

1 IN THE CIRCUIT COURT OF THE STATE OF OREGON
2 FOR MULTNOMAH COUNTY

3 _____
4 **DAVID KOENIG**

11 Case No.: 23CV15424

5 Plaintiff

12 **PLAINTIFF’S DECLARATION IN**

6 vs

13 **SUPPORT OF PLAINTIFF’S MOTION**

7 **EVANS CLINCHY**

14 **TO DETERMINE THE SUFFICIENCY**

8 **JENNIFER CLINCHY** and

15 **OF JENNIFER CLINCHY’S**

9 **BRIANNA (LOLA) McKISSEN**

16 **RESPONSES AND OBJECTIONS TO**

10 Defendants

17 **REQUESTS FOR ADMISSION**
18 _____

19 **DECLARATION**

20 I, David Koenig, declare the following under penalty of perjury:

21 1. This declaration sets forth facts as would be admissible in evidence, and I am competent
22 to testify to the matters stated.

23 2. In 2014 through 2016, while Jennifer Clinchy was working for the White House Office of
24 Science and Technology Policy and while she and I were romantically involved, on many
25 occasions she used her connections at work to arrange for gifts to be mailed to me from
26 the White House and for us to attend special events at or connected to the White House.

27 3. Among these gifts were:

28 a. A 2014 birthday letter from President Obama and a photo of him. (Bates
29 #463-464)

30 b. A 2014 holiday card from the Obama family (Bates #465)

- 1 c. A 2015 holiday card from the Obama family (Bates #466)
- 2 4. Among these special events that Jennifer Clinchy and I attended together were:
- 3 a. A tour of the White House
- 4 b. The 2015 White House Garden Tour (Bates #467)
- 5 c. Seating in the Presidential Box at the John F. Kennedy Center for the Royal
- 6 Swedish Ballet (Bates #469)
- 7 d. The 2016 National Inventors Hall of Fame Induction Ceremony (Bates #470)
- 8
- 9 5. On June 8th, 2023 Michael Fuller filed in the court DEFENDANT JENNIFER
- 10 CLINCHY’S RESPONSES TO PLAINTIFF’S REQUESTS FOR ADMISSION, which
- 11 included the following at page 3, lines 21-28:
- 12

13 *REQUEST NO. 9: Prior to 2022, you had never contacted law*

14 *enforcement in any way regarding Plaintiff.*

15 *RESPONSE: Objections: form, undefined terms. Notwithstanding the*

16 *objections, reasonable inquiry has been made and the information known or*

17 *readily obtainable by defendant is insufficient to enable defendant to admit or*

18 *deny without knowing the definition of the vague term “law enforcement.”*

19

- 20 6. On June 28th, 2023 Michael Fuller filed in the court DEFENDANT JENNIFER
- 21 CLINCHY’S RESPONSES TO PLAINTIFF’S MOTION TO DETERMINE
- 22 SUFFICIENCY, which included the following at page 6, lines 2-10:
- 23

Request 9 pertains to whether defendant ever contacted law enforcement in any way regarding plaintiff. Again, law enforcement may simply mean a local police department, but it may instead mean federal officials, both of whom defendant has contacted regarding plaintiff. Defendant should not be required to guess at a response to this vague and unclear request, nor should defendant be required to provide an explanation. Defendant’s objection should be sustained.

7. Request 9 specifically begins with the words “Prior to 2022” but Jennifer Clinchy omits that from her analysis in item 6.

8. Both of the following statements of the plaintiff’s beliefs pertain to the sentence, “*Again, law enforcement may simply mean a local police department, but it may instead mean federal officials, both of whom defendant has contacted regarding plaintiff.*”

9. I believe that Jennifer’s claim in the sentence in item 8 that she contacted a local police department regarding plaintiff refers only to her actions in 2022 or later, and not to anything prior to 2022.

10. I believe that Jennifer’s claim in the sentence in item 8 that she contacted federal officials regarding plaintiff refers only to her actions in arranging gifts and attendance at special events such as those listed in items 3 and 4 of this declaration, and does not refer to making any complaints about my behavior.

11. In section 7 of JENNIFER CLINCHY’S SPECIAL MOTION TO STRIKE, (p.5-7) filed by Michael Fuller on August 3rd, 2023, defendant accuses the plaintiff of “Bad Faith Litigation Conduct.”

1
2
3
4
5
6
7
8
9

August 10, 2023.

/s/ David Koenig

[Redacted signature block]

Plaintiff, representing *pro se*

PROOF OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

I certify that I caused this document to be served via e-mail on:

Defendants Jennifer and Evans Clinchy
% Atty: Michael Fuller
Olsen Daines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com

Defendant BriAnna (Lola) McKissen
% Atty: Ashley L. Vaughn
Dumas & Vaughn
3835 NE Hancock St., Suite GLB
Portland, Oregon 97212
Ashley@DumasandVaughn.com

August 10th, 2023.

/s/ David Koenig
[Redacted signature block]

Plaintiff, representing *pro se*



THE WHITE HOUSE
WASHINGTON

September 19, 2014

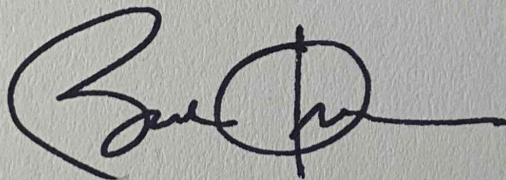
Mr. David Koenig
Falls Church, Virginia

Dear Dave:

We extend our best wishes for a happy 37th birthday, and we hope you are able to celebrate with loved ones.

As you mark this occasion, may your achievements over the past year fill you with pride. Please know we wish you all the best for a fantastic birthday and year ahead filled with joy and laughter.

Sincerely,

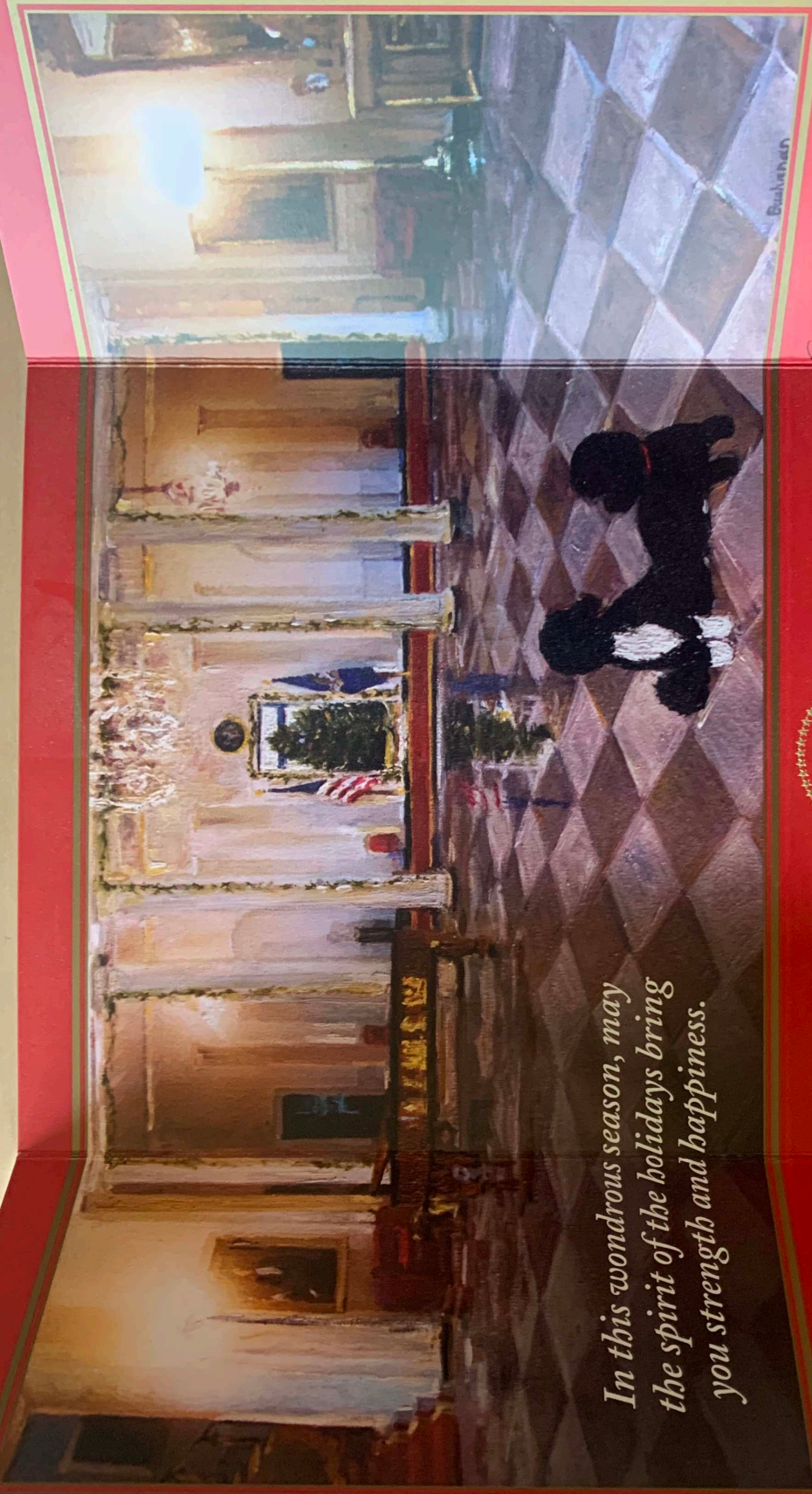
 Michelle Obama

000464



All the best,

000465



*In this wondrous season, may
the spirit of the holidays bring
you strength and happiness.*



Sasha

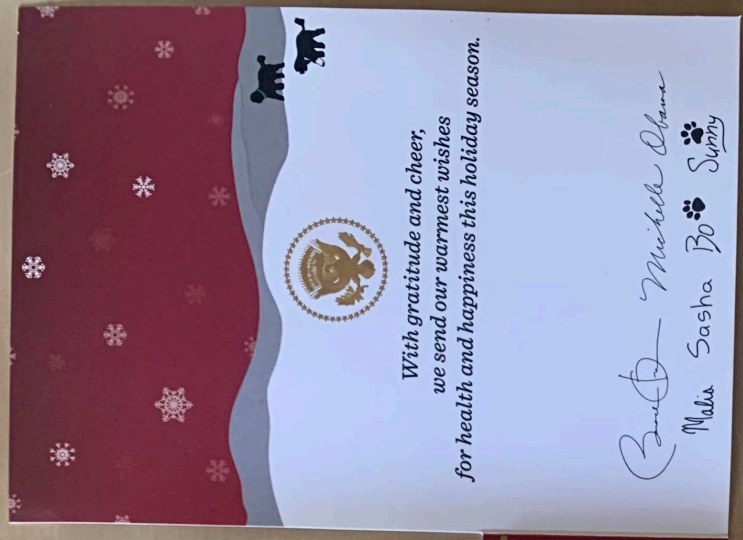
Sunny 

Mavis

Bo 

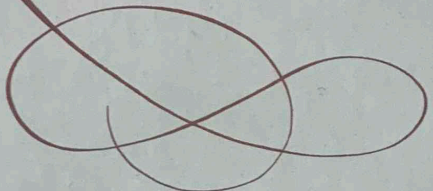
*Bob
Michelle Obama*

000466



000467

THE WHITE HOUSE
GARDEN TOUR



2015



000468

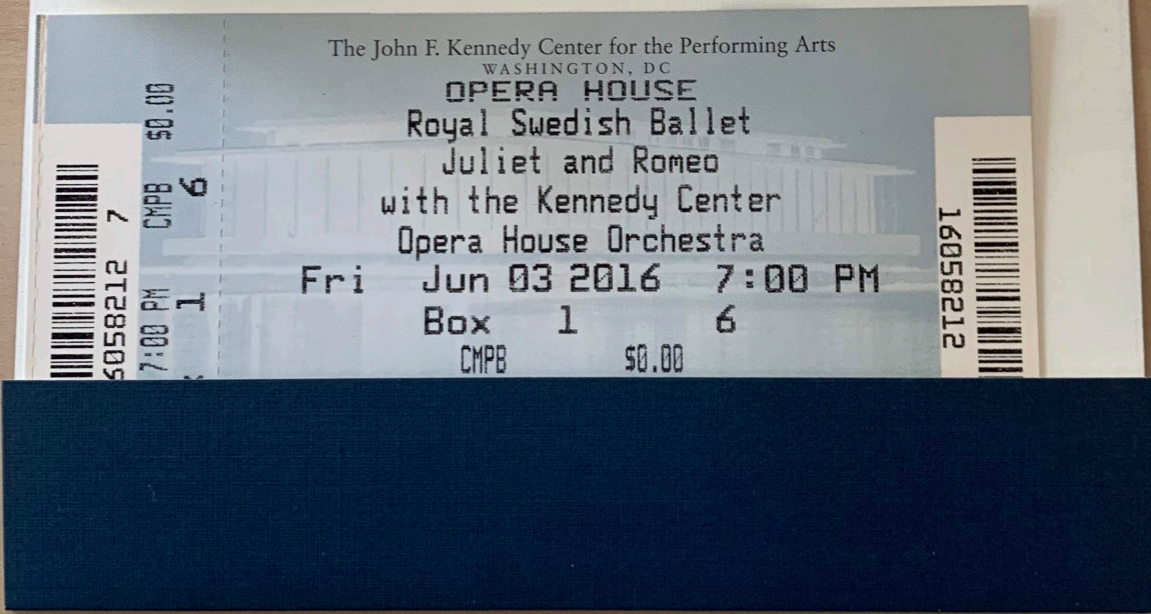


THE PRESIDENTIAL BOX
The John F. Kennedy Center for the Performing Arts

000469

*The John F. Kennedy Center for the Performing Arts,
 the National Cultural Center, hosts exceptional performances from around the world,
 nurtures promising young artists, and serves as a national leader in arts education.
 We are delighted that you can enjoy this event from the President's Box
 and hope you have a wonderful time.*

Barack & Michelle Obama



As guests in the Presidential Box, it is requested that you observe the following protocol:

- *Ticket holders are viewed as guests of the President; appropriate attire and consideration to the performers and audience is expected at all times.*
- *All guests in the President's Box must be escorted by an EOP staff member.*
- *Guests should arrive punctually and be seated before the curtain rises.*
- *Beverages are only permitted within the lounge area of the suite and may not be taken into the theater.*
- *Photos of the President's Box or of the Theater may not be posted on social media.*
- *The railing must remain free of all items.*

Thank you and enjoy the show!

Refrigerator Lock: 03247

QUALCOMM

UNITED STATES PATENT AND TRADEMARK OFFICE
uspto

000470

Ford
Go Further



National Inventors Hall of Fame

NightattheNIHF



National Inventors Hall of Fame

NIHF

eNIHF

#Nig

Qualcomm

sonian
ution

