

VIRGINIA:

**IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND
John Marshall Courts Building**

BONNIE KRENZ-SCHNURMAN,

Plaintiff,

v.

BENJAMIN TRIBBETT,

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Bonnie Krenz-Schnurman, for her complaint against Defendant Benjamin Tribbett, states as follows:

PRELIMINARY STATEMENT

1. Defendant Ben Tribbett has told elected officials, consultants, and senior political leaders across Virginia that Plaintiff—chief of staff to Governor Spanberger—engaged in an extramarital affair with a sitting state delegate who supported a competing congressional redistricting proposal, became pregnant by him, and is passing that child off as her husband’s.
2. Those statements are completely and demonstrably false.
3. She has never been unfaithful to her husband. Her child was conceived within her marriage. The paternity allegation Defendant is circulating is scientifically impossible and Plaintiff can provide DNA and genetic testing to remove any doubt regarding these facts. Plaintiff has never had a romantic or sexual relationship with the delegate Defendant identifies.
4. Defendant Ben Tribbett is not a casual participant in Virginia politics. He is a professional political consultant whose clients pay him to influence political outcomes. His own website advertises his “ability to use and place opposition research” and his ability to shape

narratives in high-profile political fights. His website also likens politics to some sort of high-stakes poker game, calling his clients “high rollers,” referring to politics as “a game of skill,” and claiming that in politics one must “always be ‘all in’ to win!”



Defendant Benjamin Tribbett

5. At the outset of Governor Abigail Spanberger’s term—following her decisive statewide election—Virginia Democrats were engaged in a consequential debate over congressional redistricting. Multiple approaches were advanced within the party. Defendant supported one strategy. A different proposal allegedly supported by the state delegate Defendant now falsely claims is the father of Plaintiff’s child, ultimately advanced.

6. Consequently, Defendant’s preferred approach did not prevail.

7. But rather than attribute that result to legislative negotiation, political judgment, or any other factual consideration, Defendant concocted and spread a different explanation to the same political class whose approval sustains his business: that the governor’s chief of staff was personally involved with the delegate aligned with the prevailing plan, implying that her supposed relationship influenced the outcome.

8. The accusation is not political commentary. It is a factual claim of adultery and paternity fraud. And even more so, it suggests that a major public process was influenced by secret sexual misconduct rather than lawful political decision-making. And most recently, he has pitched himself as a “sought-after source on topics” including “redistricting.”

9. The claim did not originate from a source. It did not arise from reporting. It did not follow from misunderstanding.

10. Defendant invented it for his own personal and political gain.

11. He then spread the fabrication deliberately—to legislators, consultants, and influential leaders in the Commonwealth—ensuring it would circulate where reputational harm would be most severe and where it would most effectively deflect attention from his own strategic defeat.

12. Plaintiff is the first woman to serve as chief of staff to the first woman governor in Virginia’s history. Defendant chose to falsely attack her fidelity, her sexuality, and the parentage of her newborn child rather than engage the merits of the policy disagreement. In doing so, Defendant falsely attacked her credibility not just as a parent, but also as a devoted and dedicated public servant.

13. After she learned of the accusation, Plaintiff demanded that Defendant retract his false claims. He flatly refused. He has produced no evidence to support his lies. Because there is none. Instead, upon information and belief, he continues to repeat his invented story within Virginia’s political leadership and to continue to falsely malign Plaintiff’s integrity.

14. These statements are false. They are defamatory *per se*. And they were published to protect Defendant’s professional standing and deflect from his own failures by shifting blame for a political loss onto Plaintiff.

15. Mrs. Krenz-Schnurman files this case as a last resort to stop the ongoing defamation and hold Defendant accountable for the harm he has caused.

PARTIES

16. Plaintiff Bonnie Krenz-Schnurman is chief of staff for Governor Abigail Spanberger. Plaintiff is a citizen of the Commonwealth of Virginia and works in the City of Richmond.

17. Defendant Benjamin Tribbett is a citizen of the Commonwealth of Virginia who works in Richmond, Virginia, as a political consultant.

JURISDICTION & VENUE

18. This Court has personal jurisdiction over Defendant Benjamin Tribbett because he regularly conducts business in Richmond, Virginia, and the acts giving rise to Plaintiff's claims occurred within this jurisdiction.

19. Venue is proper pursuant to Virginia Code § 8.01-262 because the parties conduct business in Richmond, Virginia, and a substantial part of the events giving rise to these claims occurred here.

FACTUAL ALLEGATIONS

Bonnie Krenz-Schnurman Is a Lifelong Public Servant with an Impeccable Reputation.

20. Plaintiff Bonnie E. Krenz-Schnurman has spent her career in public service and Democratic politics at the highest levels of state and federal government.

21. She earned a Bachelor of Science in Economics from the Massachusetts Institute of Technology in 2010. She later earned a master's in public administration from Princeton University's School of Public and International Affairs, where she received the Bradford Prize and was a Ryoichi Sasakawa Young Leaders Fellow, and obtained a certificate in science, technology, and environmental policy.

22. Following graduate school, she served in the Obama Administration, including as a senior policy adviser on the Energy and Climate Change Team within the White House and the Domestic Policy Council.

23. In 2019, Mrs. Krenz-Schnurman joined Representative Abigail Spanberger's congressional office, ultimately serving as chief of staff. In that role, she managed legislative strategy, constituent services, and a professional staff in one of the most closely watched swing districts in the country.

24. Mrs. Krenz-Schnurman later served as senior adviser and policy director for Spanberger for Governor, helping guide a successful statewide campaign.

25. In January 2026, following Governor Spanberger's election victory, Mrs. Krenz-Schnurman was appointed Governor Spanberger's chief of staff.

26. Mrs. Krenz-Schnurman married her husband in Richmond, Virginia in August 2024. The couple welcomed their first child in December 2025.

27. Throughout her career in federal and state government, Mrs. Krenz-Schnurman has built a reputation for discretion, competence, and integrity—qualities essential to the role she now holds.

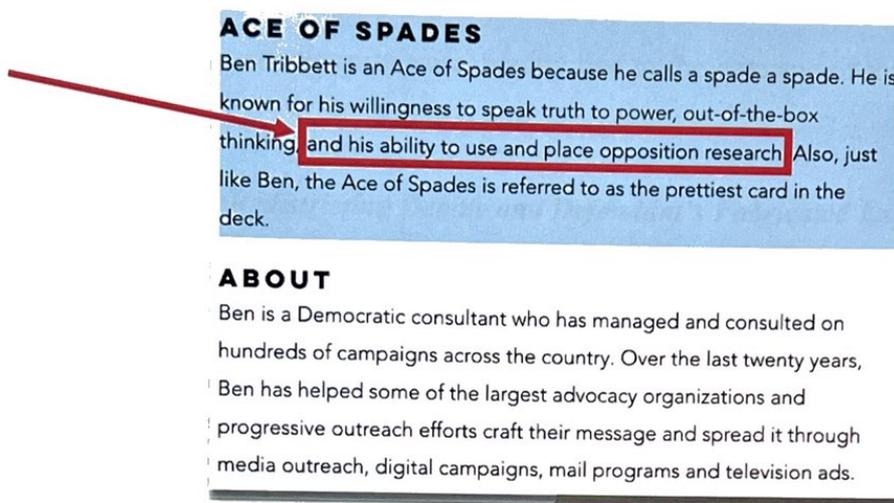
***Ben Tribbett Is a Professional Political Operative
Who Trades on Influence and Narrative Control***

28. Defendant Benjamin Tribbett is a Virginia-based political consultant and media commentator who operates at the center of the Commonwealth's political class.

29. For more than two decades, Defendant has advised candidates, advocacy organizations, and political committees in Virginia and nationally. He markets himself as a seasoned strategist with the ability to shape political narratives and influence public perception.

30. Defendant's own website boasts about his "ability to use and place opposition research" and highlights his role in crafting and disseminating political messaging in high-profile fights.

31. He promotes himself as a consultant capable of identifying damaging information about political actors and ensuring that such information reaches influential audiences.



32. Defendant frequently comments to members of the press on internal political disputes, legislative maneuvering, and electoral strategy. He has been quoted in major publications and has cultivated a reputation within Virginia political circles as someone with "inside" knowledge of public officials and behind-the-scenes decision-making.

33. During the 2026 congressional redistricting debate, Defendant publicly advocated for a specific map configuration and served as a political consultant to senior legislative leadership involved in the dispute. He communicated with reporters about the merits of particular map proposals and framed the debate in partisan and strategic terms.

34. Defendant's professional livelihood depends upon his perceived strategic acumen and access to nonpublic political intelligence. His clients retain him to advance preferred political

outcomes and, ultimately, to win their political fights. His public persona is built on the assertion that he understands—and can influence—the internal dynamics of Virginia politics.

35. Defendant has also previously inserted himself into high-profile political controversies, including briefly serving as a public advocate for the Washington NFL franchise in its defense of its former name before resigning amid public backlash.

36. At all relevant times, Defendant acted as a professional political operative whose financial and reputational interests were directly tied to the outcome of the redistricting dispute described herein.

The 2026 Redistricting Debate and Defendant's Fabricated Explanation

37. Following the 2020 Census, Virginia voters amended the Constitution of Virginia to establish a bipartisan Redistricting Commission intended to reduce overt partisanship in the drawing of congressional districts.

38. When that Commission was unable to reach agreement in 2021, the Supreme Court of Virginia appointed bipartisan experts to draw the Commonwealth's congressional map. That map remained in effect at the beginning of Governor Spanberger's term in January 2026.

39. In early 2026, members of the General Assembly advanced a proposed constitutional amendment that would temporarily authorize the legislature—subject to approval by Virginia voters in a statewide referendum—to replace the existing congressional map prior to the upcoming federal election cycle.

40. Under Virginia law, the Governor does not draw congressional districts. The Governor does, however, possess constitutional authority to sign or veto legislation and plays a central role in executive review of major statewide measures.

41. As chief of staff, Plaintiff was responsible for coordinating policy review, advising the Governor, and managing communications between the executive branch and legislative leadership concerning significant legislative initiatives, including redistricting.

42. Defendant Benjamin Tribbett is a paid political consultant. During the 2026 redistricting debate, Defendant was retained by senior legislative officials to advocate for a particular redistricting approach.

43. His role was to publicly comment on and privately advocate for that preferred approach and for a particular legislative configuration—which put his own reputation for shaping political outcomes and successfully advancing the strategies he promotes at stake.

44. The General Assembly ultimately advanced a different configuration than the approach Defendant had publicly and privately championed.

45. When that occurred, Defendant—desperate to save face and explain why he didn't deliver—started offering a personal explanation for the legislative outcome.

46. Defendant told elected officials, consultants, and senior political leaders across the Commonwealth that Plaintiff was engaged in an extramarital affair with a sitting state delegate who allegedly supported the legislative proposal that ultimately advanced.

47. On information and belief, as recounted by a source who was a direct recipient of Defendant's statement, on or about February 7, 2026, in Richmond, Virginia, Defendant Benjamin Tribbett stated to a third party the following defamatory exact words:

“Bonnie's baby is actually [a Delegate's] baby.”

48. Defendant stated those words as fact. He did not present them as rumor, speculation, or opinion.

49. In the context of the ongoing redistricting dispute, Defendant communicated these statements to individuals directly involved in or observing the legislative process.

50. By making these accusations during discussions concerning the redistricting outcome—and by identifying the specific state delegate who supported the legislative configuration that ultimately advanced—Defendant conveyed the clear and defamatory implication that Plaintiff's alleged intimate relationship improperly influenced official decision-making.

51. The recipients of Defendant's statements reasonably understood him to be asserting that Plaintiff's supposed affair explained or caused the Governor's Office's posture during the redistricting debate.

52. These accusations are false.

53. Plaintiff has never had a romantic or sexual relationship with the delegate Defendant identifies. She has never been unfaithful to her husband. Her child was conceived within her marriage.

54. Defendant did not misinterpret facts. He did not rely on a source.

55. He made them up. And he spread those lies within Virginia's political leadership to protect his own professional standing.

56. Defendant has repeated these accusations to elected officials, political consultants, campaign operatives, and other influential leaders within Virginia's political community.

Defendant Refused to Retract and Doubled Down on His False Accusations

57. On February 17, 2026, Plaintiff, through counsel, sent Defendant a detailed written demand for retraction.

58. The letter explained what Defendant already knew: the accusations he was spreading were demonstrably false.

59. The letter further explained that Defendant's statements falsely accused Plaintiff of adultery and paternity fraud, attacked the sanctity of her marriage and her family, and were causing immediate and severe reputational harm.

60. The letter demanded that Defendant immediately cease repeating the allegations, issue a written retraction to the individuals to whom he had communicated them, and provide a public apology correcting the record.

61. Defendant refused to do so. Instead, he admitted he had no personal knowledge supporting the allegations and no basis for repeating them as fact.

62. He did not retract the allegations. He did not apologize. He did not identify any source or evidence supporting his claims—because none exists.

63. Instead, Defendant stood by his accusations.

64. Defendant was not confused about the truth. He was not uncertain about the facts. He was placed on explicit notice that his statements were false and defamatory.

65. He nevertheless chose to continue the defamation.

Defendant's Smear Campaign Targeted Plaintiff's Marriage, Child, and Career

66. Defendant's statements accuse Plaintiff of adultery, deceit, and paternity fraud.

67. These are among the most serious and damaging accusations that can be made about a person. They attack the foundation of a marriage, the parentage of a child, and the integrity of a public servant.

68. In Virginia, allegations of adultery and dishonesty in one's personal and professional life constitute defamation *per se* because they inherently injure a person's reputation and standing.

69. Defendant did not confine himself to criticizing a policy position or legislative outcome. He chose instead to target Plaintiff's family.

70. He accused a married woman—just months after the birth of her child—of infidelity and of falsely representing her husband as the father of her baby.

71. Those accusations are not merely false. They are deeply personal and intentionally harmful.

72. Plaintiff is the first woman to serve as chief of staff to the first woman governor in the history of the Commonwealth of Virginia. Rather than engage the merits of a political disagreement, Defendant resorted to a smear that reduces a woman in public service to disparaging claims about her sexuality.

73. The suggestion that official decisions were the product of a secret intimate relationship, rather than lawful deliberation and professional judgment, reflects a familiar and harmful narrative that attempts to diminish a woman's professional authority by attributing it to personal impropriety.

74. Defendant spread this fabrication deliberately within Virginia's political leadership, ensuring that it would cause maximum reputational damage in the very community in which Plaintiff must work every day.

75. The harm is real and ongoing. Plaintiff has suffered humiliation, emotional distress, and injury to her professional standing. Her marriage and her newborn child have been pulled into a manufactured scandal for Defendant's own self-protection.

76. Because Defendant's statements constitute defamation *per se*, damages are presumed as a matter of law.

77. Defendant's conduct was willful and wanton.

78. Defendant deliberately republished and escalated a false accusation of adultery and paternity fraud as fact. He did so in wanton and reckless disregard for the rights of Plaintiff.

79. Defendant is an experienced political consultant who understands the reputational and professional consequences of accusing a married woman and senior public official of infidelity and deception regarding the parentage of her child.

80. Defendant's decision to persist in publishing false allegations after formal notice constitutes willful and wanton conduct and demonstrates a conscious disregard for Plaintiff's rights.

81. An award of punitive damages is necessary to punish Defendant's intentional misconduct and to deter similar defamatory conduct in the future.

82. Defendant's actions evince such recklessness and indifference to the consequences of his conduct as to warrant punitive damages under Virginia law.

83. Defendant's knowing fabrication, refusal to retract, and continued repetition of these accusations warrant an award of compensatory and punitive damages sufficient to vindicate Plaintiff's reputation and deter similar misconduct.

FIRST CLAIM FOR RELIEF

DEFAMATION *PER SE*

84. Plaintiff repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

85. In February 2026, Defendant published false statements of fact concerning Plaintiff to third parties within Virginia's political community.

86. Specifically, Defendant stated that Plaintiff engaged in an extramarital affair with a sitting state delegate, became pregnant by him, and falsely represented her husband as the father of her child.

87. Defendant further implied that this supposed relationship influenced or explained official governmental decision-making during the Commonwealth's redistricting process.

88. These statements are statements of fact, not opinion.

89. The statements are false.

90. Defendant published the statements to elected officials, political consultants, campaign professionals, and other influential leaders in the Commonwealth.

91. The statements are of and concerning Plaintiff, and they were understood by their recipients to refer to Plaintiff.

92. The statements falsely impute to Plaintiff adultery, dishonesty, and conduct incompatible with her role as chief of staff to Governor Spanberger.

93. Under Virginia law, false accusations of adultery and dishonesty constitute defamation *per se* because they inherently tend to injure a person in her reputation and profession.

94. Defendant made and repeated these statements knowingly and deliberately, despite knowing they are false.

95. Defendant fabricated the allegations and published them with actual malice—that is, with knowledge of their falsity or reckless disregard for the truth.

96. Defendant's conduct was motivated, at least in part, by his own financial and professional interests. Defendant is a paid political consultant whose livelihood depends upon his perceived ability to advance the strategies he is retained to support.

97. After the redistricting outcome did not align with the approach Defendant had publicly and privately advocated, Defendant had a personal and financial incentive to deflect responsibility and preserve his professional standing with current and prospective clients.

98. Defendant used the fabricated accusations against Plaintiff to supply a personal explanation for that outcome and to protect his own reputation within Virginia's political community.

99. After receiving Plaintiff's February 17, 2026 written demand for retraction and apology, Defendant refused to retract his statements.

100. As a direct and proximate result of Defendant's defamatory statements, Plaintiff has suffered and continues to suffer reputational harm, emotional distress, humiliation, and injury to her professional standing.

101. Because the statements constitute defamation *per se*, damages are presumed as a matter of law.

102. Defendant's knowing fabrication and refusal to retract warrant an award of compensatory and punitive damages in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Bonnie Krenz-Schnurman respectfully requests that the Court award her relief against Defendant Benjamin Tribbett as follows:

103. Actual and compensatory damages exceeding \$17,750,000, as well as interest, reasonable attorneys' fees, and costs, as allowed by law;

104. Punitive damages totaling \$350,000, as allowed by law; and

105. Such other and further relief as the Court deems appropriate.

JURY TRIAL DEMAND

Plaintiff demands trial by jury for all claims and issues that are so triable.

Date: February 23, 2026



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