

**In The
Supreme Court of the United States**

—◆—
ANNE K. BLOCK,

Petitioner,

v.

WSBA, et al.,

Respondents.

—◆—
**On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Ninth Circuit**

—◆—
**RESPONDENTS JOE BEAVERS, LINDA LOEN,
CRYSTAL HILL-PENNINGTON, PORT OF
SEATTLE, KALI MATUSKA, JULIA TANGA,
SEAN GILLEBO, JAMES TUTTLE, KENYON
DISEND, MICHAEL KENYON, ANN MARIE
SOTO, SANDRA SULLIVAN, AND MARGARET
KING'S JOINT BRIEF IN OPPOSITION**

—◆—
MICHAEL R. KENYON
ANN MARIE SOTO
KENYON DISEND, PLLC
11 Front Street South
Issaquah, WA 98104
(425) 392-7090
Mike@KenyonDisend.com
AnnMarie@KenyonDisend.com

*Attorneys for Kenyon Disend,
PLLC, Michael Kenyon,
Ann Marie Soto, Sandra
Sullivan and Margaret King*

AMANDA G. BUTLER
Counsel of Record
KEATING, BUCKLIN
& MCCORMACK, INC., P.S.
801 Second Avenue,
Suite 1210
Seattle, WA 98104
(206) 623-8861
abutler@kbmlawyers.com

*Attorneys for Joe Beavers,
Linda Loen, Crystal
Hill-Pennington, Port of
Seattle, Kali Matuska,
Julia Tanga, Sean
Gillebo, and James Tuttle*

QUESTIONS PRESENTED

1. Whether Ms. Block has met her burden in demonstrating allowance for her writ as set forth in United States Supreme Court Rule 10 (Considerations Governing Review on Certiorari).

2. Whether certiorari should be denied where the case arises from a unique set of facts; the Ninth Circuit's decision does not conflict with the decision of any other Court of Appeals or with any decision of this Court; and the Petition does not present any question of exceptional importance worthy of this Court's attention.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1, Kenyon Disend, PLLC is a Washington professional limited liability company and states that it has no parent corporation or publicly held corporation that holds 10% or more of its stock.

STATEMENT OF RELATED CASES

Anne Block v. Washington State Bar Association, et al., No. C15-2018, U.S. District Court for the Western District of Washington. Judgment entered August 17, 2016.

Anne Block v. Washington State Bar Association, et al., No. 16-35274, U.S. Court of Appeals for the Ninth Circuit. Judgment entered September 28, 2016.

Anne Block v. Washington State Bar Association, et al., No. 16-35461, U.S. Court of Appeals for the Ninth Circuit. Judgment entered February 11, 2019.

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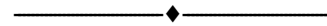
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INTRODUCTION

This Petition is nothing more than Petitioner Anne Block's most recent of her relentless attempts to harass the Respondents. Ms. Block, a formerly licensed attorney in Washington State, brought this action against a multitude of defendants including the Washington State Bar Association ("WSBA"), various local government agencies, WSBA and local government officials, and the attorneys who represent them, alleging a widespread conspiracy amongst these officials and agencies to harm her. All of the Defendants were dismissed, and Ms. Block was sanctioned by the district court for her "vexatiously pursued litigation." The Ninth Circuit Court of Appeals affirmed the dismissal of *all* of the Defendants and the award of attorneys' fees.

In her Petition, Ms. Block fails to cite to any of the criteria in Supreme Court Rule 10 to support granting of review here. Instead, Ms. Block makes the same unsuccessful arguments she made before the district court and Ninth Circuit Court of Appeals in an attempt to relitigate purely *factual* issues. No conflict between courts exists. No important federal question is presented. Review is not appropriate in a factually intense case, such as here. Certiorari should be denied.



DECISION BELOW

The Ninth Circuit Court of Appeals' order affirming the District Court's dismissal of Ms. Block's Amended Complaint and denial of her motions to

disqualify District Court judges is available at *Block v. Washington State Bar Ass'n*, 761 Fed. Appx. 729 (9th Cir. 2019).

◆

STATEMENT OF THE CASE

A. Procedural Background.

On December 28, 2015, Block filed her Complaint—and subsequently, an Amended Complaint and “RICO Statement”—in the instant matter alleging various governmental agencies and individuals were part of a conspiracy to retaliate against her stemming from her blogging activities. ER Vol. V: 94-158; ER Vol. V: 1-87; ER Vol. IV: 69-235. All of the Defendants—and in particular, the Gold Bar, Port of Seattle, and Kenyon Disend Defendants—ultimately moved to dismiss under Fed. R. Civ. P. 12(b)(6). ER Vol. II: 61-82; ER Vol. IV: 1-21; 56-68. The Kenyon Disend Defendants also filed a motion for sanctions pursuant to Fed. R. Civ. P. 11. ER Vol. III: 168-183. The district court subsequently dismissed the Gold Bar, Port of Seattle, and Kenyon Disend Defendants, and granted Kenyon Disend’s motion for sanctions, awarding monetary sanctions to Kenyon Disend and issuing a pre-filing order against Block for her vexatiously pursued litigation. ER Vol. I: 33-47; 74-100; 105-136.

As part of her vexatious litigation tactics, Ms. Block also filed multiple motions to disqualify the judges who were assigned to this case, alleging they were barred—as members of the WSBA—from hearing

this matter because the WSBA was a defendant. ER Vol. 177; ER Vol. IV: 49-55; ER Vol. V: 88-93. All of Ms. Block's motions to disqualify were denied. ER Vol. I: 137-139; ER Vol. V: 172; ER Vol. V: 181.

On appeal to the Ninth Circuit, the Court affirmed the dismissal of all of the Defendants, denial of the motions to disqualify, and the awards for attorneys' fees.

B. Causes of Action and Decisions Pertaining to the Gold Bar Defendants (Linda Loen, Joe Beavers, Crystal Hill Pennington and the City of Gold Bar).

Ms. Block pled numerous causes of action against the various Gold Bar Defendants to include defamation, First Amendment retaliation and RICO violations.

Ms. Block claimed that Linda Loen (a former mayor of the City of Gold Bar) deprived her of her constitutional rights by retaliating against her. ER Vol. V: 109-110, 15. Ms. Block alleged that Ms. Loen conspired with others to retaliate against her for exercising her constitutional and statutory rights. *Id.* Ms. Loen was identified as a RICO Defendant. *Id.* That was the extent of Ms. Block's claims against Ms. Loen in her original Complaint. Ms. Block did not mention Ms. Loen again throughout her 65-page missive. In her Amended Complaint, Ms. Block claimed Ms. Loen: met with Joe Beavers (former Gold Bar Mayor) during the first week of December 2013; called Ms. Block urging her to keep her WSBA license; told her she needed to

attend a deposition; and told her she would get a lot of public records. ER Vol. V: 74-75.

Ms. Block likewise claimed Joe Beavers (former Gold Bar Mayor) deprived her of rights guaranteed by the United States Constitution by retaliating against her for exercising those rights. ER Vol. V: 110, 15. He too was identified as a RICO Defendant. *Id.* Specifically Ms. Block alleged Mr. Beavers:

- Breached his public duties, violated his oath of office, conspired and agreed to cover up former City of Gold Bar employee, Karl Marjerle's, crimes in exchange for assistance obtaining a new job with the City of Bellevue, unfettered access to unemployment benefits and \$10,000. ER Vol. V: 116-117, 26-29.
- Illegally accessed and retrieved Plaintiff's mental health history, retrieved history for some other person, falsely characterized it as Plaintiff's and disseminated inside public records. ER Vol. V: 122, 32.
- Ordered Gold Bar's clerk to write a WSBA complaint for former City of Gold Bar council member Dorothy Croshaw who filed a WSBA complaint against Plaintiff in June 2010. ER Vol. V: 123-124, 33-34.
- Stole money from the City's water fund in late 2010. ER Vol. V: 124, 34.
- Conspired to assemble, write and file the second WSBA complaint against Plaintiff using city staff and city's public records in June 2012. ER Vol. V: 125-126, 36.

- Furthered the efforts of the enterprise on June 19, 2015 meeting at King County District Court. ER Vol. V: 143, 70.
- Assisted Kenyon Disend in obtaining the contract with the City of Gold Bar for legal services. ER Vol. V: 123, 33.
- Stated “we’re going to get [Plaintiff’s license].” ER Vol. V: 124, 34-35.
- Met and conspired with others at the WSBA offices. ER Vol. V: 146, 72.
- Used city resources to assist the WSBA by providing altered records to a WSBA investigator. ER Vol. V: 74-75.
- Signed onto the Gold Bar Reporter. ER Vol. V: 147, 75.

Ms. Block pled defamation and First Amendment retaliation against Crystal Hill Pennington (former mayor of Gold Bar). She also identified Hill Pennington as a RICO defendant. ER Vol. V: 63-64. Ms. Block’s claims against Hill Pennington are set forth below:

- Hill Pennington filed criminal complaints against Plaintiff. ER Vol. V: 60-70.
- Hill Pennington retaliated against Plaintiff for First Amendment protected speech and filed a Petition for Restraining Order in King County, attempted to have Plaintiff criminally prosecuted in Duvall and Gold Bar and altered supporting documents in those matters. ER Vol. V: 60-70.

- Hill Pennington knowingly made and/or published false libelous recorded statements inside King County Washington State records and knowingly filed false statements with the King County District Court, City of Duvall and Snohomish County. ER Vol. V: 60-70.
- Hill Pennington met with others at King County District Court to further the Enterprise. ER Vol. V: 60-70.

C. Causes of Action and Decisions Pertaining to the Port of Seattle Defendants.

Ms. Block's allegations against the Port of Seattle Defendants were as follows:

- Plaintiff was "illegally detained at Seattle Tacoma International Airport by two Port officers." ER Vol. V: 67-69.
- King County Defendant Cary Coblantz "placed a phone call to the Port of Seattle informing them what flight Plaintiff was on asking the Port of Seattle . . . to serve a civil order on Plaintiff. That Port of Seattle Officer Matuska, Tanga and [Gillebo] elicited the assistance of US Customs Officer Curtis Chen to place a tracker on Plaintiff's passport. That Port of Seattle admitted via a public records request that it has never served a civil order on any other person except for Plaintiff." ER Vol. V: 67-69.

- Port of Seattle Defendants “Tanga, [Gillebo], and Tuttle were being paid by King County.” ER Vol. V: 67-69.
- The Port of Seattle Police Department received an email from King County Defendant Cary Coblantz indicating “that Plaintiff was ‘anti-government.’” ER Vol. V: 67-69.
- Port of Seattle Defendant Tuttle “told Plaintiff that he was an internal affairs investigator for the Port of Seattle. Plaintiff learned from Port of Seattle public records, in August 2015, that Tuttle was not an internal affairs investigator.” ER Vol. V: 67-69.

D. Causes of Action and Decisions Pertaining to the Kenyon Disend Defendants.

Kenyon, Soto, King and Sullivan are all current or former employees of Kenyon Disend, PLLC, and are all identified by Block as “RICO defendants.” ER Vol. V: 16-17. The sole factual allegations against KD are:

- In May 2009, Kenyon Disend, PLLC, Sullivan and Kenyon assisted defendant John Pennington (Pennington) in “quashing criminal assault charges” in some unidentified matter and are withholding public records relating to this assistance. ER Vol. V: 32-33.
- In April 2011, Defendant Joe Beavers (Beavers) assisted Kenyon Disend, PLLC in obtaining a legal services contract with the City of Gold Bar, and King was assigned to represent the City. ER Vol. V: 33, ¶ 3.20.

- King had some “involvement” in a Washington State Bar Association complaint filed against Block by a non-party, Dorothy Crowshaw (Crowshaw) in June of 2010. ER Vol. V: 33-34.
- In early 2011, King, without seeking permission from the Gold Bar City Council, filed a Motion for Sanctions against Block in a recall petition case that Block had filed against former Gold Bar Mayor Beavers. ER Vol. V: 34.
- In late 2011, a Gold Bar Councilmember “stated” in an unidentified forum and to an unidentified person(s), “Margaret King is coming after you!” King then filed a Motion for Sanctions in an unidentified recall matter “in violation of Washington State Recall laws.” Such actions “amount to extortion, thus a predicate act under RICO.” ER Vol. V: 35.
- In late 2011, King filed an unidentified “ex-parte Motion” in an unidentified Snohomish County Superior Court matter after “notifying Plaintiff via email only hours before.” This Motion was heard by defendant Snohomish County Commissioner Geoffrey Gibbs, a “personal friend to Michael Kenyon” even though “Washington State’s Public Records Act prohibits a Commissioner from hearing any issues relating to public records.” Block was then sanctioned as a result. Such actions “amount to extortion, thus a predicate act under RICO.” ER Vol. V: 35-36.

- In January 2012, King, Kenyon and Soto¹ conspired with defendants Crystal Hill-Pennington, Pennington and Beavers to write and file a WSBA complaint against Block using Gold Bar staff and public records, and that Kenyon Disend billed Gold Bar taxpayers for doing so. ER Vol. V: 36.
- On May 13, 2014, defendant Sean Reay (Reay) “called Kenyon Disend.” ER Vol. V: 57.
- At some unspecified time and in an unidentified matter, someone named Krista Dashtestani “personally met Michael Kenyon in court proceeding [sic] involving Hill-Pennington.” ER Vol. V: 61-62.
- Cary Coblantz (Coblantz) conspired with Sullivan to have Block charged with stalking. On September 21, 2015, Block published articles on her Gold Bar Reporter blog entitled, “Duvall City attorney Sandra Sullivan (Meadowcraft) [sic] quashing criminal charges for political favors, EXPOSED” and “Michael Kenyon’s Dirty Bag of Secrets Part II.” ER Vol. V: 69.
- In 1993, Kenyon was the City Attorney for Kelso at the time Pennington was a suspect in the rape of a five-year-old girl in Cowlitz County. Kenyon “owns one of the largest municipal law firms in Washington State.” ER Vol. V: 71-72.

¹ This is the only allegation which pertains to Soto. Block’s original Complaint (ER Vol. V: 94-158) failed entirely to mention Soto except in the case caption.

- From May 2014 to present, Kenyon “sign[s] on to [Block’s blog] the Gold Bar Reporter on an almost daily basis.” ER Vol. V: 75.



REASONS FOR DENYING THE PETITION

A. This Case Presents a Fact-Specific Scenario and is Thereby Improper for Certiorari.

The Supreme Court does not ordinarily grant review in “fact bound cases.” *See* Supreme Court Rule 10 (“A petition for a writ of certiorari is rarely granted when the asserted error consists of erroneous factual findings.”). A major reason why this Court will frequently deny certiorari in a case is if the legal dispute is fact-bound, that is, if it arises primarily from a unique constellation of facts unlikely to frequently arise again. *Allapattah Services Inc. v. Exxon Corp.*, 362 F.3d 739 (11th Cir. 2004). “The Court’s job is to make law. . . . [Lower courts] cannot be brought into line by a Supreme Court decision that turns exclusively on the facts of one particular case. . . . [T]he Court prefers to take cases in which the facts are simple and clear and the legal issue is presented crisply.” *Id.*, quoting, Stewart A. Baker, *Symposium on Supreme Court Advocacy: A Practical Guide to Certiorari*, 33 *Cath. U. L. Rev.* 611, 616 (1984); Sanford Levinson, *Book Review: Strategy, Jurisprudence, and Certiorari. Deciding to Decide: Agenda Setting in the United States Supreme Court*, 79 *Va. L. Rev.* 717, 726 (1993) (noting that some certiorari petitions “are likely to be denied because they are essentially fact bound”).

If the facts of the case are unusual or unique, such a ruling would only apply to a few people or have little real-world importance. See S. Shapiro *Certiorari Practice: The Supreme Court's Shrinking Docket*; *Litigation*, Vol. 24, No. 3, 25-33 (Spring 1998). When a petitioner concedes that the case was unusual or unique in its brief in the lower courts, such a characterization is “a kiss of death” (*id.* at 27) on a petition for writ of certiorari. The Supreme Court will usually deny certiorari when review is sought of a lower court decision that turns solely upon an analysis of the particular facts involved, or upon the construction of particular contracts or written instruments. “We do not grant a certiorari to review evidence and discuss specific facts.” *United States v. Johnson*, 268 U.S. 220, 227 (1925); *Texas v. Mead* 465 U.S. 1041 (1984) (Stevens, J.); see *NLRB v. Hendricks County Rural Electric Corp.*, 454 U.S. 170, 176 n.8 (1981) (improvident grant of cross-petition that presented “primarily a question of fact,” “which does not merit Court review”); *Rudolph v. United States*, 370 U.S. 269 (1962); *Southern Power Co. v. North Carolina Public Service Co.*, 263 U.S. 508 (1924); *Houston Oil Co. v. Goodrich*, 245 U.S. 440 (1918). Fact bound bases are the “type of case[s] in which we are *most* inclined to deny certiorari.” *Kyles v. Whitley*, 514 U.S. 419, 460, 115 S.Ct. 1555, 131 L.Ed.2d 490 (1995) (Scalia, J., dissenting).

As a threshold matter, this case presents an idiosyncratic body of facts. Ms. Block’s allegations (set forth above) confirm as much. Likewise, her Petition presents a tangled web of conspiracies in an attempt

to persuade this Court that her version of the facts is true rather than point to any of the considerations which would warrant review here. *See* Petition at 38 (“Block offers several plausible *factual allegations* to support her contention. . . .”). Review should be denied on that basis alone.

B. The Ninth Circuit’s Decision Does Not Conflict With the Decision of Any Other Court of Appeals or With Any Decision of This Court.

“[T]he ‘single most important’ factor for granting certiorari petitions . . . is a split within the circuits that have considered the issue below.” Sanford Levinson, *Book Review: Strategy, Jurisprudence, and Certiorari. Deciding to Decide: Agenda Setting in the United States Supreme Court*, 79 Va. L. Rev. 717, 726 (1993) (quoting H.W. Perry, Jr., *Deciding to Decide: Agenda Setting in the United States Supreme Court* 251 (1991)).

Allapattah Services, Inc. v. Exxon Corp., 362 F.3d 739 (11th Cir. 2004). There is no such split here.

Petitioner did not and cannot argue that the Ninth Circuit’s decision in this case was inconsistent with any of these decisions. Nor does the Ninth Circuit’s decision conflict with any decision reached by this Court.

It is unclear whether Petitioner is trying to argue that the Ninth Circuit’s decision on disqualification conflicts with other precedent. *See* Petition at 27-28. Not only is an alleged misapplication of the law not an

appropriate consideration for granting review (*See* Supreme Court Rule 10), but Petitioner is simply incorrect. None of the cases Petitioner cites involved appellate decisions by the Ninth Circuit—or *any* Circuit—related to issues of prejudice based on WSBA membership. Petition at 27. No conflict exists.

This too, warrants denial of Ms. Block’s Petition.

C. The Petition Does Not Present Any Question of Exceptional Importance Worthy of This Court’s Attention.

There is no question of exceptional importance here and Ms. Block fails to clearly articulate that one exists. Instead, Ms. Block cites to her First Amendment constitutional right to disassociate and her assertion that she properly pled First Amendment retaliation claims. That alone is not a basis for certiorari.

The right to eschew association for expressive purposes is protected. *Roberts v. United States Jaycees*, 468 U.S. 609, 623, 104 S.Ct. 3244, 82 L.Ed.2d 462 (1984) (“Freedom of association . . . plainly presupposes a freedom not to associate”); *see Pacific Gas & Elec. Co. v. Public Utilities Com’n of California*, 475 U.S. 1, 12, 106 S.Ct. 903, 89 L.Ed.2d 1 (1986) (“[F]orced associations that burden protected speech are impermissible”). Nobody disputes that. Rather, Ms. Block’s convoluted, tangled alleged conspiracy against fifty different defendants will not and could not conceivably bear on any other individual’s right to disassociate, and is entirely *fact*-based.

With respect to Ms. Block's First Amendment retaliation claims, she again merely reargues the case she presented to the district court and Ninth Circuit by focusing on the specific *factual* issues. Ms. Block fails to articulate anything more than her disagreement with the lower courts' decisions. No unsettled area of law is alleged.

This case was correctly decided by application of specific facts to well-settled law. Ms. Block has utterly failed to demonstrate how any issue in this case is of exceptional importance to anyone but her.



CONCLUSION

The purpose of a petition for certiorari is not for the petitioner to demonstrate that his or her position is correct or that the lower court was right or wrong. It is also not an opportunity for the petitioner to reargue the merits of their case on purely factual issues. Yet, in doing just that, Ms. Block has failed to address any of the considerations to enable this Court to determine whether review is appropriate. For the reasons stated above, the Court should deny the Petition for Writ of Certiorari.

RESPECTFULLY submitted this 4th day of November, 2019.

AMANDA G. BUTLER
Counsel of Record
KEATING, BUCKLIN
& McCORMACK, INC., P.S.
801 Second Avenue, Suite 1210
Seattle, WA 98104
(206) 623-8861
abutler@kbmlawyers.com

*Attorneys for Joe Beavers, Linda
Loen, Crystal Hill-Pennington,
Port of Seattle, Kali Matuska,
Julia Tanga, Sean Gillebo,
and James Tuttle*

MICHAEL R. KENYON
ANN MARIE SOTO
KENYON DISEND, PLLC
11 Front Street South
Issaquah, WA 98104
(425) 392-7090
Mike@KenyonDisend.com
AnnMarie@KenyonDisend.com

*Attorneys for Kenyon Disend, PLLC,
Michael Kenyon, Ann Marie
Soto, Sandra Sullivan
and Margaret King*