



1 of King County, Washington. Defendant McKissen is, upon information and belief, a resident of  
2 Multnomah County, Oregon.

3 3.

4 Upon information and belief, Defendants Evans and Jennifer Clinchy undertook a  
5 campaign to smear the reputation and tarnish the standing of Plaintiff within the competitive  
6 Scrabble community. This included violating tournament rules in order to exclude Plaintiff from  
7 competitions, and, unbeknownst to Plaintiff, spreading false and defamatory rumors about him.

8 4.

9 The primary organizer of competitive Scrabble tournaments in the United States and  
10 Canada is the North American Scrabble Players Association (“NASPA”). Rival organizers have  
11 emerged in recent years, including the World Game Players Organization (“WGPO”) and the  
12 Collins Coalition (“CoCo”). CoCo was founded by Defendants Evans Clinchy and Jennifer  
13 Clinchy, and others, in 2019.

14 5.

15 Upon information and belief, the motive behind the creation of CoCo was to create an  
16 organization where Plaintiff would be unable to participate.

17 6.

18 Plaintiff and Defendant McKissen began dating in early 2020, and their relationship  
19 continued for several months.

20 7.

21 Frustrated with his ostracism from a community he cherished and relied upon, and to  
22 alleviate the psychological trauma he was experiencing, Plaintiff published a two-part blog post  
23 in July 2020 explaining his side of the story and criticizing Defendants’ actions. Defendant  
24 McKissen assisted in the preparation of these posts, and supported Plaintiff’s efforts to make the  
25 truth known.

26 8.

27 Plaintiff had no further substantial contact with any Defendants from July 2020 onward,  
28 outside of a single e-mail message conversation in December 2020, a single text conversation in  
February 2021, and a single in-person encounter in January 2022 with Defendant McKissen.  
What insubstantial contact there was between Plaintiff and Defendants was amicable and  
respectful.

9.

On April 14, 2022, Plaintiff received a Notification of Potential Disciplinary Action from WGPO's President, Steve Pellinen. The Notification indicated that Pellinen had filed complaints with all three organizations named in Paragraph 3 alleging that Plaintiff had breached the organizations' codes of conduct by threatening violence against individuals as well the Scrabble community at large and by engaging in "predatory behavior" towards Defendants Jennifer Clinchy and Brianna McKissen. (Notification is attached as Exhibit A.)

10.

The Notification was accompanied by written statements from all three Defendants. Each statement contained false and defamatory statements, the communication of which plaintiff had not discovered prior to his receipt of the Notification. Defendant Evan Clinchy's statement claimed, *inter alia*, that Plaintiff "has spent hours and hours discussing his intent to kill me" and that Plaintiff had "expressed his urge to shoot up a Scrabble tournament." (Defendant Evan Clinchy's statement is attached as Exhibit B.) Defendant Jennifer Clinchy's statement accuses Plaintiff of, *inter alia*, "sexual coercion" and the "harassment and stalking" of "multiple women." (Defendant Jennifer Clinchy's statement is attached as Exhibit C.) Defendant McKissen calls Plaintiff "an actual psychopath" and says that he was a threat to "shoot down" a "whole random tournament of Scrabblers."

11.

Plaintiff filed a response to the Notification with NASPA, but despite his refutation of the defamatory statements made by Defendants, he was suspended from all tournament play for three years.

12.

Defendant's defamatory statements were, upon information and belief, a coordinated effort, made with malicious intent and with the intention of interfering with Plaintiff's professional relationship with NASPA, its members, and other parts of the competitive Scrabble community.

13.

The above-referenced defamatory statements have directly affected Plaintiff's ability to earn income from competitive Scrabble, resulting in a significant loss of revenue estimated not to exceed \$10,000.

14.

The above-referenced defamatory statements have, in addition, caused Plaintiff to suffer severe mental and emotional damages resulting in medical expenses not expected to exceed \$10,000.

15.

In addition to the foregoing damages, Plaintiff has suffered damage to his reputation in an amount not expected to exceed \$400,000.

FIRST CLAIM FOR RELIEF

(Defamation)

(Against All Defendants)

16.

Plaintiff realleges and incorporates by reference paragraphs 1 through 15 above.

17.

Defendants and each of them made false and defamatory statements of fact concerning Plaintiff. Each of the statements alleges that plaintiff has committed, or is a danger to commit, a crime of moral turpitude, including sexual assault and murder, and therefore constitutes libel *per se*. Plaintiff denies the truth of each defamatory statement. Defendants maliciously made the statements to third parties knowing they were false and/or with reckless disregard for the truth of the statements.

18.

Plaintiff sustained economic damages resulting from lost income and noneconomic damages for emotional distress and injury to his reputation, for which damages are presumed.

SECOND CLAIM FOR RELIEF

(Conspiracy to Defame)

(Against All Defendants)

19.

Plaintiff realleges and incorporates by reference paragraphs 1 through 18.

20.

Defendants and each of them entered into a coordinated, premeditated agreement to commit tortious acts of defamation concerning Plaintiff, namely defamatory statements by the

1 other defendants. Even if a particular defendant is not liable for its own defamatory statement, it  
2 is liable for entering into a coordinated, premeditated agreement to further other defendants'  
3 defamatory statements.

4 21.

5 As a result of this conspiracy, Plaintiff sustained economic damages resulting from lost  
6 income and noneconomic damages for emotional distress and injury to his reputation, for which  
7 damages are presumed.

8 **THIRD CLAIM FOR RELIEF**

9 (Intentional Interference with Economic Relations)

10 (Against All Defendants)

11 22.

12 Plaintiff realleges and incorporates by reference paragraphs 1 through 21 above.

13 23.

14 By participating in professional Scrabble tournaments, Plaintiff possessed a professional,  
15 economic relationship with NASPA.

16 24.

17 Defendants and each of them intentionally interfered with that economic relationship  
18 through the improper means of falsely defaming Plaintiff.

19 25.

20 Defendants' interference caused Plaintiff to be banned by NASPA and ostracized within  
21 the broader competitive Scrabble community.

22 26.

23 As a result of this interference, Plaintiff sustained economic damages resulting from lost  
24 income and noneconomic damages for emotional distress and injury to his reputation, for which  
25 damages are presumed.

26 **FOURTH CLAIM FOR RELIEF**

27 (Conspiracy to Tortiously Interfere with Economic Relations)

28 (Against All Defendants)

29 27.

30 Plaintiff realleges and incorporates by reference paragraphs 1 through 26 above.

31 28.

1 Defendants and each of them entered into a coordinated, premeditated agreement to  
2 commit tortious interference with the economic relationship between Plaintiff and NASPA. Even  
3 if a particular Defendant's defamatory statement did not constitute such tortious interference,  
4 that Defendant entered into a coordinated, premeditated agreement to further other Defendants'  
5 tortious interference.

6 29.

7 As a result of this conspiracy, Plaintiff sustained economic damages resulting from lost  
8 income and noneconomic damages for emotional distress and injury to his reputation, for which  
9 damages are presumed.

10 FIFTH CLAIM FOR RELIEF  
11 (Intentional Infliction of Emotional Distress)  
12 (Against All Defendants)

13 30.

14 Plaintiff realleges and incorporates by reference paragraphs 1 through 29 above.

15 31.

16 Defendants intended to inflict severe mental or emotional distress upon Plaintiff or acted  
17 with reckless disregard in taking actions that were substantially certain to result in such distress.

18 32.

19 Defendants' actions did in fact cause Plaintiff severe mental and emotional distress,  
20 which has been ongoing since Plaintiff's discovery of Defendant's defamatory statements and  
21 has resulted in Plaintiff seeking treatment for damaged vocal cords, speech and voice therapy,  
22 depression, anxiety, and post-traumatic stress disorder, all of which have been severely  
23 exacerbated following Plaintiff's discovery of Defendants' defamatory statements.

24 33.

25 Defendant's actions, including false and defamatory statements concerning Plaintiff,  
26 constituted an extraordinary transgression of the bounds of socially tolerable conduct.

27 34.

28 As a result of Defendants' actions, Plaintiff sustained economic damages resulting from  
lost income and noneconomic damages for emotional distress and injury to his reputation, for  
which damages are presumed.

SIXTH CLAIM FOR RELIEF

(Conspiracy to Intentionally Inflict Emotional Distress)  
(Against All Defendants)

35.

Plaintiff realleges and incorporates by reference paragraphs 1 through 34 above.

36.

Defendants and each of them entered into a coordinated, premeditated agreement to inflict emotional distress upon Plaintiff. Even if a particular Defendant's defamatory statement does not constitute the intentional infliction of emotional distress, that Defendant entered into a coordinated, premeditated agreement to further other Defendants' intentional infliction of emotional distress.

37.

As a result of this conspiracy, Plaintiff sustained economic damages resulting from lost income and noneconomic damages for emotional distress, for which damages are presumed.

38.

WHEREFORE, plaintiff demands judgment against defendant for damages in the sum of \$20,000 in economic damages, for \$400,000 in noneconomic damages, and for attorney's fees, costs and disbursements incurred.

DATED: MAY 9, 2023.

/s/ Marc Mohan  
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