

1 IN THE CIRCUIT COURT OF THE STATE OF OREGON
2 FOR MULTNOMAH COUNTY

4	DAVID KOENIG	11	Case No.: 23CV15424
5	Plaintiff	12	PLAINTIFF’S DECLARATION OF
6	vs	13	ESTIMATED SCRABBLE PRIZE
7	EVANS CLINCHY	14	WINNINGS
8	JENNIFER CLINCHY and	15	
9	BRIANNA (LOLA) McKISSEN	16	
10	Defendants	17	

19 **DECLARATION**

20 I, David Koenig, declare the following under penalty of perjury:

- 21 1. This declaration sets forth facts as would be admissible in evidence, and I am competent
- 22 to testify to the matters stated.
- 23 2. I have competed in Scrabble tournaments since November 9th, 2002 and I have won cash
- 24 prizes in many of these events.
- 25 3. The vast majority of these events have been sanctioned by the National Scrabble
- 26 Association (NSA) in the USA and Canada through June 2009, by the North American
- 27 Scrabble Players Association (NASPA) in the USA and Canada from July 2009 onward,
- 28 by the Association of British Scrabble Players (ABSP) in the UK and Europe.
- 29 4. Additionally, many of these tournaments have been sanctioned by the World
- 30 English-language Scrabble Players Association (WESPA), and I have played in a small

- 1 number of tournaments which were sanctioned only by WESPA and not by one of the
2 other associations.
- 3 5. I have won prize money in United States Dollars, Canadian Dollars, British Pounds,
4 Euros, and Malaysian Ringgit.
- 5 6. All Canadian prize winnings are estimates in American Dollars, as I do not have exact
6 data for those tournaments.
- 7 7. I have made a good faith effort to collect all data that I could on past prize winnings, but
8 the data sources are incomplete.
- 9 8. I have made a good faith effort to estimate all unknown prizes as accurately as possible.
- 10 9. My data for NSA and NASPA tournaments comes from cross-tables.com. The **Prize**
11 column in the first chart corresponds to the data at
12 <https://www.cross-tables.com/results.php?playerid=60>, except as noted in the next item.
- 13 10. I have added to the **Prize** column two prizes, because I have corroborated exact values
14 for those prizes. They are for the 06/07/14 tournament in Pittsburgh and the 12/08/17
15 California Open.
- 16 11. Where cross-tables has provided estimates, I have used their estimates.
- 17 12. The rows highlighted in yellow are tournaments in which I likely won money but for
18 which cross-tables has no data.
- 19 13. I have estimated my likely winnings at the tournaments in yellow, using several heuristics
20 as a guide:
- 21 a. Comparison to other tournaments with roughly the same size of field and a similar
22 result.

- 1 b. Multiday tournaments (more than 8 rounds) tend to pay higher than one-day
2 tournaments (8 rounds or fewer).
- 3 c. Anecdotal knowledge of particular directors and geographic areas that tend to pay
4 higher or lower prizes.
- 5 d. Knowledge of specific events that is not from official data sources is noted.
- 6 14. The second chart shows all of my winnings from ABSP tournaments. Stewart Houtens of
7 ABSP provided me the full list of ABSP tournaments that I played.
- 8 15. The vast majority of the ABSP prize winnings are corroborated by ABSP data or by my
9 own social media posts, as shown in the notes.
- 10 16. The third chart shows the only tournaments that I am aware of which were sanctioned by
11 WESPA but not by NSA, NASPA, or ABSP in which I won prizes.
- 12 17. The links in the third chart show corroboration of those finishes, but I have not found any
13 extant data corroborating the prize amounts.
- 14 18. For ABSP and WESPA tournaments where I do not have data, I have estimated from
15 memory.
- 16 19. The fourth chart combines the totals of the previous three charts to estimate my total
17 prize winnings in American dollars.
- 18 20. I have not accounted for the changing relative value of the currencies and have just used a
19 fixed estimate of \$1.30 to a Pound, \$1.10 to a Euro, and \$0.22 to a Ringgit.
- 20 21. The value in US Dollars of the total estimated prize winnings I have calculated is
21 \$21,602.

- 1 22. Although the estimate for an individual tournament might be slightly higher or lower than
2 what I actually won, I believe this total number is a good ballpark estimate for how much
3 money I have won in place or class prizes at these tournaments.
- 4 23. I also believe that this number underestimates my total winnings from Scrabble
5 tournaments for two reasons:
- 6 a. I sometimes won high game or high word prizes for individual games or plays
7 that are not always accounted for in this data.
 - 8 b. I played in a few unsanctioned house tournaments and may have won money in
9 some of those. Since I do not have data about these nor good memory of the
10 specifics, I have omitted them from consideration in these calculations.
- 11 24. These prize winnings encompass a roughly 20 year period, from late 2002 to early 2022.
- 12 25. Combining the conclusions of items 21 and 24, I have won on average a little more than
13 \$1000 per year over the course of my entire tournament Scrabble career.
- 14 26. Inspection of the chart of NASPA events shows that my winnings are heavily biased
15 toward the more recent years. I have more consistently won prizes, and many of the
16 prizes that I have won have been bigger in the later part of the chart.
- 17 27. Note, for example, that I won money in every single tournament between November
18 2017 and October 2019.
- 19 28. Almost all of the international prize winnings in the ABSP and WESPA charts are from
20 2016 and later.
- 21 29. Based on the factors in items 26-28, I think it is a reasonable estimate that my expected
22 prize winnings in recent years would have been in the range of \$1500-\$2000 per year, if
23 the defendants had not interfered with my ability to compete in Scrabble tournaments.

1 30. This \$1500-\$2000 per year estimate is consistent with the statement I made in item 7 of
2 my affidavit on May 22, 2023.

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4 August 11, 2023.

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/s/ David Koenig

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Plaintiff, representing *pro se*

North American Prizes

Location	Date	W	L	T	B	Spread	Place (Division)	Prize	with est.	Notes
Plainview LI NY	11/09/02	6	1			813	1 of 12 (4)	\$60E	\$60	
Plainview LI NY	12/07/02	6	1			467	1 of 10 (3)	\$60E	\$60	
Parsippany NJ Main Event	12/27/02	11	6			645	5 of 36 (3)	\$50E	\$50	
Philadelphia PA	03/23/03	2	5			-153	17 of 20 (2)			
Philadelphia PA	06/22/03	3	4			-57	6 of 10 (2)			
Queens NY	06/28/03	3	3			70	9 of 16 (2)			
Bayside NY	07/12/03	6	1			436	1 of 10 (2)	\$60E	\$60	
Philadelphia PA	07/20/03	6	1			412	1 of 14 (3)	\$125	\$125	
Bayside NY	08/16/03	4	3			-89	4 of 8 (2)			
Parsippany NJ Main Event	08/23/03	8	9			-69	23 of 38 (2)			
Danbury CT	02/13/04	14	6			858	3 of 44 (2)	\$240	\$240	
Boston Area Tournament Main Event	04/02/04	11	4			604	4 of 40 (2)	\$250	\$250	
Piscataway NJ	05/21/04	6	9			112	12 of 16 (1)			
Albany NY Main Event	07/02/04	12	8			407	5 of 30 (1)			
Bayside NY	07/10/04	4	3			21	5 of 10 (1)			
Philadelphia PA	07/18/04	4	3			9	4 of 12 (1)			
Parsippany NJ Main Event	09/04/04	12	13			-160	11 of 18 (1)			
Philadelphia PA	10/24/04	4	3			454	3 of 10 (1)		\$40	
Atlantic City NJ	01/28/05	4	8			-182	30 of 36 (1)			
Danbury CT	02/18/05	6	14			-538	30 of 32 (1)			
Philadelphia PA	03/20/05	5	2			690	1 of 10 (1)	\$125E	\$125	
Philadelphia PA	04/03/05	4	3			142	5 of 14 (1)			
Boston Area Tournament Main Event	04/22/05	11	4			273	2 of 40 (2)	\$250	\$250	
Parsippany NJ Main Event	05/28/05	14	11			37	2 of 8 (1)	\$200E	\$200	
Albany NY Main Event	07/02/05	10	10			736	6 of 16 (1)			
Philadelphia PA	07/17/05	4	3			220	6 of 17 (1)			
16th National Championship	08/20/05	15	12	1		179	28 of 87 (1)			
Philadelphia PA	02/18/07	5	2			184	3 of 14 (1)	\$40E	\$40	
Princeton NJ Main Event	03/31/07	11	3			744	1 of 16 (1)	\$550	\$550	
Annapolis MD	05/13/07	6	1			690	2 of 22 (1)	\$150E	\$150	
Philadelphia PA	05/26/07	13	6			908	2 of 12 (1)	\$200	\$200	
Albany NY Main Event	06/30/07	11	8	1		734	8 of 30 (1)			
Boston MA	07/07/07	3	5			-148	7 of 8 (1)			
Philadelphia PA	08/19/07	5	2			617	2 of 14 (1)	\$75	\$75	
Philadelphia PA	09/01/07	18	1			1739	1 of 10 (1)	\$220	\$220	
Baltimore MD	09/28/07	7	6			139	17 of 40 (1)			
Big Apple Tournament	10/12/07	8	7			226	17 of 42 (1)			
North Salem, NY (LCT)	11/24/07	4	2			193	2 of 6 (1)		\$40	
Port Jefferson LI NY	12/16/07	4	3			288	2 of 8 (1)	\$40E	\$40	
Albany NY Early Bird	12/28/07	3	4			28	6 of 8 (1)			
Albany NY Main Event	12/29/07	12	12			-30	28 of 46 (1)			
Bayside NY	01/05/08	4	3			474	3 of 12 (1)	\$25E	\$25	
Atlantic City NJ	01/25/08	10	5			763	3 of 24 (1)	\$200E	\$200	
Philadelphia PA	02/17/08	3	4			338	8 of 16 (1)			
Hyde Park NY	03/01/08	5	3			636	1 of 8 (1)	\$160E	\$160	
Philadelphia PA	03/16/08	4	3			156	5 of 14 (1)			
Farmingdale NY	03/22/08	5	2			524	1 of 8 (1)	\$150E	\$150	
Princeton NJ Early Bird	03/28/08	3	2			457	4 of 12 (1)			
Princeton NJ Main Event	03/29/08	8	6			479	5 of 14 (1)			
Poughkeepsie NY	04/11/08	9	8			619	5 of 16 (1)			
Boston Area Tournament Main Event	04/26/08	5	10			-75	15 of 16 (1)			
Philadelphia PA	05/24/08	12	7			1069	2 of 10 (2)	\$200	\$200	
Can-Am Match	06/21/08	5	9			-332	12 of 14 (1)			
New York NY	06/28/08	2	5			8	6 of 8 (2)			
19th National Championship	07/26/08	17	11			668	14 of 103 (1)	\$20	\$20	
Philadelphia PA	08/10/08	4	3			592	6 of 16 (1)			
Big Apple Showdown	08/23/08	8	8			329	11 of 20 (1)			
North Salem NY	09/13/08	7	1			1222	2 of 22 (1)	\$300	\$300	
New York NY	10/03/08	9	6			897	8 of 42 (1)			
North Salem NY	11/29/08	7	1			613	1 of 10 (1)	\$180E	\$180	
Albany NY Late Bird	01/04/09	5	4			620	15 of 45 (1)			
Teaneck NJ	01/24/09	4	3			-87	4 of 8 (1)			
North Salem NY	02/07/09	6	2			243	2 of 8 (1)	\$80E	\$80	
Rockville MD	03/21/09	9	5			415	4 of 16 (1)			
Boston Area Tournament Main Event	04/17/09	10	5			719	3 of 36 (2)	\$180	\$180	
Annapolis MD	05/09/09	5	2			218	3 of 14 (1)	\$250	\$250	
Pittsburgh PA	06/13/09	7	6			430	9 of 26 (1)			
Washington DC	07/18/09	6	2			641	2 of 14 (1)	\$210	\$210	
Maine Event	09/05/09	10	10			158	13 of 28 (1)			
Wilmington, DE	11/08/09	7	0			609	1 of 8 (1)		\$150	
Philadelphia, PA	12/13/09	3	4			-158	9 of 14 (1)			
Charlotte, NC Early Bird	02/12/10	5	1			403	2 of 16 (1)	\$95	\$95	
Charlotte, NC Main Event	02/13/10	13	8	1		284	3 of 28 (1)	\$165	\$165	
Charlotte, NC Late Bird	02/13/10	5	3			115	10 of 26 (1)			

North American Prizes

Rockville, MD	04/10/10	7	7			266	9 of 18 (1)			
Philadelphia, PA	04/25/10	4	3			297	4 of 14 (1)			
Arnold, MD	05/15/10	4	3			223	4 of 12 (1)			
Wilmington, DE	06/13/10	4	3			384	3 of 8 (1)			
Albany, NY Main Event	07/02/10	9	10	1		143	17 of 28 (1)			
Rockville, MD	07/24/10	6	1		1	780	1 of 14 (1)		\$200	
Maine Event	09/04/10	12	8			296	5 of 20 (1)			
California Open	10/29/10	15	4			1066	4 of 120 (1)	\$800	\$800	
Princeton, NJ	12/28/10	5	0			910	1 of 12 (1)		\$200	
Charlotte, NC Main Event	02/19/11	14	8			846	3 of 16 (1)	\$355	\$355	
Bethesda, MD	03/19/11	8	6			423	4 of 10 (1)			
Boston Area Tournament Main Event	04/08/11	6	9			74	14 of 16 (1)			
Pittsburgh, PA	06/04/11	7	6			-51	7 of 12 (1)			
Bethesda, MD	07/09/11	6	2			595	2 of 14 (1)		\$100	
22nd National Championship Main Eve...	08/06/11	16	15			-152	49 of 108 (1)			
11th World Championship (CSW)	10/12/11	17	17			-383	62 of 106 (1)			
Charlotte, NC (CSW)	02/17/12	16	8			1324	2 of 6 (1)	\$110	\$110	
Boston Area Tournament (CSW) Early ...	04/13/12	3	2			288	3 of 6 (1)	\$20	\$20	
Boston Area Tournament Main Event (...)	04/13/12	13	2			987	1 of 12 (1)	\$350	\$350	
Pittsburgh, PA (CSW)	06/02/12	8	5			1142	1 of 4 (1)		\$280	2012/05/31 email chain with director confirms this is reasonable estimate
Old Greenwich, CT (CSW) Early Bird	07/27/12	2	2	1		85	4 of 6 (1)			
Old Greenwich, CT Main Event (CSW)	07/27/12	7	7		2	507	4 of 9 (1)			
23rd National Championship Main Eve...	08/11/12	18	12	1		1072	6 of 37 (1)			
New York, NY (CSW)	09/01/12	12	9			174	3 of 6 (1)			
Cambridge, MD (CSW)	11/02/12	14	2			1351	1 of 4 (1)		\$140	
Crescent City Cup (CSW)	01/19/13	11	9			210	5 of 12 (1)			
Boston Area Tournament (CSW) Early ...	04/12/13	4	1			391	1 of 6 (1)	\$150	\$150	
Boston Area Tournament Main Event (...)	04/12/13	10	5			816	3 of 14 (1)	\$125	\$125	
Hudson, NY (CSW)	05/11/13	8	0			1022	1 of 10 (1)		\$220	
Washington, DC (CSW)	06/01/13	7	1			862	1 of 4 (1)		\$100	
Princeton, NJ (CSW)	06/15/13	5	3			261	2 of 4 (1)			
Philadelphia, PA (CSW)	08/04/13	3	4			181	5 of 8 (1)			
Charleston, WV (CSW)	10/12/13	11	3			889	1 of 6 (1)	\$240	\$240	
12th World Championship (CSW)	12/04/13	17	14			783	28 of 110 (1)			
Bethesda, MD (CSW)	05/10/14	11	3			1311	1 of 6 (1)		\$150	
Arden Cup (CSW)	05/24/14	11	9			16	5 of 12 (1)			
Pittsburgh, PA (CSW)	06/07/14	10	3			825	1 of 4 (1)	\$200	\$200	Corroboration of prize
Princeton, NJ Main Event (CSW)	06/20/14	13	3			1232	1 of 12 (1)		\$350	
25th National Championship Main Eve...	08/09/14	17	13	1		787	17 of 63 (1)			
New York, NY (CSW)	08/30/14	10	10			192	4 of 8 (1)			
Catonsville, MD (CSW)	09/20/14	5	2			307	1 of 10 (1)		\$220	
Scrabble Champions Tournament (CSW)	11/19/14	13	11			226	41 of 108 (1)			
WESPA Championship Consolation (CSW...)	11/22/14	9	5			583	11 of 76 (1)			
Crescent City Cup (CSW)	01/17/15	14	6			1033	2 of 16 (1)	\$350	\$350	
Port Clinton, OH Main Event (CSW)	02/14/15	9	6			647	3 of 10 (1)		\$80	
Port Clinton, OH (CSW) Late Bird	02/16/15	5	2			569	3 of 8 (1)			
Philadelphia, PA (CSW)	03/01/15	7	0			1049	1 of 10 (1)		\$220	
Washington, DC (CSW)	04/18/15	5	2			1022	1 of 8 (1)		\$150	
Niagara Falls, ON (CSW)	05/01/15	8	6			481	10 of 30 (1)			
Rockville, MD (CSW)	06/06/15	5	3			148	3 of 6 (1)			
Potomac, MD (CSW)	07/25/15	7	1			568	1 of 6 (1)		\$150	
New York, NY (CSW)	09/05/15	10	8			905	4 of 10 (1)			
WESPA Championship (CSW)	11/04/15	18	14			588	30 of 130 (1)			
Potomac, MD (CSW)	12/19/15	7	1			897	1 of 10 (1)		\$220	
Crescent City Cup (CSW)	01/16/16	12	8			905	7 of 32 (1)			
Potomac, MD (CSW)	03/26/16	5	3			366	4 of 14 (1)			
Washington, DC (CSW)	04/16/16	5	2			1253	1 of 6 (1)		\$150	
Niagara Falls, ON (CSW)	04/30/16	9	5			951	6 of 54 (1)	\$160	\$160	
Dover, DE Main Event (CSW)	05/27/16	14	5			629	1 of 12 (1)	\$450	\$450	
Catonsville, MD (CSW)	06/04/16	6	1			613	1 of 6 (1)		\$150	
Atlanta, GA Main Event (CSW)	06/25/16	15	7			1049	2 of 23 (1)	\$450	\$450	
Vienna, VA (CSW)	12/18/16	5	3	1		423	2 of 7 (1)		\$60	
Crescent City Cup (CSW)	01/14/17	10	10			329	14 of 26 (1)			
Charlottesville, VA Main Event (CSW...)	03/18/17	11	3			1248	1 of 10 (1)	\$400	\$400	
Niagara Falls, ON (CSW)	05/20/17	12	10			183	41 of 110 (1)			
Arden Cup (CSW)	05/27/17	13	8			667	5 of 8 (1)			
Asheville, NC (CSW)	11/04/17	12	2			1220	1 of 12 (1)	\$750	\$750	
California Open (CSW)	12/08/17	14	5		1	765	3 of 30 (1)	\$300	\$300	Corroboration of prize
Crescent City Cup (CSW)	01/13/18	12	8			913	5 of 30 (1)	\$120	\$120	
Manhattan, NY (CSW)	02/24/18	5	1			322	2 of 6 (1)		\$80	
Gaithersburg, MD (CSW)	03/31/18	6	2		2	318	1 of 5 (1)		\$100	
Princeton, NJ Main Event (CSW)	04/06/18	13	3			1000	1 of 10 (1)		\$325	
Portland, OR (CSW)	05/20/18	4	2			179	3 of 8 (1)	\$25	\$25	
Arden Cup (CSW)	05/26/18	13	7			742	2 of 8 (1)		\$100	
Austin, TX (CSW)	03/09/19	10	5			461	2 of 8 (1)		\$100	

North American Prizes

<i>Arden Cup (CSW)</i>	05/25/19	11	9		791	1 of 4 (1)		\$150	
<i>Niagara Falls, ON (CSW)</i>	06/08/19	15	6		911	3 of 50 (1)		\$300	was paid in Canadian dollars, estimate of American equivalent
<i>Lake Oswego, OR (CSW)</i>	06/22/19	5	1		592	1 of 4 (1)	\$40	\$40	
<i>Seattle, WA (CSW)</i>	10/26/19	6	2		504	2 of 4 (1)	\$50	\$50	
<i>California Open (CSW)</i>	12/13/19	13	7		906	4 of 18 (1)			Finished just out of money and won box of chocolates
<i>Albany, NY Main Event (CSW)</i>	12/28/19	22	9		1294	3 of 20 (1)	\$200	\$200	
<i>Montclair, NJ (CSW) Early Bird</i>	01/03/20	3	2		124	6 of 12 (1)			
<i>Montclair, NJ Main Event (CSW)</i>	01/04/20	8	0		801	1 of 14 (1)		\$200	
<i>Crescent City Cup (CSW)</i>	01/18/20	12	8		799	6 of 26 (1)			
<i>Lake Oswego, OR (CSW)</i>	01/26/20	3	3		-12	3 of 4 (1)	\$5	\$5	
<i>Lynnwood Half-Day, WA (CSW)</i>	08/07/21	2	4		-73	4 of 6 (1)			
<i>Crescent City Cup (CSW)</i>	01/15/22	13	6	1	1280	1 of 14 (1)	\$1,190	\$1,190	
<i>Kingston, ON (CSW) Early Bird #1</i>	03/10/22	5	2		506	2 of 8 (1)		\$85	was paid in Canadian dollars, estimate of American equivalent
<i>Kingston, ON (CSW)</i>	03/11/22	5	10	3	-281	7 of 8 (1)			
								\$16,560	Estimated total of all NASPA tournament prizes

Association of British Scrabble Players (ABSP) Prizes

Tourney	Date	Place	Prize (pounds)	Prize (euros)	Notes			
SCT14	2014-11-21	41st	£10		Spot prize, high word round 13	Corroboration		
BMSCEarlyBird2016	2016-08-26	3rd	£20		Corroboration			
BMSCMainEvent2016	2016-08-29	4th	£150		Corroboration			
ViennaEarly16	2016-09-09	1st		€100	estimated, prize money not listed in config.tsh			
ViennaEuCSC16	2016-09-11	4th	£0		Corroboration			
StockholmSep17	2017-09-02	5th	£0					
BMSC17Main	2017-08-28	1st	£500		Corroboration			
BMSC18	2018-08-27	15th	£0					
BMSCWarmUp18	2018-08-25	3rd	£40		Corroboration			
BordeauxOct18	2018-10-14	7th	£0					
SIMPLEMay19	2019-05-06	2nd	£700		Corroboration			
NSCLastChance19	2019-10-04	4th						
NSCFinals19	2019-10-06	4th	£100		Corroboration			
GrandSlamFebMar20	2020-03-01	1st	£825		config file says £800 for first, and I won a £25 Slam Dunk prize			
NSC22	2022-06-12	5th	£150		prize table has wrong records, this shows I finished fifth			
BerlinEarlyJun22	2022-06-17	1st		see below				
BerlinMainJun22	2022-06-19	2nd		€400	combined prizes for Early Bird and Main Event			
		Total	£2,495	€500				

World English-language Scrabble Players Association (WESPA) Prizes

These are the WESPA tournaments that were not also ABSP tournaments and in which I cashed. All prizes estimated.				
2016 WSC Lille	2016-09-02	9th	€400	https://www.wespa.org/aardvark/html/tournaments/460.html
MSISatOpenLille	2016-09-03	8th	€100	https://www.wespa.org/aardvark/html/tournaments/459.html
				corroborating that I cashed in both tourneys
2018 WSC Torquay	2018-10-26	10th	£200	https://www.wespa.org/aardvark/html/tournaments/679.html
2019 WSC Torquay	2019-11-22	9th	£100	https://www.wespa.org/aardvark/html/tournaments/791.html
2019 Malaysian Open	2019-07-01	2nd	MYR RM1,400	https://www.wespa.org/aardvark/html/tournaments/797.html
Total	£300	€500	MYR RM1,400	

Total Of All Prizes in US Dollars

	Dollars	Pounds	Euros	Ringgit	Converted to \$
NASPA	\$16,560				
ABSP		£2,495	€500		
WESPA		£300	€500	MYR RM1,400	
total	\$16,560	£2,795	€1,000	MYR RM1,400	\$21,602

PROOF OF SERVICE

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August 11, 2023.

/s/ David Koenig

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Plaintiff, representing *pro se*