters. So, you're not claiming he's
22 receiving money for it. What you're claiming - this
23 is why I thought you - this RICO thing that you
24 mentioned - that he's in some form of civil
25 conspiracy thing. I gather your point is to line the
26 pockets of all lawyers or just certain lawyers -

27 ATTY. CUNHA: No.

1 THE COURT: - or -

2 ATTY. CUNHA: No.

3 THE COURT: - or certain lawyers -

4 ATTY. CUNHA: Certain lawyers, yes.

5 THE COURT: What? Certain lawyers.

6 ATTY. CUNHA: Certain lawyers. And Attorney
7 Aldrich happens to be a huge beneficiary of Judge
8 Adelman's conduct and so does Attorney Hurwitz.

9 THE COURT: You mean - you mean because he's
10 appointed both of them as GALs? Has he appointed
11 Attorney Aldrich as a GAL many times?

12 THE COURT: Because his - because his - his
13 orders have consistently benefitted throughout the
14 history of his cases Attorney Aldrich and Attorney
15 Hurwitz to the detriment of the opposing party and
16 opposing counsel -

17 THE COURT: Okay. But we were talking -

18 ATTY. CUNHA: - consistent -

19 THE COURT: - about GALs, and so you - I don't
20 know whether he's ever appointed Attorney Aldrich as
21 a GAL. You're not - you're claiming, in other words,
22 that he's favored Attorney Aldrich in this case is
23 the point; right?

24 ATTY. CUNHA: Not only this case, but
25 historically in all cases that she has come before
26 him in.

27 THE COURT: All right. And - and what files

1 would you - you're making a statement that in all
2 cases in which Attorney Aldrich has - has
3 participated in front of Judge Adelman he has favored
4 her. What cases are you citing for me that reflect
5 that because if you're - you must have a basis for
6 saying that? What cases are you referring to?

7 ATTY. CUNHA: I have a list of them, if I just
8 may. We're kind of going all over the place. I was
9 still on -

10 THE COURT: Well, that's -

11 ATTY. CUNHA: - with the discovery. But so -
12 so, I can just keep track of where we are, Judge,
13 because it's a lot, is with respect to the transcript
14 testimony of Judge Adelman from his reappointment -

15 THE COURT: Well, you - you made a specific
16 claim about that that I said I'd hear, and that was
17 that a senator accused him of lying to the Committee.

18 ATTY. CUNHA: Correct.

19 THE COURT: (indecipherable) - that that was
20 significant enough to listen to it.

21 But I'm not going to have hearsay statements
22 coming in from other people who says he appoints too
23 many GALs. I'm - you're making very specific claims
24 about - about this case.

25 I don't have a problem with seeing a larger
26 pattern and - and your providing evidence of it. So,
27 for instance, you've just said that one reason he's

1 biased is he's always - he always favors Attorney
2 Aldrich in this and all other cases. What other
3 cases? Do you have a list of them. In other words -

4 ATTY. CUNHA: I do.

5 THE COURT: - if you're not prepared to back the
6 thing up, don't say it because I cannot keep saying -
7 I keep saying, well, what's the evidence and
8 something else gets said and I have to say what's the
9 evidence. We - we started on March 31st and we've
10 been running all around - all around the
11 (indecipherable) -

12 ATTY. CUNHA: Right. Because every time I bring
13 something up, it - it interests you and it brings you
14 to that subject. So, I have my stuff kind of piled
15 to give you it in - in a kind of chronological
16 fashion. So, I could get you the cases but -

17 THE COURT: Well, why don't you - alright. Why
18 don't you - I mean, if you have them, give them to me
19 because you've just - just said it? If you want to
20 save it for some other point in our discussion, do
21 it. But, if you bring up and say that he always
22 favors Attorney Aldrich and you want me to conclude
23 that that's one reason he's biased here against women
24 and the disabled and non-Jews, then what are the
25 cases?

26 ATTY. CUNHA: I understand. So, my - my
27 preference is, Your Honor, is if we can get to that

1 in a moment because I have an entire list that I will
2 recite off to you.

3 THE COURT: All right.

4 ATTY. CUNHA: But I'd like to go back just so
5 that I know that I've reached every point that is
6 important here, if that's okay.

7 THE COURT: Are we going back to the
8 transcripts, then, you want me to look at?

9 ATTY. CUNHA: If we go back - no. If we go back
10 to the to the first day of trial March 31, 2021 -

11 THE COURT: Okay. You mentioned the restraining
12 order issue.

13 ATTY. CUNHA: Right.

14 THE COURT: - (indecipherable). Okay.

15 ATTY. CUNHA: And then, when we were before
16 Judge Adelman before he took - recessed for
17 depositions to take place at - in the courthouse,
18 there was specific argument that he heard about
19 discovery.

20 And this is extremely important for Your Honor
21 to - to get a good foundation on because the course
22 of the trial after March 31st even though Judge
23 Adelman said one thing went a completely different
24 way which completely impacts an ability to represent
25 a client and for the party. There's no consistency
26 and expectation or ability to proceed in a - in - in
27 a sequential fashion when you cannot rely upon a

1 judge's ruling. So, on -

2 THE COURT: You're saying - you're saying,
3 though, this about a discovery ruling and that he
4 said something or - or -

5 ATTY. CUNHA: Yes.

6 THE COURT: - said something that showed bias
7 against women, the disabled, and non-Jews. So, what
8 is it? Where would I -

9 ATTY. CUNHA: What happens -

10 THE COURT: - (indecipherable)? What is it he
11 said?

12 ATTY. CUNHA: - is this: On March 31st, we have
13 argument on discovery.

14 THE COURT: Okay.

15 ATTY. CUNHA: I point out to Judge Adelman that
16 Attorney Aldrich made material misrepresentations to
17 the court in her request for relief in that she
18 appeared at a deposition wherein the parties - there
19 was an agreement among the attorneys for - for,
20 first, Mr. Ambrose to be deposed and have his
21 material to disclose. And then, following Mr.
22 Ambrose's deposition, Mrs. Ambrose would be deposed
23 with her discovery.

24 Well, at that deposition - and the transcript is
25 part of the court's file because I attached it to my
26 motion - Attorney Aldrich made the unilateral
27 decision not to proceed with the deposition because

1 Mr. Ambrose wanted to have his wife be deposed first.
2 That was not the agreement. The record is very clear
3 what the agreement was. So, Attorney Aldrich
4 cancelled the deposition.

5 And then, she ran to court and sought an order
6 from Judge Stewart seeking sanctions against my
7 client right before trial which Judge Stewart acted
8 on. But, again, Attorney Aldrich omitted the fact
9 that she cancelled the deposition and walked away
10 from the receipt of discovery and did not provide
11 discovery for her client. And then, she files a
12 motion for order with the trial judge based on an
13 erroneous order by Judge Stewart because Attorney
14 Aldrich lied to Judge Stewart by omitting the facts
15 that occurred. I -

16 THE COURT: So, you say there was a - so, you
17 say - just so I'm following you, you say that Judge
18 Stewart made a ruling based on a lie that Attorney
19 Aldrich -

20 ATTY. CUNHA: Yes.

21 THE COURT: - gave to Judge Stewart. And then,
22 you got in front of Judge Adelman.

23 And - and how did he show bias against women,
24 the disabled, or non-Jews at that point? That's what
25 I'm trying - let's get to that now.

26 ATTY. CUNHA: So, when I let Judge Adelman know
27 that - what happened and that there was a motion

1 before him which was the motions for - motion for
2 sanctions and to disqualify Attorney Aldrich which
3 was filed I believe on March 30th and that is motion
4 number 298 -

5 THE COURT: Hm-hmm.

6 ATTY. CUNHA: - Judge Adelman essentially said
7 on the record, very frustrated - you could tell that
8 he was extremely frustrated - that he wasn't dealing
9 with the discovery issues, that both parties had
10 dirty hands. Now, I don't know how he came up with
11 that my client had dirty hands under the
12 circumstances articulated, but okay. That's a ruling
13 I'm not happy with. That's not my fight.

14 My fight is this. We were given a ruling. He
15 ordered that we both had dirty hands, and we both
16 were going to take depositions. The - the defendant
17 was going to be deposed for one hour. The plaintiff
18 was going to be deposed for one hour. That took
19 place. Okay. I reserved my client's right to review
20 the transcript which gives her 30 days.

21 THE COURT: (indecipherable).

22 ATTY. CUNHA: That's the detriment of Attorney
23 Aldrich for waiting until trial to try to depose the
24 party. She has 30 days -

25 THE COURT: (indecipherable) to Judge Adelman.
26 In other words -

27 ATTY. CUNHA: Right.

1 THE COURT: - you're saying he made some ruling,
2 though, that shows he's biased -

3 ATTY. CUNHA: I'm getting there.

4 THE COURT: - against women, disabled, or
5 non-Jews. How does this get us there?

6 ATTY. CUNHA: I'm getting there, Judge.

7 THE COURT: Okay.

8 ATTY. CUNHA: So, we have this - we have these
9 depositions. We then start - we have the argument
10 about the guardian ad litem. He allows her to stay.

11 We also have an argument - now, this is super
12 important - about whether or not there is an actual
13 order based on an agreement for supervised visits.
14 This is all on the transcript. Judge Adelman heard
15 argument. He reviewed the record. He took a long
16 time to do this. He then indicated on the record
17 that there was no such order because Judge Grossman
18 never acted on it and the parties never signed this
19 purported agreement. It was only signed by the two
20 attorneys and the guardian ad litem. But it was
21 never acted on. This is clear on the record. So,
22 now we have -

23 THE COURT: (indecipherable) in the record.

24 ATTY. CUNHA: Okay. So, now we have - we have
25 Judge Adelman's discovery order. We have Judge
26 Adelman's guardian ad litem order. And we have Judge
27 Adleman making this order about there's no order

1 regarding supervised visits.

2 Okay. We then have argument on the record about
3 my motion to dismiss Judge Grossman's order which,
4 essentially, terminated my client's parental rights
5 is really what happened. And the hearing never
6 completed. And my argument, essentially, was that my
7 client was never afforded due process because a - a
8 hearing to seek ex parte custody has certain elements
9 that are akin to an application for a restraining
10 order or an injunction. And there are certain due
11 process procedural aspects that must be complied
12 with, or the order is no good. It's invalid as a
13 matter of law.

14 Judge Adelman said it doesn't matter that Judge
15 Grossman said that the hearing had not been completed
16 and that it would be completed, that he took the
17 position that because the parties entered into some
18 other agreement for my client to have this supervised
19 phone call with Dr. Horwitz that there was no longer
20 a need for the hearing because the parties entered
21 into an agreement. And, on June 10, 2019, Judge
22 Grossman I believe indicated that if the parties
23 don't have an agreement as to the issues in this case
24 then a hearing will continue.

25 Well, the law is clear -

26 THE COURT: All right. But - but that's what
27 I'm trying - I'm still trying to get at - so, what

1 you've told I should note is, is what he's done about
2 GALs, the discovery issue you just described, the
3 supervised visits question, and now you're saying he
4 should have vacated Judge Grossman's prior order.

5 ATTY. CUNHA: Correct or -

6 THE COURT: So, are - is what you're trying to
7 do is to show a pattern of wrong rulings or - how do
8 I get from these things to him being biased against
9 women, the disabled, and non-Jews?

10 I haven't heard anything about - in other words,
11 let's say, for instance, you showed me 432 rulings
12 that he made and that in 430 of those rulings it was
13 a woman against a man and the man wins every time.
14 That might tend to be statistically significantly.

15 But now you've shown three things - and I think
16 you're not saying a fourth thing that you think were
17 very bad rulings. But get - where do I - how do I
18 get out of that that it has something to do with Jews
19 versus non-Jews, women versus men, disabled versus
20 nondisabled people? Where is that link?

21 Because you could say - you know, as I said,
22 statistically you could show certain types of people
23 always win. And you mentioned that Attorney Aldrich
24 always wins or suggested that Attorney Aldrich is a
25 favored person. I believe she's a woman, so I'm not
26 sure how - again, you've got to - where does this
27 bias against women come in and - and what's the

1 evidence on those three points that he favors Jews,
2 he favors the nondisabled, and he favors men, I
3 assume is the other point you're making.

4 So, you've mentioned these four rulings you
5 don't - you don't like. What - what - what attaches
6 those things to religion, gender, and disability
7 status?

8 ATTY. CUNHA: So, I - I - for me to adequately
9 tie it all together, I need to show you the orders
10 and what happened with the orders and the direct
11 violations of law and then I will tie it into the
12 consistent pattern which I believe that that's what
13 is occurring.

14 But I don't even believe that I need to get to
15 that level in this particular case because I believe
16 that Judge Adelman's direct conduct as it relates to
17 my - (indecipherable) - is so egregious and the fact
18 that Judge Adelman in and of himself referred this
19 matter to Your Honor on the question of whether or
20 not he should be recused based on our law in and of
21 itself requires him to be recused. And it is my -

22 THE COURT: Wait. Wait. Wait. I want to make
23 sure I'm following you. So, I want to - I want to
24 make sure I have a clear thing to decide. I take
25 this very seriously. I mean, I - it was sent me to
26 hear this, and I want to hear it and make a ruling.
27 But I need to know what I'm ruling on.

1 There is - I - it sounded like you were arguing
2 that - and I assume you're not really rearguing that
3 the fact that he referred this to me is a reason that
4 he is - is biased. It seems (indecipherable) to me.
5 You're not claiming that, are you?

6 ATTY. CUNHA: I am, and I believe - I believe,
7 Judge, that the law supports this in that when a
8 judge questions himself the fact as to whether or not
9 his conduct has been prejudicial or biased that mere
10 question in the judge's mind brings the case to the
11 level of concerns with the - I'm trying to remember
12 the exact language - with concerns where the judge
13 should just recuse himself from the case. And I
14 think if you -

15 THE COURT: I think you remembered in our last
16 hearing I - I said that this raises an interesting
17 concern on my part because nobody was asking to
18 recuse Judge Adelman at that point. In other words,
19 the Practice Book actually allows him to move to
20 recuse himself.

21 ATTY. CUNHA: Yes.

22 THE COURT: But he didn't do that. He sent it
23 to me, and my reaction was what am I doing with this?
24 There's nobody moving to recuse him. And I asked
25 Attorney Aldrich because she represents the
26 plaintiff, I said, first, Attorney Aldrich, do you
27 wish - do you claim you want to disqualify the judge,

1 and she said no. Then, I turned to you and said,
2 again, nobody here is asking to disqualify the judge.
3 Are you? And you said yes and then ultimately filed
4 a motion. So, we're here because of your motion now.

5 ATTY. CUNHA: Well -

6 THE COURT: And, if I understand the crux of
7 your motion, it's about bias against non-Jews, women,
8 and the disabled. And that's - where do these three
9 things come up?

10 ATTY. CUNHA: But see, that's the problem,
11 Judge. And this is what Judge Adelman does where he
12 thinks he's intelligent and crafty, and he is not.
13 Okay. So, I want to thank you for allowing this to
14 proceed because he has turned this into a circus.

15 One of my arguments in this case early on was,
16 judge, you are allowing this matter to go on and on
17 and on making it a case that will become economically
18 impossible for appellate purposes because of the
19 number of days that we are here litigating and
20 hearing the same thing over and over again. And, of
21 course, he got very angry at me, and he yelled at me
22 and so forth. But-

23 THE COURT: Are you claiming that that is an
24 incident that you want me to look at?

25 ATTY. CUNHA: I'm - I'm - I'm claiming that it
26 supports the - what I believe to be joke - and I know
27 that Judge Adelman gets very upset with me when I say

1 this - that Judge Adelman turns this - this family
2 court system into a circus, into a show like a bunch
3 of freaks because what he does is he makes things so
4 convoluted.

5 Instead of just recusing himself, what he does
6 is he sends the matter to Your Honor for a hearing on
7 recusal when no there's motion before the Court. So
8 now the court knows Attorney Aldrich is not going to
9 file a motion to recuse him. So who is left with it?
10 In his order, he says based on Attorney Cunha's
11 complaints. Well, what complaints did Attorney Cunha
12 make? Because at that time the only complaints that
13 Attorney Cunha had made was in response to Judge
14 Adelman's conduct and behavior during the status
15 conference that he called I believe on November -

16 THE COURT: I listened - I listened to that
17 tape, and I'm going to listen to others if you want
18 to point them to me.

19 But the thing was is that, for instance, if you
20 think this is - is delaying the trial and -

21 ATTY. CUNHA: I do.

22 THE COURT: - and wasting time, then - then I'm
23 only here because of your motion because I would have
24 ruled in the absence of your motion that there's
25 nothing before me because nobody had moved to
26 recuse -

27 ATTY. CUNHA: Exactly.

1 THE COURT: And I was prepared on the day that
2 you came in front of me to simply say, look, there
3 isn't anything in front of me, get this trial over
4 with, because I -

5 ATTY. CUNHA: Exactly.

6 THE COURT: - I - I agree that - that our
7 proceedings take too long. I agree in many cases
8 that our proceedings are too expensive. But that is
9 a different thing than saying that a judge is - is to
10 be recused and taken out a case because of - of
11 prejudice against non-Jews, disabled people, and -
12 and women.

13 So, the point is, is that if you want to get
14 back to the trial and get the case over with, all we
15 have to do is -

16 ATTY. CUNHA: Not with Judge Adelman.

17 THE COURT: - all - pardon me?

18 ATTY. CUNHA: Not with Judge Adelman. He can't
19 proceed. He - he -

20 THE COURT: Okay. So, to be clear, in other
21 words, you think this proceeding we're doing right
22 now is - is necessary and so -

23 ATTY. CUNHA: I do.

24 THE COURT: - so let's get back to it and not -
25 and make sure we're not wasting time because what I
26 want is your evidence about him favoring Jews, the -
27 the nondisabled, and men in this case because that's

1 your - that's your claim.

2 Does it come up anywhere where, for instance,
3 the parties reveal their - their religious faiths in
4 some way? Does he know that - I don't know what
5 anyone's religious faith in this case is. But is -
6 did that come up somewhere where he would know that a
7 person is Jewish or not Jewish in this case? Is
8 there some place in the transcript, in other words,
9 where it turns out that someone's a Christian and
10 someone is not?

11 ATTY. CUNHA: I do not believe that there is
12 some place in the transcript that would support that.
13 But what I have learned - and I will admit that I'm
14 naive to this - this particular subject - is that
15 Attorney Aldrich is Jewish, Attorney Hurwitz is
16 Jewish, the - the - the custody evaluator in this
17 case Dr. Biren Caverly is Jewish. Dr. Horwitz, the
18 supposed reunification therapist, is Jewish in this
19 case.

20 And all of these particular professionals, by
21 the way, were professionals other than Attorney
22 Aldrich that my client was strongly objecting to
23 being involved in the case. So -

24 THE COURT: Okay. But you're - you're
25 suggesting that somehow outside this case - I don't
26 know whether what you've just said is right or wrong
27 because I don't know anyone's faith in this case and

1 I don't care what it is.

2 But you're saying that somehow outside of the
3 record that - that - that Judge Adelman secretly
4 knows that certain people are Jews and not Jews and
5 that somehow he favors them because of that? I mean,
6 this is a very serious thing to say -

7 ATTY. CUNHA: I don't think it's secret, Judge.

8 THE COURT: Pardon?

9 ATTY. CUNHA: I don't think - I don't think it's
10 some secret knowledge. I think that it is - it's
11 well-known within the Jewish community who the Jewish
12 professionals are. And if you look at - if you look
13 at the rulings -

14 THE COURT: What Jewish community and what
15 evidence do you have that there's - there's a
16 universal understanding among the Jewish community as
17 to what professionals are Jewish or not? I mean,
18 that's a dangerous thing to say.

19 ATTY. CUNHA: I - I understand, Your Honor. And
20 - and I want the Court to understand this, is that
21 alls I wanted to do was help this woman her get
22 divorce. Okay.

23 THE COURT: I'm with you on that.

24 ATTY. CUNHA: Here I end up - and - and - and,
25 frankly, get her kids back because there's no
26 evidence that has been presented at all, not one
27 iota, to support her not having her children. In

1 fact, it's a direct violation of federal law.

2 THE COURT: Well, the thing that -

3 ATTY. CUNHA: So, the problem -

4 THE COURT: - always occurs to me in cases like
5 this that that means that what you have to do is to
6 sweep aside the case about the case, where the
7 parties are simply fighting each other, the lawyers
8 are fighting the lawyers, the lawyers are fighting
9 the GAL, the lawyers are fighting about discovery and
10 get the case to trial. And then, if you don't like
11 the result -

12 ATTY. CUNHA: But see, that's not the case.
13 That's - that's my problem, Judge.

14 THE COURT: I'm sorry. The problem -

15 ATTY. CUNHA: That's my problem.

16 THE COURT: - is it's been case about a case or...

17 ATTY. CUNHA: Well, my problem is this: There
18 was no fight from my client's perspective. None.
19 All she wanted to do this was a no-fault divorce.
20 Okay.

21 The problem is, is my strong belief, okay, as a
22 whistleblower, that from day one this case was
23 already planned out by Attorney Aldrich and Attorney
24 Hurwitz. And the reason I know that to be is that
25 Judge Rodriguez was the first judge in this case, and
26 he actually heard evidence and entered orders. Those
27 ordered are orders that one would normally expect to

1 take place in this type of a case. Okay. But for
2 the fact that he did not enter financial orders based
3 on Attorney Aldrich's representation that the
4 finances were accessible by my client and she
5 wouldn't be blocked to them.

6 Within less than a month, all of a sudden we
7 have motions to modify. We have Attorney Hurwitz,
8 and low and behold, the case is now under the control
9 of Judge Grossman. Judge Grossman crafts with
10 Attorney Hurwitz and Attorney Aldrich this pattern
11 where ultimately in March in the middle of the
12 pandemic absent the procedural requirements for an ex
13 parte order she rips the kids away from the mother
14 with no contact saying that the hearing is going to -
15 that these rulings are temporary and she needs to
16 finish the hearing. My client doesn't even get to
17 speak at that hearing. So, this is -

18 THE COURT: Was your client - was your client
19 unrepresented at that hearing?

20 ATTY. CUNHA: No. She was represented, but
21 Judge Grossman didn't let the other attorneys put
22 their evidence on, didn't - she stopped the hearing
23 after - after Jocelyn Hurwitz gave some brief
24 testimony -

25 THE COURT: Okay. But - okay. But I'm follow -
26 follow where you're going here because now you're
27 talking about Attorney Aldrich, Attorney Hurwitz, and

1 Judge Grossman. And is this you're saying part of -

2 ATTY. CUNHA: Yes.

3 THE COURT: Are you saying they're all Jewish or
4 something, that they conspired -

5 ATTY. CUNHA: Oh. Yes.

6 THE COURT: - together? Is that -

7 ATTY. CUNHA: Yes.

8 THE COURT: And you have some evidence that -

9 ATTY. CUNHA: I believe that the evidence -

10 THE COURT: - that they conspired, say, off the
11 record to do things? Do you have some evidence of
12 that or are you -

13 ATTY. CUNHA: Yes.

14 THE COURT: All right. What's -

15 ATTY. CUNHA: No. I -

16 THE COURT: - (indecipherable) - that they
17 communicated off the record?

18 ATTY. CUNHA: Judge, I think that the
19 transcripts in this case are so horrendous that it
20 supports what I'm saying. So, this is -

21 THE COURT: In other words - in other words, you
22 need to point me to something that I can look at -

23 ATTY. CUNHA: Yes.

24 THE COURT: - that shows that actual conspiracy,
25 the bias you're talking about where something - you
26 know, even if it were just a pattern of -

27 ATTY. CUNHA: Yes.

1 THE COURT: - every single time a woman makes a
2 motion they lose because you said it's a bias against
3 women. Of course, Judge Grossman is a woman.

4 ATTY. CUNHA: That's right.

5 THE COURT: I believe Ms. Aldrich is a woman.
6 Is - Attorney Hurwitz's a woman?

7 ATTY. CUNHA: And they're all Jewish.

8 THE COURT: And they're all - so, that's - so,
9 that's not bias about gender, then,; right?

10 ATTY. CUNHA: That's -

11 THE COURT: The bias -

12 ATTY. CUNHA: That's faith - (indecipherable) -

13 THE COURT: - against gender - where would I
14 find the - the bias against - against gender?
15 Because I - what I hear from you is allegations about
16 - about a Jewish conspiracy among these people.

17 But what's - other than the fact that you claim,
18 anyway, that they're all Jewish, what means - what -
19 why should I conclude that they - they're conspiring
20 together to frustrate justice?

21 ATTY. CUNHA: Because it's a money thing. What
22 they do is they side - normally it's the father that
23 has the money and what they do is they create this -
24 this false fact pattern to ultimately divest the
25 parent without the money of all of her rights.

26 My client ended not only up penniless. She
27 ended up without her children. She ended up

1 homeless. And this is a consistent pattern that has
2 occurred in cases where Attorney Aldrich and Attorney
3 Hurwitz, Judge Grossman, and Judge Adelman have sat
4 on cases.

5 THE COURT: So, you're claiming that because
6 they're Jewish that they are trying to direct money
7 to - to one another? Is that what it was?

8 ATTY. CUNHA: I don't - that - listen, alls I
9 can say to the Court is that they are all Jewish. To
10 me, that rises a level of concern. And, in other
11 cases, it is a consistent level of pattern of concern
12 where the mothers end up without their children, end
13 up homeless, and end up broke.

14 And it's always either based on a mental health
15 condition which is what this case started out with.
16 And then, when they couldn't prove the mental health
17 condition, they then started to go towards, well, she
18 keeps violating courts orders -

19 THE COURT: Okay. So, but let's be clear,
20 they're talking about - if you're - I just have to be
21 clear what you're saying. I - I thought what you
22 were saying was that you believed that Judge
23 Grossman, Judge - Ms. Aldrich, Ms. Hurwitz because
24 they're Jewish are conspiring together to help each
25 other to make money. Is that what you're saying? Or
26 that Judge Adelman helps them to get money because
27 they're Jewish? Is that you're claim?

1 ATTY. CUNHA: I believe that there is an element
2 of consistency and a pattern that support that Judge
3 Grossman and Judge Adelman (indecipherable)
4 attorneys that are within the Jewish faith. I
5 believe that support that.

6 THE COURT: All right. So -

7 ATTY. CUNHA: And I believe that what has
8 occurred in this case -

9 THE COURT: Just to be clear, I just want to
10 make sure I have (indecipherable) so, what you're
11 claiming is that Judge Hurwitz and Judge Grossman
12 favor lawyers who are Jewish -

13 ATTY. CUNHA: Yes.

14 THE COURT: All right. And you say this is one
15 such example. And what other evidence of that do you
16 have?

17 ATTY. CUNHA: So - so, this is what I believe
18 supports it. I came into this case on August 27,
19 2019. It was my first appearance in the case. It
20 was some emergency hearing that was called. It was
21 not a level one matter. We had not been released yet
22 under the governor's COVID orders to appear in court
23 unless it was a level one case.

24 But yet, Judge Grossman is going to pull us all
25 into court. Judge - Attorney Aldrich had no concerns
26 with that, neither did Attorney Hurwitz. Now, that's
27 important, and I'm going to get back to it. But I

1 want you to remember that Attorney Aldrich did not
2 complain about being physically present before Judge
3 Grossman in August of 2019. But yet, throughout -

4 THE COURT: Physically as opposed to over the -

5 ATTY. CUNHA: As opposed to remotely. But yet,
6 throughout the course of this trial, Attorney Aldrich
7 has raised objections to being physically present in
8 court, and she supports those objections to the
9 concerns she has for COVID. But she wasn't -

10 THE COURT: So, when did she - when did she
11 first start making the objections to being physically
12 present in court?

13 ATTY. CUNHA: During the course of this trial, I
14 requested multiple times -

15 THE COURT: In - in front of Judge Adelman?

16 ATTY. CUNHA: Yes. I requested multiple -

17 THE COURT: So, but how does the fact that she
18 was comfortable in appearing physically in front of
19 Judge Grossman and - and objected in front of Judge
20 Adelman shows that there's some Jewish conspiracy?

21 ATTY. CUNHA: Well -

22 THE COURT: Because both of them you said -

23 ATTY. CUNHA: Judge - Judge Adelman -

24 THE COURT: - both of them you say - and I don't
25 know - are Jewish.

26 ATTY. CUNHA: Judge Adelman -

27 THE COURT: (indecipherable)

1 ATTY. CUNHA: Judge Adelman ordered that we were
2 going to appear in person in this case. He agreed
3 that due to the enormous amount of exhibits the and
4 length of the trial and the problems that have
5 occurred with the remote trial, either you can't hear
6 someone or someone gets locked off or something of
7 that nature, that we were going to appear in person.

8 Attorney Aldrich then puts in writing to the
9 Clerk to Michael Smuda that she has somebody at home
10 that is high risk. I believe something to that
11 nature and objects to being in person. So, the next
12 thing you know Judge Adelman undoes his order that
13 we're going to be in person.

14 Okay. But yet, on the record, Attorney Aldrich
15 says in one of the hearings I need to leave a little
16 early; I have a train to catch. So, she's publicly
17 traveling around our states, right, but yet, she
18 can't appear in court. And why she can't appear in
19 court is because she gets the assistance of Attorney
20 Hurwitz and of - hold on - Attorney Nusbaum who is
21 the attorney that (indecipherable) -

22 THE COURT: Sorry. You're frozen -

23 ATTY. CUNHA: - has representing her who - can
24 you hear me?

25 THE COURT: Yeah. You said something about
26 attorney - you said -

27 ATTY. CUNHA: Attorney Nusbaum.

1 THE COURT: Are you - are you claiming now - the
2 trouble is that there's so many claims they're very
3 hard for me to sort out.

4 It sounds like now you're - you're claiming that
5 Attorney Hurwitz is in touch during the - the trial
6 with Attorney Aldrich. Is - are you saying, in other
7 words, they don't want to be in person because -

8 ATTY. CUNHA: I believe that -

9 THE COURT: - they're all -

10 ATTY. CUNHA: - yes.

11 THE COURT: - talking during the - the
12 proceedings?

13 ATTY. CUNHA: Yes.

14 THE COURT: And what evidence do you have of
15 that?

16 ATTY. CUNHA: Oh. Yes, I believe that. Well -

17 THE COURT: What evidence -

18 ATTY. CUNHA: Yes.

19 THE COURT: - (indecipherable) - because you -
20 you have to - when you say something - you say - you
21 said a moment ago that saying yes to being in front
22 of Judge Grossman suggested some sort of Jewish
23 conspiracy and then saying no in front of Judge
24 Adelman also suggests some Jewish conspiracy. It -
25 the two things don't - don't match.

26 Now - now you're saying that - that she doesn't
27 want to be present physically because that would

1 prevent her from conspiring, I assume, with Attorney
2 Hurwitz and Attorney Nusbaum. Is that - is that the
3 point? You're frozen again. Sorry.

4 ATTY. CUNHA: I have - I have several - several
5 support for that. One, when we were in New Haven
6 before Judge Goodrow, Attorney Hurwitz was not there
7 because I believe she had a death in the family. She
8 was not appointed in the restraining order matter
9 anyway. So absent having been subpoena or called as
10 a witness, she shouldn't have been there.

11 But Mr. Ambrose was panicking because Attorney
12 Aldrich was fumbling in her argument before Judge
13 Goodrow, and he was trying to get Attorney Hurwitz
14 there to assist Attorney Aldrich in her presentation
15 to the court before Judge Goodrow because he felt as
16 if Attorney Aldrich could not handle that. And that
17 was an open and notorious conversation that was heard
18 by Mr. Ambrose. And -

19 THE COURT: Are you saying Mr. Ambrose heard
20 Attorney Aldrich talking to Attorney Hurwitz or
21 something else?

22 ATTY. CUNHA: No. No. Attorney - it was - it
23 was observed and heard Mr. Ambrose reaching out to
24 Attorney Hurwitz trying to get her to court to assist
25 Attorney Aldrich, and - and he was panic stricken -

26 THE COURT: So, in other words, you - so, you're
27 saying that evidence of this conspiracy is that Mr.

1 Ambrose heard - I'm sorry - you heard or who heard
2 Mr. Ambrose? You?

3 ATTY. CUNHA: Myself - his -

4 THE COURT: You heard Mr. Ambrose -

5 ATTY. CUNHA: His -

6 THE COURT: - talking to Attorney Hurwitz on the
7 phone?

8 ATTY. CUNHA: Yes.

9 THE COURT: Okay. What else?

10 ATTY. CUNHA: And - and over - and talking to
11 Attorney Aldrich at one point, he was panic stricken.

12 The other point is that we have text messages
13 between Attorney Aldrich, Mr. Ambrose, and Attorney
14 Hurwitz that - that, basically, Mr. - they are
15 suggesting that Attorney Hurwitz get Judge Grossman
16 on the phone immediately to undo the restraining
17 order. And, low and behold, within 24 hours the
18 restraining order is undone.

19 I believe that without doubt supports ex parte
20 communication by the guardian ad litem with Judge
21 Grossman because it is known that Judge Grossman
22 contacted Judge Price-Boreland and had Judge Price-
23 Boreland vacate her ex parte orders the following day
24 at -

25 THE COURT: But you say that's evidence that
26 Attorney Hurwitz contacted Judge Grossman; is that
27 the point?

1 ATTY. CUNHA: Yes.

2 THE COURT: And that this was part of a - a
3 Jewish conspiracy?

4 ATTY. CUNHA: They're all Jewish, Judge.

5 THE COURT: I -

6 ATTY. CUNHA: It's consistent.

7 THE COURT: - take the answer is -

8 ATTY. CUNHA: But - but putting aside the Jewish
9 thing for a minute, the point is this, is that this
10 is evidence that is before Judge Adelman that he has
11 ignored. Okay. This is serious evidence. This is
12 serious misconduct. This is evidence -

13 THE COURT: Yeah but it - it assumes you've
14 proved that Attorney Hurwitz contacted Judge
15 Grossman. And you're actually just asking me at - to
16 put it charitably, you want me to infer because a
17 decision came down that you didn't like that it was -
18 it was Ms. Hurwitz speaking to Judge Grossman
19 directly.

20 If, in fact, the GAL called up the judge and had
21 an ex parte communication, I'd absolutely agree with
22 you. But that - that -

23 ATTY. CUNHA: I believe -

24 THE COURT: - is a question of - of evidence,
25 of -

26 ATTY. CUNHA: Well, I - I do believe, Judge,
27 that if - that you can infer that when there's text

1 communications between Christopher Ambrose, Nancy
2 Aldrich, and the guardian ad litem and those texts
3 communications are Christopher Ambrose telling them
4 to contact the judge to undo the restraining order
5 and the police acknowledge that they're waiting to
6 hear back from the court to see if the orders are
7 valid and the next thing I know I'm getting the last
8 minute notice that this ex parte order is now down
9 for some emergency hearing within less than 24 hours
10 and I find out from the Clerk from Nancy in New Haven
11 that Judge Grossman called Judge Price-Boreland. So,
12 I believe that -

13 THE COURT: But judges call each other about
14 administrative matters. That doesn't mean Ms.
15 Hurwitz, who shouldn't contact the judge, did. So,
16 but let's - let's - let's go onto other points
17 because I want to make sure I get everything you're -
18 you're saying.

19 I want to go back to the bias you claim against
20 women at some point. But are we finished with the -
21 the claims that you wanted to make about a Jewish
22 conspiracy?

23 ATTY. CUNHA: No. So -

24 THE COURT: Something else -

25 ATTY. CUNHA: No.

26 THE COURT: - about it, then?

27 ATTY. CUNHA: So -

1 THE COURT: What other piece of evidence should
2 I look at about the Jewish conspiracy?

3 ATTY. CUNHA: The fact that Judge Adelman
4 allowed the custody evaluator to testify in this
5 case, Jessica Biren Caverly, absent notice that she
6 was going to testify as an expert witness. There was
7 no disclosure.

8 And then, he unilaterally decided that he would
9 have a hearing to have her testimony sealed. And
10 this is because Jessica Biren Caverly appeared and
11 said she was concerned for her safety because my
12 client wrote to her lawyer and challenged her - her -
13 her ethics and her - her conduct and told her that
14 she was going to hold her accountable and sue her.
15 So, that - that level of concern which my client has
16 the statutory right to seek those remedies for
17 malpractice -

18 THE COURT: Okay. But this was a sealing of -
19 so, you said two things I think. Judge Adelman
20 allowed the custody evaluator to testify and then did
21 you say seal the transcript?

22 ATTY. CUNHA: And then sealed the hearing. He
23 decided that it would -

24 THE COURT: Closed the hearing to the -

25 ATTY. CUNHA: He closed - right. He decided
26 that it rose to the level over objection to have the
27 - have it be a private hearing and the record sealed.

1 Now -

2 THE COURT: Let's assume he did those two
3 things, how do they - how are - how are they evidence
4 of a Jewish conspiracy?

5 ATTY. CUNHA: So, sure, Jessica Biren Caverly is
6 Jewish. She already testified in this matter in
7 March of 2019. She -

8 THE COURT: And you have some reason to believe
9 that Judge Adelman would know that?

10 ATTY. CUNHA: Of course he knew that because it
11 was argued to him.

12 THE COURT: It was argued to him that she was
13 Jewish?

14 ATTY. CUNHA: It - it - no. It was argued that
15 she'd already testified, and she was not disclosed
16 and her prior testimony was public, a public record.

17 THE COURT: Right. But, in other words, you're
18 saying that Judge Adelman would know that she's
19 Jewish and, therefore, would favor her. How do we
20 know that he knew she was Jewish?

21 ATTY. CUNHA: I don't know that. I don't know
22 that.

23 THE COURT: But you're claiming he favored her
24 because she was Jewish?

25 ATTY. CUNHA: I - he definitely favored her, and
26 she is Jewish. I will tell you those two things.

27 He -

1 THE COURT: And how do you know she's Jewish?
2 Did you take her testimony on (indecipherable)? How
3 do you know -

4 ATTY. CUNHA: It is represented within the
5 professional community of psychologists that she is
6 in the Jewish faith. I've spoken with other
7 psychologists. It is well-known that she is Jewish,
8 just as it is well-known that Dr. Horowitz is Jewish.

9 THE COURT: So, if she - so, someone in the
10 professional community - you talked to another
11 psychologist and that person told you Jessica Biren
12 Caverly is a Jew; is that right?

13 ATTY. CUNHA: Is of the Jewish faith, yes.

14 THE COURT: So, and, therefore, you - you want
15 me to infer because somebody in...

16 ATTY. CUNHA: I'm not asking you to defer
17 anything about - infer anything about the Jewish,
18 Judge. I'm saying -

19 THE COURT: No. In other words, you're saying
20 that -

21 ATTY. CUNHA: - it is my belief -

22 THE COURT: - you're saying Judge Adelman
23 favored these people because they're Jewish. And I
24 asked you the question: How did you - how would
25 Judge Adelman know that? I assume what you're
26 telling me is that Judge Adelman would tend to know
27 who in the professional community was Jewish. That's

1 what you want me to assume; right?

2 ATTY. CUNHA: That is my belief, yes. That is
3 my belief. That is my understanding. It is kind
4 like - it's a cultural thing. It's like as if you go
5 to the Italian Club or the Portuguese Club or - there
6 is a community of individuals that are well-known to
7 each other of the Jewish faith which is common, same
8 thing with Catholics. You have -

9 THE COURT: You believe Judge Adelman is part?

10 ATTY. CUNHA: I believe that it is well-known to
11 Judge Adelman, yes. Whether he's part of that, I -
12 I'm not going to say something that I don't have
13 evidence on. I don't know that. I'm just telling
14 you, Judge, that -

15 THE COURT: (indecipherable) - in other words, I
16 have to try to determine as a matter of evidence
17 these things. And you're a lawyer, and you know that
18 I have to - so, you're telling me he'd know this, and
19 I wanted to know why. And you said there's a
20 community. But what you're telling is you don't -
21 you don't really know - you don't know any specifics
22 about his connection to a -

23 ATTY. CUNHA: I don't -

24 THE COURT: - specific group?

25 ATTY. CUNHA: I don't know any specifics about
26 Judge Adelman's connections. I'm not going to make
27 that leap. But I will say that in this particular

1 case as in other cases the conduct is consistently
2 favorable to attorneys and professionals of the
3 Jewish faith.

4 Now, I can't prove that Judge Adelman knew that.
5 It is something that came to my attention recently.
6 It is not even something I would have ever dreamed of
7 looking into. But, when you start looking at the
8 cases and you start looking at the professionals
9 engaged in the cases, it is consistent and it
10 supports that claim.

11 THE COURT: Okay. So, we've talked about this
12 and maybe this is the time for me to press you on it.
13 You said that - so, the - so, you claim that he
14 favors Jewish professionals and Attorney Aldrich in
15 particular.

16 Where would I look to find that? In other
17 words, did you survey a list of cases in which
18 whatever Attorney Aldrich says, she gets. And - or
19 you say maybe there's - maybe there's a 100 cases and
20 that the Jewish lawyers always win or something? You
21 - you must have a basis for saying what you're
22 saying. What is it? Where would I look to find
23 that?

24 ATTY. CUNHA: So, I'm just - I have a list of
25 cases where Attorney Aldrich was one of the attorneys
26 where Attorney Hurwitz is the guardian ad litem and
27 either Judge Grossman or specifically Judge Adelman -

1 THE COURT: This is about Judge Adelman so -

2 ATTY. CUNHA: Right. Well, it's also about
3 Judge Grossman because Judge Adelman denied my motion
4 to recuse her without prejudice. But then, he sends
5 a motion for clarification to Judge - to Judge
6 Grossman knowing the concerns I have with her. So,
7 it's a vicious circle -

8 THE COURT: This is part of the broader Jewish
9 conspiracy. In other words -

10 ATTY. CUNHA: Correct.

11 THE COURT: - Judge Grossman and Judge Adelman -
12 all right. So, what cases should I look at?

13 ATTY. CUNHA: Just one moment.

14 (Brief pause in the proceedings.)

15 ATTY. CUNHA: The Sorrento - I'm sorry. The
16 Sorrentino case, Sorrentino.

17 THE COURT: What's the docket number? And read
18 it slowly because I have to type it. And what - what
19 district is it in, first of all, because I have to
20 get that too? Sorrentino is what you said?

21 ATTY. CUNHA: Yes. Yes.

22 THE COURT: What district?

23 ATTY. CUNHA: I'm trying to pull it up from
24 other my device over here.

25 THE COURT: Well, I assumed you must have had a
26 list already because you -

27 ATTY. CUNHA: I -

1 THE COURT: - claimed that this is a pattern.

2 ATTY. CUNHA: I do. I'm just trying to pull the
3 list up, Judge.

4 THE COURT: I see.

5 ATTY. CUNHA: I have different screens up, so
6 I'm trying to get to it. It's just taking a little
7 bit - a little -

8 THE COURT: So, by the way, if what you want to
9 do is to print that list and it make an exhibit, we
10 can do that if you have that list ready to print.

11 ATTY. CUNHA: Can we do that during the break?
12 And then, we can go the over the names.

13 THE COURT: We're going to take a break - either
14 we can take it now and then you could email Attorney
15 Aldrich and the Clerk a copy of this list of cases
16 you want me to examine.

17 ATTY. CUNHA: Okay. And then, I could -

18 THE COURT: It doesn't even have to be an
19 exhibit because it's just taking judicial notice of
20 the list of cases -

21 ATTY. CUNHA: Right.

22 THE COURT: - we need to make an exhibit.

23 So, why don't you do that? We can take our 15-
24 minute break now and you can email - make sure you
25 email Attorney Aldrich and then Mr. Knowlton this
26 list of cases you want me to examine.

27 ATTY. CUNHA: And I'll also email - I'll also

1 email over the information on Senator Winfield.

2 THE COURT: Yeah. If there's a statement from
3 Senator Winfield that you want me to take judicial
4 notice of, again, I can take notice that it was said
5 whether it's evidence -

6 ATTY. CUNHA: Right.

7 THE COURT: - (indecipherable) is a separate
8 question.

9 ATTY. CUNHA: I understand that.

10 THE COURT: - (indecipherable) said.

11 ATTY. CUNHA: I understand that.

12 THE COURT: All right. So, you can do those two
13 things. We'll reconvene in 15 minutes. Court is in
14 recess.

15 ATTY. CUNHA: Perfect. Thank you, Your Honor.

16 (The Court recessed.)

17 (The Court resumed.)

18 THE COURT: All right. Good morning. Are both
19 counsel present? I see Attorney Aldrich. Attorney
20 Cunha?

21 ATTY. CUNHA: Good morning, Your Honor.

22 THE COURT: All right. Good morning. So, over
23 the break, I understood it was your intent to - to
24 send to Attorney Aldrich and to the Clerk a portion
25 of a transcript that indicated I think you said
26 Senator Winfield accusing Judge Adelman of lying.

27 We do have a transcript that's arrived. It

1 arrived moments ago, and so, I haven't read it yet.
2 Is there a piece of that transcript that you now want
3 to read to me in which Senator Winfield accuses -

4 ATTY. CUNHA: Judge, I can't hear you. You're
5 frozen.

6 THE COURT: Ms. Aldrich, can you hear me? I'm
7 sorry. You're muted.

8 ATTY. ALDRICH: Yes, I can, Judge. I've heard
9 you the whole time.

10 THE COURT: So, Attorney Cunha, can you hear me
11 now?

12 ATTY. CUNHA: No. You're, like -

13 THE COURT: Yeah.

14 ATTY. ALDRICH: I can hear you, Judge. I think
15 she's frozen.

16 THE COURT: I think you may be having trouble,
17 Ms. Cunha, so do you want to go out and come back in
18 again? Give that a try or maybe there are too many -
19 sometimes if - if anyone has their microphone open
20 that shouldn't, that sometimes throws us off. Let me
21 see if there's any open mics. It may just be on your
22 end, Attorney Cunha. I gather that Attorney Cunha is
23 leaving and coming. And I don't see any mic
24 problems. All right. We'll wait for Attorney Cunha.

25 (Brief pause in the proceedings.)

26 THE COURT: So, Ms. Aldrich, we'll give Attorney
27 Cunha a few more moments, and we'll stand at ease in

1 the meantime which means that you can shut your
2 camera and microphone off, if you wish. And then, as
3 soon as Attorney Cunha appears, you just come right
4 back in. So, I'm going to turn my camera and
5 microphone off, but I'm still - I'm still present.

6 ATTY. ALDRICH: Thank you, Your Honor.

7 THE COURT: This way we're still on the record.
8 I want to keep the record going, and then -

9 ATTY. ALDRICH: Okay.

10 THE COURT: - hopefully Attorney Cunha will join
11 us shortly.

12 ATTY. ALDRICH: Okay. Thank you.

13 (Brief pause in the proceedings.)

14 THE COURT: All right. Attorney - Attorney
15 Cunha, can you hear me?

16 ATTY. CUNHA: I can hear you. I can't see you.

17 THE COURT: Well, I had my camera off. It
18 should be back on now.

19 ATTY. CUNHA: I can see both - I can see both
20 you and Attorney Aldrich now. And I seem to be able
21 to hear you both okay.

22 THE COURT: All right. Can you see me now?

23 ATTY. ALDRICH: I cannot, Your Honor.

24 THE COURT: Yeah. So, I think my - there it is.
25 Now I should be back on. Can you see me alright now?

26 ATTY. ALDRICH: Yes.

27 THE COURT: Both of you?

1 ATTY. ALDRICH: Yes.

2 ATTY. CUNHA: Now I can.

3 THE COURT: Okay. So, I was saying before the
4 break that you indicated that you were going to send
5 testimony from the - or a statement I should say from
6 Senator Winfield at the confirmation hearing in which
7 Senator Winfield accuses Judge Adelman of lying. I
8 have the transcript, but I haven't been able to read
9 it because it's - because we've just got it and it's
10 kind of long.

11 Do you want to read to me the portion where
12 Senator Winfield accuses Judge Adelman of lying? Can
13 you point me to that?

14 ATTY. CUNHA: Sure. Let me - one minute,
15 please.

16 THE COURT: I assume you know where it is
17 because you - you -

18 ATTY. CUNHA: I just have so much. I keep going
19 back and forth between cases and - and the transcript
20 and -

21 THE COURT: Okay.

22 ATTY. CUNHA: This is - this is why I do not
23 like the remote hearings, Judge. I'm used to the
24 old-fashioned way of having my exhibits and my papers
25 in order and..

26 THE COURT: Sure. I understand.

27 ATTY. CUNHA: This case is very enormous. So,

1 and in preparing for today, I wasn't really sure what
2 it was that I was going to need to rely on.

3 Let's see, I'm just trying to go to the specific
4 part.

5 (Brief pause in the proceedings.)

6 ATTY. CUNHA: Okay. So, it's his opening
7 remarks.

8 THE COURT: Where are they in the transcript? I
9 see - give me some language because I found one spot
10 where Senator Winfield is speaking, and he says so,
11 I'm okay. Is it not that part or somewhere else?

12 ATTY. CUNHA: It starts where he says he'd never
13 had the opportunity to meet you other than your
14 nomination hearing eight years ago. I've never
15 appeared before you, um, and so, candidly don't know
16 you or -

17 THE COURT: Let me back up then because it must
18 have been earlier. Okay. Uh, I don't know exactly
19 how to frame my question, or earlier than that?

20 ATTY. CUNHA: Let's see.

21 THE COURT: Because it says thank you, question,
22 Senator Winfield. Senator Winfield says, I - I don't
23 know exactly how to frame my questions, but I guess
24 the questions that surround these hearings. Is it
25 after that?

26 ATTY. CUNHA: It starts - I'm sorry, Judge.
27 This - right with - right in the beginning, it says -

1 yes. So...

2 THE COURT: Tell me what his first words are,
3 that might help me spot it because it says thank you,
4 questions, Chairman Tong, thank you, questions,
5 Senator Winfield, and it says -

6 ATTY. CUNHA: Yes.

7 THE COURT: - and that's like the first time
8 he's speaking.

9 ATTY. CUNHA: Right. So, the first -

10 THE COURT: Is that where I should look?

11 ATTY. CUNHA: It starts - it starts with - right
12 after Chairman Tong, and then, it says, right, I - I
13 don't know exactly how to frame my questions. So, it
14 goes into, let's see -

15 THE COURT: So, Senator Winfield is speaking to
16 Judge Adelman. He - he makes a statement. Is that
17 where he accuses him of lying or is it later?

18 ATTY. CUNHA: No. It's later.

19 THE COURT: Okay. So then, Judge Adelman
20 speaks. And then, Senator Winfield comes back and
21 says so, um, okay. Do you see that part if you keep
22 going down -

23 ATTY. CUNHA: Yes. I'm - I'm just trying to
24 find the exact spot, Judge. I'm sorry.

25 THE COURT: Okay. But are you -

26 ATTY. CUNHA: I now have the printed paper and
27 not my highlighted text and my computer, so I'm -

1 THE COURT: All right. So -

2 ATTY. CUNHA: I didn't want to send you
3 something highlighted because it's now going to be
4 considered, so I sent you the whole transcript. So,
5 I just need a moment. I'm sorry.

6 THE COURT: Okay. So, I'm at the point where
7 Senator Winfield has said something. Senator - Judge
8 Adelman responds.

9 ATTY. CUNHA: Yes.

10 THE COURT: It looks like someone has their
11 camera on -

12 ATTY. CUNHA: So, there's -

13 THE COURT: Just a moment. Only the attorneys
14 should be on camera. So, if anyone has joined us, of
15 course they're welcome. This is a public proceeding.
16 But your - your camera and your microphone should be
17 off. So, if your camera and microphone aren't off,
18 please turn them off.

19 All right. Now I have just Ms. Aldrich and Ms.
20 Cunha.

21 So, Senator Winfield then comes back after Judge
22 Adelman speaks and says, so, um, okay. Do you see
23 that part?

24 ATTY. CUNHA: Yes.

25 THE COURT: Is this the section -

26 ATTY. CUNHA: And then he -

27 THE COURT: - where -

1 ATTY. CUNHA: This is - this is where Senator
2 Winfield starts to talk about and -

3 THE COURT: Right. I have that section. But is
4 that where he accuses him of lying? If so, where?

5 ATTY. CUNHA: So, he starts saying that - down
6 in the third paragraph, he's challenging the judge
7 saying that the person is incapable of following
8 orders and then -

9 THE COURT: Let me read that part, it says, but
10 you seem to indicate that that's one of the - when
11 you see that it indicates to you that a person will
12 be incapable of following orders and so maybe what
13 I'm trying to ask you is if you could speak a little
14 more about that because that to me to be honest with
15 you is if that's your perspective that's concerning.

16 That isn't a claim of him lying, is it?

17 ATTY. CUNHA: Not - not yet but it - it develops
18 - the - the claim of him lying is based on the
19 questions that are posed to Judge Adelman by Senator
20 Winfield. So -

21 THE COURT: Yeah. But I - I want to be clear.
22 You said Senator Winfield accused Judge Adelman of
23 lying. And I have asked you to show me where that
24 is.

25 That wasn't it. So does it come later? Because
26 the next thing you have is Judge Adelman responds to
27 it. Senator Winfield says, thank you, I appreciate

1 your responses. Now, if I look through the rest of
2 the transcript, let's see if there's anything more by
3 Senator Winfield. Looking for Senator Winfield,
4 looking for Senator Winfield, looking.

5 ATTY. CUNHA: No. I think -

6 THE COURT: He never speaks again.

7 ATTY. CUNHA: I think it's part - let's see.

8 Hold on.

9 THE COURT: As far as I can tell - I've read the
10 - there are two places Senator - three places Senator
11 Winfield speaks. He asks a question and in that
12 question he doesn't accuse Judge Adelman of lying.
13 Then, he asks another question. He doesn't accuse
14 Judge Adelman there of lying. And then, he says
15 thank you, I have no more questions and doesn't speak
16 again.

17 So, do you press your claim that Senator
18 Winfield (indecipherable)?

19 ATTY. CUNHA: He absolutely accuses Judge
20 Adelman of not being honest. And I might have given
21 you the - the wrong transcript. It was the day that
22 they were being nominated, and Judge - Judge - sorry
23 - Senator Winfield specifically opposes Judge
24 Adelman's nomination. And he states clearly and
25 distinctly why, and I've got it -

26 THE COURT: Your claim is that he specifically
27 accused Judge Adelman at the Judiciary Committee of

1 lying. So -

2 ATTY. CUNHA: Of not being honest -

3 THE COURT: - you've given me - you've given me
4 this, and it doesn't use - it doesn't say anything
5 like that. If there's something else you want to
6 direct me to, fine. But this doesn't say it.

7 Do you want to - do you want to move on from
8 there?

9 ATTY. CUNHA: Can we move on, Judge? I
10 apologize. I wasn't sure what I was going to need,
11 but I will get it to you during the lunch break and
12 Attorney Aldrich along with I can give you the
13 written list verbally of the names, but I have my
14 staff typing it right now. I had it written out with
15 the docket numbers and the names. I'm happy to put
16 that on the record or I could -

17 THE COURT: And this is -

18 ATTY. CUNHA: Of all the cases.

19 THE COURT: Yeah. These are cases in which you
20 - you claim that if I look at these the pattern that
21 will emerge is the Jewish conspiracy we've been
22 talking about -

23 ATTY. CUNHA: The pattern -

24 THE COURT: - Judge - Judge - Judge Adelman,
25 Judge Grossman, Ms. Aldrich, and Ms. Hurwitz; right?

26 ATTY. CUNHA: No. The -

27 THE COURT: No?

1 ATTY. CUNHA: The cases will establish Judge
2 Adelman's specific bias against mothers of domestic
3 violence trying to protect their children from harm
4 where he takes their custody away from them -

5 THE COURT: (indecipherable) - victims of
6 domestic harm?

7 ATTY. CUNHA: Correct.

8 THE COURT: Okay. Let's - we can go on and move
9 on to this other topic because this may relate to the
10 gender bias you've talked about.

11 ATTY. CUNHA: This - this -

12 THE COURT: But, in terms of the - of what you -
13 in terms of what you said about favoring Jews over
14 non-Jews, you - you - you - there isn't a list of
15 cases that you're pointing to me about that; is that
16 - is that right?

17 ATTY. CUNHA: There - there is not, Judge.
18 And -

19 THE COURT: Okay.

20 ATTY. CUNHA: - just to be clear - just to be
21 very clear on that, right, I want - I want you to
22 understand, Your Honor, I - I do not have a specific
23 evidentiary trail to support the Jewish faith
24 biasness. It is something that has been pointed out
25 to me recently when I have had a flurry of people
26 sending me their cases. And upon reading them, there
27 is a consistent pattern of professionals that are all

1 within the Jewish faith. And that was pointed out to
2 me. It is not something that I have ever thought of
3 or even imagined to be the situation. But, when -

4 THE COURT: (indecipherable)

5 ATTY. CUNHA: - it was pointed out to me -

6 THE COURT: Go ahead.

7 ATTY. CUNHA: - it seemed to be very consistent
8 with what is occurring here in this case because it
9 was also pointed out to me that Attorney Aldrich,
10 Attorney Hurwitz, Dr. Biren Caverly, Dr. Horowitz,
11 they are all of the Jewish faith, as is Judge
12 Adelman.

13 I - it never dawned on me that that was
14 something that was even a remote possibility until it
15 came to my attention in preparing for this hearing.
16 But I do believe -

17 THE COURT: That's circumstantial - to be clear,
18 that's circumstantial evidence is what you want me to
19 consider on that (indecipherable) is that right?

20 ATTY. CUNHA: Correct. Yes.

21 THE COURT: Okay. All right. And so, are we
22 done with that question? Do you want to move to the
23 gender issue?

24 ATTY. CUNHA: We - we are, Judge, because I
25 don't want anyone - this is not something that I had
26 thought about, dreamed of, or looked at. It is
27 something that the pattern was brought to my

1 attention. And, based on it being brought to my
2 attention, it appears to be consistent very sadly.

3 THE COURT: Right. So, that's -

4 ATTY. CUNHA: Whether -

5 THE COURT: So, that's part of the three things
6 that you want me to consider; right?

7 ATTY. CUNHA: Yes.

8 THE COURT: Okay. So, why don't we go then -
9 you were talking specifically about cases that show
10 he has a bias - now, this is what I need to
11 understand - is it against women or is it against
12 mothers who are victims of domestic violence? I
13 wasn't - is it a specific category of women or are
14 you saying that he's against all women?

15 ATTY. CUNHA: I believe it's a specific category
16 of women. When a - when a protective mother comes to
17 court and raises concerns of abuse either with the
18 children or with the family as a whole or with them
19 individually, they ultimately end up divested of
20 their custody with the - with either zero or very
21 minimal of the proportionate share of the marital
22 assets and for a period of time homeless during the
23 pendency of the proceedings. Those are -

24 THE COURT: Okay. So, you claim relate - that -
25 that's part of your claim about this case, too;
26 right?

27 ATTY. CUNHA: Yes.

1 THE COURT: So, you claim that this - your
2 client - and I'm not trying the case, so I'm not as
3 familiar with the facts as everybody else is. But
4 you claim that in this case your client was a victim
5 of - of domestic violence; is that right?

6 ATTY. CUNHA: Yes. Coercive control.

7 THE COURT: Coercive - in the form of coercive
8 control; right?

9 ATTY. CUNHA: Yes.

10 THE COURT: Coercive control. And that because
11 - because she claims that, Judge Adelman is against
12 her or just doesn't take her seriously when he ought
13 to? I'm not sure which one it is.

14 ATTY. CUNHA: I - I believe what happened in
15 this case is that the - a - a very unfortunate theory
16 of parental alienation seems to bear its ugly head in
17 some of these cases. And, in this particular case,
18 that theory was pursued by Mr. Ambrose and the
19 evidence did not support it.

20 But this is where Attorney Aldrich and Attorney
21 Hurwitz and Judge Grossman I believe manipulate the
22 record to try and support parental alienation. And,
23 when I get to Judge Adelman and I give him supporting
24 evidence and law that was not followed, specifically
25 ignored, he further ignores it. And, instead of
26 righting the wrong, he literally denies my client's
27 due process rights and ultimately allows my client

1 and the children to be continuously victimized by Mr.
2 Ambrose with the assistance of his attorney and
3 Attorney Hurwitz. And this is at the - the - the
4 sole control of Judge Adelman which is what he has
5 consistently done in many other cases.

6 THE COURT: Okay. So, let's - let's parse that
7 out, then. You're saying that - so, you're claiming
8 he wrongly did not give your client a fair hearing
9 about her claims and then assumed wrongly without
10 support that there was parental alienation; in other
11 words, that the child was alienated from your client;
12 is that right?

13 ATTY. CUNHA: No. I - I don't - I don't think
14 he could support that claim. I think what he tried
15 to do because he can't support parental alienation is
16 they then come up with these trumped-up claims that
17 my client violated court orders which, essentially,
18 are not really court orders.

19 THE COURT: Yeah.

20 ATTY. CUNHA: And I'll - I'll give you example.
21 Okay.

22 THE COURT: Back up for one second, you're now
23 telling me, in other words, that Judge Adelman did
24 not include - conclude there was parental alienation,
25 that he prejudiced your client by finding - or by
26 saying she violated court orders; is that what -

27 ATTY. CUNHA: Well, let - let's look at the

1 October - I think it's the October 20th or October
2 21st orders entered by Judge Adelman.

3 THE COURT: In this year?

4 ATTY. CUNHA: In this year.

5 THE COURT: 2021 orders.

6 ATTY. CUNHA: Those - those orders are so
7 illegal and without factual basis in complete
8 violation of every potential constitutional and
9 statutory right that it is a complete derelict of
10 what our judicial system stands for. And this is
11 what happens, I appear -

12 THE COURT: Okay. But you want me to draw - so,
13 there's this first thing - one thing you're saying is
14 that this is legally based so he made a legally basis
15 ruling. Then, you want me to take the next step
16 which is that he did this because he is prejudiced
17 against mother's who raise questions of abuse; is
18 that right?

19 ATTY. CUNHA: Protective mothers, yes.

20 THE COURT: Okay. So, then, are you saying that
21 the reason that this is about a bias or prejudice is
22 because I could look over a pattern of cases and he
23 consistently rejects claims by mothers who raise
24 issues of abuse? Is that what I'd find?

25 ATTY. CUNHA: Yes. And -

26 THE COURT: Let me make a note because -

27 ATTY. CUNHA: Okay.

1 THE COURT: - that's - I want to - because I
2 think you're going to give me some cases; right? And
3 I'm going to -

4 ATTY. CUNHA: Yes.

5 THE COURT: - look and see if there's a pattern
6 that whenever a mother raises a concern about abuse,
7 that that person I think you said they lose custody,
8 they end up with minimal assets. He basically goes
9 after them is what I gather you're saying.

10 ATTY. CUNHA: Yes.

11 THE COURT: Let me just make one note about that
12 and then you can continue.

13 (Brief pause in the proceedings.)

14 THE COURT: Okay. So, that was one point. So,
15 you - you want me to conclude that, first of all, he
16 made a baseless ruling; and that, second of all, it's
17 - it's linked to a bias or prejudice because he
18 always does that sort of thing; right?

19 ATTY. CUNHA: Yes. Yes.

20 THE COURT: Okay. So, what - what else was
21 there about it that would connect it to bias or
22 prejudice?

23 ATTY. CUNHA: So, I want to give you the exact
24 order number and -

25 THE COURT: I think I've seen the order you're
26 talking about. Is this about your client having to
27 sign something and do certain things? Is that what

1 you're talking about?

2 ATTY. CUNHA: Exactly.

3 THE COURT: I know which one that is, but I - I
4 wrote down the number you gave me. But I can find
5 that order.

6 ATTY. CUNHA: So, the problem with that is Judge
7 Adelman - that order, essentially, is an order of
8 restraint. And not only does he order my client to
9 sign federal and state tax returns which could
10 jeopardize her and put her in penalty of both federal
11 and state law after he has been put on notice time
12 and time again that Mr. Ambrose has purposely refused
13 to allow my client access to the information he
14 provided to the accountants to prepare those returns.

15 THE COURT: I think I read one of the things you
16 said was if the tax return isn't telling the truth
17 your client shouldn't have to sign that. So, I think
18 I understand why you're claiming that this was not a
19 good order. But that would be one thing as to
20 whether it's not a good order.

21 The second question is whether it shows a bias
22 or prejudice. One thing you've told me about that is
23 that I should look, and I'll see a pattern of these
24 things across these cases. Is there something else
25 on this point or is that everything?

26 ATTY. CUNHA: Well, on that particular point on
27 that part of the order, Judge, it is my position

1 that's an illegal order. He is ordering my client to
2 engage in illegal conduct.

3 THE COURT: Right. But let's - I'm not going to
4 - it's not my job to decide whether the order is good
5 or not. Maybe it is and maybe it isn't.

6 The question is, is this because of - maybe he's
7 legally correct. Maybe he's legally incorrect. But
8 remember, we've been talking about it isn't a
9 question of whether he's legally right or wrong.
10 It's a question of whether that legal right or wrong
11 can be connected to a bias or prejudice that should
12 disqualify him. You've said one thing. He does this
13 all the time, and I can look at that. And he - and
14 that every time that somebody like your client comes
15 in front of him, he - you said basically they lose
16 custody, and they get a minimum of assets. It sounds
17 like that's the basis on which you're making that
18 claim.

19 So, are there other - is there other pieces of
20 evidence on the bias against mothers who have - who
21 raise questions about abuse? Oh, you may have frozen
22 again.

23 ATTY. CUNHA: No. On - on that particular
24 order, the - the judge started out the hearing that
25 day by attacking me because I filed a request for
26 injunctive relief. So, the judge literally - Judge
27 Adelman literally violates my rights and my client's

1 rights for seeking out a legal remedy that we're
2 entitled to seek. That -

3 THE COURT: So, to be clear, I should listen to
4 the transcript - I should listen to the transcript of
5 October 21? Is that what you -

6 ATTY. CUNHA: Well, that's - that's going to be
7 an interesting situation, Judge, because this is what
8 happened - this is what I pointed out I believe in my
9 writing to you is that on October 21 when I signed on
10 and I introduced myself, the first thing Judge
11 Adelman does is he starts to attack me because my
12 client is not present. And we go through this whole
13 colloquy about my client not being present and why
14 she's not present. He challenges my voracity as to
15 that subject matter. And then -

16 THE COURT: Okay. So -

17 ATTY. CUNHA: Then, he says, well, you were able
18 to go to Hartford with your client to file an
19 application for an injunction; why didn't you just go
20 to her house and pick her up? Then, at some point, I
21 hear the Clerk say to the - the - the court reporter
22 say to the judge are we on the record.

23 So, what I found really interesting is this
24 whole time I believe we're on the record when I'm
25 being attacked by the judge, and then, conveniently
26 there's this commentary questioning whether or not
27 this is really on the record or not.

1 THE COURT: Okay. Do you remember if the answer
2 was that you were not on the record?

3 ATTY. CUNHA: I don't remember.

4 THE COURT: So -

5 ATTY. CUNHA: I don't - I just -

6 THE COURT: - is that a transcript that you want
7 me to check?

8 ATTY. CUNHA: Yes, please.

9 THE COURT: This is October - in your - in your
10 document, paragraph 46, you talk about October 20th.
11 Was there a hearing on the 21st, too, is that what
12 you're talking about or - okay. I'm sorry. Here we
13 go - well, no, he ordered - he entered an order on
14 October 21st. Maybe it's - I'll check both days and
15 see if there was a hearing. October 20th or 21st.

16 ATTY. CUNHA: I believe -

17 THE COURT: One or the -

18 ATTY. CUNHA: - it was the 20th, and the order
19 is dated - he entered an order on the 20th, and then,
20 there is one dated the 21st. I think that is - that
21 is -

22 THE COURT: The first place - the first place
23 I'll look for is the transcript of October 20th. And
24 you - you claim that maybe it was - maybe it was off
25 the record, maybe it was on the record, but your -
26 your - your claim is, is that he berated you about
27 the absence of your client.

1 ATTY. CUNHA: He berated me about the absence of
2 my client. His anger about my seeking injunctive
3 relief on behalf of my client as a result of what's
4 occurred in -

5 THE COURT: Okay. So, one of the things you're
6 telling me I'd find in this transcript is Judge
7 Adelman berating you for the filing or you're saying
8 he was just giving you a hard time and you want me to
9 infer it was because of the filing? Did he say I -
10 things about the filing?

11 ATTY. CUNHA: He did. He said why didn't - why
12 don't you just go to her house and pick her up like
13 you did when you went to Hartford and filed the
14 injunction.

15 THE COURT: Okay. So, is that everything - is
16 that what I should look for or does he say things you
17 should never have filed that injunction and berates
18 you about filing it?

19 ATTY. CUNHA: He doesn't say anything about I
20 should have never filed it, and he doesn't further
21 that commentary. I believe I immediately defend
22 myself and tell him that I'm not going to her house.
23 I do not - there's not an obligation of me to go and
24 pick up litigants. And -

25 THE COURT: For some reason, I think I've heard
26 this. I did - I have listened to parts of the record
27 and read some of the things. But I understand that.

1 Okay. So, you're not claiming that he said - he
2 was berating you about the actual filing although you
3 think he was angry with you because of the filing; is
4 that -

5 ATTY. CUNHA: I believe that his commentary and
6 the fact that he brought up the injunction supports
7 that he was angry about the filing. And then, the
8 order that he enters is clearly an order absent any
9 legal authority. There's no notice -

10 THE COURT: This is the order we've already
11 talked (indecipherable).

12 ATTY. CUNHA: I'm - correct. There's no notice.
13 The motion was filed the day before. There's no
14 notice that we're going to address this issue on the
15 20th. And he, essentially, restrains my client from
16 coming within a certain distance I believe of Mr.
17 Ambrose which then -

18 THE COURT: Yeah, I read that.

19 ATTY. CUNHA: - (indecipherable) -

20 THE COURT: Again -

21 ATTY. CUNHA: - her ability to even go to the -

22 THE COURT: Again, we talked about that order.

23 ATTY. CUNHA: But I -

24 THE COURT: So, the - we talked about that
25 order.

26 ATTY. CUNHA: Okay.

27 THE COURT: And you - you think that I should

1 connect that with a pattern of other orders in other
2 cases, and you're going to give me a list. Then, on
3 - he - you claim that he was angry with you about
4 this injunction thing, and that's why he berated you
5 about the absence of your client.

6 All right. Other - other things you want me to
7 consider as evidence about his bias against people
8 who - against mothers who make claims of abuse?
9 Other evidence on that?

10 ATTY. CUNHA: Well, I - the other evidence that
11 consistently shows the pattern are the other cases.
12 But his -

13 THE COURT: Right.

14 ATTY. CUNHA: - all -

15 THE COURT: You're going to give me that list.

16 ATTY. CUNHA: - of his - all of his orders in
17 this case - so, for example, if I go back to the day
18 one where I - where on the transcript it's clear that
19 Judge Adelman found that there was no order of
20 supervision that Judge Grossman acted upon, that
21 request was filed but it was never granted, he then
22 later changes his opinion and finds that, in fact,
23 that is an order and should be an order because
24 judges are very busy and just because they forget to
25 act on something doesn't mean that it's not an order.
26 That is -

27 THE COURT: Okay.

1 ATTY. CUNHA: - the most -

2 THE COURT: So - so, if I understand that, that
3 part you're talking about correctly, there was a
4 stipulation that was filed, signed by the lawyers,
5 and then, Judge Grossman never entered an order
6 approving the stipulation; is that right?

7 ATTY. CUNHA: Correct. And - and -

8 THE COURT: And yet, he found - yet he held that
9 that order was enforceable; is that right?

10 ATTY. CUNHA: After he found that
11 (indecipherable) -

12 THE COURT: You're fading -

13 ATTY. CUNHA: - it wasn't. That's the problem I
14 have. (indecipherable) 2021 he found on the record
15 there was no order in place for supervised parenting
16 time.

17 THE COURT: No order in place for supervised
18 parenting.

19 ATTY. CUNHA: He then later - recently. He then
20 later makes a determination when responding to a - a
21 trial brief that I filed and while it was we're not
22 going to hold that just because judges are busy and
23 they can't act on something that something is not
24 enforceable, that is so averse to our law it's
25 ridiculous. There's no -

26 THE COURT: Are you - are you saying, in other
27 words, that - that he contradicted himself in those

1 two holdings?

2 ATTY. CUNHA: He contradicted himself absent any
3 challenge of his first finding. There was no motion
4 to vacate that finding. There was no motion for
5 clarification of that finding. How can I rely on
6 anything that the judge says during the course of the
7 trial if he's going to change what he says in orders
8 without any advance notice or right to defend upon
9 it? And that is what's occurred throughout this
10 whole trial.

11 We started on March 31st. He set the stage with
12 discovery orders, and then, immediately after
13 Attorney Aldrich files repeated motions and Judge
14 Adleman acts on those motions after he said he wasn't
15 going to act on discovery motions because of unclean
16 hands. And you cannot get anymore prejudicial or
17 biased than that.

18 There has to be some basis of reliability when
19 you are trying a case. When your trial judge says I
20 am not acting on this because both lawyers have
21 unclean hands, I should not have to worry about
22 reminding the judge two weeks later what he already
23 found and decided because Attorney Aldrich now is
24 trying to again enforce discovery after the judge
25 said he wasn't acting on it.

26 THE COURT: Well, that's why I'm a little
27 confused now, then. So, it sounds like we're talking

1 about two different things, one was about an order of
2 supervision. And what you want me to do is to look
3 at the record and you're saying that I'm going to
4 find that he made contradictory holdings on that
5 question.

6 ATTY. CUNHA: Correct.

7 THE COURT: The second thing you're now telling
8 me is that he said that he was not acting on
9 discovery because of unclean hands, and you're
10 telling me that I'll also find in the record but that
11 when Attorney Aldrich said something about discovery
12 he then acted. Is that - is that right?

13 ATTY. CUNHA: (indecipherable) rulings -
14 holdings. What he did is on March 31st he held one
15 thing with respect to discovery, and then, he later
16 forgot or ignored what his prior holding was and in -
17 which put my client at a disadvantage. And he
18 allowed Attorney Aldrich to enforce the discovery
19 request that he had already said he wasn't going to
20 enforce.

21 THE COURT: Okay. Is there a specific date with
22 a ruling for the second part? I wrote down March
23 31st. Is there a specific date for the second part
24 of what you're saying where he - where he then allows
25 Attorney Aldrich to get discovery and not you - you?

26 ATTY. CUNHA: Yes. Yes. I'm trying to get that
27 date right now.

1 THE COURT: Okay.

2 (Brief pause in the proceedings.)

3 ATTY. CUNHA: And just because I found it, Your
4 Honor, the order with respect to supervised parenting
5 time is - it looks - hold on - I just had it. Sorry.

6 THE COURT: I've seen that one, and I think I
7 can probably find it. But, if you have the number,
8 that's great.

9 ATTY. CUNHA: It is 2 - well, see, this is the
10 other issue - I believe it is 202 or 203. It's not
11 really - okay. So, it's 202.

12 THE COURT: Yes. Okay. You want me to look at
13 202 about the supervision issue. What about the
14 second -

15 ATTY. CUNHA: And then -

16 THE COURT: - second action on - on discovery?

17 ATTY. CUNHA: The discovery orders are..

18 (Brief pause in the proceedings.)

19 ATTY. CUNHA: I know they're in April - let's
20 see.

21 THE COURT: If you want me to just look at
22 discovery orders during that month, I can - I can
23 find them on the docket.

24 So, you want - you're saying in - in March there
25 was a ruling that said I'm not going to enforce any
26 discovery. And you're telling me I'll find in April
27 where Attorney Aldrich asked for something on

1 discovery, and she gets it; right?

2 ATTY. CUNHA: It's actually - she - several
3 times she does it. On - on number 349.10, she -
4 which is Judge Adelman's order granting a motion to
5 compel, and then, again...

6 (Brief pause in the proceedings.)

7 ATTY. CUNHA: On 4/16/21, I believe it's motion
8 number 335.

9 THE COURT: 335?

10 ATTY. CUNHA: Yes.

11 THE COURT: All right. I'll look at it.

12 ATTY. CUNHA: And...

13 (Brief pause in the proceedings.)

14 ATTY. CUNHA: Also, motion - motion number 328.

15 THE COURT: So, 328?

16 ATTY. CUNHA: Yes.

17 THE COURT: All right.

18 ATTY. CUNHA: So, then, with respect to
19 discovery specifically is during the course of this
20 trial, Attorney Aldrich now for the third time
21 subpoenas my client's cell phone records. I file a
22 motion to quash. Attorney Aldrich (indecipherable)
23 to quash. The court - the trial court has not acted
24 on it yet. We come to court and lo and behold
25 Attorney Aldrich is in possession of my client's cell
26 phone records which is a complete violation of law,
27 and she knows that and Verizon knows that.

1 THE COURT: So, Attorney Ambrose - sorry.

2 Attorney Aldrich your claim is subpoenaed records
3 from Verizon?

4 ATTY. CUNHA: Correct.

5 THE COURT: And then, when that subpoenaed
6 issued, she - as she's required to do, I assume, sent
7 you a copy of the subpoena?

8 ATTY. CUNHA: No, she did not. What happened -

9 THE COURT: You're fading in and out. Hang on.
10 So, stop for a second and then start over because
11 your - your -

12 ATTY. CUNHA: - Verizon us put on notice.

13 THE COURT: Verizon told you. And you moved to
14 quash is what you're saying.

15 ATTY. CUNHA: And when Verizon (indecipherable)
16 a motion to quash and for order of protection was
17 filed and there was no objection filed to it, but
18 yet, Attorney Aldrich shows up to trial with my
19 client's cell phone records. I argued that she
20 should not have them. And Judge Adelman again
21 ignores the law and not only does not penalize Judge
22 - excuse me - not only does not penalize Attorney
23 Aldrich for having the records in violation of the
24 law and rules of practice but allows them to come in
25 as evidence. And I hadn't even seen them before.

26 THE COURT: Okay. So, let me just clear on the
27 sequence of events. Your claim is that, is that

1 without copying - giving you a copy of the subpoena,
2 Attorney Aldrich served Verizon with a subpoena.
3 Verizon told your client about it.

4 ATTY. CUNHA: Correct.

5 THE COURT: And then, you moved to quash.

6 ATTY. CUNHA: Correct.

7 THE COURT: The court didn't hear the motion to
8 quash. And at trial, Attorney Aldrich showed up with
9 the record. Is that - that's the sequence?

10 ATTY. CUNHA: Correct.

11 THE COURT: Okay. I've written it down, then.
12 I think I've got it right. Okay. So, other - we're
13 dealing with the question of bias against - against
14 mothers who claim abuse. What else?

15 ATTY. CUNHA: So, pendente lite and - and at
16 trial the court was put on notice that the custody
17 evaluator ignored the court's orders and request to
18 produce her file. Because of that, there was no way
19 for me to know what evidence, if any, I would be
20 using from that file. Judge Adelman orders -

21 THE COURT: But are we back to the argument that
22 - are we back at that argument that there are - there
23 are legal rulings that you disagree with and because
24 they were against your client and - I mean, in other
25 words, you - it seems to me the crux of what you're
26 claiming about the bias against women who claim abuse
27 is that I should look at the pattern of rulings

1 against you and your client in this case and compare
2 them with the others to see a pattern. It wouldn't
3 make sense to go through every - we're not going to
4 go through every ruling and then have you ask me to
5 determine whether he made the right ruling or the
6 wrong ruling.

7 You just want me to note that he continuously -
8 this is your claim is that he continuously ruled
9 against your client and that I'm going to look at the
10 other cases and he's always going to be ruling
11 against similarly situated people; right?

12 ATTY. CUNHA: Correct. But in the -

13 THE COURT: All right. So, I don't want to go
14 through each ruling and then decide whether it's
15 right or not; right?

16 ATTY. CUNHA: In - in addition to that, Judge,
17 these - the denial of discovery violates my client's
18 due process rights. How can my client possibly be
19 prepared to try a case if I cannot get the court to
20 act on requests for discovery which I had been trying
21 to get complied with since October of 2020?

22 And at trial, I made the court aware of the fact
23 that I still had not received compliance with
24 discovery and that Attorney Aldrich did on I believe
25 it was March 29th for the first time provide a
26 limited response to the original request for
27 discovery, but it didn't even touch upon what was

1 actually requested. Judge Adelman did nothing to
2 respond to that request for information. He,
3 essentially, ignored it.

4 But yet, any time Attorney Aldrich came to the
5 court seeking enforcement of requests for her trial
6 discovery which is not even a normal request for
7 discovery he would enter orders penalizing my client
8 and put financial circumstances attached to those
9 noncompliance making it impossible to try this case
10 with the nonstop attacks and demands of
11 unreasonableness that were being put upon my client.

12 THE COURT: So, you're - you're going to -
13 you're telling me I'm going to find a pattern of
14 rulings - this is during trial, actually - about
15 getting access to information that - that are - are
16 against your client and in favor of Ms. Aldrich's
17 client repeatedly.

18 ATTY. CUNHA: Absolutely. Yes. Yes.

19 THE COURT: Okay. Well, I'm going to go
20 through -

21 ATTY. CUNHA: In fact - okay.

22 THE COURT: I'll go through those and look at
23 them, and then, I will compare them with the rulings
24 in the other cases. Anything else on this subject of
25 bias against women who have claims of abuse?

26 ATTY. CUNHA: Yes. The - the -

27 THE COURT: Again, I don't want to go through

1 every motion -

2 ATTY. CUNHA: No. I understand.

3 THE COURT: - that you didn't like a ruling on.
4 I'm going to compare the rulings and see - look for a
5 pattern of you always lose, they always lose, that
6 sort of stuff. But so, what - what else is there
7 besides going through specific motions?

8 ATTY. CUNHA: The fact - the fact that the court
9 specifically denied the right of my client to be
10 heard on her application for restraining order -

11 THE COURT: Well, we talked -

12 ATTY. CUNHA: - is - is -

13 THE COURT: - about that, that was the thing -

14 ATTY. CUNHA: Right.

15 THE COURT: - that started in March.

16 ATTY. CUNHA: There are still multiple
17 outstanding motions that the court has failed to act
18 upon. And, specifically, I recently filed in August
19 of this year another motion. I amended the original
20 emergency motion for ex parte relief. And to date, I
21 still have not had no action on that motion. And but
22 yet, there's no objection to it.

23 Attorney Aldrich files a motion the day before
24 we come back to court, and Judge Adelman wants us to
25 put evidence on - on that motion, not even giving me
26 an opportunity to review it or to respond to it which
27 is consistent throughout this record.

1 So, my client has multiple motions for
2 visitation, for custody and access, motions that have
3 come in through the manner of ex parte requests for
4 relief, none of which have been acted upon within the
5 time frame that our statute or Practice Book
6 provides. They are left out there in the wind. And,
7 if I have not done what I have done and made such a
8 big issue out of this, they probably never would have
9 been addressed.

10 And the evidence - this is my big problem here.
11 The evidence - the clear evidence - not what Mr.
12 Ambrose says, not what Mrs. Ambrose says, but the
13 evidence that has come in from the - from the -
14 interestingly, plaintiff's own witnesses which is
15 Detective DeGoursey, which is the DCF - the - the
16 multiple DCF workers, and the DCF records are
17 consistent with the position and information that my
18 client has provided to this court and directly
19 support that Mr. Ambrose is a danger to his children.

20 The police department sent the children to the
21 hospital on a peer review. The detective testified
22 to that. The records support it. The medical
23 record -

24 THE COURT: What is this - what is this - in
25 other words, I think -

26 ATTY. CUNHA: It's Judge Adelman's refusal -

27 THE COURT: To?

1 ATTY. CUNHA: - to acknowledge the clear and
2 convincing evidence of the - of the dangers that are
3 present relating to the children and the mother.

4 He -

5 THE COURT: Okay. So -

6 ATTY. CUNHA: - ignores the evidence.

7 THE COURT: You're in the middle of a trial, and
8 he hasn't decided the case yet. Your - your major
9 concerns I thought on that subject was that he should
10 have heard your motion first, right, so that you
11 should have heard the - your - your application for a
12 restraining order right away because of the danger
13 involved. Is that fair?

14 ATTY. CUNHA: Pursuant to 46b-56, it is my
15 strong belief that the court just as the guardian ad
16 litem have an obligation to protect the children.
17 And, when there is evidence that is presented to a
18 court that children are in imminent harm of risk of
19 physical danger or emotional danger, that the court
20 must act in the children's best interests, not in the
21 father's best interests because he has the most money
22 but in the children's best interests. I even
23 presented to the court put them with a third party
24 until you figure out the evidence.

25 But they are complaining of sexual assault. It
26 has been established that the complaints have been
27 substantiated by a multidisciplinary taskforce team

1 who - who recommended those children not be with
2 their father. And, because of the lies presented to
3 the court by the guardian ad litem and Attorney
4 Aldrich manipulating the facts, Judge Adelman has
5 ignored the real evidence. And -

6 THE COURT: Okay. So, let me just
7 (indecipherable) if I understand your argument, so,
8 you're saying that a multidisciplinary taskforce
9 concluded that the children were in immediate
10 physical emotional danger -

11 ATTY. CUNHA: Yes.

12 THE COURT: - you said that they were victims of
13 sexual assault and that Judge Adelman heard that
14 testimony. You asked him to do something about it,
15 and he didn't do anything about it. Is that what
16 you're saying?

17 ATTY. CUNHA: Yes.

18 THE COURT: Okay.

19 ATTY. CUNHA: Yes.

20 THE COURT: So, what is the - what - what is
21 this - the evidence of the multidisciplinary
22 taskforce conclusions about the sexual assault? Is
23 there a document in evidence in the case that I would
24 look at to see that?

25 ATTY. CUNHA: Yes. It's actually the DCF
26 records. I believe it is Exhibit 70 -

27 THE COURT: Oh, it's the DCF -

1 ATTY. CUNHA: - well, there's a lot. This is
2 the -

3 THE COURT: But if I understand the - if I
4 understand what you're saying -

5 ATTY. CUNHA: Or 73.

6 THE COURT: If I understand what you're saying,
7 you're saying that there is - there was evidence
8 submitted to Judge Adelman that these children had
9 been victims of sexual assault by their father and
10 that the DCF concluded that he had sexually assaulted
11 them and that this was brought to Judge Adelman, and
12 he refused to do anything. Is that -

13 ATTY. CUNHA: No, I'm not - I'm not saying DCF
14 concluded that. I'm saying the multidisciplinary
15 taskforce team concluded that -

16 THE COURT: Well, you said it was in the DCF
17 records. That wasn't DCF -

18 ATTY. CUNHA: It's in the DCF - it's in the DCF
19 records that that was their conclusion -

20 THE COURT: Oh.

21 ATTY. CUNHA: - and that they said the children
22 should not be with Mr. Ambrose. And, in fact, the
23 children - the records will support the children were
24 put on four 96-hour holds during the time period that
25 they've been in Mr. Ambrose's care because of Mr.
26 Ambrose's conduct related to those children. Four.

27 THE COURT: Okay. So, let me just be clear

1 about what you're saying, you're saying that if I
2 look at this exhibit - are you saying that's Exhibit
3 70 or something?

4 ATTY. CUNHA: I'm going to give you the exact
5 number. I believe it's 73.

6 THE COURT: - (indecipherable) number. But -
7 but, as I understand what you're saying, if I look at
8 that DCF document, within that document there are the
9 conclusions of a multidisciplinary taskforce that
10 Christopher Ambrose has sexually assaulted his
11 children repeatedly and that - and that the taskforce
12 recommends that he - that they be taken away from
13 him. Is that what -

14 ATTY. CUNHA: Yes. Yes. And you will also find
15 that the legal department for DCF recommends that DCF
16 file a take into custody matter with the juvenile
17 court.

18 THE COURT: Okay. So, this was -

19 ATTY. CUNHA: That -

20 THE COURT: When - when were these conclusions
21 reached? Well, I guess I can see it in the document.
22 But the point is you're saying there was a taskforce
23 report before the court that said the father had
24 sexually assaulted his children repeatedly and that
25 they should be taken away from him and that the court
26 ignored that. That's what I'll find in the exhibit;
27 right?

1 ATTY. CUNHA: I don't know if it says
2 repeatedly, but I do know that they substantiated
3 that the kids - the children's complaints of - of
4 sexual assaulted and abuse -

5 THE COURT: By the father?

6 ATTY. CUNHA: - were founded by the father -
7 were founded.

8 THE COURT: Okay. So -

9 ATTY. CUNHA: And Detective -

10 THE COURT: - the DCF - the DCF report -

11 ATTY. CUNHA: Yes.

12 THE COURT: - will quote this taskforce saying
13 that - that the father committed sexual assault
14 against the children and should be - and they
15 shouldn't be allowed with him. That's what I'll find
16 in there; right?

17 ATTY. CUNHA: Yes. Absolutely.

18 THE COURT: Okay. So - so, what exhibit number
19 is it because I'll look at it? And you're saying you
20 brought this to the court's attention, and the court
21 ignored it because you claim it's part of a pattern
22 of him ignoring claims of abuse.

23 ATTY. CUNHA: Not only did I bring it to the
24 court's attention verbally, I brought it to the
25 court's attention in my brief that I filed with the
26 court and -

27 THE COURT: What's the exhibit number? Is there

1 only one DCF report in?

2 ATTY. CUNHA: No. There's - there's multiple.
3 That's why I'm trying to get to the exact one. I...
4 And I will tell Your Honor that Detective DeGoursey
5 when he testified - oh, here we go - acknowledges
6 exactly what I just said that the multidisciplinary
7 taskforce team substantiated the sexual abuse of the
8 children.

9 THE COURT: By the father.

10 ATTY. CUNHA: By the father, yes.

11 THE COURT: Okay. So, what -

12 ATTY. CUNHA: By father.

13 THE COURT: - exhibit number is it?

14 ATTY. CUNHA: And not only did - is it that, the
15 medical records that are exhibits -

16 THE COURT: I'm sorry. The question I was
17 asking you is - I need to look at this. What exhibit
18 number? You said you just found it. What number is
19 it?

20 ATTY. CUNHA: It's Exhibit Number 71.

21 THE COURT: 71. Okay. I'll look at that. And
22 you want me to conclude from that that was a matter
23 you brought to the court's attention, that it has a
24 clear conclusion, essentially, that the children are
25 in immediate danger -

26 ATTY. CUNHA: Yes.

27 THE COURT: - and the court refused to act on it

1 because the judge has a bias against mothers who
2 claim abuse; right?

3 ATTY. CUNHA: Yes.

4 THE COURT: Okay. Any - what's - is there
5 another? I'm going to look at that. I'm going to
6 claim seriously. What else on this issue
7 (indecipherable)?

8 ATTY. CUNHA: I believe that - that the - in
9 addition to the DCF records (indecipherable) in
10 imminent risk of immediate harm and that, you know,
11 not even going into what - what is going on behind
12 the scenes as to why these kids aren't being
13 protected, but the detective himself sent the
14 children to Yale-New Haven on a peer review in
15 September of 2020.

16 The Yale-New Haven Hospital put the children -
17 recommended they be put on an a - on a 96-hour hold
18 and released the children only to Christopher
19 Ambrose's brother, the paternal uncle. The guardian
20 ad litem lied to the court and said that the children
21 were with the father. And I say she lied to the
22 court because she omitted the information to the
23 court that the children were put on a 96-hour hold.
24 They were released to the uncle -

25 THE COURT: I'm going to look at that - I'm
26 going to look at that issue in terms of what you put
27 before the Court, but I don't want to - to retry

1 every aspect of the motion.

2 So, is there any other - I'm going to look at
3 all the pattern of the - of the rulings and the
4 claims and the seriousness of the claims in light of
5 what you said and compare them with the list of other
6 cases.

7 All right. So, are we ready to go onto - the
8 third claim was - is about discrimination or bias
9 against people with disabilities. Are you ready to
10 go onto that now?

11 ATTY. CUNHA: Yes.

12 THE COURT: All right. Let's (indecipherable)
13 that.

14 ATTY. CUNHA: In this - in this case when - when
15 my client first is called to testify and it is early
16 on in the trial and she's challenged based on her
17 deposition testimony even though I say to Judge
18 Adelman I am concerned that there is information
19 missing from the transcript and I have tried - from
20 the deposition transcript and I am trying to obtain a
21 copy of the recording and my client reserved her
22 right to 30 days to review the transcript for
23 accuracy and she should not be subjected to this -
24 this challenge at this time, he ignored those - those
25 arguments.

26 But, when my client starts to testify - she has
27 a diagnosed learning disability which is documented

1 in the custody evaluation - he immediately attacks
2 her and basically says to her that because she is not
3 responding as fast as he would like her to that it is
4 being - to him it is deemed as her attempt to not
5 want to answer the question when all she was trying
6 to do was understand the questions that were
7 presented to her at times or read what she was being
8 asked to read which because of her disability takes
9 her a longer time to do.

10 THE COURT: And did you raise that question -
11 did you raise that issue with Judge Adelman when this
12 happened?

13 ATTY. CUNHA: I don't believe that I - that I
14 was able to articulate on the record the aspect
15 relating to the disability. I did raise objections,
16 but I was not always allowed to articulate my
17 objections so -

18 THE COURT: Can you remember what day this was
19 on so I can - so I listen to that -

20 ATTY. CUNHA: I have -

21 THE COURT: - as -

22 ATTY. CUNHA: I -

23 THE COURT: Maybe you don't know. I can look
24 for it. But, if you can give me a range days at
25 least, I could look. You're saying I'm going to find
26 Judge Adelman berating your client for not answering
27 quickly enough and not reading quickly -

1 ATTY. CUNHA: Yes.

2 THE COURT: You -

3 ATTY. CUNHA: Yes.

4 THE COURT: You don't claim that you stood up
5 and said she has a learning disability, but you're
6 saying it's in the record somewhere.

7 ATTY. CUNHA: I - it is in the records. It's in
8 the custody evaluation. And I know I raised
9 objections, but there were times when I raised
10 objections and I ask to be heard and the judge says
11 no, so it doesn't allow me to make a record.

12 THE COURT: All right. It's 1:00. We're going
13 to have to take the luncheon recess. But, if you can
14 find me over the break the date that I should listen
15 to for that. We're on this third topic now on bias
16 against people with disabilities. And, so on that
17 score, think about what else that you want me to note
18 of, get me the date of that - that hearing date. And
19 then, I'm expecting before we resume that you'll have
20 this list of the cases you want me to compare with
21 respect to bias against women who claim abuse.

22 All right. We'll take our recess until 2 p.m.

23 ATTY. CUNHA: Thank you.

24 THE COURT: Court is in recess.

25 (The Court recessed.)

26 (The Court resumed.)

27 THE COURT: All right. Good afternoon. I see

1 Attorney Cunha. I assume you can hear me. Attorney
2 Aldrich, are you there? All right. I assume
3 everyone can hear me.

4 ATTY. CUNHA: Yes, Your Honor.

5 ATTY. ALDRICH: Yes, Your Honor.

6 THE COURT: All right. So, before the break we
7 talked about a few things that I - I now have in
8 front of me. I have Exhibit 71. It's a long
9 exhibit, and I promise that I will examine that as
10 you requested, Attorney Cunha.

11 I have also received - I assume, Attorney
12 Aldrich, you have a copy of - a transcript of senate
13 floor comments made - made by Senator Winfield with
14 respect to Judge Adelman's appointment. Again, I
15 take it that there's no dispute that this is a public
16 record and that the statements were made. As to
17 whether it's evidence, I will reserve on that as to
18 what evidence it is.

19 I note - and I assume this is what you want me
20 to note, Attorney Cunha - that at one point Senator
21 Winfield is discussing Judge Adelman about an ex
22 parte order that Judge Adelman signed. And there's
23 an exchange between Judge Adelman and this person,
24 but if you're on the Judiciary Committee and you're
25 hearing this, what you hear is there's no reason why
26 this person might have an issue with me. And then,
27 he states, now that might not be a lie and untruth,

1 but it also isn't the truth and it was interesting to
2 me that the judge who seemed particularly interested
3 with decorum because he told in an exchange with me,
4 etcetera.

5 So, that's - that's the place I assume you want
6 me to note because it's the only place where the word
7 "lie" is used in any of the material you gave me. Is
8 that right, Attorney Cunha?

9 ATTY. CUNHA: Correct, Your Honor.
10 Specifically, the voracity of Judge Adelman is
11 challenged or - or noted by judge - by - sorry -
12 Senator Winfield in that during questioning, Senator
13 Winfield had inquired of Judge Adelman about a number
14 of complaints that had come forth against Judge
15 Adelman. And apparently, Judge Adelman of at least
16 one of the litigants, if not more, indicated he
17 didn't know why that complaint would have been made
18 because the litigant hadn't appeared before him in
19 his court. And then, Senator Winfield challenges
20 that because, in fact, the litigant had appeared
21 before Judge Adelman and Judge Adelman had acted on
22 the matter. So, that's exactly what -

23 THE COURT: An ex parte order is what I think it
24 was discussing; right?

25 ATTY. CUNHA: It does discuss an ex parte order.
26 But, if you read the - the commentary in its whole, I
27 - I don't believe - the way I - what I take from that

1 is that that was not the only particular situation
2 that - but in any event, I'll leave it to the Court -

3 THE COURT: I'll read it in context. But the
4 point is that's the place where the word "lie" is
5 used, and I guess I have to make some sense out of
6 him saying that might not be a lie and an untruth,
7 but it isn't the truth. So, I'll have to sort out
8 what that means. But that's the place I will focus
9 on.

10 And the DCF report I've also received and
11 printed out the - the list of cases that you wanted
12 me to - to look at to support by taking notice of the
13 court's own records, a claim that there's a pattern
14 that Judge Adelman is biased against women who make
15 claims about abuse. So, I have that list.

16 ATTY. CUNHA: So -

17 THE COURT: Do you have it, Attorney Aldrich?
18 Did you receive a copy of the email?

19 ATTY. ALDRICH: Yes, Your Honor. I got the
20 email. I was unclear about what that list of cases
21 were. I thought she was doing -

22 THE COURT: What was represented to me was - was
23 that this is a list of cases that I'm being asked to
24 examine in which the record will show a pattern of
25 bias by Judge Adelman against women who make claims
26 of abuse. This is a - so, we did discuss another
27 list, but this is the list that actually is being

1 produced.

2 ATTY. ALDRICH: Understood.

3 ATTY. CUNHA: And just so the Court understands,
4 I - I actually went through the list and tried to -
5 during the break with the limited time to limit what
6 may not be related to claims of protection, you know,
7 domestic violence or protective parents seeking
8 assistance of the court.

9 But I also pulled off case names that I was
10 unsure whether or not the parties would be
11 comfortable with me disclosing or referring to them
12 because some of them are recent or within recent time
13 or presently active. And I don't want anyone without
14 - even though it's a public record, I - I do have
15 concern that litigants would be upset with me if I
16 highlight their particular case. So -

17 THE COURT: That's your choice. The thing to
18 understand, of course, is I can only act on the
19 evidence you - you provide me. These are the ones
20 you want me to look at, and I'm going to look at
21 them.

22 ATTY. CUNHA: Yes.

23 THE COURT: All right.

24 ATTY. CUNHA: But I also -

25 THE COURT: Let's go back to the issue of bias
26 against the disabled, you described before about the
27 difficulties you said your client had on the witness

1 stand. You've told me - I thought you were going to
2 tell me what day so I could look - look at the -
3 listen to the recording there. Do you have a day
4 that I - I should listen to where this - where this
5 problem occurred?

6 ATTY. CUNHA: I do. One moment, please, Judge.
7 Your Honor, just before we kind of go off again, if I
8 may just to the Court articulate something very
9 clear, if that's okay?

10 THE COURT: All right. I just don't want to get
11 lost again because we're - we're on that topic. But
12 what - what is it you want to say?

13 ATTY. CUNHA: I wanted Your Honor to understand
14 that this is a very difficult situation for me as a
15 professional. I've been practicing now for over 21
16 years. And obviously, there's a lot of individuals
17 that are viewing this proceeding.

18 I take the claims very serious. I - I feel very
19 strongly about the wrongs that I know have occurred
20 in this case, that I strongly believe the evidence
21 supports have occurred in this case. And my motion
22 that was filed based on Judge Adelman's commentary
23 and then order referring the matter to Your Honor for
24 consideration is based on Karen Riordon, also known
25 as Karen Ambrose.

26 These other situations came to me of recent. I
27 - it was not my plight in life to find out who has

1 bone of contention against Judge Adelman or Attorney
2 Aldrich or Attorney Hurwitz. However, because this
3 case has gained public interest, I have had a flurry
4 of individuals reaching out to me and sharing
5 information with me.

6 So, when we started this hearing this morning, I
7 made opening commentary as to it has come to my
8 attention based on information that I have learned or
9 that's been shared with me that the patterns of bias
10 and prejudicial conduct that I believe has occurred
11 in my client's matter have consistently occurred in
12 other litigants matters which is what I represented
13 to Judge Adelman on the record I believe on November
14 9th when Judge Adelman had indicated to me on the
15 record that he had never had this type of problem
16 before or these types of complaints.

17 And, when I called him out on that material
18 misrepresentation, I had indicated to him as I'm
19 indicting to Your Honor that that is not true. In
20 fact, I have heard and leaned recently of the
21 consistency of litigants being unhappy because of
22 your rulings. And I pointed out to Judge Adelman on
23 the record on that date specifically that I had read
24 the transcripts from the - his reappointment and
25 those transcripts, specifically Senator Winfield,
26 highlighted just how serious in nature these
27 complaints have been and how long this conduct has

1 been occurring.

2 But I don't want the Court or anyone else that
3 is listening to this to think that I am on some
4 mission to right the Connecticut litigants as a
5 whole. That is not my goal here. I do not represent
6 other individuals. I believe it is a valid claim and
7 concern for Your Honor to look into the consistent
8 pattern, but that is not what my original
9 representation to the court was in writing as Your
10 Honor knows -

11 THE COURT: To be clear - just to be clear,
12 though, I mean, you've chosen to pursue this motion
13 (indecipherable) to do it and then we're walking
14 through the evidence. That's all I need.

15 ATTY. CUNHA: Okay. I just -

16 THE COURT: (indecipherable) the motion. I'm -
17 I'm giving you a chance to do that.

18 We're on the third topic - and I want to make
19 sure we have enough time out of fairness to give
20 Attorney Aldrich a chance to - to make her claims
21 about it.

22 So, we're on this third point, and I wanted to
23 know if there's anything else that you want me to
24 review with respect to the question of his bias
25 against those with disability. You've told me about
26 the colloquy about - between the judge and your
27 client on the stand. Is there anything else that you

1 want me to look at with respect to that issue?

2 That's our third.

3 ATTY. CUNHA: I'm going to - I'm going to give
4 you the date when I believe that occurred.

5 THE COURT: (indecipherable).

6 ATTY. CUNHA: Just one moment.

7 THE COURT: I'll listen to that.

8 (Brief pause in the proceedings.)

9 ATTY. CUNHA: It was early on in March, and it
10 followed immediately Attorney Aldrich's motion for
11 contempt.

12 THE COURT: I thought your first day of trial
13 was the end of March, March 31.

14 ATTY. CUNHA: Sorry. Thank you. Thank you.

15 THE COURT: (indecipherable).

16 ATTY. CUNHA: It - yes. Early on in April.

17 THE COURT: Early April. Okay. Not March.

18 ATTY. CUNHA: So, right, our first day of trial
19 was March 31st. And then, I believe Attorney Aldrich
20 - we received the transcript fairly quickly, let's
21 see...

22 THE COURT: Well, you want me to take a look at
23 the first couple of days of March when your client
24 was testifying?

25 ATTY. CUNHA: So, yeah, my client was taken out
26 of order. We started the trial with Mr. Ambrose, and
27 then, Attorney Aldrich filed this motion. And then,

1 Judge Adelman over objection allowed Attorney Aldrich
2 to pursue the issue of contempt against my client.
3 And the issue of contempt against my client is a
4 significant one because, again, this issue relates to
5 discovery and -

6 THE COURT: Okay. But I - I want to make sure
7 we're talking about the same thing again. So, what
8 we have just been talking about is that you claim
9 that Judge Adelman badgered your client about her
10 delayed responses and her delayed -

11 ATTY. CUNHA: Yes.

12 THE COURT: - unfairly because she's disabled -

13 ATTY. CUNHA: Yes.

14 THE COURT: - and that you're telling me that I
15 should listen to that and that it's in early April.
16 So, that's what I'm going to do -

17 ATTY. CUNHA: Yes.

18 THE COURT: - about that. Are you a raising a
19 new topic?

20 ATTY. CUNHA: It - as - while you're listening
21 to that issue concerning the manner in which Judge
22 Adelman - the court demeanor, I would like the Court
23 to keep in mind that the issue that is before the
24 court for which my client was being questioned on for
25 - was testifying that she was taking out of order
26 over objection on - on Attorney Aldrich's motion for
27 contempt. And the motion for contempt, again, had to

1 do with the discovery issues that Judge Adelman had
2 already said on March 31st that he wasn't going to
3 enter orders on.

4 So, not only was it an inconsistent, again,
5 ruling, it also did - I had no opportunity to digest
6 what the claims were or to respond to it in writing
7 and my client was thrown, essentially, right into the
8 hotseat and challenged on a transcript that I didn't
9 even have the opportunity - a real opportunity to sit
10 down with my client and review for accuracy. And I
11 did challenge in part the accuracy of the transcript,
12 and Judge Adleman would not allow me the opportunity
13 to pursue obtaining the audio recording from the
14 deposition to ensure that the transcript was, in
15 fact, accurate.

16 And this is so vitally important because, again,
17 it goes to the point where I was repeatedly pointing
18 out to Judge Adelman that Attorney Aldrich was not
19 being forthright with the court. And it was directly
20 violating my client's due process rights because the
21 court, Judge Adelman, was acting on Attorney
22 Aldrich's request for relief in complete
23 contradiction to what Judge Adelman had set as the
24 trial rules on March 31st.

25 THE COURT: Okay. I - I think we're changing
26 topics again. So, I'm going to listen to that. I
27 now know the context in which you what you want me to

1 listen to it.

2 What I'm asking you is: Is there any other
3 evidence you want me to consider with respect to your
4 claim that Judge Adelman is biased against people
5 with disabilities? Something, in other words, that
6 involves disability.

7 ATTY. CUNHA: So, I believe that some of the
8 cases that I've - I've provided to the Court have
9 those - have those elements to them also, not only -

10 THE COURT: (indecipherable) disabled people I
11 should be looking for that might have been
12 discriminated against in those cases?

13 ATTY. CUNHA: Yes. Yes.

14 THE COURT: All right. I'll look for that in
15 the cases when I look at them. All right.

16 ATTY. CUNHA: And then, the specific way in
17 which Judge Adelman immediately attacked my client
18 and basically - I think he even said to her, well,
19 that's now two red flags. And, I mean, she hadn't
20 even started presenting her case.

21 THE COURT: This all in this - this part I'm
22 going to review; right?

23 ATTY. CUNHA: Yes. Yes.

24 THE COURT: I'll - I'll review that. So, I'm
25 going to assume that those are the two places you
26 want me to look, one his treatment on - through
27 looking at the records in other cases of people with

1 disabilities; and two, this interaction that you
2 described in court.

3 Okay. So, I - I assume that's - that's the
4 third and final point. Any reason now I shouldn't
5 allow Attorney Aldrich to have her chance?

6 ATTY. CUNHA: Well, what I'd - I just would like
7 the Court to understand that I want to point out a
8 few additional items that I had referred to in my
9 motion because I believe it's pertinent to the Court
10 to understand that I do not believe - I'm sorry. I
11 didn't mean to interrupt you, Judge.

12 THE COURT: I have your affidavit. I just want
13 to get it in front of me again. But - but the point
14 is just let's make sure it isn't, you know, that
15 we're talking about bias and we're not just talking
16 about not liking his rulings because I - I can't make
17 his rulings for him.

18 ATTY. CUNHA: Right. But I understand that.
19 But I do not believe that the standard in Connecticut
20 for recusal or disqualification of a judge rises to
21 the level of actual bias. The - the standard is not
22 - the threshold is not that high.

23 And I want to be clear on that, and I think that
24 - I do believe that there's outright bias here
25 without a doubt. I believe that the record reflects
26 that. I also believe that the cases that I provided
27 will support that not only is there bias in this case

1 but that there's a consistent pattern.

2 But I don't believe that I am stuck to that
3 standard in terms of having to have Your Honor
4 actually find that there's actual bias or that
5 there's an actual pattern of bias.

6 THE COURT: Well, I think if I've got the
7 standard right, the question is whether a reasonable
8 person would question the judge's neutrality, that a
9 reasonable person would conclude that the judge was
10 biased, right, on the face of what happened. I don't
11 have to say he was biased. I have to say that he
12 would appear to a reasonable person to be biased. Is
13 that the standard?

14 ATTY. CUNHA: Yes, that is, which is much -
15 right, which is much lower -

16 THE COURT: Just different -

17 ATTY. CUNHA: - than you actually having to find
18 - right.

19 THE COURT: Right, a reasonable person.

20 ATTY. CUNHA: And I think - right. And I think
21 that that - the impartiality rule is under the Canon
22 2.11, and so I think that that's - that's important
23 here because if you look at just being impartial as
24 the threshold here and you take the civil docket
25 taking judicial notice of it and I'm going - I'd like
26 the opportunity to recite off to the Court the number
27 of pleadings that I have filed that just within the

1 trial alone that Judge Adelman has blatantly refused
2 to address or consider versus Attorney Aldrich on
3 behalf of her client the moment that a pleading is
4 filed not only does he allow immediate litigation of
5 that motion in the middle of trial, he doesn't allow
6 an opportunity for me to respond to it in writing
7 which is - which is alarming. And then -

8 THE COURT: I have a - I have the docket. In
9 fact, I actually started looking at what motions were
10 granted, what motions were denied. And I've made
11 note that some motions have never been decided.

12 So, I mean, you can give me your numbers, but I
13 plan to go - go through those and count those.

14 ATTY. CUNHA: Okay. And what's really
15 important, Your Honor, is that - well, I mean, I
16 think the whole - obviously the whole issue is really
17 important, right, because we have three children here
18 of the ages of, you know, 14 I believe and the
19 youngest one I think now is 11 that are clearly
20 capable of articulating for themselves, is that,
21 again, on March 31st the issue of the children having
22 their own attorney because the evidence in this case
23 is extremely clear that the children do not trust the
24 guardian ad litem. That is throughout the record.
25 It's been argued. It's been testified to by DCF
26 workers, is that on March 31st one of the motions
27 that was before the court which unfortunately had to

1 be changed was a motion to have an attorney appointed
2 for the children just based on their age alone and
3 the fact that they - none of them trust the guardian
4 ad litem should call for an appointment of their own
5 legal representation.

6 And what Judge Adelman had represented was that
7 he was not going to forego the consideration of
8 appointing an attorney but there was a conflict
9 because I - the allegations and the evidence is so
10 significant in this case as to the ongoing harm that
11 is occurring to these children that I filed a
12 petition in the juvenile court for neglect on behalf
13 of my client against Mr. Ambrose in another attempt
14 to protect these three children because we were not
15 getting the ability to have access and be heard by
16 the court. So, I -

17 THE COURT: And is this in addition to the
18 (indecipherable)? You said you filed -

19 ATTY. CUNHA: Yes.

20 THE COURT: And that was filed in Hartford?

21 ATTY. CUNHA: That was filed - no. The - the
22 injunction was filed in Hartford. The petition in
23 the juvenile court was originally filed in Middletown
24 based on my reading of where the petition should be
25 filed based on where the parties reside. And, for
26 whatever reason, Middletown bumped it to New Haven.

27 So, we - when New Haven got the petition, they

1 as matter of course automatically appoint an attorney
2 for the minor children which is a little different
3 than the family court. Right. Usually you look at
4 appointment a GAL first. Well, as a matter of
5 procedure in the juvenile court, an attorney is
6 appointed.

7 I had not known who that attorney was or that
8 that even took place, but the evidence will show
9 based on this attorney's own testimony that an
10 attorney was, in fact, appointed and because of the
11 claims made and her vacation scheduling in the
12 petition, she immediately went to Mr. Ambrose's home
13 to meet with the children. And Mr. Ambrose denied
14 her access to the children. He would not allow her
15 to meet with the children alone. And I raised that
16 concern with the court and then -

17 THE COURT: With which court?

18 ATTY. CUNHA: With Judge Adelman.

19 THE COURT: Okay. You raised it with Judge
20 Adelman.

21 ATTY. CUNHA: And Judge Adelman I - when I found
22 out that this attorney had been appointed, I asked
23 her if she would be agreeable to me moving to have
24 her be appointed in this case, the family divorce
25 case, to be consistent with the attorneys and not
26 have to have another independent person. And she was
27 agreeable to it. This attorney was agreeable to it.

1 And so based on her agreement, I filed a motion to
2 have an attorney appointed and I named her
3 specifically.

4 Now, I'm not naming her on the public record
5 because of the nature of her testimony and the claims
6 that she made as to why she wanted to get out of the
7 case. But, because Your Honor has taken judicial
8 notice, I believe that Your Honor can read the motion
9 and listen to her testimony, and you will understand
10 what it is that my claims are and why I'm not
11 publicly naming her.

12 THE COURT: Okay.

13 ATTY. CUNHA: So -

14 THE COURT: (indecipherable) - bias
15 (indecipherable). All right.

16 ATTY. CUNHA: So -

17 THE COURT: Turn to Attorney Aldrich -

18 ATTY. CUNHA: - we have this -

19 THE COURT: But go ahead.

20 ATTY. CUNHA: We have this attorney - we have
21 this attorney appointed, and the first thing that
22 Attorney Hurwitz does is she seeks protection on
23 behalf of Mr. Ambrose from Judge Grossman in
24 Bridgeport who is not even part of the trial, right,
25 and wants Judge Grossman to enter orders not having
26 to have to have Mr. Ambrose cooperate with this
27 attorney which is the most ludicrous thing that I've

1 seen or heard. And her excuse is that, well, these
2 kids have had to speak with so many professionals
3 and, you know - and I don't believe that Judge
4 Grossman actually entered -

5 THE COURT: How does that - how does that relate
6 to Judge Adelman -

7 ATTY. CUNHA: I'm getting there.

8 THE COURT: All right.

9 ATTY. CUNHA: So - so, I don't believe Judge
10 Grossman entered any orders. But I brought that to
11 Judge Adelman's attention because it is a complete
12 violation in my opinion of the guardian ad litem's
13 obligations which are to the children, not Mr.
14 Ambrose, not Mrs. Ambrose. They are to the children.

15 THE COURT: Okay.

16 ATTY. CUNHA: And all she has done is sought to
17 protect the money that comes to her from Mr. Ambrose.
18 And I pointed that out to Judge Adelman very clearly
19 on the record, and Judge Adelman has ignored it and
20 he has told me that I am abusive for pointing out to
21 the court every time Attorney Aldrich lies to the
22 court or when I point out to the court the
23 malfeasance and material misrepresentations by
24 Attorney Hurwitz.

25 THE COURT: Okay. All right. I now -

26 ATTY. CUNHA: My ethical obligation when I am -
27 I'm sorry? May I finish?

1 THE COURT: I (indecipherable) said that. I
2 assume you want me to consider that Judge Adelman was
3 - I don't know - I'm not sure which category this
4 fits in, bias against women who have -

5 ATTY. CUNHA: Well, I'm a - I'm woman, that's
6 for sure, and my client -

7 THE COURT: Well, wait a minute, I thought you
8 said that the bias you want me to consider about
9 Judge Adelman is bias against women who make
10 complaints about abuse, not all women. Are you
11 changing that?

12 ATTY. CUNHA: No. No. That is - that is in a
13 general scope. The - the original claims in this
14 case relate to Judge Adelman's actions against my
15 client directly. And if Judge Adelman is behaving in
16 an appropriate manner against me, my client's
17 attorney, it has a direct impact on my client.

18 I have an ethical obligation to report to this
19 court when I know that there are ethical violations
20 occurring by way of lying and dishonesty by opposing
21 counsel. And, for Judge Adelman to outright to tell
22 me that I am being abusive for letting the court know
23 that an officer of the court is being dishonest,
24 raises all kinds of questions as to the - I don't
25 even know what proper adjective goes with that.

26 But, frankly - I mean, any judge that tells me
27 I'm abusive because I'm showing the court that

1 opposing counsel is lying and purposely submitting
2 false material representations to the court for the
3 court to act and then the judge attacks me, I don't
4 know how much more impartial one could be when that
5 occurs.

6 And that - I believe he told me I was abusive on
7 the first day of the trial when I pointed out that
8 Attorney Aldrich blatantly lied by not letting the
9 court know that she cancelled the deposition and
10 refused to go forward with an agreed upon deposition
11 wherein my client was ready, willing, and able to -
12 to -

13 THE COURT: I have heard you talk about that
14 before. And I do have to give Attorney Aldrich a
15 chance to - to be - to be heard. I'll let you
16 respond briefly after she speaks because it's your
17 motion, so I'll give you another chance. But I've -
18 I've walked through the evidence on the three points
19 that you have made. I've made notes of them. I have
20 follow up things to do.

21 Now, Attorney Aldrich, do you wish to be heard
22 on this motion?

23 ATTY. ALDRICH: Yes, Your Honor.

24 THE COURT: All right. I'll hear you.

25 ATTY. ALDRICH: Thank you, Your Honor. First of
26 all, I'm going to try not to take too of the Court's
27 much time, but I would like to respond to some of the

1 - some of the statements made by Attorney Cunha.

2 As the movant, Attorney Cunha has the burden of
3 proof to establish bias and prejudice in this case.
4 I don't believe, Your Honor, that she has established
5 that. She has not provided any factual evidence of
6 bias and prejudice and which would result in a
7 mistrial. The information she has given are not a -
8 do not have a - show that there's any bias on the
9 part of Judge Adelman, and there's been no factual
10 showing that any conduct would lead any reasonable
11 person which is the standard to - knowing all the
12 circumstances that to - a conclusion that the judge's
13 impartiality might be questioned which would be basis
14 for that - that disqualification. So, the - the -
15 the things that she had stated -

16 ATTY. CUNHA: (indecipherable) just froze.

17 ATTY. ALDRICH: Your Honor, I would ask I
18 would -

19 THE COURT: Sorry. Is there a technology
20 problem? What happened?

21 ATTY. CUNHA: There is. I did not hear the last
22 two minutes of what Attorney Aldrich said. If Your
23 Honor heard it and it's on the record, I'm fine with
24 it. I don't want to delay things, but -

25 THE COURT: I heard. What she's saying is -

26 ATTY. CUNHA: - you both froze.

27 THE COURT: - that you have not produced

1 evidence that meets your burden of proof. And go
2 ahead, Ms. Aldrich, what else do you want to say?

3 ATTY. ALDRICH: Thank you, Your Honor. Also,
4 the other cases regarding Judge Adelman that she has
5 listed, I don't know what those are about. Whether
6 or not - she also indicated that I had cases with
7 Judge Adelman before. If I have, it's been many,
8 many years. I don't even remember them. I don't
9 know -

10 THE COURT: She - there was a discussion, in
11 other words, about the claim that there's a
12 conspiracy among Jewish professionals. And there was
13 a discussion of providing a list of cases that would
14 show a conspiracy among you and Attorney Hurwitz and
15 Judge Adelman and Judge Grossman. And there is no
16 such - there is no list that's been produced of those
17 cases.

18 What's been produced is a list of cases that I'm
19 being asked to look at - and will look it; and you've
20 got the list too - in which it's claimed that it will
21 show Judge Adelman's biased against women who make
22 claims of abuse. So, that's where we stand with
23 that.

24 ATTY. ALDRICH: Okay. Thank you, Your Honor.
25 And, Your Honor, according to her initial reasons for
26 the judge being impartial and - not - being biased
27 include bias against women - I think you narrowed her

1 focus - bias against people with disabilities, and
2 bias against people who are not of the Jewish faith.

3 And I - the - this Jewish conspiracy theory that
4 she has is very troubling, and she has no evidence to
5 support anything like that. And there's no facts
6 that she puts in that can support a conspiracy or a
7 RICO or Jewish club. I don't understand her - her -
8 her - her - her statements regarding that. So, I
9 can't refute those. She has many incorrect
10 assumptions, but there's no need to go to that level
11 and discuss any of that any further. There's no
12 evidence of bias on any of those things that she has
13 put forth.

14 In terms of the disabilities, I was never aware
15 that there was anyone with a disability. I do know
16 very well the custody evaluation that was done on the
17 family, and that does include that her client, Ms.
18 Ambrose, had some mental health issues. I don't know
19 that they - and I don't think that Attorney Cunha has
20 acknowledged that those rose to the level of
21 disabilities.

22 I was never made aware in court or otherwise
23 that she had any other disability that would preclude
24 her from being able to testify, to be deposed, to
25 hand in documents, or things like that.

26 In terms of the women issue, there are three
27 women involved in this case and one man. So, I

1 don't -

2 THE COURT: I want to clarify that too because I
3 believe - I just went over that with Attorney Cunha.
4 I wanted to understand what the claim of - of bias
5 related to and was because there are multiple women
6 involved in this.

7 And - and so my clarifying question was whether
8 she claims - whether she presses the claim because I
9 think she did make it originally - whether she
10 presses the claim that Judge Adelman is biased
11 against women in general. And I believe that what's
12 in front of me now - and I've clarified this a couple
13 of times - is that the claim is that Judge Adelman is
14 biased against women who make claims of abuse in
15 cases like that.

16 So, it's not simply the broader question of
17 women. It's women who claim abuse. Presumably this
18 - we're talking about the parties to the case. I
19 think what she said was that when - that when a women
20 claiming that there's been abuse involved in a case
21 comes forward and makes those claims that Judge
22 Adelman I believe says no custody, was what she said,
23 and that then he typically gives them very little
24 financial support, that sort of thing.

25 So, that's seems to be a new and narrower focus
26 on that. So, if you'd like to address that, go
27 ahead. But I'm not considering the broader against

1 all women because that's not what's been pressed
2 here.

3 ATTY. ALDRICH: I understood, Your Honor. I
4 believe she started out that way. And then, based on
5 your questions, I think she did narrow focus.

6 I don't believe that she has shown any evidence
7 of the fact that Judge Adelman was even aware that
8 there was a learning - that the - Mrs. Ambrose had a
9 learning disability and that could affect or cause
10 him to make different accommodations for her. That
11 was not requested, and it was never a part of this
12 case.

13 Her mental health issues, however, have been a
14 very big part of this case and are what have been
15 brought to the attention of the court through the
16 custody evaluator and everything else. But that is
17 not what I believe that they are claiming.

18 So, she does have the burden to prove every
19 element of the facts that show that Judge Adelman was
20 biased. And she certainly has not done that with
21 women with - who have been abused or women - or
22 anybody with a disability.

23 THE COURT: (indecipherable) women that claim
24 there was abuse in the case they're involved in, that
25 the claim is, is that he punishes them for making
26 those claims of abuse. I assume it's mostly about
27 the abuse of the children. But, I guess, also as

1 well against the spouse, in other words, that the -
2 that the male has abused the woman or a child. And
3 the argument is, is that when there are such cases
4 Judge Adelman punishes them by denying them any
5 custody and financially disadvantaging them as well.
6 So, it's that kind of narrow - that's - that's the
7 claims I understood.

8 ATTY. ALDRICH: Understood. Your Honor, the
9 custody was taken from Mrs. Ambrose well before Judge
10 Adelman got involved. That was in - in April of
11 2020. She had a no contact order, no custody, no
12 visitation. She did have the right to supervised
13 visitation which she has opted not to take. She had
14 the ability to do so, and she has never chosen to do
15 so. So -

16 THE COURT: I'm sorry. She has the opportunity
17 to do what?

18 ATTY. ALDRICH: She had the opportunity to have
19 supervised visitation, but she chose not to avail
20 herself of that option. So, as a result, she has
21 chosen not to see her children and be with her
22 children.

23 So, that is something that's important for the
24 Court to note, that for somebody that is saying that
25 she's being denied access to her children, she could
26 have access from - there was an agreement that was
27 signed and entered into court regarding her having

1 supervised visitation. And she never availed herself
2 of that option. So, she's made her own choices.

3 And Judge Adelman did not - he has not made a
4 decision about what's going to happen with this case,
5 as you mentioned, Your Honor. This is - these things
6 happened prior to his - his time in the case.

7 And he is - has now tried some 30 plus days of
8 this case over a very long period of time, has not
9 made a decision, and has had - seen many - and most
10 of the actions have happened prior to the trial, so
11 things like protective orders that had been - Mrs.
12 Ambrose tried to get in a New Haven court that were
13 about the children being abused. There's been no
14 allegations that Mr. Ambrose has abused his wife.
15 So, those have not been made.

16 So, this is not a person that's a victim of
17 domestic abuse that Attorney Cunha is alleging that
18 Judge Adelman is biased against. This is not -

19 THE COURT: Okay.

20 ATTY. ALDRICH: - that case.

21 THE COURT: Okay. I think she's claiming here
22 is that her complaints about him abusing his children
23 were the thing because I guess that's - that's right.
24 That's what the focus of it is.

25 ATTY. ALDRICH: Okay.

26 THE COURT: She's - she's claiming that he is
27 punishing her for that.

1 ATTY. ALDRICH: Okay. So -

2 ATTY. CUNHA: I just want to be -

3 ATTY. ALDRICH: I don't -

4 ATTY. CUNHA: Excuse me -

5 ATTY. ALDRICH: - (indecipherable) Attorney
6 Cunha speak during my time, Your Honor.

7 THE COURT: Yeah. I think it would be better,
8 Attorney Cunha, to make note because I'm going to
9 come back to you. It's just so much easier if we
10 just let everybody - you say your piece, and I'm
11 going to come back to you again, Attorney Cunha.

12 ATTY. CUNHA: All right. Thank you.

13 THE COURT: So, make note of something you want
14 to follow up on something. Go ahead, Attorney
15 Aldrich.

16 ATTY. ALDRICH: Thank you, Your Honor. Also,
17 it's clear that Attorney Cunha doesn't like anybody's
18 rulings. She doesn't like - most of her so-called
19 factual and not very factual affidavit include pages
20 and pages involving Judge Grossman and the guardian
21 ad litem and me and other actions that other people
22 have done. This is a - this is a hearing about -
23 about Judge Adelman being disqualified. This is not
24 about getting rid of a GAL, getting rid of me,
25 getting rid of Judge Grossman, or doing anything like
26 that. This is about Judge Adelman. And most of her
27 affidavit deals with things that she's not happy

1 with. She's mainly unhappy that her client lost
2 custody of the children. You know, I understand her
3 frustration, but you don't - it's not to be taken out
4 on Judge Adelman.

5 And she - a large part of her dissatisfaction is
6 with Judge Adelman is that she doesn't like his
7 rulings. Well, the rulings haven't been in her favor
8 or in her client's favor for a reason. And the
9 reasons are the facts that have happened in the case.
10 So, in order to show bias, she needs to not just - it
11 has to be based on more than she's unhappy with this
12 rulings as Your Honor has stated.

13 THE COURT: And she agrees with that. Attorney
14 Cunha agrees with that. And so, I've been directed
15 to certain - to certain things. Some parts of it are
16 looking at the record seeing what Judge Adelman said,
17 another is to look at this group of five cases and
18 see if there's a pattern that he doesn't - that he
19 retaliates against people who claim abuse. That -
20 that's - so, she knows that - that it can't be simply
21 disagreeing with his rulings. It has to be more.

22 ATTY. ALDRICH: But it's very clear she doesn't
23 agree with his rulings, and it's very clear that she
24 has tried several other avenues which she even said
25 because she wasn't getting the help that she needed
26 or the rulings she wanted, trying them in other
27 courts. She's filed an action in the Hartford Court

1 naming judge - Governor Lamont. She's filed new
2 temporary restraining orders in this action. She's
3 filed a juvenile action. All of these have -

4 THE COURT: Do you know the Hartford case? Does
5 anybody have the Hartford case?

6 ATTY. ALDRICH: It's not a part of this case,
7 Your Honor

8 ATTY. CUNHA: It's - it's uploading -

9 THE COURT: I want to take note of it. Do you
10 know - is it called - what's the name of case and the
11 caption?

12 ATTY. CUNHA: It's Karen Riordon, also known as
13 Karen Ambrose, et al versus Ned Lamont et al. And
14 I -

15 THE COURT: Do you have a docket number?

16 ATTY. CUNHA: I will. I'll look it up for you
17 right now, Your Honor.

18 ATTY. ALDRICH: So -

19 ATTY. CUNHA: I - if counsel wants to proceed,
20 I'll look it up.

21 THE COURT: Go - go ahead, but I'd like to have
22 the docket number because then - then there's a
23 juvenile matter - juvenile court matter, a TRO
24 matter -

25 ATTY. ALDRICH: Right.

26 THE COURT: - and the Hartford and this matter;
27 right?

1 ATTY. ALDRICH: Right. Well, there's other -
2 there's other actions, Your Honor. The - I believe
3 the juvenile matter was dismissed. I don't believe
4 she's done her brief that she needs to do which is
5 what's happened in - in this case many times for the
6 Hartford case, so I believe that's - that will be
7 dismissed.

8 And, in terms of the TRO, that hasn't - I don't
9 believe that that's going to have any - going to go
10 anywhere. And she's also filed malpractice actions -
11 her client has filed malpractice actions I believe
12 with her help - I don't know - against various people
13 involved in this case. So - and the threatening
14 emails and letters that have gone to witnesses in
15 this case which she alluded to with a Jennifer
16 Celentano who backed out the based on the fact that
17 there were threats made to her. So, this is - there
18 have been a lot of actions that have been taken, Your
19 Honor, because she's not satisfied with the way this
20 case has gone. And - and there are reasons - many
21 reasons for that, but none of them had to do with
22 Judge Adelman.

23 Your Honor, in terms of the - the restraining
24 order that was done in New Haven, that was she took
25 to a different court, not the Bridgeport Court where
26 the case was filed and pending for the entire time
27 until it was moved to Middletown, but to a New Haven

1 Court. She used a different name. She did not say -
2 she said there was not a custody hearing, and it was
3 sworn to on the affidavit by Attorney Cunha. That
4 case was initially granted without Judge Price-
5 Borland knowing that there was a custody that was -
6 custody was removed from this litigant, Mrs. Ambrose.
7 And within a day of learning the facts about this
8 case, it was vacated, and the children were to be
9 returned.

10 And part of the issues that have gone on in this
11 case are the children are not returned and I would
12 ask your - the Court to draw your attention to the
13 fact that there are several transcripts from Judge
14 Grossman that have nothing to do with Judge Adelman
15 but - but Attorney Cunha brought them up, regarding
16 Mrs. Ambrose failing to appear in court as she did
17 with Judge Adelman recently on October 21, I believe,
18 failing to appear, and keeping the children and
19 holding onto the children in spite of two - three
20 court orders, Judge Price-Boreland and two court
21 orders by Judge Grossman, to return the children and
22 she failed and neglected to do so and neglected to
23 appear in court. So, the bad acts that have gone on
24 throughout this case have been numerous.

25 And they - the - in terms of what she hasn't
26 done throughout - beginning with Judge Adleman's - on
27 Judge Adelman's watch began with the discovery. So,

1 as you know, Your Honor - and I know you have
2 standing orders that are complied with - the standing
3 orders were not complied with on the part of Attorney
4 Cunha and Mrs. Ambrose.

5 So, on the date that they were due, there was no
6 compliance. We had to go to court several times to
7 get the compliance completed. The judge made several
8 orders, and I can -

9 THE COURT: So, there's a claim - to get to the
10 bias thing rather than - because as I indicated to
11 Attorney Cunha, I don't want to re - the merits of
12 any of the motions pending are not my business. My
13 business is the question of bias. And there was a
14 claim that motion handling reflected bias because
15 Judge Adelman ruled that he wasn't going to take up
16 with any discovery because both parties had unclean
17 hands, and then, the claim is that he took up your
18 discovery claims. That seems to get to the question
19 of bias.

20 ATTY. ALDRICH: Sure.

21 THE COURT: How do you answer and respond to
22 that?

23 ATTY. ALDRICH: I can address that. It's - it's
24 being charitable to Attorney Cunha to say there's
25 unclean hands on two parts. From the beginning and
26 to date -

27 THE COURT: She says that's what Judge Adelman

1 said.

2 ATTY. ALDRICH: She said that's what Judge
3 Adelman said, and Judge Adelman was being charitable
4 to her -

5 THE COURT: Oh. I see. Judge Adelman...

6 ATTY. ALDRICH: - based on the fact that to date
7 she has not produced any evidence for this trial.
8 She has not produced - it took three motions in order
9 to get her to produce a financial affidavit, proposed
10 claims, and each time she passed the deadline set by
11 judge. She failed to show up to - to - you know she
12 failed to show up to court. But, to date, she has
13 not produced any documents, any documents that she
14 would put in evidence.

15 So, the judge made orders. And the judge said
16 he was going to not continue with discovery orders
17 depending on the - the attorneys needed to speak, do
18 emails, do an affidavit, and if they - regarding the
19 - you know, the discovery conversation and what -
20 what was -

21 THE COURT: Let me see if I'm following you
22 because I - I -

23 ATTY. ALDRICH: Yes.

24 THE COURT: There's the claim that - in other
25 words, that - that Judge Adelman showed bias by
26 saying to both sides I'm not going to hear any other
27 discovery matters and then as soon as you wanted

1 something in discovery, he dropped everything and
2 gave it to you. That - that's the claim.

3 Did he - at some point, in other words, say that
4 there's unclear on both sides; I will not hear any
5 discovery matters again? Did he say that?

6 ATTY. ALDRICH: No, that's not true. What he
7 gave us was an opportunity in 312 and let's see -

8 THE COURT: 312 is the entry?

9 ATTY. ALDRICH: 312, let's see - well, 312 is
10 she was supposed to provide a financial affidavit,
11 and she was late. Sorry, Your Honor. Then, there
12 was a discovery special masters, that's 317, that was
13 going to help with discovery. But, when Mrs. Ambrose
14 destroyed her computer that had the discovery on it,
15 he made a ruling. We got rid of the DSM, the
16 discovery masters, and he said that - he made a
17 ruling based on the fact she destroyed her computer
18 after the orders that anything that came from the
19 computer was not to be included -

20 THE COURT: I saw that. Did he ever make a
21 ruling that he was not going to hear anymore
22 discovery matters or did he just send it off to the -
23 to the master and that's what we're talking about?

24 ATTY. ALDRICH: It never went to the master
25 because she never complied because she destroyed her
26 computer. So, we didn't have anything to work with.

27 THE COURT: I'm saying -

1 ATTY. ALDRICH: So, no.

2 THE COURT: - did he - did he ever make a ruling
3 I am not going to hear any more discovery questions?

4 ATTY. ALDRICH: Yes. He said, number 353 -

5 THE COURT: 363?

6 ATTY. ALDRICH: 353.

7 THE COURT: 353. Okay.

8 ATTY. ALDRICH: If counsel do not provide the
9 court the next trial date an affidavit concerning
10 good faith efforts exchanging discovery, the court
11 will preclude any evidence that counsel has failed to
12 produce to the other side. The prohibition will
13 include evidence on the dissolution as well as the
14 restraining order.

15 So, that was going to be the end of the line.

16 So, that was -

17 THE COURT: (indecipherable) that doesn't say
18 anything about - in other words, the suggestion is,
19 is that the court had said at - made a ruling at some
20 point I will not hear any additional motions on
21 discovery. That was -

22 ATTY. ALDRICH: He did not say that.

23 THE COURT: That was the way I understood the
24 claim, that he made such a ruling, and then as soon
25 as you wanted something, he turned around and gave it
26 to you. That's the claim. I'm - I'm searching, in
27 other words -

1 ATTY. ALDRICH: There's - there's no truth to
2 that claim, Your Honor.

3 THE COURT: - for the ruling where the judges
4 says no more discovery.

5 ATTY. ALDRICH: Yeah, there's no truth to that
6 claim.

7 THE COURT: Okay. I (indecipherable).

8 ATTY. ALDRICH: He didn't say that. He - he
9 gave the attorneys an opportunity to submit an
10 affidavit regarding discovery that each believed the
11 other one had. Discovery was provided by me on
12 behalf of my client, and the onus was on Attorney
13 Cunha to say what was missing. Everything was
14 missing for me. He - he told us to do affidavits.
15 She did not. She never exchanged the - she never
16 sent the affidavit to the court. The day after the
17 judge made his ruling 353 on - on 7/29 I submitted my
18 affidavit. She never did.

19 So, de facto there was no further discovery
20 motions or discovery things done, but he never said
21 I'm not doing discovery any more as far as -

22 THE COURT: Well, that's what I wanted to
23 understand because the claim about bias is no more
24 discovery motions; I'm not going to hear anymore.
25 And then, you make one, and he rushes to give you
26 what you want. That's - that's -

27 ATTY. ALDRICH: No.

1 THE COURT: - my understanding of the essence of
2 the claim. And you - you - you deny the first part
3 of it which is there was ever such an order. And -

4 ATTY. ALDRICH: Right.

5 THE COURT: Okay. So, other points you want to
6 make?

7 ATTY. ALDRICH: Yes. Your Honor, the - the
8 allegation that Attorney Cunha made that there were -
9 I'm quoting her - trumped up claims Karen violated
10 many court orders. Mrs. Ambrose violated so many
11 court orders it's hard to keep track of them. So,
12 that is not true.

13 And that it is not true that Judge Adelman never
14 took extreme measures for all of the violations of
15 the court orders. He was incredibly patient and -
16 and allowing Attorney Cunha, as Your Honor has today,
17 to speak as much as she wants, to make longwinded
18 objections, to take two and a half days to - for
19 witnesses that took an hour as were my witnesses.
20 So, he has given her incredibly leeway as one would
21 do with a pro se party.

22 There is no - I - there is no evidence of Judge
23 Adelman making rulings based on the fact that - or -
24 or extreme sanctions or limitations on what Attorney
25 Cunha could present or what her client did or didn't
26 do. And there were many, many orders that she
27 violated. And, Your Honor, all of the - the

1 transcripts will obviously show that.

2 Also, Attorney Cunha has been disrespectful to
3 the court which is why I believe that he had the
4 moment in court that Attorney Cunha is asking you to
5 look at - to look at - I believe it was on October
6 21st - where she accused the judge of lying and
7 called the court a joke. And he had - you know,
8 after many - and - and her client didn't appear, just
9 didn't appear without any advance notice or warning
10 and everyone was prepared to go forward with the
11 trial that has been standing since July. And she
12 just didn't appear, so it -

13 THE COURT: (indecipherable) testifying that day
14 or she was just -

15 ATTY. ALDRICH: Yes. She was -

16 THE COURT: She was to be on the stand?

17 ATTY. ALDRICH: Yes, she was on the stand. It
18 was -

19 THE COURT: Do you know what day that was,
20 October - was that October 20th?

21 ATTY. ALDRICH: I believe it was the 20th or
22 21st. I will look up - I will look that up, Your
23 Honor.

24 THE COURT: I will be looking at those two days,
25 anyway.

26 ATTY. ALDRICH: Right. I know he made his
27 ruling on the 21st, so it may have been the 20th we

1 were in court. But I - I'll check that

2 THE COURT: That's what Attorney Cunha was
3 suggesting, it was the 20th. So, alright, I'm going
4 to look at both of those days anyway just to see if
5 there's -

6 ATTY. ALDRICH: Thank you, Your Honor.

7 THE COURT: - (indecipherable) - information.

8 ATTY. ALDRICH: And I don't think that Judge
9 Adelman - he had said that based on the - that she
10 was claiming and screaming that he was biased and
11 very agitated throughout and calling everyone a liar
12 including (indecipherable) - does all the time with -
13 obviously, I - you know, I just take it in stride
14 because that's what she does. But doing it to the
15 court is disrespectful and he had had it and he said
16 I'm going to declare a mistrial. I - I asked him
17 not -

18 THE COURT: Well, that's the November hearing,
19 and I listened - I listened to that. That happened
20 at the November - is it 8th or 9th? I listened to
21 that already.

22 ATTY. ALDRICH: Sorry, Your Honor. That's the
23 one -

24 THE COURT: (indecipherable) confused.

25 ATTY. ALDRICH: Your Honor, that's what I'm
26 confusing myself. Sorry about that. That was - it
27 was the November - that was the November date.

1 THE COURT: I've listened to that already. I'm
2 going to go back and listen -

3 ATTY. ALDRICH: Okay. Okay.

4 THE COURT: All right. Any other points?

5 ATTY. ALDRICH: And, well, that he changed his
6 decision because he realized that obviously this case
7 has been pending for 30 days. And I think he saw
8 that that even - in spite of the fact she was, you
9 know, begging for him and doing whatever she can to
10 get him off the case, that it wasn't going to be the
11 best interest of this family or either client to
12 forgo, you know, 30 plus days of trial. So, I just
13 wanted to say that, Your Honor.

14 THE COURT: How far are you - how far are you
15 into the case after 30 days?

16 ATTY. ALDRICH: You know, I can't - I stopped
17 counting it, like, 31 or 32. I don't know.

18 THE COURT: But where - how far through the
19 evidence? When -

20 ATTY. ALDRICH: I have - I just - I think we
21 have - I have one more day, Your Honor. I'm - half a
22 day with Mrs. Ambrose and a half day of Mr. Ambrose,
23 and then, we have the guardian ad litem. And then,
24 that's it, Your Honor. So, there really is very few
25 days that I have left. And, unfortunately, Attorney
26 Cunha -

27 THE COURT: You - but the question is Attorney

1 Cunha hasn't started to put on her case -

2 ATTY. ALDRICH: Right.

3 THE COURT: Okay. So -

4 ATTY. ALDRICH: Right.

5 THE COURT: So, you're about done. You're about
6 done. The GAL has to testify, and then, Attorney -

7 ATTY. ALDRICH: Right.

8 THE COURT: - Cunha is going to put on her case.
9 Okay.

10 ATTY. ALDRICH: Right. Many of her witnesses
11 are - have been already - were my witnesses as well.
12 She did give a list of witnesses; some I don't know.
13 There was a very long list, and I don't even know if
14 she intends to call them. And we never had any had
15 any conversation about any of that because it wasn't
16 able to have any conversation about that. So, I
17 don't know how long.

18 THE COURT: Yeah. I just wanted to put it in
19 context to understand how far along. All right.
20 Other points with respect to Attorney Cunha's -

21 ATTY. ALDRICH: Yes, Your Honor. There was a
22 discussion about a - records that were - there was a
23 motion to quash that she had done about cell phone
24 records -

25 THE COURT: Verizon.

26 ATTY. ALDRICH: Yes. And that was done by her,
27 number 254, and Judge Grossman denied her motion.

1 So, the Verizon records, she said there wasn't any
2 motion. That's not true. There was a motion.

3 THE COURT: Let me just make sure because I want
4 to understand what you're telling me.

5 ATTY. ALDRICH: Yup. Yup.

6 THE COURT: So, you subpoenaed records - cell
7 phone records from Verizon?

8 ATTY. ALDRICH: Correct.

9 THE COURT: And did you send a copy of the
10 subpoena to the other side?

11 ATTY. ALDRICH: I believe I did, Your Honor. I
12 don't recall right now. But I believe I did. But I
13 - I do know that -

14 THE COURT: Was the motion to quash filed before
15 you got a response from Verizon or after?

16 ATTY. ALDRICH: It was before.

17 THE COURT: Okay. So, in other words -

18 ATTY. ALDRICH: Before.

19 THE COURT: - the question is whether there was
20 a meaningful chance to be heard on the motion to
21 quash. And, if you've already gotten the records,
22 it's too late. But you're telling me -

23 ATTY. ALDRICH: Right. I hadn't gotten the -
24 this was in January, Your Honor, so this is before
25 the trial - before the trial.

26 THE COURT: So, you're saying that Attorney
27 Cunha - so, there was a subpoena. Attorney Cunha had

1 a motion to quash. The motion to quash was denied.

2 ATTY. ALDRICH: Yes.

3 THE COURT: And then you got the records. Is
4 that your -

5 ATTY. ALDRICH: Correct. And - and Verizon
6 would not release anything without court - the court
7 orders.

8 THE COURT: Court ordered.

9 ATTY. ALDRICH: Yes. They're pretty strict -

10 THE COURT: So, 254 is where I'll look on that.
11 Go ahead.

12 ATTY. ALDRICH: Correct.

13 THE COURT: Other points?

14 ATTY. ALDRICH: Let's see, Your Honor. Your
15 Honor, 7D that she - that Attorney Cunha referred to
16 is the multidisciplinary team meeting regarding the
17 96-hour hold. I don't call people liars, but I will
18 say that facts that aren't true. Attorney Cunha said
19 that there were four 96-hour holds. That is not
20 true.

21 THE COURT: Oh. Wait a minute. I just want to
22 make sure I'm talking about the same thing. I have
23 here Exhibit 7 - is it 71? I thought it was 71.

24 ATTY. ALDRICH: Well, it's 7D which his the -
25 which is - I thought what she was referring to which
26 talks about the 96-hour hold which was based on the
27 multidisciplinary task team meeting. So, that's 7D

1 is the exhibit that, perhaps, she was meant to talk
2 about. But that's -

3 THE COURT: Well -

4 ATTY. ALDRICH: - that -

5 THE COURT: (indecipherable) - I thought she
6 said it was referred to in the DCF document. The DCF
7 document is as she said 71. It's very long, so I
8 haven't gotten to where it is. But you're telling me
9 this -

10 ATTY. ALDRICH: If you look at -

11 THE COURT: - multidisciplinary report is in
12 Exhibit 7D and is -

13 ATTY. ALDRICH: Correct.

14 THE COURT: All right. I'll look there because
15 that might be shorter. And you're telling me -

16 ATTY. ALDRICH: Yes.

17 THE COURT: You're telling me -

18 ATTY. ALDRICH: (indecipherable) two pages.

19 THE COURT: - that it's been misrepresented as
20 to what it says?

21 ATTY. ALDRICH: Yes, Your Honor. It's
22 misrepresented - she has misrepresented that there
23 were four 96-our holds, number one. And, number two,
24 the multidisciplinary task team which is a whole - a
25 thing that happened as a result of the many, many
26 reports made by Attorney Cunha, by Mrs. Ambrose, by
27 friends of Mrs. Ambrose to DCF. They got a

1 multidisciplinary task team together and a - and a
2 DCF worker in place to - so these - these things
3 wouldn't keep happening.

4 So, the 7D specifically discusses the meeting.
5 And, based on that the child's safety may be of
6 immediate concern after the meeting and after their
7 investigation - and this is not the first
8 investigation they had done, this is now a team
9 including police officers, the children's therapists,
10 the guardian ad litem, many staff workers from DCF,
11 and it rescinded the 96-hour hold, one child was
12 already in the father's care the entire time and the
13 other two children were returned to their father's
14 care.

15 THE COURT: Okay. So -

16 ATTY. ALDRICH: So -

17 THE COURT: What was told me to that I wrote
18 down and that I'm concerned with - with finding out
19 what the document says is that it was represented to
20 me that a multidisciplinary team found that, in fact,
21 the father had sexually assaulted these children.
22 And do - do you dispute that?

23 ATTY. ALDRICH: I do, Your Honor.

24 THE COURT: But what does - what does the report
25 actually say about that? Did - did someone conclude
26 whether these assaults happened one way or the other?

27 ATTY. ALDRICH: Yes, Your Honor. This -

1 THE COURT: What did -

2 ATTY. ALDRICH: Yes. There have been no
3 conclusions and no findings that Mr. Ambrose has ever
4 sexually assaulted his children, not by three
5 different police departments, Madison, Guilford, and
6 Westport; not by many, I believe more than ten or
7 fifteen DCF calls and - and - what - what do they do
8 when they do the - you know - investigations, no
9 findings ever that there have been any sexual abuse
10 of the children including two - three hospitals. So,
11 there is -

12 THE COURT: Three hospitals -

13 ATTY. ALDRICH: Three, Hartford Hospital, Yale
14 Hospital, and I believe Hartford is a Children's
15 Hospital, so two times at Hartford -

16 THE COURT: (indecipherable) DCF reach some
17 conclusion -

18 ATTY. ALDRICH: Yes.

19 THE COURT: - on the subject after - and did it
20 say - usually they say something like abuse
21 allegations are substantiated -

22 ATTY. ALDRICH: Yes.

23 THE COURT: - allegations are not substantiated.
24 Did they make such a conclusion about sexual assault?

25 ATTY. ALDRICH: They did, Your Honor.

26 THE COURT: What did they -

27 ATTY. ALDRICH: So, we have all the exhibits in

1 place, and each time a DCF worker testified, that DCF
2 worker - I provided their report and their exhibits
3 and their exhibit numbers 7B.

4 THE COURT: So, I'll look at 7B. What does it -

5 ATTY. ALDRICH: 7B, 7C, and I believe 7D, there
6 were three of them, and they all say that there's no
7 neglect - I forget their wording but there's no -

8 THE COURT: No abuse or neglect substantiated is
9 usually the -

10 ATTY. ALDRICH: Correct.

11 THE COURT: That's what you're saying -

12 ATTY. ALDRICH: Correct.

13 THE COURT: - I'll find?

14 ATTY. ALDRICH: Yes. Yes. And there - you
15 know, each - you can find many reports that will
16 start out with there's a suspicion of sexual assault,
17 correct, because these children were brought to
18 Hartford Children's Hospital; these children were
19 brought to Yale all times by Mrs. Ambrose or her - or
20 her people that she sent to do that. And so, there
21 will be in the - in the heading sexual assault
22 suspected, sexual assault whatever. But each and
23 every time there's a unsubstantiated; the children
24 were released from hospitals; the children have
25 unsubstantiated DCF reports; and the police never
26 took any action. So, there is no - no department
27 that has ever found that Mr. Ambrose sexually abused

1 his - his children.

2 There are two people that consistently say he
3 is, Attorney Cunha and Mrs. Ambrose. But many times
4 during the trial, Your Honor, you will hear that Mrs.
5 Ambrose says she doesn't believe that he sexually
6 abused his children. She never wants to say that
7 because she - she - she doesn't put that out there in
8 her testimony. But certainly Attorney Cunha has.

9 THE COURT: But the point is -

10 ATTY. ALDRICH: So -

11 THE COURT: - it was suggested to me that I
12 would find in the DCF document substantiation, that
13 somebody found, a multi - a multidisciplinary
14 taskforce team I was told found that Mr. Ambrose had
15 sexually assault his children. You're telling me
16 when I read those documents it will say the exact
17 opposite.

18 ATTY. ALDRICH: Correct.

19 THE COURT: Okay. So, next point.

20 ATTY. ALDRICH: My next point, Your Honor, is
21 the - well, I think - you'll take note of Exhibit 13,
22 Your Honor, too, which is the forensic exam that when
23 Attorney Cunha went to the police station on
24 September 1, 2020 with her client that they asked for
25 a welfare check of the children who - who were at
26 their father's home. As a result of that, the
27 children were brought by the police to the hospital,

1 Yale. And the findings at Yale, there was no hold.
2 The children were released. They went to their
3 uncle, the father's brother, for one night. It was
4 not a 96-hour hold, and again, no findings of sexual
5 assault.

6 Also, the temporary restraining order did not
7 make a finding of temporary assault. Obviously, that
8 was vacated. There was also the - Mrs. Ambrose's
9 friend brought the children to Hartford Children's
10 Hospital, and they were also released to their
11 father.

12 So, there's been no - no - and these are
13 forensic exams. These are not just bringing them to
14 the hospital, going to the ER. These are extensive
15 forensic interviews and exams with the children
16 asking very personal and difficult questions, and
17 these children have had to be put through this. So,
18 there's been no substantiation if any of this.

19 THE COURT: The thing that was brought to my
20 attention on the bias question is that this had been
21 - that the fact that a conclusion of sexual assault
22 had been made was ignored by Judge Adelman. You've
23 told me what you have to say on that.

24 ATTY. ALDRICH: Yes.

25 THE COURT: Another topic (indecipherable).

26 ATTY. ALDRICH: Your Honor, that Attorney Cunha
27 said she was not allowed to articulate her

1 objections. That is totally not true. Judge Adelman
2 gave her every opportunity, if you listen to any of
3 the transcripts, to give pages and pages of reasons
4 why she objected to certain things being - coming in
5 as evidence. And she wasn't always - her objections
6 were sometimes sustained. So, there's no evidence of
7 any bias or prejudice on the part of Attorney - Judge
8 Adelman.

9 And, Your Honor, I think basically that I don't
10 believe I have to go through all of the remaining
11 facts in Attorney Cunha's affidavit because I don't
12 believe there's anything that addresses specific
13 facts against Judge Adelman. I'm really more
14 refuting -

15 THE COURT: That's why I've tried to focus it -

16 ATTY. ALDRICH: Yes.

17 THE COURT: - on the bias. Sometimes the
18 rulings connect to the claims of bias, but just your
19 approval of his rulings and her disapproval or vice
20 vera aren't pertinent to what I have to decide.

21 ATTY. ALDRICH: Understood.

22 THE COURT: But I understand that there are
23 claims of patterns that overlap cases, and I'm going
24 to look at those (indecipherable).

25 ATTY. ALDRICH: I don't -

26 THE COURT: Anything else?

27 ATTY. ALDRICH: Yeah. I don't know that there's

1 any evidence of that, Your Honor. Certainly not with
2 any case I've ever had with Judge Adelman which I
3 can't even remember the last time I had a case with
4 him. And I don't believe that she - that - I think
5 what matters is what happened in this case. And I
6 don't think that she has provided - she's given us -
7 me virtually nothing to rebut, and she hasn't met her
8 burden of proof in this case.

9 Whether or not in other cases of people who, you
10 know, have had children taken from them or other
11 things, I don't believe that that would be pertinent
12 to - or relevant to this matter. And maybe Your
13 Honor feels that's something that you need to look
14 into. But I believe that this case -

15 THE COURT: I've been asked to look at these
16 cases. And, if, you know - if you have a situation
17 as - and I look at the docket in this case and some
18 of the transcripts have been described and if it
19 appeared that Judge Adelman simply ignored, was
20 dismissive, or was, you know, wantonly biased against
21 a woman who claimed abuse against the child, for
22 instance, which was the argument here, and then he
23 does the exact same thing in another fifteen cases or
24 I guess I've been given a list of five and if the
25 things are just this identical pattern that anybody
26 who complains about abuse Judge Adelman basically
27 just throws them out of court and will turn against

1 them and, in fact, the suggestion is retaliate
2 against them, if there was, you know, a very concrete
3 pattern that he did that across a wide spectrum of
4 cases, then, yeah, that might be something that would
5 substantiate that he always does the same thing. It
6 suggests that he's biased. But I'll look at the
7 cases and do that. I can, of course, look at other
8 cases. They're all in the public - all part of the
9 public record.

10 ATTY. ADELMAN: Right. Your Honor, also, for
11 her affidavit, she did make a certificate that it was
12 made in good faith. And the one that I received or
13 that is online is also not notarized. So, again -

14 THE COURT: The affidavit - (indecipherable).

15 ATTY. ALDRICH: The affidavit - her affidavit is
16 not notarized, the one that I received, or the one
17 online. So, you know, we all follow rules. Attorney
18 Cunha doesn't seem ever to follow the rules and
19 comply with - in a timely fashion with any court
20 orders. And I just want to bring that to the Court's
21 attention.

22 think that the main reason we're here is that -
23 and I don't believe that this motion is made in good
24 faith on her part. And the reason that we're here is
25 because she doesn't like the rulings and she doesn't
26 like the way the case is going, and this case has
27 been going in this direction for quite a long time

1 based on her client's own actions. So, I don't think
2 that you use other courts in other ways and any other
3 way she can get out of this case and to have a
4 mistrial in this case and have this judge be recused
5 when there's no - no evidence she's - she's shown to
6 support this would be so detrimental I believe not
7 just for the judicial system but to this family in
8 particular that I think that it would be a real, you
9 know, a real disservice -

10 THE COURT: Well, certainly -

11 ATTY. ALDRICH: - (indecipherable) this family.

12 THE COURT: - (indecipherable) - concerned about
13 how (indecipherable) how other things have taken over
14 the case. I think Attorney Cunha reflected the same
15 concern.

16 All right. Anything else, then?

17 ATTY. ALDRICH: Nothing other than Judge
18 Grossman has shown extremely leniency and this is the
19 reason that the case has taken so long. And I - I
20 just want the Court to understand that because you
21 don't unless you're in it. You know, reading the
22 transcript you wouldn't see how patient and
23 understanding he is of the antics that have gone on
24 in this case. And I have nothing further.

25 THE COURT: Thank you, Ms. Aldrich.

26 So, Ms. Cunha, it's your motion so you get the
27 last word. Any final point you wish to make? I

1 think you're muted. You're muted. Attorney Aldrich,
2 you're muted now good so that way we have as few mics
3 open as opposable because - go ahead.

4 ATTY. CUNHA: (indecipherable) - and - and this
5 is - this specifically wherein lies the problem with
6 Judge Adelman and his prejudice with respect to how
7 he has interacted in this case.

8 Attorney Aldrich is very good at purposely
9 omitting the actual details that rise to the level of
10 a truthful representation of facts. She did it
11 repeatedly in her closing argument to you today. I
12 take that as so egregious. She has an obligation, as
13 do I, as an officer of the court to make honest
14 representations to this court, not to purposefully
15 omit details or to slightly change the information to
16 change the way in which Your Honor would perceive
17 what has occurred.

18 So, Attorney Aldrich started out by saying that
19 to date - and I - I asterisked this - to date that I
20 have not complied on behalf of my client in trial
21 management orders. That is a blatant material
22 misrepresentation. It is false and intentionally
23 misleading.

24 When we started this case on March 31st, my
25 argument to Judge Adelman is my client has been put
26 at a very - in a very serious detrimental position.
27 We have no compliance with financial discovery. The

1 first time my client received an affidavit in this
2 case - a sworn affidavit was five days before the
3 trial. I had been trying to get the affidavit since
4 October of 2020, and it was first requested by way of
5 standard discovery in June of 2020.

6 And even though I filed a motion for contempt
7 and a motion for compel well before the trial and
8 then let Judge Adelman know they were outstanding
9 motions, I still did not get an order from Judge
10 Adelman with respect to that failure. And I
11 articulated to Judge Adelman that it was very
12 difficult for me as an attorney to let the court know
13 exactly what I proposed as exhibits when I don't know
14 what is out there.

15 And, in fact, Your Honor will see one of Judge
16 Adelman's orders that was issued I believe on March
17 31st was his order allowing my client to take the
18 deposition of the Connecticut accountant. What is -
19 what is vitally notable about that is, one, when he
20 entered - when Judge Adelman entered that order, my
21 client had absolutely no independent access to money.
22 She was given a credit card that Mr. Ambrose
23 monitored which is how Mr. Ambrose knew that she sent
24 her computer to a computer shop to be prepared -
25 repaired.

26 Judge Adelman knew because it was articulated to
27 him that the accountant that was of interest and most

1 important was the accountant in California. And
2 there are - there is an exhibit in the exhibits that
3 represent Mr. Ambrose's direct interference with my
4 client reaching out to that accountant in California
5 and asking -

6 ATTY. ALDRICH: Your Honor -

7 ATTY. CUNHA: - for (indecipherable) -

8 ATTY. ALDRICH: - (indecipherable) -

9 THE COURT: Are you having a technology problem,
10 Ms. Aldrich?

11 ATTY. ALDRICH: No. I - I wondered if she's
12 rebutting - if you're allowing her last word on the
13 things based on what I said?

14 THE COURT: I - keep your mic muted. I'll -

15 ATTY. ALDRICH: Okay.

16 THE COURT: I was going to ask you, actually,
17 Ms. Cunha, how this - let's not start a new topic
18 about the accountant -

19 ATTY. CUNHA: Well -

20 THE COURT: - but just - just respond to -

21 ATTY. CUNHA: It's -

22 THE COURT: - the bias issues that Attorney
23 Aldrich (indecipherable).

24 ATTY. CUNHA: But - but, Judge, the problem is
25 Attorney Aldrich didn't - didn't focus on the bias
26 issue. She basically represented to this Court that
27 the claims that I have made are not truthful. I find

1 that so egregious and problematic because that is a
2 blatant lie and material representation. And,
3 frankly, Attorney Aldrich should not be allowed to
4 practice law in this state based on what she has done
5 in this case alone. She has interfered with criminal
6 investigations.

7 She wants you to look at this other exhibit from
8 DCF because it is not the complete record of DCF.
9 The reason I point the Court to 71 is because 71 is
10 the running narrative which includes the first
11 96-hour hold, number one, in September of 2020. It
12 includes the second 96-hour hold on December 1, 2020.
13 And then, there is a third one in there, and I can't
14 remember the exact date. But then, the fourth one
15 was done in - I think it was January 26, 2021
16 immediately following the forensic interview which is
17 the only forensic interview that took place in this
18 case. And that was on January 26, 2021 -

19 THE COURT: So, you're telling me I will find in
20 Exhibit 71 that there are four 96-hour holds; right?

21 ATTY. CUNHA: Yes.

22 THE COURT: So then, the second thing - and
23 since you raised that topic and it was something
24 Attorney Aldrich addressed - I'm going to look at 71,
25 and I'm going to look at 7B, 7C, and 7D which she
26 cited for me. I take it, then, I have everything
27 about that that I could - I could look at with

1 respect to the claim.

2 Now, you - you claimed that this
3 multidisciplinary panel concluded that Christopher
4 Ambrose sexually assaulted his children. And you -
5 and so, you're telling me 71 will show that the
6 multidisciplinary group reached that conclusion; is
7 that correct?

8 ATTY. CUNHA: Yes. And not only did they reach
9 that conclusion, they opined which was testified to
10 by Detective DeGoursey, by Stacy Faulk, and I can't -
11 by Jamie Isaacs which was the other DCF worker, that
12 the team opined that the children could not be in Mr.
13 Ambrose's care and requested that if they couldn't
14 give the children to the mother because there's some
15 court order that the mother can't have custody, then
16 they have to go to foster care which is -

17 THE COURT: All right.

18 ATTY. CUNHA: - what happened -

19 THE COURT: I'm trying to focus on the question
20 that I asked, and I took - I took a clear answer from
21 you, is that I'm going to read Exhibit 71 and you're
22 telling me when I read the full Exhibit 71, I am
23 going to find that the multidisciplinary group
24 concluded that Christopher Ambrose had sexually
25 assaulted his children. That's what you've asserted,
26 and I'm going to read that report.

27 Attorney Aldrich says that repeated findings

1 were made of no abuse or neglect. And you're telling
2 me I'm going to find that the multidisciplinary group
3 said Christopher Ambrose sexually assaulted his
4 children; correct?

5 ATTY. CUNHA: Yes.

6 THE COURT: Okay. That's all I needed.

7 ATTY. CUNHA: In fact -

8 THE COURT: That's a really - that's a really
9 clear disparity between the representations of the
10 two sides. And I'm going to look at all the exhibits
11 that you both described because you're using that as
12 saying there Judge Adelman was with this in front of
13 him, and yet, he refused to act. And that's - that's
14 one of your claims. It's not - it's part of your
15 claims about bias, or it certainly would be part of
16 your claims about ignoring women claiming abuse. So,
17 alright, any other last points you want to make?

18 ATTY. CUNHA: What I want to point out, Judge,
19 is in - in Exhibit 71 that it specifically details
20 that the youngest child of this family whose first
21 initial is S - and I will leave it there - disclosed
22 that father engaged in conduct which included
23 tickling his upper thigh and that some of that
24 conduct (indecipherable) Yale-New Haven Hospital
25 included father touching his private parts and that
26 one of the DCF workers who said that the youngest son
27 recanted that father had touched his private parts

1 actually that was not the case. In fact, what the
2 child said was that instead of using the word
3 "private parts" when questioned by William Villanueva
4 in September, the children said, well, maybe it was
5 more like tickling my upper thigh and that the child
6 never recanted the actual conduct that the child -

7 THE COURT: Okay.

8 ATTY. CUNHA: - (indecipherable) of. So -

9 THE COURT: But this is apart from - this is
10 apart from what we've been addressing. You have made
11 crystal clear to me that you claim that this
12 multidisciplinary group concluded that the father
13 sexually assaulted his children. That's what I'm
14 going to look for in 71, and I'm going to read - read
15 also 7D, B, and C. Any other points you want to make
16 before we conclude?

17 ATTY. CUNHA: Yes, Your Honor. I want the Court
18 to specifically refer to the medical exhibits that
19 were entered in this case from Yale-New Haven
20 Hospital and from the Children's Hospital wherein
21 both of those facilities put 96-hour holds on the
22 children and both of those facilities found that the
23 children needed to be - Yale made a referral to the
24 sexual assault clinic and the - not Hartford, but the
25 Children's Hospital in Hartford, Connecticut made a
26 referral for a scan which is another type of forensic
27 evaluation but it's a - it just has different title.

1 What's important about that is Attorney Aldrich
2 specifically said that these children were - were
3 forensically evaluated multiple times. That is not
4 true. There was one forensic evaluation. That
5 forensic evaluation took place I believe on January
6 26, 2021. There were multiple referrals for forensic
7 evaluations that Mr. Ambrose failed to produce the
8 children to, but they did not take place.

9 THE COURT: All right. But so, you have the two
10 hospitals. You have a couple of hospitals, Yale and
11 Hartford, I guess it was hospital, the Children's
12 Hospital?

13 ATTY. CUNHA: Correct.

14 THE COURT: And Attorney Aldrich asserted that
15 there was no conclusion - actually, she had quite a
16 group of people, no conclusion by Yale that the
17 father sexually assaulted the child - now, it's
18 different to say, well, they referred for
19 investigation - no conclusion of a sexual assault by
20 Yale, no conclusion of a sexual assault by Hartford
21 Hospital, no action taken by, what, two or three
22 police departments. Do you disagree with those
23 points?

24 ATTY. CUNHA: What I disagree with - and - and
25 thank you, that's - that a very important issue.
26 It's the way in which the points were raised to the
27 court. Yale was not tasked with the goal of coming

1 to a conclusion. In fact, that would be against our
2 state law.

3 When - when a provider finds that there are -
4 that a complaint raise - rises to the level of
5 concern of abuse or sexual assault, a referral is
6 made to the multidisciplinary taskforce team. And
7 the reason for that is to avoid the children from
8 being exposed, to being questioned and
9 questioned, and reevaluated. So, they were never
10 meant to make those -

11 THE COURT: So -

12 ATTY. CUNHA: - conclusions -

13 THE COURT: - they're a mandatory reporter to
14 DCF, and then, DCF convenes this multidisciplinary
15 taskforce.

16 ATTY. CUNHA: Correct. So, they were never
17 tasked -

18 THE COURT: They wouldn't be in the business of
19 making the conclusion is your (indecipherable).

20 ATTY. CUNHA: Correct.

21 THE COURT: Okay.

22 ATTY. CUNHA: Correct.

23 THE COURT: And so - so, everything came back to
24 this multidisciplinary taskforce. And I'm going to
25 be looking at that carefully. All right. Any other
26 point besides this - this issue?

27 ATTY. CUNHA: The other - the other point was,

1 which this is a huge point, here was never a finding
2 of substantiation by DCF. And I questioned I believe
3 it was Jamie Isaacs on this point at length because I
4 was in complete shock because when you look at the
5 elements of abuse by our law, there is - it is -
6 there's no way that anyone that engaged in an
7 investigation would not have found that Mr. Ambrose's
8 conduct rose to abuse putting aside the sexual
9 assault. He failed to provide medication. He failed
10 to get to them to doctors. There's a laundry list of
11 failures that rises to the level of abuse -

12 THE COURT: But you - you agree, though, with
13 Attorney Aldrich then that DCF did not find any
14 abuse; right?

15 ATTY. CUNHA: But - yes. This is why -

16 THE COURT: You disagree with that.

17 ATTY. CUNHA: This is what Attorney Aldrich -
18 no, I don't disagree with that. But they were never
19 - they didn't take the case on, and I'm - I'm taking
20 this issue up, by the way, with the Department of
21 Children and Families.

22 What was testified to is that they were not
23 investigating Mr. Ambrose. They were servicing Mr.
24 Ambrose. So, because they were providing services to
25 Mr. Ambrose through this intensive outpatient program
26 for the children (indecipherable), there is no
27 requirement for them to make a finding as to whether

1 or not the facts are substantiated or not
2 substantiated with abuse or - with sexual abuse or
3 other abuse. That's problematic -

4 THE COURT: You're telling me, though - just so
5 I'll understand when I read these things, you're
6 telling me that the multidisciplinary group that was
7 convened under DCF found that Christopher Ambrose
8 sexually abused his children, but you agree that the
9 DCF at the end of all this concluded there was no
10 abuse or neglect? And I'm going to find that in
11 the -

12 ATTY. CUNHA: They didn't conclude that. What
13 they did is they did not take that question on.
14 That's my point.

15 THE COURT: So, you're - you're -

16 ATTY. CUNHA: So, there's a big difference.

17 THE COURT: - you're (indecipherable) - that
18 when I look at these documents there will be nothing
19 either way. There won't be - there's won't a
20 statement - because, you know, you've read many of
21 these. I've read many of these. They either - they
22 end up saying abuse and neglect is substantiated or
23 they say no abuse or neglect substantiated or abuse
24 and neglect not substantiated. Are you telling me
25 there's no conclusion?

26 ATTY. CUNHA: I don't remember what the form
27 says. There's a standard form that goes out when the

1 case is closed, and that standard form may say on it
2 that there has not been a substantiation.

3 But the specific testimony of Jamie Isaacs was
4 that there was no consideration as to whether or not
5 these facts would be substantiated or unsubstantiated
6 because DCF was not investigating. They were
7 providing services to Mr. Ambrose. And, when they
8 provided services, they don't make those findings.

9 THE COURT: Okay. I'm going to read all those
10 documents and determine if DCF did make a conclusion,
11 and I'm going to read them to look for what you claim
12 is the conclusion by the multidisciplinary group that
13 Christopher Ambrose sexually assaulted his children.
14 All right.

15 ATTY. CUNHA: And then -

16 THE COURT: Let's go - are there any other
17 topics besides that that you want address because I
18 know what I'm going to do on those? And -

19 ATTY. CUNHA: Well, I think just - just to point
20 out, Judge, what further supports this is that there
21 was a brochure provided to my client or an
22 understanding - definition of what this intensive
23 outpatient program consisted of which was - and it
24 was testified to Stacey Faulk - that it is inclusive
25 of a provider being established for the father and
26 for each of the children in coming into the home, and
27 that's done to ensure the safety. And the whole

1 family is supposed to be included which would include
2 my client.

3 But yet, the children were not provided
4 providers. Mr. Ambrose's provider was not notified
5 that the multidisciplinary taskforce team made the
6 findings that they found. So they circumvented -

7 THE COURT: But your - your point is Judge
8 Adelman - because remember this is - whether you're
9 happy with the way the DCF process worked or not, the
10 question here was - that you raised was that Judge
11 Adelman was confronted with a finding that
12 Christopher Ambrose had sexually assaulted his
13 children. You begged him to do something about it,
14 and he ignored you. That in terms of Judge Adelman's
15 alleged bias is the thing that I'm going to be
16 examining.

17 With respect to other things Attorney Aldrich
18 said in response to the question of bias, do you have
19 any additional points to make other than the one we
20 just discussed?

21 ATTY. CUNHA: Yes. Attorney Aldrich indicated
22 when you asked her specifically whether or not Judge
23 Aldrich had made a ruling regarding-

24 THE COURT: (indecipherable).

25 ATTY. CUNHA: Sorry - Judge Adelman had made a
26 ruling regarding discovery. On March 31st, Judge
27 Adelman specifically said we both had dirty hands and

1 he wasn't dealing with the discovery issue. That -

2 THE COURT: Let me ask you this, because that
3 intrigued me as well, and I'm going to go back and
4 read that, but is that because - it sounded like it
5 might be one of two things, and that you - you were
6 suggesting to me that it was Judge Adelman saying I
7 am not going to hear any more matters about
8 discovery; it's over. And then, the other - the
9 alternative suggestion was that Judge Adelman said
10 you two go back and in good faith try to - try to
11 work this out and I'm not going to take it up now
12 because of that. Which one am I going to find, the
13 first one -

14 ATTY. CUNHA: No. No. The first one - on March
15 31st -

16 THE COURT: March 31.

17 ATTY. CUNHA: - specifically when I pointed out
18 the omissions by Attorney Aldrich of the actual facts
19 regarding discovery because we were only there on
20 March 31st to start - to do the deposition of Karen
21 Ambrose based on Attorney Aldrich's claims and then
22 we were to start trial.

23 But, when Judge Adelman heard my arguments, he
24 got very upset. And he basically said we both had
25 dirty hands and that he wasn't dealing with it and
26 that I would have an hour to depose Mr. Ambrose and
27 Attorney Aldrich would have an hour to depose Mrs.

1 Ambrose. And that's was it, and that's what
2 happened. And then, we started trial.

3 THE COURT: You want me to conclude - and I'm
4 going to back and listen or - and look at that. You
5 want me to conclude that he said he was not going to
6 hear more discovery matters; right?

7 ATTY. CUNHA: Yes. Because what happened after
8 that was we were there on his order which,
9 essentially, was the form of a sanction for my client
10 to be there at 9 a.m. to be deposed and to produce
11 all these exhibits. And you will hear Judge Adelman
12 on March 31st saying if - if Mrs. Ambrose doesn't
13 have the documents, she can't produce them. This was
14 based on a subpoena duces tecum and based on a trial
15 discovery request, not a standard request for
16 discovery which is very different. So Judge -

17 THE COURT: I just - I just wanted to get - you
18 know, you've told me a couple of things about
19 favoritism and bias, and I like to have nice, crisp,
20 clear contrast. You're telling me that I'm going to
21 find him saying on March 31st I'm done with
22 discovery; I'm not going to consider any other
23 matters about discovery. It will be a nice, crisp,
24 clear thing that he says.

25 And then, as soon as Attorney Aldrich asks him
26 to do something about discovery, he jumps to it and
27 does what she wants. So, I'm going to look at it

1 with that in mind.

2 I'm not going to - I'm not, of course, here to
3 rule on - on the discovery and what you should have
4 had.

5 ATTY. CUNHA: Right.

6 THE COURT: I'm just looking at the contrast, so
7 that's another -

8 ATTY. CUNHA: No. I understand.

9 THE COURT: - separate point. And I appreciate
10 that clarification. Any other separate points?

11 ATTY. CUNHA: So, I filed a trial brief in this
12 case in - I believe - just one moment - I believe it
13 was in July of this year and was offered to have been
14 filed by Judge Adelman - and I believe this is
15 important - on the same day that Jamie Isaacs
16 testified after Judge Adelman had the opportunity to
17 look at Exhibit 71. He didn't say anything on the
18 record, but it was my belief that when he saw Exhibit
19 71 there was an eye opening as to what the actual
20 circumstances are and that is why he extended the
21 offer for the trial brief.

22 When I filed the trial brief, I set forth in
23 that trial brief my specific concerns, as I have done
24 for Your Honor, along with the law. And it is Judge
25 Adelman's response to that trial brief which is,
26 again, clearly prejudicial in that Judge Adelman then
27 changes his - his holdings starting from the first

1 holding of March 31st specifically indicating that an
2 order that's not signed is now an order because
3 judges are busy. So, that is the one regarding
4 supervised visits.

5 And the - Attorney Aldrich - and Your Honor
6 asked Attorney Aldrich this, well, where are we in
7 the trial and Judge Adelman hasn't really heard all
8 the evidence. I would have been fine with that.
9 Remember, I didn't start this ripple effect right
10 now. Okay. Judge Adelman did. Even though he
11 denied my trial brief, even though I disagreed with
12 it, I did not file this motion to recuse until I was
13 put in the position to so based on -

14 THE COURT: I want to make it clear. I'm not
15 trying to force you to do it. If you don't - if you
16 want to withdraw -

17 ATTY. CUNHA: No. No. No.

18 THE COURT: - you can.

19 ATTY. CUNHA: No. I'm not going to withdraw at
20 this point because to me just the mere fact that
21 Judge Adelman's questions his ability to be impartial
22 rises to the level of concerns of impartiality.

23 But what I want to point out is that Judge
24 Adelman responds to my trial brief by saying he
25 hasn't heard all the evidence yet. But then, on
26 October 20th and 21st without my client being present
27 in court, he enters, essentially, orders of restraint

1 in making findings without any further testimony from
2 my client.

3 So, it's clear to me that although he hasn't
4 even heard my client's case he's already decided this
5 case. He's already decided that my client has
6 violated things that are not even court orders which
7 is really alarming and problematic to me.

8 THE COURT: All right. Any last point you want
9 to make?

10 ATTY. CUNHA: No, that would be it.

11 THE COURT: Okay. Then, I am going to review
12 everything that I've described that I will review.
13 And I know this is a matter of great concern to the -
14 to the family and, above all, I hope you all remember
15 the children. So, I won't keep you waiting long.
16 I'll get you a ruling as quickly as I can, but I'm
17 going to thoroughly review the things you've asked me
18 to. I appreciate the cooperation of both sides. I
19 thank the court staff. Court is adjourned.

20 ATTY. ALDRICH: Thank you, Your Honor.

21 ATTY. CUNHA: Thank you, Your Honor.

22 (The Court adjourned.)
23
24
25
26
27

NO: FBT-FA19-6088163-S : SUPERIOR COURT
CHRISTOPHER AMBROSE : JUDICIAL DISTRICT
OF MIDDLESEX
v. : AT REGIONAL FAMILY TRIAL
DOCKET
KAREN AMBROSE : DECEMBER 1, 2021

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Middlesex, Middletown, Connecticut, before the Honorable Thomas G. Moukawsher, Judge, on the 1st day of December, 2021.

Dated this 8th day of December, 2021 in Middletown, Connecticut.

Danielle Lorenzen
Court Recording Monitor