

## Introduction

On Monday, April 10th, 2023, I retained Marc Mohan of Verité Law Company to represent me in a defamation civil suit against Evans Clinchy, Jennifer Clinchy, and BriAnna (Lola) McKissen.

I was aware that he was an inexperienced attorney, but I was under a very strict deadline, because I had only recently learned of the one year statute of limitations on defamation in Oregon. The initial round of written defamatory statements that the proposed defendants had made about me were delivered to me on April 14th, 2022. Mr. Mohan was the only lawyer I could find who was willing to get the complaint filed by Friday, April 14th, 2023.<sup>1</sup>

Although Mr. Mohan did get case 23CV15424 filed in the Circuit Court of Oregon for Multnomah County in a timely way, he later demonstrated gross incompetence that caused me and him to sever our working relationship on July 28, with me taking over representing myself *pro se*. The case was then thrown out because of anti-SLAPP motions on August 16, which will result in me owing legal fees to both defense attorneys.

I believe that with competent representation I would have won the case, but—even if I had not—is a sure thing that the case would not have been struck down by anti-SLAPP motions, resulting in me owing defense legal fees. Anti-SLAPP motions are supposed to be for removing frivolous cases from the courts. After Judge Kelly Skye upheld the motions, I said that there was nothing frivolous about this lawsuit, and the judge said that she was not making any judgment about that.

Mr. Mohan did not communicate adequately with me about his communication with the defense attorneys nor about amendments and motions that were filed in court. I did not learn about many aspects of his incompetent representation of me until after I began representing myself *pro se*, when defense attorney Michael Fuller had already made multiple accusations against the plaintiff for “bad faith litigation conduct” that were a result of Mr. Mohan’s mistakes.

In an attempt to resuscitate the case, I made public filings which explained how errors in evidence handling and discovery were the fault of my now former attorney Mr. Mohan alone, and I assiduously filled in the gaps, submitting evidence that Mr. Mohan had failed to submit for the last two months, despite repeated instructions by me to submit those documents. My filings also explained many other ways that Mr. Mohan represented me incompetently.

## Disclosure Failures & Falling for Manipulation of Defense Counsel

On August 10th, I submitted ethics complaint LDD 2301117 to the Oregon State Bar Client Assistance Office (CAO) about Mr. Mohan. The primary reason for the complaint was that Mr. Mohan had failed to disclose to me a protective order that he had signed along with defense counsel Michael Fuller and which was signed by Judge Skye on May 25th.

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<sup>1</sup> All dates in this document are in 2023, unless otherwise specified.

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On further investigation, I learned that Mr. Mohan had also failed to disclose to me the majority of other public filings in the case and the majority of documents served between the counsels. I made a follow-up report to the CAO with details of all of the disclosure failures on October 17th.

I am including with this malpractice claim the full contents of both the August 10th and October 17th reports to the CAO, which explain the immense damage to my case that was caused by Mr. Mohan's disclosure failures.

The protective order also provided the means by which Mr. Fuller was able to manipulate Mr. Mohan into believing false things about me and into threatening to withdraw from my case on July 7th. More details of this story are told in the "Protective Order" section of the October 17th report to the CAO.

The rest of this document will focus on additional malpractice issues beyond the disclosure failures and the manipulation from the defense counsel, which have already been addressed in the documents to the CAO.

### Failure to Submit Evidence

There were 19 pages of evidence (Bates #419-434, 439, 493-494) that I had emailed Mr. Mohan for the purpose of submitting as part of discovery that he had never given to the defendants in responses to requests for production nor included in filings for the case.

I had emailed many of those pages of evidence to Mr. Mohan *repeatedly*, including some in our very first email communication of April 7th. The last email I sent him including a zipfile of evidence was a June 8th communication from me to Mina Le and Wayne Kelly, and it included all of the documents at Bates #419-434, 439.<sup>2</sup>

I then emailed Mr. Mohan on June 17th with specific instructions to submit the June 8th email and all of its attachments as part of discovery,<sup>3</sup> which he never did. A few days later, we spoke on the phone, and I repeated my instructions to submit that June 8th email and its attachments, and he still never did so.

After I had taken over representing myself *pro se*, I did a thorough cataloging of what had been submitted and learned about the missing documents. I then served a response to requests for production to the defense on August 8th which included Bates #419-434, 439. I also filed a declaration with the court on August 10th, which included proof that I had sent those documents to Mr. Mohan two months earlier.<sup>4</sup>

The other missing pages (Bates #493-494) were the last two pages of a three-page attachment in a May 10th email to Mr. Mohan. He failed to submit that as evidence because he did not properly download the attachment, so he only submitted the first page of the document, thus

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<sup>2</sup> Exhibit B of attached document 1a.

<sup>3</sup> Attached document 3.

<sup>4</sup> Attached document 1a.

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omitting the “IMPRESSION” section, which included the doctor’s evaluation of me. I am attaching the August 16th declaration that explains Mr. Mohan’s mishandling of the medical records evidence,<sup>5</sup> and the May 10th email that I sent Mr. Mohan which included all of the medical records in question.<sup>6</sup>

### Analysis of Mr. Mohan’s Defense to Failing to Submit Evidence

Among the documents that Mr. Mohan had failed to submit as evidence were screenshots of September 21st, 2022 text conversations with two members of the North American Scrabble Players Association (NASPA) Advisory Board, Jason Idalski and Stefan Rau, which proved that NASPA was lying to me during their disciplinary process. Also among those documents was a screenshot of a September 25th, 2022 Facebook messenger conversation with World English-language Scrabble Players Association (WESPA) board member Eric Kinderman, which proved that NASPA was trying to get me banned from international Scrabble competition, without telling WESPA what I had allegedly done.

In his September 26th response to the CAO, Mr. Mohan wrote,

*During my representation of Mr. Koenig, I repeatedly indicated that communications with the organizations that had suspended him were not, in my opinion, relevant to his claims against the defendants or responsive to defendants’ requests for production. Therefore, I did not produce those documents.<sup>7</sup>*

This is bad reasoning in a number of ways. We were making claims against the defendants for Defamation and Intentional Interference with Economic Relations. They had gotten me suspended from Scrabble organizations, when I had been making money playing in Scrabble tournaments for the last 20 years. The damage that the defendants did to my reputation in the Scrabble world and my relationship with those Scrabble organizations interfered with my ability to make money from Scrabble tournaments. So my communications with the Scrabble organizations were highly relevant in evaluating the damages that the defendants had done.

Furthermore, my June 17th email to Mr. Mohan was prompted by a June 16th email from Mr. Fuller which specifically asked for “relevant responsive documents that were in his possession, including communications with... Jason Idalski, ... Eric Kinderman, ... Stefan Rau.”<sup>8</sup> So Mr. Mohan’s claim that the documents in question were not responsive to defendants’ requests for production holds no water.

Later in his response to the CAO, Mr. Mohan contradicted his own statement above by writing “That organization’s [NASPA’s] suspension of Mr. Koenig is at the heart of his claims.” He had also submitted a great deal of my communications with NASPA as part of the evidence for the case, so he clearly thought it was relevant. His claim about relevancy above is disingenuous. It

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<sup>5</sup> Attached document 4.

<sup>6</sup> Attached document 5.

<sup>7</sup> Attached document 6.

<sup>8</sup> Exhibit D of attached document 1a.

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was simply the case that he was not organized and aware enough of which particular pieces of communication with NASPA he had already submitted and which he had not.

### Failure to Serve Complaints and Summons Properly

In defendant McKissen's motion to strike, attorney Ashley Vaughn argued that Mr. Mohan never properly served the initial complaint or the amended complaints with summons:

*[T]he claim is barred by the one-year statute of limitations because Plaintiff did not serve Defendant properly within 60 days of filing the original complaint. Plaintiff filed the complaint on the last possible day of the statute of limitations—April 14, 2023. See Compl. (date-stamped April 14, 2023). For that date to be effective, Plaintiff needed to serve Defendant properly within 60 days of filing. ORS 12.020(2). Service of the first complaint was ineffective because Plaintiff mailed the summons and complaint to my client via first class and certified mail on May 2, 2023 but failed to secure a signed return receipt or complete a follow-up mailing. Exs. 3-4 to Vaughn Decl. Plaintiff did not complete personal, substitute, or mail service. See ORCP 7D & D(3)(a). Service of the First Amended Complaint was ineffective because Plaintiff did not get a signature on the return receipt nor did Plaintiff mail a new summons. Ex. 5-6 to Vaughn Decl.; ¶ 8. Service of the Second Amended Complaint was ineffective because, while an individual personally handed the complaint to Ms. McKissen, Plaintiff again did not include a summons. Vaughn Decl. ¶ 9. Service of both is required to effectuate personal service. ORCP 7D(2)(a) (“Personal service may be made by delivery of a true copy of the summons and a true copy of the complaint to the person to be served.”). Plaintiff has never filed a Proof of Service for any version of the complaint. Because Plaintiff failed to properly serve Ms. McKissen with both the complaint and summons within 60 days of commencing the case, the case will be deemed to commence when Plaintiff does effectuate proper service, not the filing date—that will be outside the one-year statute of limitations.<sup>9</sup>*

Ms. Vaughn also filed a declaration with photos of physical evidence to support her arguments.<sup>10</sup>

### Writing an Inadequate Complaint, Even After Two Amendments

On August 16th, defense attorneys Michael Fuller and Ashley Vaughn and I, representing *pro se*, appeared before Judge Kelly Skye on the defendants' special motions to strike. Attorney Vaughn wrote the order that summarizes the judge's decision, and which was signed by the judge on September 5th.<sup>11</sup>

Many of the reasons that the case was thrown out by Judge Skye were because of inadequacies in the writing of the complaint, including:

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<sup>9</sup> Attached document 7.

<sup>10</sup> Attached document 8.

<sup>11</sup> Attached document 2j.

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- (1) Mr. Mohan had included in the complaint three conspiracy claims, and the judge ruled that civil conspiracy is not a recognized civil claim in Oregon.
- (2) Defendants argued that the complaint only alleged a small number of statements that were labeled as defamatory, and that those complaints were matters of opinion. I argued that there were many defamatory statements and that they were matters of fact, and I cited the PLAINTIFF'S FOURTH SUPPLEMENTAL RESPONSE TO JENNIFER CLINCHY'S REQUESTS FOR PRODUCTION, which I had served to the defense on August 14th (and which I included as Exhibit 15 in my main response to the motions to strike). However, I was told by the judge that what mattered was what was in the complaint, not the responses to requests for production.
- (3) Mr. Mohan also made a claim for attorney's fees when there was supposedly no basis in Oregon law for him to make that claim.

When we were first filing the case, I specifically asked Mr. Mohan if we should include all of the defamatory documents made against me (three by Defendant McKissen, two by Defendant Jennifer Clinchy, and one by Defendant Evans Clinchy) as exhibits, and it was his opinion that we should only include the three main statements from the April 14th, 2022 incident report. (one from each defendant) Based on what I understood of the Judge's ruling, that I needed to indicate all of the instances of defamation in the complaint itself, I now believe this was very poor judgment on Mr. Mohan's part.

### Failure to Vigorously Represent Plaintiff

On June 8th, Mr. Mohan received responses to requests for production from defendants Evans Clinchy and Jennifer Clinchy which included zero responsive documents and which stated in almost every response:

*Defendant's counsel is currently designating responsive documents according to the Court's protective order entered May 25, 2023, and expects to produce responsive documents with designations in compliance with the Court's order within 30 days.<sup>12</sup>*

Despite the defendants never following up with any responsive documents in the next 30 days, nor at any time while Mr. Mohan represented me, he never followed up in any way to compel defendants' compliance with the requests for production.

On June 15th, Mr. Mohan filed motions to determine the sufficiency of defendants' Evans Clinchy's and Jennifer Clinchy's responses and objections to requests for admission. The filings said that oral arguments were requested. However, he never followed up in scheduling a hearing to address those motions.

On June 26th, Mr. Mohan attempted to issue *subpoenas duces tecum* to the North American Scrabble Players Association, (NASPA) the Word Game Players Organization, (WGPO) and the

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<sup>12</sup> Attached documents 2k and 2l.

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Collins Coalition (CoCo) by filing a motion, proposed order, and declaration in the court. However, he never succeeded in getting any subpoenas issued. He also never attempted to issue a subpoena duces tecum to the World English-language Scrabble Players Association (WESPA) despite my repeated requests for him to do so.

### Analysis of Mr. Mohan's Defense to Failing to Execute Subpoenas

Mr. Mohan wrote in his response to the CAO, "I did not feel it was necessary or advisable to subpoena the other organizations [besides NASPA], but eventually I agreed to do so."<sup>13</sup> However, his belief that my interactions with the other Scrabble organizations (WESPA, WGPO, and CoCo) were less relevant derived from a poor understanding of the case, an issue on which I attempted to correct him many times. My 20 year history of tournament Scrabble play has not only been under NASPA auspices. I have also played many international tournaments that were sanctioned by WESPA but not NASPA, including eight world championships.

Furthermore, the defendants founded CoCo and in 2021 aligned themselves with WGPO, and the two organizations were poaching tournaments from NASPA, while using their lies about me as a way of persuading tournament directors and players to play for those organizations instead of for NASPA. My last tournament in the USA was the January 2022 Crescent City Cup in New Orleans, a tournament which has been one of the most popular in the country aside from Nationals and a tournament in which I finished in first place. In the summer of 2023, when WGPO and CoCo had already banned me based only on the words of my accusers and my disciplinary process with NASPA was still ongoing, the organizers of the Crescent City Cup announced that they were switching the 2023 tournament to WGPO & CoCo auspices, which they are planning to do again in 2024.

In short, my reputation with CoCo and WGPO, and the extent to which they were able to enhance their own reputations and damage the reputations of NASPA through the defamatory stories they told about me, strongly affects my ability to play Scrabble tournaments and make money from them in the future.

Also, the extent to which the defendants used their defamatory stories about me outside the bounds of a single political organization's disciplinary process to aid them in fighting political battles between the organizations *should have invalidated any claims that their defamation of me was protected by qualified immunity*. The decision of the Judge to dismiss the claims cited qualified immunity. I was handicapped from being able to tell the full story to the judge of how the defendants' defamation and intentional interference with economic relations went far beyond my relationship with a single organization and far beyond the usage of the defendants' statements in my own disciplinary processes, because Mr. Mohan had not properly executed the subpoenas.

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<sup>13</sup> Attached document 6.

## Conclusion

Mr. Mohan committed malpractice in case 23CV15424 in Multnomah County Circuit Court in the following ways:

- Failure to disclose the majority of public filings to client, including a protective order signed by the himself, a defense attorney, and the judge, and including multiple amendments to the complaint, and including important defendants' objections to motions
- Failure to disclose the majority of documents served between counsels, including requests for production that omitted important pieces of evidence
- Falling for manipulation of defense counsel and threatening to withdraw from the case based on false information about client presented by defense counsel
- Telling both defense attorneys that he was going to withdraw from the case before talking about it with client
- Failure to submit evidence despite written and verbal instructions from client to submit exactly that evidence
- Failure to submit evidence because he could not properly open and read attachments in an email, including psychiatrist visit notes indicating client had a PTSD diagnosis, and did not bring this up with client
- Failure to serve complaints properly
- Failure to serve summons properly
- Failure to serve documents to one of the defense attorneys
- Writing an inadequate complaint with many faults, especially that it included three civil conspiracy claims that are not in Oregon law
- Failure to correct the fundamental flaws in complaint, despite amending it twice
- Failure to address the failure of defendants to meet discovery deadlines
- Failure to notify client that defendants had not met discovery deadlines
- Failure to schedule a hearing that he had requested in a motion
- Failure to issue multiple *subpoenas duces tecum*

Due to Mr. Mohan's malpractice, the case was stricken from the court by anti-SLAPP motions, resulting in me owing legal fees to both defense attorneys.

## Claim

I paid Mr. Mohan a total of \$14,085.20 after receiving my retainer refund. As a result of the anti-SLAPP motions being upheld, ORS 31.152(3) states that a defendant shall be awarded reasonable attorneys fees and costs. Ms. Vaughn has petitioned the court for \$9,339.65. Mr. Fuller has petitioned the court for \$84,717.25. I am including the statements filed in court by both defense attorneys showing attorney fees, as well as Mr. Mohan's invoices to me and record of payments from me. Because of Mr. Mohan's gross incompetence in representing me, I am claiming the total of all of these, or \$108,142.10 from the Professional Liability Fund.

## Attached Documents

1. Ethics complaint about Mr. Mohan to Oregon State Bar Client Assistance Office (CAO), August 10th, (2 pages) with two attachments:
  - a. Declaration of David Koenig, August 10th, explaining Mr. Mohan's mishandling of evidence, Mr. Fuller's bullying him into attempting to withdraw from the case, and other aspects of Mr. Mohan's malpractice (25 pages)
  - b. Stipulated Protective Order, May 25th, signed by Mr. Mohan, Mr. Fuller, and Judge Skye and withheld from plaintiff (10 pages)
2. Ethics complaint follow-up to CAO, October 17th, (8 pages) with 13 attachments:
  - a. (A\*) Email from Mr. Mohan to me, July 7th, about withdrawal from case (1 page)
  - b. (A\*) Letter attached to email (2 pages)
  - c. (A\*) Motion to Withdraw attached to email (2 pages)
  - d. (A\*) Order Granting Withdrawal attached to email (2 pages)
  - e. (A\*) Email from Mr. Mohan to Mr. Fuller and Ms. Vaughn, July 7th (1 page)
  - f. (B\*) List of documents filed in court while Mr. Mohan was representing me, highlighting documents not shared with me (1 page)
  - g. (B\*) List of documents served between attorneys, highlighting documents not shared with me (1 page)
  - h. (C\*) Plaintiff's Declaration in Support of Plaintiff's Motion To Determine The Sufficiency of Jennifer Clinchy's Responses and Objections To Requests For Admission, August 10th (13 pages)
  - i. (C\*) Plaintiff's Additional Requests for Admission to Defendant Jennifer Clinchy, August 10th (4 pages)
  - j. (D\*) Order Granting Defendants' Special Motions To Strike, granted September 5th (7 pages)
  - k. (E\*) Excerpt from Plaintiff's Supplemental Response to Evans Clinchy's and Jennifer Clinchy's Special Motions To Strike, August 15th, showing defendants missed discovery deadline and submitted no evidence (1 page)
  - l. (E\*) Exhibit from Plaintiff's Supplemental Response to Evans Clinchy's and Jennifer Clinchy's Special Motions To Strike, August 15th, showing defendants' responses to requests for production with no responsive documents (25 pages)
  - m. (F\*) Emails with Ms. Vaughn's assistant Emily Chung, August 7th-8th, showing Mr. Mohan's failure to deliver responses to requests for production to their office (2 pages)
3. Email from me to Mr. Mohan, June 17th, with instructions to submit specific evidence that Mr. Mohan never submitted (2 pages)
4. Declaration of Medical Records, August 16th, explaining Mr. Mohan's failure to properly open email attachments and submit evidence (7 pages)
5. Email from me to Mr. Mohan, May 10th, including all the medical records I emailed him
6. Mohan reply to CAO, September 26th (4 pages)
7. Excerpt from Defendant McKissen's Special Motion To Strike, August 1st, explaining Mr. Mohan's failure to serve complaints and summons properly (2 pages)



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8. Excerpts from Declaration of Ashley L. Vaughn in Support of Motion To Strike, August 1st, showing physical evidence of Mr. Mohan's failure to serve complaints and summons properly (8 pages)
9. Invoices from Mr. Mohan, showing \$13,000 billed for time and \$1,085.20 for expenses, or \$14,085.20 total (10 pages)
10. Payment record from Mr. Mohan, showing \$15,600 billed to my credit card minus \$1,514.80 refunded, or \$14,085.20 total paid (1 page)
11. Defendant BriAnna McKissen's Petition for Attorney Fees and Costs, September 20th, claiming \$9,339.65 for Ms. Vaughn (9 pages)
12. Statement of Jennifer and Evans Clinchy Attorney Fees, Costs and Disbursements, October 6th, claiming \$84,717.25 for Mr. Fuller (37 pages)

\* Capital letter labels on the attachments to the October 17th report to the CAO refer to how the attachments are referred to internally in document 2. For example, (Filenames beginning "A") refers to documents 2a through 2e.

I am only appending documents 3 through 8, since the entirety of the ethics complaint has been shared elsewhere, and the financial statements are not interesting.



Dave Koenig [REDACTED]

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**additional communications**

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Dave Koenig [REDACTED]

Sat, Jun 17, 2023 at 11:05 AM

To: Marc Mohan &lt;marc@veritelawcompany.com&gt;

In the last couple days after posting the new blog post, I sent via text or facebook messenger to a number of people in the Scrabble community a link to the blog. Not many people, but a few, engaged me in private conversation about it, but those conversations were just about NASPA or WGPO involvement, not about the defamation case.

From their letter, it doesn't sound to me like what they're talking about though. I think they're just referring to the documents of communications that I've already passed to NASPA. I would think they'd be able to get them all from NASPA through discovery, but I'm happy to hand them all over directly too.

All of those documents are included in the attachments of the "David Koenig's status in international Scrabble, including the upcoming WESPA Championship" that I sent to Mina and Wayne to forward to WESPA and ABSP and bcc'ed to you. So I think you should just forward that email with all of its attachments to them, and that should cover all the bases.

I'm not aware of any other documents.

Cheers,  
Dave

On Sat, Jun 17, 2023 at 10:46AM Marc Mohan <[marc@veritelawcompany.com](mailto:marc@veritelawcompany.com)> wrote:

Document 3

Dave,

I received the attached letter late yesterday afternoon. It refers to additional documents or communications you've had with several individuals that they believe are responsive to the requests for production. Can you go through e-mails, texts, or other communications with these folks and provide me with any that even remotely relate to the case?

I am scheduling a conference with Mr. Fuller on Tuesday to determine more specifically what documents and communications they are referring to, so I will let you know what I learn.

If they are not satisfied with the discovery documents they receive, they can file a motion either to compel their production or (more likely) revive their request to inspect your phone and/or computer. We can of course oppose those motions, but it would be up to the judge whether to grant them or not.

I've got a busy weekend, but I'm free most of Monday to talk. Anytime except noon-2pm.

Thanks,

Marc

Marc Mohan  
Verite Law Company  
1525 SE 22nd Ave.  
Portland OR 97214  
(503) 754-1656

\*\*\*PLEASE NOTE NEW EMAIL ADDRESS\*\*\*

[marc@veritelawcompany.com](mailto:marc@veritelawcompany.com)

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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**

6 vs

13 **PERTAINING TO MEDICAL**

7 **EVANS CLINCHY**

14 **RECORDS**

8 **JENNIFER CLINCHY** and

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9 **BRIANNA (LOLA) McKISSEN**

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10 Defendants

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18  
19 I, David Koenig, declare the following under penalty of perjury:

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

22 2. On May 10, 2023, I sent my former attorney Marc Mohan an email with the subject  
23 “Notes from psychiatrist, ENT, and SLP visits”.

24 3. This email contained three attachments:

25 (a) A six-page summary of my April 29, 2023 visit with Psychiatrist Dr. Moses Ijaz,  
26 when I was diagnosed with PTSD.

27 (b) A three-page summary of my April 7, 2023 visit with Ears, Nose, Throat (ENT)  
28 Specialist Erica Bocchi in which I was diagnosed with dysphonia and referred to a  
29 Speech Language Pathologist (SLP).

- 1 (c) A four-page summary of my May 1st, 2023 visit with SLP Sarah Erter, in which  
2 the dysphonia was confirmed and voice therapy was recommended.
- 3 4. Gmail's preview functionality only shows the first page of the first documents (a) and (b),  
4 though it shows the entirety of document (c).
- 5 5. Downloading the documents gives a PDF with all pages intact.
- 6 6. In responses to requests for production, Mr. Mohan gave no pages of document (a), only  
7 the first page of document (b) at Bates #326, and the entirety of document (c) at Bates  
8 #322-325.
- 9 7. After I began representing *pro se*, I noticed the lack of document (a) and included it as  
10 Exhibit C in the PLAINTIFF'S SUPPLEMENTAL RESPONSE TO EVANS  
11 CLINCHY'S AND JENNIFER CLINCHY'S SPECIAL MOTIONS TO STRIKE, also  
12 assigning it Bates #472-477.
- 13 8. I did not notice that only the first page of document (b) was included in previous  
14 responses to requests for production when I included that page as Exhibit D in the  
15 PLAINTIFF'S SUPPLEMENTAL RESPONSE TO EVANS CLINCHY'S AND  
16 JENNIFER CLINCHY'S SPECIAL MOTIONS TO STRIKE.
- 17 9. I noticed the omission today and am including at the end of this declaration the entirety of  
18 document (b) and assigning it Bates #492-494.
- 19 10. The entirety of document (b) should be considered an amendment of Exhibit D in the  
20 PLAINTIFF'S SUPPLEMENTAL RESPONSE TO EVANS CLINCHY'S AND  
21 JENNIFER CLINCHY'S SPECIAL MOTIONS TO STRIKE, filed August 15, 2023.
- 22 11. Plaintiff regrets the error.  
23

1 August 16, 2023.

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/s/ David Koenig

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.

Plaintiff, representing *pro se*

**PROOF OF SERVICE**

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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](mailto: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](mailto:Ashley@DumasandVaughn.com)

August 16, 2023.

/s/ David Koenig

A large black rectangular redaction box covering the signature and name of the plaintiff.

Plaintiff, representing *pro se*

Patient: David E Koenig  
DOB: 10/08/1977  
MR#: 2480041  
DOS: 04/07/2023

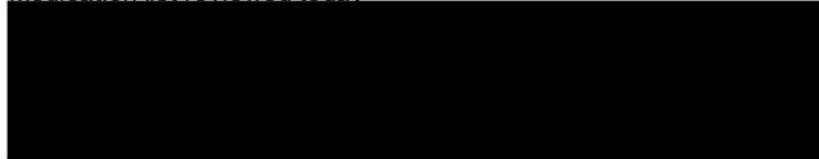
### New Patient Consultation

David E Koenig was seen today as a new patient. The patient is a 45 year old male with a chief complaint of voice change. He has chronic hoarseness that can fluctuate in the severity. This began about 2 years ago. He has been dealing with anger issues and other mental health issues that resulted in him screaming often. There has been about 5 times where he has lost his voice completely for about 24 hours. During this time there was some pain with phonation. Typically there is no pain when he speaks. He has tried drinking throat comfort tea recently. He has also been working on his mental health and is screaming less. No odynophagia, dysphagia, or dyspnea. No neck trauma or intubations. He is concerned that he is done permanent damage to his throat/voice. No other concerns.

Pharmacy Verified

### CURRENT MEDICATIONS

Medication list reviewed today



escitalopram oxalate 10 mg tablet (escitalopram oxalate)



### ALLERGIES

No known allergies

Have you ever had an allergic reaction to a medication (for example: rash, itching, trouble breathing)? No

Have you ever had anaphylaxis (a life-threatening allergic reaction)? No

Is there any personal or family history of inhaled gas allergy? No

Do you have an allergy to IV Contrast? No

Do you have an allergy to Latex? No

### PAST MEDICAL HISTORY

CARDIOVASCULAR: Heart murmur, High blood pressure, High cholesterol

PSYCHOLOGICAL: Post-traumatic stress disorder

### PAST SURGICAL HISTORY

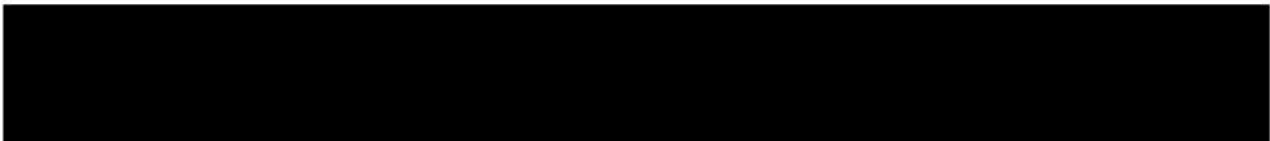
Have you ever had complications from a surgery? No

### FAMILY HISTORY:

Are you adopted? No

Father: Deceased, heart attack, 51-70

Mother: Alive



### SOCIAL HISTORY

Marital status: Separated/Divorced

What is your current living situation: Alone



Children: 1 living; Male, 20, healthy  
0 deceased

000493

Do you have pets at home: No

### LIFESTYLE

Do you exercise regularly? Yes, Orangetheory, 2-3 days per week, 60 min per day

Do you drink caffeinated beverages? Yes, usually one, sometimes two per day

Cigarette use: Never smoker

Other tobacco or nicotine products: Never

Marijuana use: Never

IV or other recreational drug use: Never

### PHYSICAL EXAM

Vitals: Height: 70 in, Weight: 175 lbs, BMI: 25.20

General: Well developed, well nourished, in no apparent distress. Voice is raspy.

Ears: Normal pinnas, clear external auditory canals, tympanic membranes are clear, intact without any signs of infection or effusion.

Nose: Septum is deviated to the right. Otherwise clear and anterior rhinoscopy without masses or lesions.

Oral Cavity/ Oropharynx: No masses or lesions in the oral cavity or oropharynx. Moist mucosa.

Hypopharynx/Larynx: Unable to be examined secondary to hyperactive gag reflex and unfavorable anatomy.

Neck: Supple, without any lymphadenopathy. Larynx is midline with normal crepitus. No audible stridor or stertor. No thyromegaly

Cranial Nerves: CN II-XII grossly intact.

### PROCEDURE NOTE:

After a PARQ was discussed with the patient, topical anesthetic consisting of Lidocaine and phenylephrine was applied to the left nasal cavity. Flexible laryngoscopy was then performed. The left nasal cavity is otherwise clear. There is diffuse mucosal edema and erythema of the supraglottic and glottic areas. Vocal cords are moving normally without paresis. There is no vocal cord lesions. There is minor laryngeal muscle tension. The pyriform sinuses are clear and symmetric without pooling of secretions. No change with Valsalva. This was well tolerated.

### IMPRESSION

1. Dysphonia. His exam today it looks consistent with voice overuse and trauma along with some muscle tension. I recommend he continue to work on his mental health as I think the screaming is the main contributing factor here. We also discussed how speech therapy might be helpful for the muscle tension and overall to learn better vocal hygiene measures and techniques. He is interested this. I will send out a referral for him nearby his home which would be which is to voice and swallowing clinic. He is to let me know if they are booking out for in advance and we can consider sending the referral to a different clinic. Follow-up can be as needed but he knows to return for any new or worsening symptoms. All questions were answered.

### NEW/CHANGED MEDICATIONS

Added new medication of escitalopram oxalate 10 mg tablet (escitalopram oxalate) - Signed

### REVIEW OF SYSTEMS

**Ears, Nose, and Throat:** *Positive for* Hoarseness, Throat pain/soreness

Thank you for allowing me to participate in the care of your patient. Please feel free to contact me with

any questions or concerns.  
Document 4

000494

Sincerely yours,

Erica E Bocchi PAC

**CC.**

Sent to:  
Khaleed Alston ND  
Method: Fax  
(503) 624-0118



Dave Koenig

## Notes from psychiatrist, ENT, and SLP visits

Dave Koenig  
To: Marc Mohan <marc@veritelawcompany.com>

Wed, May 10, 2023 at 11:10 AM

Attached are notes from

- My most recent psychiatrist visit with Moses Ijaz on 2023/04/29, at which I got my PTSD diagnosis.
- My ENT (Ears, Nose, Throat doctor) evaluation with Erica Bocchi on 2023/04/07, which resulted in a referral to an SLP (Speech Language Pathologist)
- My SLP evaluation with Sarah Erter on 2023/05/01, which resulted in a recommendation of voice therapy treatment.

Additional note: I first tried to get a psychiatrist appointment in late 2022, but there was a very long wait before I finally got to meet with Moses Ijaz on 2023/01/07. To date, the January and May appointments with Moses Ijaz are the only times I have been able to meet with a psychiatrist. The January meeting was when I was first prescribed Escitalopram/Lexapro. Prior to that, my primary care physicians had prescribed me a different antidepressant. I can produce visit notes from the January appointment too, if it is necessary.

My first voice therapy session is scheduled for 2023/05/16.

Cheers,  
Dave

### 3 attachments




**Koenig-ENT-Visit-2023-04-07.png**  
639K



**Koenig-Ijaz-Visit-2023-04-29.png**  
929K

 **Koenig-SLP-Visit-2023-05-01.pdf**  
291K

From: Marc Mohan marc@veritelawcompany.com   
Subject: LDD 2301117  
Date: September 26, 2023 at 5:09 PM  
To: OSB Client Assistance Office Intake cao@osbar.org



I appreciate the opportunity to respond to Mr. Koenig's complaint and accompanying declaration. I'll address each of the specific points he lists in paragraph 37 of his declaration.

1. "failing to submit evidence that I repeatedly asked him to submit."

It's not clear to me what relevant evidence this item refers to. Presumably it refers to the e-mail and attachments referenced in paragraph 19 of the declaration. **During my representation of Mr. Koenig, I repeatedly indicated that communications with the organizations that had suspended him were not, in my opinion, relevant to his claims against the defendants or responsive to defendants' requests for production. Therefore, I did not produce those documents.**

2. "lack of awareness of what he had or had not submitted."

Again, it's not exactly clear to me what this refers to. If it refers to the fact that the first batches of documents produced in response to defendants Evans and Jennifer Clinchy's attorney's requests for production were not provided to Brianna McKissen's attorney, that is because the first batches of documents (Bates 1-411) were produced on between May 22 and June 1, and I was only informed of defendant McKissen's representation on June 5.

3. "failing to take a proactive enough approach to discovery."

In drafting requests for production and admission on Mr. Koenig's behalf, I counseled against his efforts to expand the scope of those requests beyond what could be reasonably relevant to his claims against the defendants. In his view, this approach was apparently not proactive enough, but in my opinion, pursuing the approach Mr. Koenig would have been counterproductive and would have resulted in a waste of the court's time.

4. "failing to properly execute subpoenas."

Mr. Koenig expressed a desire to subpoena several Scrabble organizations. Defendants Evans & Jennifer Clinchy's attorney had already subpoenaed one of those organization, **NASPA. That organization's suspension of Mr. Koenig is at the heart of his claims. I did not feel it was necessary or advisable to subpoena the other organizations, but eventually I agreed to do so.** However, I was unable to issue said subpoenas prior to withdrawing as Mr. Koenig's attorney.

5. "agreeing to a stipulated protective order with opposing counsel without my consent."

The stipulated protective order proposed by Mr. Fuller and agreed to by me

is, in my opinion, a standard measure in cases involving allegations related to private conduct. The order does not prevent any party from objecting to a confidential designation and does not prevent any documents or other information designated as confidential from being used in the case. Mr. Koenig strongly desired to make his case against the defendants' in the public arena, as evidenced by repeated online comments and statements reiterating his claims. I did not feel it was necessary to obtain Mr. Koenig's specific permission to stipulate to this standard protective order, since doing so did not prejudice him. In addition, even if I had opposed the protective order, I am certain the court would have issued it regardless.

6. "failing to disclose to me a stipulate protective order after he and the judge has signed it."

Again, as I considered the protective order a *pro forma* filing with no impact on the ability to pursue Mr. Koenig's claims, I did not feel it was necessary to bring it to his attention. Also, it is quite possible that I did mention it to him in a phone, although I do not have a record of such.

7. "falling for Michael Fuller's bullying deception that I was doing anything wrong."

Mr. Fuller made serious allegations regarding Mr. Koenig's behavior and communications of which I had been previously unaware. It was incumbent on me to take those allegations seriously in order to avoid violating the ORPC myself and to evaluate whether I would be able to continue representing Mr. Koenig going forward. I do not see this as "falling for" anything. I see it as doing everything I could in order to ethically represent Mr. Koenig, and to withdraw from doing so when it became apparent that would be difficult to do.

8. "telling both Michael Fuller and Ashley L. Vaughn that he had to withdraw from the case before talking with me about it first."

When I determined that I would be withdrawing from representing Mr. Koenig, I notified him via email and then notified opposing counsel afterward. I did this so that they would be on notice that Mr. Koenig would be engaged in the process of obtaining new counsel or proceeding pro se. This was to Mr. Koenig's benefit, since he would be allowed some flexibility on filing deadlines while this process moved forward. Ultimately, I opted not to file a motion for mandatory withdrawal and assisted Mr. Koenig in attempting to obtain substitute counsel. When those efforts were unsuccessful, I filed a notice of withdrawal on July 28. A copy of my letter of July 7 to Mr. Koenig is attached.

To sum up:

to sum up.

When Mr. Koenig initially contacted me and provided me with the documents he had assembled, I concluded that he likely had a prima facie case of defamation. I informed him that defamation cases can be very difficult to prevail in, and that I would need to know a lot more about the facts before I could provide a more solid estimation of the strength of his case. Because the statute of limitations deadline was very near, I filed his complaint without performing as thorough an investigation of the facts as would have been ideal.

As we worked together, a tension quickly became apparent between Mr. Koenig's desire to publicly air his grievances (which, again, I felt were legitimate) against the Clinchys and Ms. McKissen. He had previously sought to hire a public relations firm to represent him in this manner, but they, like I, informed him that it would be strategically unwise to continue to make public statements about his claims, or any other matters related to them, or to contact any of the parties or potential witnesses in the case. When he pushed to send communications to the various Scrabble organizations, I similarly counselled strongly against it. When he insisted, I reasoned that if he was going to send letters to these organizations, I should at least advise him to ensure that he didn't harm his case any more than possible. Therefore, I approved his communications to the organizations only to prevent more explicitly damaging communications from being sent.

As the case moved forward, Mr. Koenig continued to push for what, in my opinion, would have been overly aggressive, even frivolous motions. I was able for the most part to counsel him against these moves, which included adding additional defendants, making argumentative requests for admission, and even flying down to Las Vegas to confront players at the Scrabble tournaments he was missing due to his suspension. Eventually, it became clear that I did not possess the skills and qualities that would enable me to represent my client effectively going forward. In my views, continuing to represent him in the litigation would pose significant ethical risk.

As soon as that became apparent, I informed Mr. Koenig, in order to maximize his ability to obtain substitute counsel, and opposing counsel, in the expectation that they would grant Mr. Koenig flexibility regarding filing deadlines until his representation was determined. I arranged for Mr. Koenig to meet with an experienced Portland litigator, who declined due to the litigator's current commitments. I remained Mr. Koenig's attorney of record for the period from July 7 to July 28 because I did not want to abandon him. I am sympathetic to his claims and continue to believe he was ill-treated and defamed.

uerameu.

Throughout my representation of Mr. Koenig, I endeavored to vigorously and efficiently pursue those claims while maintaining professional standards and providing my client with honest, informed counsel. When it became apparent that I could no longer do so, I withdrew in as gentle a manner as possible, and made a more than reasonable effort to help him obtain substitute counsel. I can understand Mr. Koenig's frustration. However, I provided competent representation. I abided by his decisions regarding the objectives of the representation. I consulted with him about the means to pursue those objectives. I abided by his decision about whether to settle a matter, even when I advised him to accept a settlement offer from defendant McKissen. And I explained matters to him in a way reasonably necessary to allow him to make informed decisions.

For these reasons, I disagree that any violation of ORPC 1.1, 1.2(a), or 1.4(b) has occurred.

Again, thank you for the opportunity to respond, and feel free to reach out if you need any further information from me.

Sincerely,

Marc Mohan (he/him)

Verite Law Company  
6404 E Burnside St.  
Portland OR 97215  
(503) 754-1656

\*\*\*PLEASE NOTE NEW EMAIL ADDRESS\*\*\*

[marc@veritelawcompany.com](mailto:marc@veritelawcompany.com)

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23-07-07 letter  
withdrawing.pdf

1 comments damaged his reputation to a greater degree than it was already damaged. Finally, it is  
2 *Plaintiff*, not Defendants, that continues to publicize and re-publish the allegedly defamatory  
3 statements. How much harm have his own actions inflicted on his reputation?

4 Finally, Plaintiff's defamation claim is barred by the applicable statute of limitations.  
5 The Oregon appellate courts have left undecided whether resolution of affirmative defenses is  
6 required when considering an anti-SLAPP motion. *Davoodian*, 327 Or App at \*29. However,  
7 the policy underlying anti-SLAPP law—the expeditious dismissal of frivolous lawsuits meant to  
8 chill speech—supports the consideration of dispositive affirmative defenses at this stage.

9 Even if we assume the discovery rule applies and work from an operative date of April  
10 14, 2022—when Plaintiff alleges he first learned of Ms. McKissen's statements—the claim is  
11 barred by the one-year statute of limitations because Plaintiff did not serve Defendant properly  
12 within 60 days of filing the original complaint. Plaintiff filed the complaint on the last possible  
13 day of the statute of limitations—April 14, 2023. *See* Compl. (date-stamped April 14, 2023).  
14 For that date to be effective, Plaintiff needed to serve Defendant properly within 60 days of  
15 filing. ORS 12.020(2). Service of the first complaint was ineffective because Plaintiff mailed  
16 the summons and complaint to my client via first class and certified mail on May 2, 2023 but  
17 failed to secure a signed return receipt or complete a follow-up mailing. Exs. 3-4 to Vaughn  
18 Decl. Plaintiff did not complete personal, substitute, or mail service. *See* ORCP 7D & D(3)(a).  
19 Service of the First Amended Complaint was ineffective because Plaintiff did not get a signature  
20 on the return receipt nor did Plaintiff mail a new summons. Ex. 5-6 to Vaughn Decl.; ¶ 8.  
21 Service of the Second Amended Complaint was ineffective because, while an individual  
22 personally handed the complaint to Ms. McKissen, Plaintiff again did not include a summons.  
23 Vaughn Decl. ¶ 9. Service of both is required to effectuate personal service. ORCP 7D(2)(a)  
24 (“Personal service may be made by delivery of a true copy of the summons and a true copy of  
25  
26



1 the complaint to the person to be served.”). Plaintiff has never filed a Proof of Service for any  
 2 version of the complaint. Because Plaintiff failed to properly serve Ms. McKissen with both the  
 3 complaint and summons within 60 days of commencing the case, the case will be deemed to  
 4 commence when Plaintiff does effectuate proper service, not the filing date—that will be outside  
 5 the one-year statute of limitations.

## 6 **2. Conspiracy claims**

7 Plaintiff has alleged a variety of “civil conspiracy” claims—“conspiracy to defame;”  
 8 “conspiracy to tortiously interfere with economic relations;” and “conspiracy to intentionally  
 9 inflict emotional distress.” 2nd Amend Compl. Defendant McKissenn cannot find any support  
 10 for such claims in Oregon law. During conferral, Defendant requested that Plaintiff’s counsel  
 11 provide legal support for the claims, and Plaintiff’s counsel failed to do so. Vaughn Decl. ¶ 10.

## 13 **3. Intentional infliction of emotional distress**

14 Ms. McKissen’s statements do not amount to an “extraordinary transgression of the  
 15 bounds of socially tolerable conduct.” This issue is a matter of law. *Harris v. Pameco Corp.*,  
 16 170 Or App 164, 171 (2000). Insults or mean words do not result in liability, even when the  
 17 defendant intended to cause the plaintiff distress. *See Brewer v. Erwin*, 287 Or 435, 457–58  
 18 (1979); *Kraemer v. Harding*, 159 Or App 90, 110 (1999); *House v. Hicks*, 218 Or App 348, 357–  
 19 366 (2008) (holding that liability only exists when the conduct is “so outrageous in character,  
 20 and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as  
 21 atrocious, and utterly intolerable in a civilized community.”). One incident is generally not  
 22 actionable—there must be repeated conduct. *Brewer*, 287 Or at 456–60; *Turman v. Central*  
 23 *Billing Bureau, Inc.*, 279 Or 443, 445–46 (1977).

25 Ms. McKissen wrote a letter to express her fear, based on her personal interactions with  
 26 him, that Mr. Koenig—who has a history of making violent statements—is unsafe. By his own

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

DAVID KOENIG,

Plaintiff,

v.

EVANS CLINCHY, JENNIFER  
CLINCHY, and BRIANNA (LOLA)  
McKISSEN,

Defendants.

Case No.: 23CV15424

**DECLARATION OF ASHLEY L.  
VAUGHN IN SUPPORT OF SPECIAL  
MOTION TO STRIKE**

I, ASHLEY L. VAUGHN, declare as follows

1. I am the attorney representing Defendant Brianna McKissen in the above-captioned case. I make this declaration based on personal knowledge and am competent to testify as to the matters stated herein.

2. Attached as Exhibit 1 is a true and accurate copy of a printout of an article titled “Scrabble Rouser,” (Apr. 3, 2008), published by *New Jersey Monthly* at <https://njmonthly.com/articles/jersey-living/scrabble-rouser/> (last visited Aug. 1, 2023).

///  
///

1           3.       Attached as Exhibit 2 is a true and accurate copy of a printout of a blog post titled  
2 “The Conspiracy,” (July 24, 2023), published by Plaintiff on his website at  
3 <https://splenetic.net/the-conspiracy/> (last visited Aug. 1, 2023).

4           4.       Attached as Exhibit 3 is a true and accurate copy of the envelope that the original  
5 Complaint was served in.

6           5.       Attached as Exhibit 4 is a true and accurate copy of the USPS tracking for service  
7 of the original Complaint.

8           6.       Attached as Exhibit 5 is a true and accurate copy of the envelope that the  
9 Amended Complaint was served in.

10          7.       Attached as Exhibit 6 is a true and accurate copy of the USPS tracking for service  
11 of the Amended Complaint.

12          8.       Defendant McKissen did not receive a follow-up mailing of the Amended  
13 Complaint.

14          9.       Defendant McKissen did not receive a Summons with the Second Amended  
15 Complaint.

16          10.       During conferral on the anti-SLAPP motion, Defendant McKissen’s counsel  
17 asked Plaintiff’s counsel to provide legal support for the civil conspiracy claims, and he provided  
18 none.  
19

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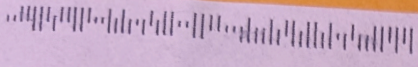
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Ver  
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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**CERTIFIED MAIL**

7022 2410 0002 1349 9095

RDC 29

97211

U.S. POSTAGE PAID  
FCM LG ENV  
PORTLAND, OR  
97214  
MAY 02, 23  
AMOUNT  
**\$6.61**  
R2305K141193-25

Brianna McKissen

# USPS Tracking<sup>®</sup>

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## 70222410000213499095

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PORTLAND, OR 97211  
May 4, 2023, 10:16 am

#### Departed USPS Facility

PORTLAND, OR 97215  
May 3, 2023, 9:33 pm

#### Arrived at USPS Facility

PORTLAND, OR 97215  
May 2, 2023, 9:22 pm

#### USPS in possession of item

PORTLAND, OR 97214  
May 2, 2023, 2:38 pm

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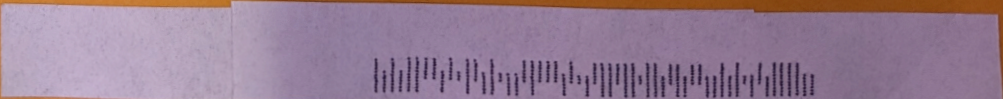
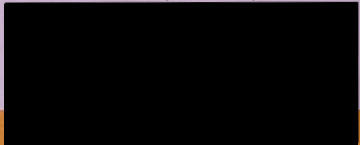
Contact USPS Tracking support for further assistance.

**FAQs**

verite Law Company  
1525 SE 22nd Ave.  
Portland OR 97214



Brianna (Lola) McKissen



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## 70222410000213489607

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May 11, 2023, 11:42 am

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May 10, 2023, 6:01 pm

#### Arrived at USPS Facility

PORTLAND, OR 97215  
May 9, 2023, 10:11 pm

#### USPS in possession of item

PORTLAND, OR 97214  
May 9, 2023, 11:46 am

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**FAQs**