

**Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, NW, Suite 5000, Washington, DC 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov**

VAUGHN BENNETT
816 3rd Street, NW
Washington, DC 20001
Plaintiff

Case Number: 2024-CAB-007272

V.

ADAM CHRISNEY
9725 Thorn Bush Drive
Fairfax Station, VA 22039
Defendant

ANSWER TO PLAINTIFF'S COMPLAINT

Defendant Adam Chrisney has a lack of knowledge and was not party in any capacity to any claims contained in the Plaintiff's complaint.

1. The Defendant was not party to and has never discussed let alone been apprised of any of the factual allegations, statement of facts or legal claims within the Plaintiff's complaint, or comprising the contents of any of the associated Exhibits provided by the Plaintiff, or any referenced discussions, video statements, radio shows, website statements, meetings, or town halls in the complaint, either by the Plaintiff or any of the other defendants named in the overall complaint at any time prior to being served this complaint.
2. The Defendant has never been aware of the interest by either the Plaintiff or any of the other defendants in any activity associated with Lamond Riggs Library.
3. The Defendant has never worked, associated or even communicated with the Plaintiff, nor has he competed for any work or contract with the Plaintiff, whether associated with chess events or otherwise.

4. Other than a handful of tiny chess tournaments conducted over 6 months prior to and in early 2013, the Defendant has not participated in Scholastic-only chess events or related tournament directing and organizing at all since, and not with or in competition with the Plaintiff or any of the other defendants. In comparison, scholastic chess is a primary component of the Plaintiff's and most of the other Defendant's chess business and activities. There is no reason for this defendant to seek information about or engage with the Scholastic activities of either DC Chess Girls, the DC State Chess Federation, their owners and employees or the Lamond Riggs Library.
5. The Defendant was not an Officer nor a Board Member of the DC Chess League (DCCL) until well after DCCL notified the US Chess Federation in the Fall of 2022 that it would relinquish its USCF State Affiliate designation for Washington, DC. This DCCL action prompted the USCF search for a replacement Affiliate for Washington, DC which led to the activities of the USCF Interim Committee in late 2023 which are referenced in and comprise Exhibit C of the complaint. The defendant assumed an acting position within DCCL in late October 2023, at about the same time as the USCF Interim Committee began formal activities. The defendant and DCCL were not party to, privy to, nor responsible for any of the deliberations of the USCF Interim Committee, the contents of Exhibit C nor the rest of the complaint. Neither the defendant nor DCCL had any position of authority over or engagement with defendant Ramson in the actions contained in the complaint and the defendant had no opportunity to endorse any related activity of defendant Ramson, much less any defamation alleged in the complaint.
6. The Defendant was not an Officer or Board Member of DCCL prior to October 2023 and could not have any associated responsibility for the contents of Exhibits D & E and rest of the complaint during that time frame.

7. The Defendant, either as part of DC Chess League or in any other capacity, including as a long-time leader of the Arlington Chess Club and the VA Chess Federation, has never been party to any business, activity or conversations associated with the conduct or organization of DC Chess Girls or the DC Chess Association.
8. The Defendant, either as part of DC Chess League or in any other capacity, including as a long-time leader of the Arlington Chess Club and the VA Chess Federation, has never been party to any business, activity or conversations associated with the conduct or organization of the Plaintiff's DC State Chess Federation.

The above constitutes my initial Answer to the Complaint.

Respectfully submitted,

Adam Chrisney, Defendant
9725 Thorn Bush Drive
Fairfax Station, VA 22039