

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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Representing the Defendant:

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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 31<sup>st</sup> and my position is this: On March 31<sup>st</sup>, 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 31<sup>st</sup> 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 31<sup>st</sup>?

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 31<sup>st</sup>. 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 31<sup>st</sup> 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 31<sup>st</sup> 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 31<sup>st</sup>, 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 30<sup>th</sup> 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 20<sup>th</sup> or October  
2           21<sup>st</sup> 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 20<sup>th</sup>.  
11 Was there a hearing on the 21<sup>st</sup>, 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 21<sup>st</sup>. Maybe it's - I'll check both days and  
15 see if there was a hearing. October 20<sup>th</sup> or 21<sup>st</sup>.

16 ATTY. CUNHA: I believe -

17 THE COURT: One or the -

18 ATTY. CUNHA: - it was the 20<sup>th</sup>, and the order  
19 is dated - he entered an order on the 20<sup>th</sup>, and then,  
20 there is one dated the 21<sup>st</sup>. 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 20<sup>th</sup>. 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 20<sup>th</sup>. 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 31<sup>st</sup>. 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 31<sup>st</sup> 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 31<sup>st</sup>. 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 low 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 29<sup>th</sup> 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 9<sup>th</sup> 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 31<sup>st</sup>. 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 31<sup>st</sup> 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 31<sup>st</sup>.

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 31<sup>st</sup> 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 31<sup>st</sup> 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 21<sup>st</sup> - 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 20<sup>th</sup>?

21 ATTY. ALDRICH: I believe it was the 20<sup>th</sup> or  
22 21<sup>st</sup>. 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 21<sup>st</sup>, so it may have been the 20<sup>th</sup> 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 20<sup>th</sup>. 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 8<sup>th</sup> or 9<sup>th</sup>? 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 31<sup>st</sup>, 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 31<sup>st</sup> 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 requestioned and  
9 requestioned, 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 31<sup>st</sup>, 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 31<sup>st</sup> -

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 31<sup>st</sup> 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 31<sup>st</sup> 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 31<sup>st</sup> 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 31<sup>st</sup> 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 20<sup>th</sup> and 21<sup>st</sup> 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 1<sup>st</sup> day of December, 2021.

Dated this 8<sup>th</sup> day of December, 2021 in Middletown, Connecticut.

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Danielle Lorenzen  
Court Recording Monitor