

EXHIBIT B

This was submitted to Atty Nusbaum to file a petition for GAL removal with the court (7/2020). Mr. Nusbaum fraudulently represents this as a "letter re: Gals" in his billings:

07-20-20	Review of e-mail from client; telephone call from Michelle; e-mail to client; e-mail to Attorney Jocelyn Hurwitz; text message exchange with Michelle	EN	0.60	450.00
	Review of e-mails and "letter" re GALs; text message exchange with Michelle	EN	0.30	225.00

(GAL Jocelyn Hurwitz was appointed 9/2019, but never spoke with the mother, Karen Riordan after 11/5/2019; just two months after her appointment, where Mr. Ambrose had sole access of all marital funds and paid GAL Hurwitz. Despite never speaking with her for two years, Jocelyn Hurwitz billed through 4/2022 for nearly \$200,000).

Jocelyn Hurwitz violations of Code of Conduct for Guardian Ad Litem per State of Connecticut Judicial Branch
Ambrose V. Riordan

I. REPRESENTATION OF MINOR CHILD

(b) Representation of the Child's Best Interest by a Guardian Ad Litem

(iv) A GAL shall not disclose information or participate in the disclosure of information relating to an appointed case to any person who is not a party to the case except as may be contemplated by the scope of the court's order...

- *Jocelyn Hurwitz (JH) endorsed Chris Ambrose (CA) to call [REDACTED] and [REDACTED] without checking with Karen Riordan (KR) to monitor Karen during parental visits.*
- *"Monitored visits" was not part of the emergency ex parte hearing order.*
- *KR had told Dr. Horwitz NOT to call [REDACTED] and does not want to be involved in the case.*

(vi) A GAL shall communicate recommendations directly to the litigant when self-represented and to counsel when a party is represented, unless the GAL obtains counsel's consent to communicate the recommendations directly to the client.

- *JH did not inform Attorney Ed Nusbaum of 90 day plan that Dr. Horwitz reported to KR on 7/21 was being followed.*

II. COUNSEL AND THE GUARDIAN AD LITEM SHALL:

(b) **Competence.** Provide competent representation. Competent representation requires the knowledge, skill, thoroughness and preparation reasonably necessary for the representation.

- *JH spoke to the three children together in Branford twice in September. Never spoke to them again.*

- *Children moved to Guilford per court order on 11/1 with KR. JH never made a home visit.*
- *Visitation with CA supposed to be in Westport home per court order to provide stability. CA moved to Madison in violation of court order. KR called JH asking JH to see the children. KR also requested for JH to give the children any means of contacting her. No visit and no contact information provided for the children.*
- *Per court order individual counseling (not family) was to be provided to children at the beginning of September. KR submitted names and followed up with her attorney Rich Callahan. JH was to coordinate with the attorneys. CA wanted to wait for JH. JH did not tell attorneys to contact Dr. Horwitz which delayed counseling for a month and then "blamed Karen." 11/13 was the first correspondence with Dr. Horwitz by JH.*

(d) **Candor.** Not knowingly make a false statement of fact or law to the court or fail to correct a false statement of fact or law previously made to the court and shall not offer evidence that he or she knows to be false.

October Hearing

- *JH presented false information to the judge that KA had made plans on father's parenting time. CA was actually making plans on KR time.*
- *JH presented opinion of "family therapist" when there was no family therapist. Bill Horn – Matthew had not seen in over a year. Sawyer and Mia never saw him. Unethical relationship with CA as Bill Horn began seeing CA and providing therapy to CA after CA hit Matthew. Alison Kravitz – Mia saw only twice in the last year. Sawyer saw only once.*

December Hearing

- *P. 10 – Does not correct fact that CA has appointment with Caverly which affects parenting plan over Christmas. JH knew of appointment.*
- *P. 56 – JH falsely states that Bill Horn and Alison Kravitz were family therapists*
- *P. 56 – JH falsely states that she had "extensive communication with counsel" - only communicated with Nancy, not with Rich*
- *9/25 visit to TCS – JH omits in testimony the fact that KR called JH twice that morning for help. KR was directed by Dr. Stubbe to pick up the kids. Omitted from invoice.*
- *JH stated under oath that KR violated the court order by going to the school to get the kids. The court order was on 10/2 and KR did NOT pick up the kids after that date.*
- *P.58 – JH states under oath that children never reported being afraid of their father to anyone else
Children have reported being afraid of their father to Bill Horn, Alison Kravitz, the police, Yale Doctor at ER who called DCF, Beth Coin, John Fix. P. 75 on cross JH denies any knowledge of fear of father but she has emails with Bill Horn where DCF was going to "have to be called."*

- P. 65 – JH falsely states that KR prevented kids from going to Caverly's and planned visits. KR never cancelled appointments with children.
- P. 66 – JH falsely states that KR has set up a negative dynamic with regards to spending time with Dad or with his family or in his home
- P.66 – JH falsely states that Mia has only seen CA 3 or 4 times in 4 months
- P.68 – JH falsely states that she met with the children in October. She only met them twice in September.
- P.85 – Judge asked about possibility of sharing part of the holiday (which KR offered to CA in Dr. Horwitz office) and JH said "no."
- P.87 – JH again falsely represents Horn and Kravitz as family therapists to the judge
- P. 89 – JH states that once the kids are with their Dad there is no issue
- P. 91 – JH states that professionals involved with the family report that it's a "volatile family". This is what is reported by CA and his therapist Bill Horn, no one else.

Emergency Hearing

- 5/1 – JH lies to Judge Grossman under oath. JH never brings up Stubbe letter and when asked directly if other opinions to consider, JH said "no everyone is in agreement."
- JH fails to give Dr. Stubbe's letter to the Judge or attorneys.
- JH stated she checked with all therapists and collaterals. JH fails to get report from Clifford Beers (Mia eval – receive individual counseling, concerns about Dad and bullying) and Dr. El-Fishawy (just completed eval on Sawyer and received weekly individual counseling). Never spoke to Amiri or Gallo and only spoke to Kravitz when Kravitz called her.

(e) Maintain Independence. Maintain independence, objectivity and operate with fairness in dealings with parties and professionals, at all times and in all settings.

- By 12/12 JH had 9 telephone conferences with Atty. Aldrich, 0 with Atty. Calahan
- By 12/25 JH had 16 with Atty. Aldrich and 1 with Atty. Callahan and Atty. Brown
- JH never spoke to KR computer expert Donna Eno who had concerns regarding porn on CA computer back in October. JH spoke instead to CA computer expert to "clear him" on 3/9
- 9/19 JH conference with CA and then telephone conference with Bill Horn (CA's therapist) for 90 minutes. JH does not attempt to contact Dr. Amiri (KR's therapist) until 1/2. JH documents that she called and spoke to Dr. Amiri's staff. Dr. Amiri's staff has no record of any contact made by JH, including faxes.
- JH fully endorses TCS without talking to Mia or KA regarding bullying. JH had no knowledge of cyber bullying on 11/24 yet communicated with TCS on 11/26.
- 11/1 Status Conference related to computer incident at TCS on 10/24

- *JH accused KR of telling TCS that CA possessed child pornography. KR did not do this.*
- *JH did not acknowledge that there was supposed to be a meeting two weeks previously that never happened.*
- *No phone calls with KR or Atty Callahan before status conference; only calls on 11/5*
- *No counselor in place for children ONLY despite court order to begin by 9/5. KR submitted names and followed through.*
- *CA sent summaries to JH weekly – never fact checked with KR.*
- *3/19 – JH tells CA and Atty. Aldrich to file ex parte motion. Affidavit never challenged in court. No information provided to KR counsel.*
- *3/23 – JH communicates with CA attorney re. status of emergency motion. No information provided to KR counsel.*

December Hearing

- *Understanding that since KR gave up Thanksgiving, KR would get Christmas Eve through Christmas morning. JH maintained that Christmas visit had to be determined and went against KR.*
- *JH recommended for Christmas vacation that weekends remain “as is” and split the weeks 50/50 which gave CA more time*
- *JH shuts down relevant information. Atty. Callahan trying to report hitting incidents from April 2019, Judge asks JH “is reading the document going to help” and JH says “no”*
- *P. 55 – Caverly appointments. JH does not explain why they were cancelled.*
- *P.57 – JH does not tell KR that she is at TCS to observe pick up on 9/25*
- *P. 60 – JH maintains falsehood that there is a “fair amount of communication” between KR and the children which undermines CA visits.*
- *P. 66 – JH repeats false narrative of CA ie “Dad did not get me what I wanted at Target.”*
- *P. 88 – JH states her opinion which is slanted toward CA and uses OFW only as a reference since she did not speak to KR after 11/5*
- *P.92 -94 – please note that JH responds to questions favoring CA until pushed and then gives complete response that is more accurate and favors KR*
- *P.99 – JH talks about KR “need to control” even though KR had offered to work with CA*

Emergency Hearing

- *5/1 – Atty. Brown asked JH why she did not talk to the children. JH responded that Dr. Caverly said in Parental Alienation you don’t want the children to repeat the false narrative.*

(i) **Diligence.** Perform responsibilities with reasonable diligence, in a prompt and timely manner, and if additional time is necessary, request judicial intervention in writing with notice to the parties.

- *TIMING OF CAVERLY REPORT/RELEASE*
 - *3/16 JH received Caverly report and notifies Atty. Callahan. No documentation of communication with Atty. Aldrich.*
 - *3/19 JH tells CA and Atty. Aldrich to file ex parte motion. Affidavit never challenged in court*
 - *3/23 JH communicates with Atty. Aldrich r.e. status of emergency motion. No information provided to Atty. Callahan*
 - *4/15 JH sign affidavit for court. JH had held Caverly report for a month and had to release it or explain why she withheld it.*
 - *4/16 – JH sends report to both parties.*
 - *4/24 – Atty. Callahan learns that Dr. Horwitz received a copy. JH did not document when she mailed report to Dr. Horwitz. Caverly’s contract does not indicate the report would be shared with anyone other than GAL and counsel of parties.*
- *Thanksgiving Incident*
 - *JH had time to talk to kids and KR but only spoke with CA.*
 - *CA reports to the children “Jocelyn said this is blackmail.”*

(p) **Recordkeeping.** Keep accurate records of work performed, time spent, fees charged and expenses incurred.

- *Documents call/fax to Dr. Amiri and staff. No phone call placed, no fax sent.*
- *No documentation of any communication with Atty. Aldrich from 3/10 – 3/22 yet had told CA and Atty. Aldrich to file ex parte motion on 3/19*
- *JH withheld Caverly report with no documented reason*