VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

DINAH YUKICH *Plaintiff*, v. KORNELIA SCHREIBER 10165 Marshall Pond Rd Burke, VA 22015-3729 FENCING SPORTS ACADEMY 11350 Random Hills Road, Suite 400 Fairfax, VA 22030 USA FENCING 210 USA Cycling Point, Suite 120 Colorado Springs, Colorado 80919 SHANNON DAUGHERTY 7248 Duryea Dr. Colorado Springs, Colorado 80923 *Defendants*.	Case No. CL-2026-0017304

COMPLAINT

Plaintiff, Dinah Yukich ("Dinah"), by and through her attorneys, for her Complaint against, Defendants Shannon Daugherty, USA Fencing, Fencing Sport Academy and Kornelia Schreiber ("Defendants"), states as follows:

INTRODUCTION

1. Dinah Yukich is a 44 year old transgender woman who loves to fence.

2. In July of 2023, Dinah re-activated her USA Fencing ("USAF") membership as she was ready to get back into fencing after an over twenty -year hiatus from the sport.

3. Being a USAF member is essentially required to participate in fencing at any level in the United States. USAF completely controls access to the sport of fencing.

4. Almost every fencing competition is sanctioned by USAF and with good reason: USAF sanction means, among other things, that the event (or competition) is covered under insurance. Recreational and community fencing clubs across the country become members ("USAF Club Members") of USAF for many benefits, the most important one being insurance. A perk of being a USAF Club Member, is that such clubs secure insurance for not only any competitions that they host, but also for club activities and everyday fencing. USAF Member Clubs receive insurance for practices, classes, lessons, clinics, camps, tryouts and other events that are run and supervised by the Club. If someone gets hurt practicing fencing after work, a Member Club need not worry: they are covered by insurance.

5. The "One Condition" as USAF puts it, is that all individuals fencing at the USAF Member Club or in a competition must also be a USAF member. The USAF website is clear, "[i]f a non-member takes part in a club activity, that activity is not covered by insurance."[1] In order for Dinah to even practice fencing at her community fencing club, she has to be a USAF registered member.

6. In July of 2023, Dinah changed her gender marker to "F" and marked eligible to compete in women's events.

7. In 2023 and 2024, Dinah was training but did not compete in any competitions, as she was working to get back into physical shape after debilitating gender affirming surgeries, working full time and raising two children.

8. Dinah is an "Unclassified Fencer" based upon her skill level. The lowest rating a fencer can maintain in the USAF is "U" meaning "Unclassified."

[1] https://www.usafencing.org/insurance

9. On July 29, 2025, Dinah Yukich signed up for the Fairfax Challenge. Her registration for the women's events was accepted.

10. Her participation as a USAF fencer, however, came to halt when USAF implemented a bigoted policy banning transgender women from competing in women's events.

11. On or about August 1st, 2025, USAF unilaterally changed Dinah's gender marker from "F" to "M" and blocked her from registering for any women's competitions.

12. On October 1, 2025, Dinah received an email correspondence from Shannon Daugherty, of USA Fencing, reading as follows:

> *I apologize but in reviewing some of the regional registrations, I noticed that you had registered for the VETWE and DV2WE events at the Fairfax Challenge ROC/RJCC/RYC Jan 2-4, 2025. Since you are not currently eligible for the women's events at this tournament based on the USA Fencing transgender and non-binary policy effective Aug 1, 2025, I have withdrawn you. If you would like to switch your registration to an event(s) you are eligible for at this tournament, please let me know and I will work with organizer to get you registered. If you do not wish join another event, please let me know and we will get a full refund issued to you.*

13. Dinah was withdrawn from the event. USA Fencing was surveilling Dinah and letting her know that they were watching her and would block her from participating in any events that are USA Fencing. USA Fencing had no regard for the state laws that protect against discrimination based on gender identity and sex, as well as disability.

14. USAF has claimed that the United States Olympic and Paralympic Committee ("USOPC") forced them to implement the discriminatory policy. Contrary to that assertion, it is averred upon information and belief, that Fencing Sports Academy and USAF worked together and conspired to ensure that transgender women were excluded from the women's competitions. Tournament organizers were aware that implementing the transgender policy may violate state law where an event is taking place.

THE PARTIES

Plaintiff, Dinah Yukich

15. Plaintiff Dinah Yukich is an individual residing in Maryland.

Defendant, Fencing Sports Academy

16. Defendant, Fencing Sports Academy is a Virginia entity with its headquarters located at 11350 Random Hills Road, Suite 400, Fairfax, VA 22030.

17. Upon information and belief, Fencing Sports Academy sponsored the Fairfax Challenge.

18. There is no federal or state or local requirement that the Fairfax Challenge be sanctioned by USA Fencing.

Defendant, Kornelia Schreiber

19. Defendant, Kornelia Schreiber ("Connie"), at all times applicable hereto and upon information knowledge and belief, is an agent of the Fairfax Challenge and served as the organizer for the fencing competition at issue.

20. Defendant, Connie Schreiber at all times applicable hereto and upon information knowledge and belief, was the Executive Director of Fencing Sports Academy.

21. As the Event Organizer, Connie Schreiber, acting on behalf of Fairfax Challenge had full and final responsibility to control who would participate in the Duel of the East ROC/RJCC/RYC in October of 2025.

22. At all times relevant to the Present action, Connie Schreiber engaged in unlawful action in denying the participation of Plaintiff Dinah Yukich in the Division II Women's Epee (DV2WE) event that took place over January 2-4, 2026.

Defendant, USA Fencing

23. USA Fencing ("USAF") is the National Governing Body ("NGB") for the sport of fencing in the United States.

24. At all times relevant to the Present Action, USAF, sanctioned the Duel of the East ROC/RJCC/RYC, meaning the event was authorized by a USAF representative, and conducted in accordance with the USAF "Rules of Competition" and the related "USA Fencing Operations Manual."

25. At all times relevant to the Present Action, USAF violated the law when they denied the participation of Plaintiff Dinah Yukich in the Division II Women's Epee (DV2WE) event that took place on January 2-4, 2026.

Defendant, Shannon Daugherty

26. Defendant, Shannon Daugherty ("Daugherty"), at all times applicable hereto, was the Senior Regional Events Manager for USAF and as a USAF employee maintained her office at 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado, 80919.

27. As the Senior Regional Events Manager for USA Fencing, Shannon Daughterty, acting on behalf of USAF discriminated against Dinah Yukich when she denied the participation of Plaintiff Dinah Yukich in the Division II Women's Epee (DV2WE) event that took place on January 2-4, 2026.

JURISDICTION AND VENUE

28. This Court has subject-matter jurisdiction over this action as the defendants Fencing Sports Academy and Kornelia Schreiber are located in Fairfax County, Virginia. Va. Code Ann. § 2.2-3904; Va. Code Ann. § 17.1-513.

29. Venue is proper in this Court under Va. Code Ann. § 8.01-262. Fairfax County is a permissible forum because Defendant Fencing Sports Academy's principal office and place of business is located here.

PROCEDURAL BACKGROUND

28. On March 28, 2026, Dinah filed a complaint with the Attorney General – Office of Civil Rights against Defendants.

29. Pursuant to Va. Code Ann. §2.2-3907(H), Dinah waited 180 days for the Office of Attorney General to conduct its investigation.

30. On October 7, 2026, after the 180 day period lapsed, and in accordance with Va. Code Ann. §2.2-3907(H), Dinah notified the Office of the Attorney General that she had not received a notice of the right to file a civil action from the Office of the Attorney General.

31. Dinah files the instant action in accordance with Va. Code Ann. §2.2-3908(A)(2) as 180 days have passed since her complaint was filed in the Office of Attorney General, and as of the date of this Complaint, Dinah had not been provided a notice of her right to file in state court.

FACTUAL BACKGROUND

30. At all times relevant to the present Plaintiff, Dinah Yukich was a transgender woman.

31. Dinah Yukich's Social Security records and Driver's license confirm that she is a female individual.

32. Additionally, she has obtained a Judicial Declaration of Gender Identity and Name Change from Howard County Circuit Court.

33. Dinah Yukich's birth certificate reflects that her sex is female.

34. Dinah was a USAF member in the early 2000s. As set forth above, Dinah took time off from fencing from 2009 through 2024.

35. In 2021, encouraged by fellow fencers, she began fencing again at the DC Fencers Club.

36. In order to compete in a USAF sanctioned event, Dinah had to become a member of USAF.

37. In order to practice at her local fencing gym, DC Fencers Club, she had to be a member of USAF.

38. In July of 2023, Dinah re-activated her USA Fencing ("USAF") membership as she was ready to get back into fencing. On July 12, 2023, Dinah contacted USA Fencing via e-mail and notified them that she is transgender and expressed her desire to change her gender marker on her membership to "F."

39. That same month, USAF changed her gender marker to "F" and marked her eligible to compete in women's events.

40. While technically eligible to compete, Dinah did not actually compete in any events in 2023 and 2024, as she was just getting back into shape after approximately 15 years away from the sport.

41. On July 22, 2025, Phil Andrews, the CEO of USAF, notified its members that USAF was being forced by the USOPC to implement a transgender policy that excludes transgender women from competing in women's events ("Trans Ban"):

> *…[O]n July 18, the U.S. Olympic and Paralympic Committee (USOPC) released new athlete-eligibility guidelines, via their Athlete Safety Policy, that every national government body must follow…In response, USA Fencing is forced to apply the Transgender & Non-Binary Participation Policy we first shared on April 15, 2025.*

42. The USAF Trans Ban prohibits transgender women from participating in women's events. However, the Trans Ban explicitly admits that there may be state laws that are contrary to this policy:

> *It is important to note that there may be existent laws per state, and an evolving federal legal landscape that have implications on the adherence to the proposed policy. In such cases, it is the responsibility of that event host(s) or individual(s) to make USA Fencing aware.*

43. On July 22, 2025, Dinah responded to Phil Andrews stating that she did not consent to the sex marker change, from "F" to "M" and communicated clearly that this change was "demeaning and offensive."

44. Despite knowing the emotional distress, USOPC compelled USAF to implement and enforce the Trans Ban.

45. On July 26, 2025, Dinah submitted a formal complaint to USA Fencing through the USAF portal to dispute the discriminatory ban on transgender women from competing in women's events.

46. On July 28, 2025, Jessica Saxon, an attorney with USAF closed the complaint and did not provide a finding, saying in part:

> *Because this policy has been approved by the USOPC, your report does not allege a violation, and we must close it with no finding.*

47. On July 29, 2025, Dinah Yukich signed up for the Fairfax Challenge. Her registration for the women's events was accepted.

48. On or about August 1, 2025, USAF unilaterally changed Dinah's sex marker from "F" to "M" on her USAF Account. USAF announced this unilateral change so that "each athlete is automatically assigned to the correct event category for the 2025-2026 season."

49. On August 3, 2025, Dinah contacted USAF notifying the organization that they incorrectly modified her gender and requested that they change it back to "F."

> *My account appears to have been incorrectly modified to classify my gender as a male fencer. I am female….I expect this to be corrected promptly.*

50. On August 3, 2025, Phil Andrews, the CEO of USA Fencing admitted to Dinah that the Trans Ban has a negative effect on her and further explicitly states that the USOPC compelled USA Fencing to implement the discriminatory ban.

> *…[U]nfortunately USA Fencing has no choice but to adhere to the requirements of the USOPC at this time….We have made diligent efforts to ensure as a respectful as possible implementation of the required policies, but I understand they have had a negative effect on a number of members.*

51. Upon information and belief, the Board of Directors of the USOPC were aware of the emotional distress the Trans Ban would cause its transgender members and that was admitted by Damien Lehfeldt, the President of USA Fencing, when he e-mailed her:

> *I am writing to express my deep sympathy regarding the recent shift in policy from the USOPC and its impact on you and other transgender fencers within our community.*

52. The Fairfax Challenge is organized by Connie Schreiber. It is a USA Fencing Sanctioned Event. The event is managed, supervised and run by Connie Schreiber and The Fencing Academy. The event took place from January 2, 2026 through January 4, 2026.

53. The Fairfax Challenge is open to members of the public. In order to register for the events, individuals of the public must create an account with USA Fencing and become a member. The individuals then must register for the event through USA Fencing website.

54. There is no federal, state or local legal requirement for the Fairfax Challenge to be sanctioned by USA Fencing.

55. On October 1, 2025, Dinah received an email correspondence from Shannon Daugherty, of USA Fencing, reading as follows:

> *I apologize but in reviewing some of the regional registrations, I noticed that you had registered for the VETWE and DV2WE events at the Fairfax Challenge ROC/RJCC/RYC Jan 2-4, 2025. Since you are not currently eligible for the women's events at this tournament based on the USA Fencing transgender and non-binary policy effective Aug 1, 2025, I have withdrawn you. If you would like to switch your registration to an event(s) you are eligible for at this tournament, please let me know and I will work with organizer to get you registered. If you do not wish join another event, please let me know and we will get a full refund issued to you.*

56. Dinah was withdrawn from the event. USA Fencing was surveilling Dinah and letting her know that they were watching her and would block her from participating in any events that are USA Fencing. USA Fencing had no regard for the state laws that protect against discrimination based on gender identity and sex, as well as disability.

57. On October 6, 2025, Dinah Yukich reached out via email to Connie Schrieber of the Fairfax Challenge and The Fencing Academy:

> *My name is Dinah Yukich and I am writing with regard to the Fairfax Challenge to be held on January 2-4, 2026. By way of brief background, on July 29, 2025, I registered for two events: (1) VETWE and (2) DV2WE. On October 1, 2025, I received an email from USA Fencing indicating that they have withdrawn me from these events because I am [a] transgender woman.*
>
> *I am contacting you because you are listed as the event organizer and running this event. I am seeking assistance in getting me registered for the VETWE and the DV2WE events. I called the number listed on the website…and spoke with an individual named Abdel, who represented that he could not assist me in getting me registered.*

58. On October 7, 2025, Connie Schreiber responded and copied Shannon Daugherty (of USA Fencing). Connie was clear that she would not independently act to ensure that Dinah

was not discriminated against, and rather would defer to the unlawful and bigoted policy of USA Fencing:

> *Thank you for reaching out, and I completely understand your concerns. However, please note that the registration system is managed entirely by USA Fencing, and we do not have the ability to control or modify registrations. The system does not allow us to override and manually add participants to events that are marked ineligible for them. If you're unable to register yourself, we're unable to do so on our end as well.*

59. Before Dinah had a chance to respond, USA Fencing through Shannon Daugherty interjected and wrote directly to Dinah:

> *Connie is correct in her response. As has been explained, the regional tournaments fall under the jurisdiction of USA Fencing and are applicable to all posted USA Fencing policies and procedures. Jess Saxon will be able to assist you should you have any questions.*

60. On October 7, 2025, Dinah Yukich responded directly to Connie Schreiber:

> *…As the organizer of the event, it is my understanding that you are managing, supervising and overseeing this event. This event is open to the public. In Virginia, gender identity is a protected status. I am being excluded because I am transgender…*

61. That same day, Connie Schrieber responded that she would not follow Virginia State Law and would discriminate against Dinah.

> *As I explained previously- and as Shannon Daugherty also mentioned in her reply on this same thread- we, as the organizers, do not determine who can or cannot participate in regional events. The registration system is managed entirely by USA Fencing, which controls eligibility for each fencer, including event and gender classifications. We do not have the ability to manually override or modify registrations.*
>
> *Please direct any questions or concerns regarding eligibility or registration to the following USA Fencing representatives [Shannon Daugherty and Jessica Saxon].*

62. The unlawful actions of Shannon Daugherty, USA Fencing, Fencing Sports Academy, USOPC, and Connie Schreiber caused great emotional distress.

COUNT ONE
YUKICH V. FENCING SPORTS ACADEMY
Va Code Ann §2.2-3904

63. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

64. The Fairfax Challenge is a "Place of Public Accommodation" as defined by the Virginia Code. VA Code Ann. §2.2 -3904(A).

65. It is an "unlawful discriminatory practice for any person, including the owner, lessee, proprietor, manager, superintendent, agent, or employee of any place of public accommodation, to:

> *refuse, withhold from, or deny any individual, or to attempt to refuse, withhold from or deny any individual, directly or indirectly, any of the accommodations, advantages, facilities, services, or privileges made available in any place of public accommodation or to segregate or discriminate against any such person in the use thereof or to publish, circulate, issue, display, post or mail, either directly or indirectly, any communication, notice or advertisement to the effect that any of the accommodations, advantages, facilities, privileges, or services of any such place shall be refused, withheld from or denied to any individual on the basis of sex…gender identity…*

66. Defendant, The Fencing Academy, is an entity that managed and oversaw the event, Fairfax Challenge. The Fairfax Challenge is in itself a "place of public accommodation, resort or amusement" under applicable VA state law. VA Code Ann. §2.2-3904(A).

67. Defendant, Fencing Sports Academy, managed the Fairfax Challenge.

68. Sex and Gender Identity are protected statuses under Virginia Law. VA Code Ann §2.2-3902, §2.2-3904(B).

69. At all times relevant to the present matter, Defendant Fencing Sports Academy was aware that Dinah was a transgender woman and knowingly and maliciously discriminated against Dinah on the basis of her gender identity and sex.

70. Defendant, Fencing Sports Academy, discriminated against Dinah when it prohibited Dinah from competing in the Division II Veteran Women's Epee Event on account of her gender identity and sex.

71. Plaintiff suffered and continues to suffer great emotional harm as a direct result of Defendants' actions.

72. The Fencing Sports Academy acted with actual malice when it discriminated against Dinah by excluding her from the women's competitions because she is a transgender woman.

73. The Fencing Academy acted with wanton and willful disregard for the rights of Dinah, to participate under Virginia law when it was foreseeable that Dinah would suffer great harm by the act of excluding her from the competition.

COUNT TWO
YUKICH V. CONNIE SCHREIBER

Va Code Ann §2.2-3904

74. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

75. The Fairfax Challenge is a "Place of Public Accommodation" as defined by the Virginia Code. VA Code Ann. §2.2 -3904(A).

76. It is an "unlawful discriminatory practice for any person, including the owner, lessee, proprietor, manager, superintendent, agent, or employee of any place of public accommodation, to:

> *refuse, withhold from, or deny any individual, or to attempt to refuse, withhold from or deny any individual, directly or indirectly, any of the accommodations, advantages, facilities, services, or privileges made available in any place of public accommodation or to segregate or discriminate against any such person in the use thereof or to publish, circulate, issue, display, post or mail, either*

> *directly or indirectly, any communication, notice or advertisement to the effect that any of the accommodations, advantages, facilities, privileges, or services of any such place shall be refused, withheld from or denied to any individual on the basis of sex…gender identity…*

77. Defendant, Connie Schreiber, managed and oversaw the event, Fairfax Challenge. The Fairfax Challenge is in itself a "place of public accommodation, resort or amusement" under applicable Virginia law. VA Code Ann. §2.2-3904(A).

78. Sex and Gender Identity are protected statuses under Virginia Law. VA Code Ann §2.2-3902, §2.2-3904(B).

79. At all times applicable to the present matter, Defendant Schreiber was aware that Dinah was a transgender woman and knowingly and maliciously discriminated against Dinah on the basis of her gender identity and sex.

80. Defendant, Connie Schreiber, discriminated against Dinah when she prohibited Dinah from competing in the Division II Veteran Women's Epee Event on account of her gender identity and sex.

81. Plaintiff suffered and continues to suffer great emotional harm as a direct result of Defendant's actions.

82. Connie Schrieber acted with actual malice when it discriminated against Dinah by excluding her from the women's competitions because she is a transgender woman.

83. Connie Schrieber acted with wanton and willful disregard for the rights of Dinah to participate under Virginia law when it was foreseeable that Dinah would suffer great harm by the act of excluding her from the competition.

COUNT THREE
YUKICH V. USA FENCING

Va Code Ann §2.2-3904

84. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

85. The Fairfax Challenge is a "Place of Public Accommodation" as defined by the Virginia Code. VA Code Ann. §2.2 -3904(A).

86. It is an "unlawful discriminatory practice for any person, including the owner, lessee, proprietor, manager, superintendent, agent, or employee of any place of public accommodation, to:

> *refuse, withhold from, or deny any individual, or to attempt to refuse, withhold from or deny any individual, directly or indirectly, any of the accommodations, advantages, facilities, services, or privileges made available in any place of public accommodation or to segregate or discriminate against any such person in the use thereof or to publish, circulate, issue, display, post or mail, either directly or indirectly, any communication, notice or advertisement to the effect that any of the accommodations, advantages, facilities, privileges, or services of any such place shall be refused, withheld from or denied to any individual on the basis of sex…gender identity…*

87. Defendant, USA Fencing, managed and oversaw the event, Fairfax Challenge. The Fairfax Challenge is in itself a "place of public accommodation, resort or amusement" under applicable Virginia law. VA Code Ann. §2.2-3904(A).

88. Defendant, USA Fencing, controlled the registration for the Fairfax Challenge. USA Fencing withdrew Dinah from the women's competitions on account of Dinah's sex and gender identity.

89. Defendant, USA Fencing, published, and circulated a policy that clearly stated that the women's events at the Fairfax Challenge shall be "refused, withheld from [and] denied" to transgender women.

90. Sex and Gender Identity are protected statuses under the Virginia Law. VA Code Ann §2.2-3902, §2.2-3904(B).

91. At all times applicable to the present matter, Defendant USA Fencing was aware that Dinah was a transgender woman and knowingly and maliciously discriminated against Dinah on the basis of her gender identity and sex.

92. Defendant USA Fencing discriminated against Dinah when ity prohibited Dinah from competing in the Division II Veteran Women's Epee Event on account of her gender identity and sex.

93. Plaintiff suffered and continues to suffer great emotional harm as a direct result of Defendants' actions.

94. USA Fencing, and the other Defendants, acted with actual malice when it discriminated against Dinah by excluding her from the women's competitions because she is a transgender woman.

95. USA Fencing acted with wanton and willful disregard for the rights of Dinah, to participate under Virginia law when it was foreseeable that Dinah would suffer great harm by the act of excluding her from the competition.

COUNT FOUR
YUKICH V. SHANNON DAUGHERTY

Va Code Ann §2.2-3904

96. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

97. The Fairfax Challenge is a "Place of Public Accommodation" as defined by the Virginia Code. VA Code Ann. §2.2 -3904(A).

98. It is an "unlawful discriminatory practice for any person, including the owner, lessee, proprietor, manager, superintendent, agent, or employee of any place of public accommodation, to:

> *refuse, withhold from, or deny any individual, or to attempt to refuse, withhold from or deny any individual, directly or indirectly, any of the accommodations, advantages, facilities, services, or privileges made available in any place of public accommodation or to segregate or discriminate against any such person in the use thereof or to publish, circulate, issue, display, post or mail, either directly or indirectly, any communication, notice or advertisement to the effect that any of the accommodations, advantages, facilities, privileges, or services of any such place shall be refused, withheld from or denied to any individual on the basis of sex…gender identity…*

99. Defendant, Shannon Daugherty, published, and circulated a policy that clearly state that the women's events at the Fairfax Challenge shall be "refused, withheld from [and] denied" to transgender women. VA Code Ann. §2.2-3904(A).

100. Defendant, Shannon Daugherty, controlled the registration for the Fairfax Challenge.

101. Sex and Gender Identity are protected statuses under Virginia law. VA Code Ann §2.2-3902, §2.2-3904(B).

102. At all times applicable to the present matter, Shannon Daugherty was aware that Dinah was a transgender woman and knowingly and maliciously discriminated against Dinah on the basis of her gender identity and sex.

103. Defendant, Shannon Daugherty, discriminated against Dinah when they individually and collectively prohibited Dinah from competing in the Division II Veteran Women's Epee Event on account of her gender identity and sex.

104. Plaintiff suffered and continues to suffer great emotional harm as a direct result of Defendants' actions.

105. Shanno Daugherty, and the other Defendants, acted with actual malice when it discriminated against Dinah by excluding her from the women's competitions because she is a transgender woman.

106. Shannon Daugherty acted with wanton and willful disregard for the rights of Dinah to participate under Virginia law when it was foreseeable that Dinah would suffer great harm by the act of excluding her from the competition.

COUNT EIGHT
YUKICH V. ALL DEFENDANTS
CIVIL CONSPIRACY

107. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

108. Defendants violated the law when they excluded Dinah from competing in the women's events at the Fairfax Challenge

109. Upon information and belief, Defendants had an agreement to exclude Dinah from the women's events at the Fairfax Challenge.

110. Upon information and belief, the Defendants engaged in a series of overt acts of excluding Dinah in furtherance of the agreement to keep Dinah out of all women's events at the Fairfax Challenge.

111. Defendants acted with intention in furtherance of the purpose of excluding Dinah from women's events at the Fairfax Challenge.

112. As a result of Defendants' actions, Dinah suffered severe emotional distress.

RELIEF SOUGHT

WHEREFORE, Plaintiff Dinah Yukich respectfully requests that this Court enter judgment in her favor and against all Defendants jointly and severally, and award the following relief:

a. A declaration that the actions of the Defendants were individually and collectively discriminatory under the controlling laws of the Commonwealth of Virginia.

b. An injunction or cease and desist order requiring Defendants to permit Plaintiff to participate in women's fencing events occurring in Fairfax County, Virginia that are managed or sanctioned by Defendants.

c. An award of damages in an amount to be determined at trial, but that do not exceed $74,999, exclusive of interests and costs.

d. Such other and further relief as the Court deems just and proper, including attorneys' fees.

PLAINTIFF DEMANDS TRIAL BY JURY

Respectfully Submitted,

By: 

Eve Hill (Va. Bar No. 96799)
Brown, Goldstein & Levy, LLP
120 East Baltimore Street, Suite 2500
Baltimore, MD 21202
Phone: (410) 962-1030
Fax: (410) 385-0869
ehill@browngold.com

Susan M. Cirilli, Esq.
(*pro hac vice application to be submitted*)
Spector Gadon Rosen Vinci PC
305 Broadway
New York, New York 10007
scirilli@sgrvlaw.com

Dated: October 30, 2026