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No. 24

Supreme Court, U.S.
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In The
Supreme Court of the United States

S. KEVIN BJORNSON,

Petitioner,

v.

EQUIFAX INFORMATION SERVICES LLC,

Respondent.

On Petition for a Writ of Certiorari to the United
States Court of Appeals for the Ninth Circuit

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS IN REVIEW

Was the Ninth Circuit Court of Appeals correct in their Interpretation of the laws regarding the disqualification of the Respondents counsel? When is the counsel of the Respondent a direct party to the harm caused to the Petitioner?

Was the Ninth Circuit Court of Appeals correct to make its interpretation of the law when deciding to deny the Petitioner his right to Amend his Complaint?

Was the Ninth Circuit Court of Appeals Correct in their Interpretation of the statute of limitations when determining that the two-year Statute of Limitations applies and not the Three year "Discovery Rule" statute of Limitations?

Based on the Ninth Circuit Court of Appeals interpretation of the Laws, Rules, Case Standards, and Constitutional Provisions in this matter. Was the Petitioner Denied his Civil and Constitutional Rights to Equal Protection of Law and a Due Process of Law under the 14th Amendment of the United States Constitution?

Was the Ninth Circuit Court of Appeals correct when making the Decision not to Strike the Index of the Excerpts and Excerpts of the Record although

Respondent's initial filing of the Excerpts excluded all the Exhibits related to all filings of the Record? And in the corrected set of the Excerpts of the Record the Respondents' filings were un referenceable to the alleged Index of the Record?

Was the Ninth Circuit Court of Appeals correct in their decision not to Strike the Respondents Answering Brief although the Respondent openly admitted they violated the Circuit Rules when making references directly to the Record? And failed to properly reference the Excerpts of the alleged Record in their Answering Brief?

PARTIES

Petitioner is Kevin Scott Bjornson appellant below and Plaintiff in the District Court.

Respondent is Equifax Information Services LLC appellee below and defendant in the District Court.

RELATED CASES

Bjornson vs. Equifax Information Services LLC Case No. 3:23-cv-05128-BHS United States District Court for the Western District of Washington. Judgement entered on (May 25th 2023) Dkt 18.

Bjornson vs. Equifax Information Services LLC Case No. 23- 35421, U.S. Court of Appeals for the Ninth Circuit Judgment entered on (December 30th 2024) Dkt 25.

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PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment(s) below.

OPINIONS BELOW

The opinion of the United States court of appeals on the Petition for Rehearing appears at Appendix C and is unpublished. The opinion of the United States court of appeals appears at Appendix A. to the petition and is unpublished. The Final Judgment of the United States District Court appears at Appendix B. to the petition and is published.

JURISDICTION

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: December 30th, 2024, and a copy of the order denying rehearing appears at Appendix A. The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Petitioner's Equal Protection of the law right's of the 14th Amendment were denied. When denying his Motions to Strike the Excerpts of the Record and the Appellee's Reply Brief. And, by denying the Petitioners Petition for Rehearing as the grounds laid out in the Petition regarding the "Discovery Rule" are governed by Supreme Court of the State of Washington and Washington State Law.

STATEMENT OF THE CASE

The Petitioner Kevin Scott Bjornson filed his Appeal in the Ninth Circuit Court of Appeals based on the following issues of law and material fact(s) of the case.

That the U.S. District Court had denied his right to Amend his Complaint. That the U.S. District Court had denied his “Motion(s) for Disqualification”. That the U.S. District Court had denied both his Defamation and FCRA claims.

The Petitioner filed his Complaint in the U.S. District Court for twelve counts of Defamation Libel and one count of violation of the Fair Credit Reporting Act. The Petitioner alleged that Equifax Information Services had Defamed him by claiming that he was a Resident of the State of Virginia, listed Dead by the Social Security Administration and had to prove that he was living , that he had a vehicle repossessed, that he purchased the vehicle from Westlake Auto, and that the Petitioner had filed disputes with Equifax alleging things he had never heard of on dates that he was not aware of. And that further, Equifax by making such claims against the Petitioner and publishing such not only as Defamation but also as a credit report in the Petitioners' name as well.

The Petitioners claims arise out of an Answer and Affirmative and Other Defenses filed by Heather McFarland of Seyfarth Shaw LLP Bjornson v. Equifax Inc., No. 3:20-cv-05449 RJB (W.D. Wash. Oct. 20, 2020). However, the claims arise out of the use of a document filed during civil proceeding.

The Respondent failed to raise any claims of a privilege in their defense to the suite nor deny that the Defamatory statements were in fact false. And thus, ruling out that any such claims of defense could be raised later. The Respondent also failed to raise a proper defense against the possibility of the Petitioners claims being filed under the "Discovery Rule" besides making a statement in one of the footnotes of their Answer stating that the "Discovery Rule" did not apply. And thus, again eliminating the ability for the Respondent to later raise such Defenses. See 22a.

Rather the Respondents defense relied on the 2-year statute of limitations rule for defamation claims raised in the State of Washington under RCW 4.16.100(1) and supported by *Herron v. KING Broadcasting Co.* 109 Wn.2d 514 (1987) 746 P.2d 295. In response the Respondents Answer the Petitioner immediately filed a Motion to Strike and Disqualify Seyfarth Shaw LLP as representation for the Respondent. Since Heather McFarland was an attorney who worked for their firm and was partnered with other Attorney's, Paralegals, and other staff from Seyfarth Shaw at the time that the Defamatory statement(s) and credit report were published. The U.S. District Court denied the Motion(s) to Strike the Answer and Affirmative Defense and to Disqualify the Representation of the Respondent and then granted the Respondents Motion to Dismiss. See 36-37a.

In Response the Petitioner filed a Notice of Appeal, appealing the case to the Ninth Circuit Court of

Appeals. The Petitioner in his Opening Brief addressed the fact that he was denied his right to *Amend the Complaint* and that the U.S. District Court had failed to grant his Motion(s) to Strike and Disqualify. And that the Petitioner was entitled to both his FCRA and Defamation claims. Stating that the Statute of Limitations did not begin until after a 3rd party Scott Semans read the Defamatory Statements and then decided to deny the Petitioner credit. And that the Petitioners constitutional rights had been violated. See 13-16a and 20-38a.

However, the Ninth Circuit Court of Appeals sided with the U.S District Court stating that the U.S. District Court was correct in dismissing the action under the two-year statute of limitations. And that the U.S. District Court was correct in Denying Petitioner his right to Amend his Complaint. The Ninth Circuit Court also stated that the U.S. District Court was correct when deciding to deny the Petitioner's Motion to Disqualify the counsel of the Respondent. See 1-3a.

That being the Petitioner filed a Petition for Rehearing raising issues overlooked by the Ninth Circuit Court. In the Petition the Petitioner noted that the Ninth Circuit Court had overlooked the fact that his claims were not merely subject to the two statute of limitations but that also they were subject to the *Discovery Rule* which provided the Petitioner the ability to file both his Defamation and FCRA claims within three years of the *Discovery* of the actions which caused him damages citing *JM*

Martinac Shipbuilding Corp. v. Washington, 363 F. App'x 529, 531 (9th Cir. 2010) as delineated in “Matter of Estates of Hibbard” See 22-32a.

- i. *From the time the apparent cause of the harm is discovered until the product actually caused the harm; in each scenario the Court analyzed the essential elements of possible cause of action, i.e., duty, breach, causation, and damages. Estates of Hibbard*, 118 Wn.2d 737, 747 (Wash. 1992). And supported by *U.S. Oil*, 96 Wn.2d at 93. *North Coast Air v. Grumman Corp.*, 111 Wn.2d 315, 331 (Wash. 1988).
- ii. *The discovery rule reflects a judicial determination to balance the possibility of stale claims against the unfairness of precluding justified causes of action where a plaintiff is unable to ascertain within the statute of limitations period that a wrong has been committed. U.S. Oil*, at 93. *North Coast Air v. Grumman Corp.*, 111 Wn.2d 315, 331 (Wash. 1988) and *Vanelli v. Reynolds Sch. Dist. No. 7*, 667 F.2d 773, 777 (9th Cir. 1982). *Llamas v. Butte Comm. Coll. Dist.*, 238 F.3d 1123, 1128 (9th Cir. 2001). The Petitioner then noted that the Respondent had not raised any defenses against the “Discovery Rule”.

After the Petitioner laid the grounds to his right to actions under the “Discovery Rule” he then presented

the fact that under such circumstances he would be entitled to Amend his Complaint. See 29a. And that the Ninth Circuit Court had overlooked the existence of such basis for recovery under any of the civil rights acts or heads of jurisdiction in the federal arsenal for redress of constitutional deprivations 383 F. Supp. at 1399- 1400, *Gordon v. Leake*, 574 F.2d 1147, 1151 (4th Cir. 1978) Supported by:

- iii. We have held that "[a] pro se litigant must be given leave to amend his or her complaint. *Noll v. Carlson*, 809 F.2d 1446, 1448 (9th Cir.1987)(internal quotation marks omitted). Upon remand, the district court should permit the Safouanes to attempt to amend their complaint to allege facts, if such exist. *Safouane v. Fleck*, 226 F. App'x 753, 767 (9th Cir. 2007).

The Petitioner then cited the fact that his Constitutional Rights to a Due Process of Law and to Equal Protection under the 14th Amendment of the United States Constitution had been overlooked. The Petitioner in his Motion(s) to Strike the Index and Excerpts of the Records. The Petitioner noted that when the Respondent initially filed the Excerpts of the Record that they failed to provide any of the exhibits which pertained to the different Excerpts i.e. Complaint, Responses, Motions etc. The Petitioner then addressed the alleged "Corrected Index and Excerpts of the Record". See 17-19a. Where the Petitioner noted that the Index was not referenceable as portions of the Record were missing from the Index.

Most notably ER 218 and ER 219 were not labeled properly which then offset the Index by two pages from ER 218 where now ER 220 was actually ER 218.

The Petitioner stated that this made it impossible to properly reference the record but that the Respondent also clumped all of the Exhibits into two different sets and listed the first set as what was should have been eleven different individual Exhibits A-K as Exhibit and listed then as *Plaintiffs Exhibits to Amended Complaint Excerpts ER 101- ER 193*. What was some ninety-one pages of clumped Exhibits and then what was not referenceable at all as based on the *Index* ER 218 to ER 264 another forty-four pages of clumped Exhibits of what should have been divided into three separate exhibits. The Petitioner pointed out that both sets of Exhibits were not properly listed in reverse chronological order as prescribed by the Circuit Rule 30-1.4 nor were the Exhibits listed individually as prescribed by the Circuit Rules 30-1.5.

The Petitioner noted that this created a prejudice to the Petitioner and that the Petitioner was not able to properly reference the record, because certain arguments that pertained to specified exhibits were not there based on the Index and that trying to reference the Index of the Index of the Record passed 218 became a burden as two pages were missing. The Petitioner then went on the state that the Respondent admitted to their action(s)

iv. *Equifax apologizes that document 13-1 from the District Court was*

unintentionally mis-indexed by 2 pages, "Equifax's appellate filings fell short of this Court's standards, Equifax apologizes. While some groups of exhibits were filed by Mr. Bjornson in the District Court as single documents, they are not so voluminous so as to prevent efficient review. Indeed, the entire Corrected Excerpts of Record fit into a single volume. Nonetheless, should this Court request additional correction of the Index or Excerpts of Record, Equifax would, of course, fulfill any such request.

The Petitioner would like to note that the Respondents Response suggestion that they be allowed to correct the Record came after the Petitioner had already filed his "Motion(s) to Strike and Reply Brief which if the Ninth Circuit had granted such a request would have prejudiced the Petitioner as the Petitioner had already filed their Motions and Reply Brief and having to possibly refile would have been an unjust, unfair and unconstitutional request by the Respondent.

The Petitioner noted before the Court that the Respondent admits that the Exhibits were in fact clumped and that they were filed originally as individual documents. The Petitioner then brought before the Ninth Circuit Court not only in his Motion(s) to Strike the Index and Excerpts but in his Reply Brief. That the Circuit Rules mandate that the Index of the Record be listed in *Reverse Chronological Order* and properly listed each

Excerpt of the Record individually citing the docket entry from the originating court on the Index for each individual Excerpt filed. See 17-19a.

The Petitioner in his Motion to Strike the Excerpts of the record explained to the Ninth Circuit that his Constitutional Rights had been violated by the Courts decision to allow for the Respondent to proceed with the invalid, erroneous, and unlawful Index of the Record and the Excerpts. And although the Respondent failed to deny or otherwise defend that the Index of the Record was in fact not in *Reverse Chronological Order* the Ninth Circuit Court still denied the Petitioner his right to civil redress although it is common practice for a Circuit Court to Strike and Dismiss a party's brief based on sets of the Excerpts and their Index which violate the Circuit Rules. Especially when the order of the Index is in the Opposite order listing the beginning of the case from the U.S. District Court as the initial action and the final Order of the District Court as the Last action of Review before the Circuit court.

That being when the Respondent knows that the focus of the Circuit court is the Order from the District Court which establishes the grounds of which an Appellant has filed their Appeal. Yet the Ninth Circuit although the Index placed the most important Excerpt the Order of the District Court was listed at the end of the list as ER-280 not ER-1 but ER-280 decided to overlook the 280 Excerpts which included two completely false Excerpts and two massively clumped sets of Exhibits to proceed regardless if the

Petitioner had issues composing his Brief.

Seconding the Respondents miss filed Index and Excerpts of the Record the Petitioner Motioned to Strike the Respondents' citations directly to the Records in their Answering Brief. The Respondent in violation of the Circuit Rules 30-1.1 made citations directly to the Record. The statement which relates directly to the *Citation Directly to the Record* is clearly an argument and attempt to direct one's audience belief as to the substance i.e., the "admission." And therefore, such statements cannot be construed to be used for background information nor factual or procedural history that is undisputed. As if one reviews the record, they would be left to conjure their own opinion of the matter. And would not see whether they appear related or unrelated. As one party's opinion as to whether the "Admissions" would be related or not is determined by the reader and not by the Court and is not merely for procedural history as the Citation is not to an Order from the Court making such determination nor does its present procedural history.

When confronted with the fact that the Respondent had made Citations directly to the Record the Respondent not only admitted it but tried to divert the blame back onto the Petitioner a Pro Se litigant who is allowed to Cite the Record and is not required to provide Excerpts of the Record Federal Rules of Appellant Procedure. The Respondent in response to the accusations of making citations to the record in violation of the Circuit Rules stated the following:

v. *Mr. Bjornson did not file his own Excerpts of Record, which he was not required to do, under 9th Cir. R. 30-1.3, but he was able to exhaustively argue his position in his Opening Brief. Therein, Plaintiff cited to various exhibits in to his filings the District Court record by way of docket entry and page number citations. See, e.g., Opening Brief, at 5 ¶ 12.B (citing to Bjornson v. Equifax Info. Servs., 3:23-cv-05128-BHS, DKT.13 p.2 lines 1-12, and Dkt.13-1 pg. 11-39 (W.D. Wash. April 5th, 2023).*

The Petitioner believes that it's clear that the Respondent openly provide an excuse for the action(s) they took when making citations to the Record a direct Circuit Rule violation. However, in the past it is not a common practice for a Circuit Court to allow an Appellee the right to make "Excuses" to defeat the law. We see that the Petitioner's 14th Amendment rights to a Due Process of Law and to Equal protection were in fact denied. As the case law standards state that Sanctions have been imposed simply for incorrect "Spacing and footnote typeface" as stated below:

vi. *We have certainly awarded monetary sanctions for less serious infractions. See, e.g., Kano v. Nat'l Consumer Coop. Bank, 22 F.3d 899 (9th Cir. 1994) (imposing \$1500 sanction for incorrect line spacing and footnote typeface) Lowry v. Barnhart, 329 F.3d 1019, 1026 n.7 (9th Cir. 2003)".*

Yet the Ninth Circuit not only denied the Petitioner his right to Due Process and Equal Protection of the laws. But also, allowed the Respondent to commit numerous Federal Court Rule, Appellant Court Rule, and Circuit Rule violations and simply turned a blind eye. And that being after the Respondent had admitted to such actions as stated above. The petitioner prays for the redress of these merits by the Supreme Court. The Petitioner was entitled to his Constitutional Rights and provisions of the laws of the United States and the governing case laws. Although the Petitioner raised several issues that if not addressed would deny the Petitioner his Constitutional Right the Ninth Circuit without any explanation simply denied the Petitioner his right to Rehearing.

REASONS FOR GRANTING THE PETITION

1. Based on the Statement of the Case above it becomes clear that respondents action(s) were in fact unlawful, and unconstitutional. It is further clear that the Ninth Circuit Court of Appeals failed to address any of these unlawful and unconstitutional action(s). See 12a, 20-38a.
2. Although the Petitioner pleaded for redress of the matters in what was typically common practice by the Ninth Circuit Court of Appeals to Strike, Sanction, and either Dismiss or Affirm. Yet here we see that after repeated admission by the Respondent of their guilt in the Action(s) and after “excuse after excuse” used by the Respondent to

“defeat the law”. See 1-3a, 12a, 20-38a.

3. We can clearly see that neither the district court but especially the Ninth Circuit Court did not offer the Petitioner proper Constitutional redress of the matters. But rather denied the Petitioner his 14th Amendment Rights to *a Due Process of Law, and to Equal Protection of the Laws*.
See 1-3a, 12a, 20-38a.
4. The Petitioner clearly raised arguments, filed Motions to Strike, and Dismiss all of which pointed out to the Ninth Circuit Court of Appeals all the unlawful, and unconstitutional actions taken by the Respondent. Yet the Ninth Circuit Court which in the past has Sanctioned a party as a matter of case standard for incorrect line spacing and footnote typeface *Lowry v. Barnhart*, 329 F.3d 1019, 1026 n.7 (9th Cir. 2003) *citing See, e.g., Kano v. Nat'l Consumer Coop. Bank*, 22 F.3d 899 (9th Cir. 1994). Turned a blind eye to the action(s) of the Respondent which is a clear violation of the Petitioners 14th Amendment right to Equal Protection of the laws and a Due Process. See 1-3a, 20-38a.
5. The Petitioner prays for the Supreme Court to Redress these matters and provide the type of law biding constitutional clarity that the Supreme Court is relied upon for. See 20-38a.
6. Secondly the Petitioners presentation of the case laws standards presented by the Supreme Court

of the State of Washington which determine the standards used to maintain an action under the *Discovery Rule*. When presented to the Ninth Circuit Court in the Petitioners Petition for Rehearing they were completely ignored without any valid explanation as to why or what grounds the court relied upon when making their decision. See 12a, 20-38a.

7. The Petitioner believes that these issues qualify for redress by the Supreme Court since the rulings of the Ninth Circuit Court conflict with current case laws, Constitutional provisions, and Prior State and Federal Supreme Court Rulings. In situations where a Petitioners Constitutional rights come into question as does the issues of conflict between the ruling of law made by in lower court the Supreme Court of the United States is the common and preferred Court to redress such issues and is established specifically for such. Therefore, the Petitioner Prays for the redress of these issues by the Supreme Court of the United States. See 20-38a.
8. The Ninth Circuit Court of Appeals also when presented with the fact that if the Petitioners Claims meet the qualification as set forth by the Washington State Supreme Court. Regarding the Petitioners ability to maintain an action under the "Discovery Rule" that the Petitioner would therefore be also entitled to Amend his Complaint. The Ninth Circuit Court of Appeals with no explanation as to the laws, case

standards, nor Constitutional Provisions relied upon failed to set forth any explanation as to the grounds for their decision. See 12a.

9. Considering all the questions of law, case standards, and constitutional provisions, the Petitioner in all matters raised in this Petition for Writ Certiorari. The Petitioner relies on the redress of the Supreme Court of the United States as here the conflict is so great and numerous amongst so many issues presented in the case that the Petitioner believes that only the Supreme Court of the United States is proper for the redress of such matters.

CONCLUSION

Our Constitution grants citizens of the country a right to a Due Process and to Equal protection under the Fourteenth Amendment of the United States Constitution. It has been the duty of the United States Supreme Court to uphold the constitutional values of the citizens of the United States and redress the conflicts between courts. Here in this case, we can see that there is a question as to whether the lower court's opinion(s) conflict with the current State Supreme Court Rulings, State laws, the Laws of the United States, the case standards of the Appellant Court, and the United States Supreme Court case law standards. This is the type of case where the Supreme Court of the United States is proper court to redress the matter. Therefore, the Petitioner prays that the Supreme Court will redress this matter.

The petition for a Writ of Certiorari should be granted.
Respectfully submitted, *S/Kevin Scott Bjornson*
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