

City of Seattle KV Question #3 - Why do you believe that you were not selected for the Cook, Chef, or Food Services Manager position in September 2022?

It is a multi-part answer. Ms. Campbell believes that she was not promoted to or selected for the Food Services Manager position in *August* 2022 for the following reasons:

1. In July 2022 for the second time Ms. Campbell formally applied for and was not promoted to the position of Food Services Manager at the Swedish Club.
2. The first and most apparent reasons behind Ms. Leander not promoting or selecting Ms. Campbell were in large part the same as those when Ms. Campbell was not promoted to or selected for the position of in December 2021/January 2022, March 2022, and April 2022 - a) there is the matter of the discrimination - national origin, age, and disability, b) as well as in no small part the longstanding personal reasons of Ms. Leander's that Ms. Campbell came to understand and grapple with in early 2022, Ms. Leander's personal bias against Ms. Campbell, c) Ms. Leander's general failure to carry out her duties as the executive director, d) in retaliation for Ms. Campbell having filed discrimination complaints has also come at a price, e) as well as the matter of the "Lars and Lars crowd are your enemies" animus towards Ms. Campbell that Ms. Leander disclosed on January 18, 2022, and f) Ms. Leander's strongly held personal and executive director based opposition to Ms. Campbell being in a key position like the food service manager position.¹
3. The "second" reason builds off of all of the above and then includes this, that from what Ms. Ross has told Ms. Campbell, Ms. Leander is loathe to promote Ms. Campbell because it somehow compromises Ms. Leander legally, that Ms. Leander has told Ms. Ross that Ms. Leander thinks she can either defeat Ms. Campbell's discrimination and discrimination related claims, as well as it is a super personal point of pride with Ms. Leander – that she will be damned if she is going to promote Ms. Campbell to the food service manager position.
4. In general, not only has Ms. Leander resisted Ms. Campbell becoming food service manager, but she has gone on an active campaign for the better part of 2022 on through to the first months of 2023 to incrementally dismantle Ms. Campbell's original position as cook, then has isolated her from the main food service department operations, limited her pay and severely limited her hours (while lavishing the same on RC Charles and then Ms. Ross).
5. Ms. Leander has likewise engaged in workplace bullying, in August Ms. Leander demoted Ms. Campbell, as well as over November/December she reduced Ms. Campbell's hours/jobs by farming her dessert work out to Ms. Ross and Ann Margret Lightle.

Ms. Campbell has compiled the below information to answer your question. It delves into the question and explores this latest thing that is going on – it's related to the Swedish Club board hiring lawyers, apparently the board wanting to settle but Ms. Leander not wanting to settle, legal advice from one or more sources, Vi Reno, Perkins Coie, or Lane Powell, that is being given to someone, Ms. Leander, the new HR person, Sarah Alaimo²...Ms. Leander has some legal imperative of some kind she keeps mentioning to Ms. Ross; it came to Ms. Campbell's attention starting on October 1st, when Ms. Ross started (and continues to today) to reveal

¹ Ms. Campbell has an extensive amount of information and evidence about this portion of the matter, it is a work in progress but close to being completed.

² Regarding Sara Alaimo – Ms. Campbell has an additional document to follow shortly that details her communications with her, including a new complaint about the hostile workplace Ms. Campbell has been subjected to.

what all had been going on since August 1st, with what to Ms. Campbell is a conspiracy to keep her at bay, to prevent her from having the job, etc.³

What Ms. Campbell does know is this, and perhaps it is the most important reason for not selecting her for the position – according to Ms. Ross Ross’s October 3rd text message to Ms. Campbell, “Why does KL not just give you the position. seems she is just cutting her nose off to spite her face. When she told me in the meeting with Toene [August 24th], that she could not hire me, she said that the complaint you filed could cost her everything.”

Mid-July the

- **July 27, 2022**

On July 27, 2022 Ms. Campbell applied to the Swedish Club via the online Indeed job service, for the Foodservice Manager/Chef/Cook job posted by the Swedish Club. Ms. Ross Ross (hereinafter “Ms. Ross”) applied the same day, according to her, “Ms. Campbell applied on Indeed July 27, 2022.”⁴

- **August 1, 2022**

On August 1st Ms. Leander sent Ms. Campbell an email stating that she was responding to her July 27th job application through both the Indeed job platform email and to Ms. Campbell’s Gmail account.^{5,6} In the email Ms. Leander identified the position Ms. Campbell had applied for as follows, “Thank you, Elizabeth, for applying for our open **chef/food services manager position** at the Swedish Club.”⁷ Emphasis added.

Ms. Campbell replied to Ms. Leander’s email on August 2nd, and made arrangements to meet with Ms. Leander, Mr. Rahman, and Ms. Hayes on August 5th at 2:30 PM at the Swedish Club for Ms. Campbell’s job interview.

At 6:00 PM on the evening of August 1st the Swedish Club Board meeting was held. Ms. Campbell attended that meeting. Ms. Leander reported to the board that she had over 25 applicants for the Food Service Manager job, was hopeful that she would find someone for the food service manager job and was starting to make arrangements to review applicants’ resumes and possibly meet with candidates. Ms. Leander only had six more days to process job applications as she was leaving on August 8th for her vacation in Norway.

- **August 3, 2022**

On Wednesday, August 3rd, Ms. Ross came to the Swedish Club and was interviewed by Ms. Leander and Mr. Rahman. “I met with Anis and kL on Aug 3,22”⁸

While Ms. Ross is at the Swedish Club for her job interview meeting, she briefly meets chef Tom Perricone, he is there preparing for the Wednesday, Lille Fredag, soup and salad supper.⁹ On meeting Tom, according to Ms.

³ Ms. Campbell has put together a general overview of what went on after Ms. Campbell applied, what was said, and there are specific statements Ms. Ross has made to her in her text messages that Ms. Campbell have compiled – it is all in chronological order.

⁴ Ross, Christine. Text Messages to Elizabeth Campbell. Tue Oct 4, 2022 10:54 AM

⁵ Leander, Ms. Leander. “Responding to your application?”. Gmail. Aug 1, 2022 3:33 PM

⁶ Ms. Campbell checked her Indeed email account – there was no message from Ms. Leander in it.

⁷ Leander’s statement references two job types, “chef” and “food services manager” as one position.

⁸ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 10:54 AM

⁹ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:16 PM

Ross, "I met Tom Only once in passing. Yes, it was before the 7th.", "I was just introduced and that was it.... No conversation."¹⁰

After the meeting Ms. Leander talks to Tom about her decision to hire Ms. Ross. She wants to know if he thinks that Ms. Ross is physically up to the job. Tom tells Ms. Leander that he thinks Ms. Ross might be okay. Later in his shift Tom tells Paul Jefferson the bartender who is also working that evening about meeting Ms. Ross, about Ms. Leander asking him what he thought of her hiring Ms. Ross, and his personal estimation and feelings about the situation.

- **August 5, 2022**

According to Ms. Ross, on August 5th at 12:00 noon¹¹ Ms. Leander calls her and invites her to a meeting on Sunday, August 7th at the Swedish Club. Ms. Leander says she wants Ms. Ross to meet with what Ms. Leander references as the "food committee", Ms. Leander, Ann Margret Lightle (hereinafter "Ms. Lightle"), and Judith Dern (hereinafter "Ms. Dern").^{12, 13}

Of special note, while Ms. Leander at 12:00 noon on the 5th of August is arranging to have her hiring of Ms. Ross *ratified* by her women friends, she already has another meeting that same afternoon at 2:30 PM with Ms. Campbell - ostensibly to interview her for the very job she has already made her decision about who to hire for it. The whole interview with Ms. Campbell is a not being done in good faith. However, Ms. Campbell did not know that until the next week.

Ms. Campbell arrived early at the Swedish Club, was available at 2:30 for her meeting with Ms. Leander, Ms. Rahman, and Ms. Hayes. Mr. Rahman informed Ms. Campbell that Ms. Leander just left and would be back in 10 minutes. The reality is there is not anywhere Ms. Leander could have gone even close to the Swedish Club that would have gotten her back in 10 minutes. Ms. Leander was 40 minutes late to the meeting with Ms. Campbell, it was after 3:00 PM when she returned.

Ms. Leander's lack of interest in giving Ms. Campbell even the courtesy of showing up within a reasonable amount of time in relation to their 2:30 PM appointment time speaks to the fact that Ms. Leander did not even begin to feel that the meeting rated anything more than what was a desultory response by her; that the meeting with Ms. Campbell was nothing more than a show, a checkbox activity that she had to do in order to be able to if necessary in the future be able to plausibly claim she had considered Ms. Campbell for the food service manager position.

- **August 7, 2022**

After meeting with Ms. Leander, Ms. Dern, and Ms. Lightle at the Swedish Club, according to Ms. Ross, "[Ms. Leander] called me two hours later and gave me the job."

Ms. Ross's first day of work is scheduled for Friday, August 26th^{14, 15}

¹⁰ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:16 PM

¹¹ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:15 PM

¹² The Food Committee also includes Lori Ann Reinhall and Ms. Campbell however, they were not invited to the August 7th meeting. Moreover, Ms. Leander disbanded the "Food Committee" three and a half months earlier on April 14th.

¹³ Leander, Ms. Leander. "Food Committee Meetings?" Gmail. April 14, 2022 4:38 PM

¹⁴ Elizabeth Campbell interview with Tom Perricone on August 15, 2022.

¹⁵ Ross, Christine. Text messages to Elizabeth Campbell.

Ms. Leander told the board at its meeting on August 3rd that Tom will train, on-board Ms. Ross Ross, “Chef Tom has offered to be very helpful in training any new chef.”¹⁶

- **Sunday, August 7, 2022**

On August 7th Ms. Ross met with Ms. Leander, Ann Margret Lightle, and Judith Dern at the Swedish Club, “...met with KL, Ann Margaret and Judith Aug 7,22.”¹⁷ Ms. Leander represented to Ms. Ross that Ms. Leander and the other two women were the Swedish Club’s Food Committee.ⁱ Ms. Leander wanted them to talk to Ms. Ross and give Ms. Leander their impression of Ms. Ross. This is a tactic Ms. Leander employs, drawing others into her hiring activity, *after* she has made her decision to hire someone. They ratify her decisions as opposed to informing her decisions.

In Ms. Ross’s case Ms. Leander had already made her decision to go with Ms. Ross from the outset of when she first met with her. This is what first Paul Jefferson told me on the 10th of August. Tom Perricone told Ms. Campbell the same on the 15th of August. Tom briefly met Ms. Ross when she came in for her interview on 3rd of August. He said that Ms. Ross had decided to hire her from that moment on, that Ms. Leander had decided to exclusively concentrate her hiring efforts only on Ms. Ross.¹⁸

According to Ms. Ross, “After Tom left [August 15th] KL texted me and said I was not to report to work until the 26th.... No matter what...She instructed me....(I have it on my phone). Do not go to work until the 26. I was a bit upset, as I had already been put off for weeks.”¹⁹

Based on Ms. Campbell’s conversations with first Paul Jefferson the bartender on August 10th, and with Tom Perricone the chef on August 15th, and then what Ms. Campbell have since then come to learn from Ms. Ross Ross, Ms. Campbell was never in the running for the food service manager job. Ms. Leander zeroed in on Ms. Ross from the start and never considered anyone else for the position.

Typically, Ms. Leander makes it a point to ask her go-to member friends or employees to meet the job candidate or recent hire she has chosen even if it is for mere minutes or less.²⁰ The purpose of the exercise is to see what they think about the person, but I feel the main purpose is really for others to reflect back to Ms. Leander that she has made the right choice/decision. Tom was expected by Ms. Leander to tell her what he thought of Ms. Ross, but more as an affirmation. In addition, Tom was trying to move on from his job at the Swedish Club, making it more likely that he would encourage a hire rather than discourage one. .

Two hours after Ms. Ross’s August 7th meeting w/ Ms. Leander, Ms. Lightle, and Ms. Dern, Ms. Ross received a phone call from Ms. Leander telling her that she had the foodservice manager/chef job, “She called me two hours later and gave me the job. On Aug 24,22”²¹

¹⁶ The reality of Tom offering to be “very helpful”, he asked for and received more money in order to stay.

¹⁷ Ross, Christine. Text messages to Elizabeth Campbell. Tue, Oct 04, 10:54 AM Text: “I applied on Indeed.com July 27,22. I met with Anis and kL on Aug 3,22....met with KL, Ann Margaret and Judith Aug 7,22. She called me two hours later and gave me the job. On Aug 24,22.... She said she needed me to come talk with her and Toene. That is when she informed me she could not actually hire me.”

¹⁸ Tom also said that Ms. Leander expressed her concerns about whether Ms. Ross would be able to physically do the job; she asked him what he thought Ms. Ross’s physical capacities were given her age and appearance.

¹⁹ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Sat, Oct 1, 10:39 PM

²⁰ See also discussion about this practice related to the hiring of Wendy Lundin Clark.

²¹ Ross, Christine. Text Messages to Elizabeth Campbell. Tue Oct 4 2022 10:54 AM

"I was interviewed by Food Committee, Ann-Margaret, Judith, and Ms. Leander. Two hours later Ms. Campbell got a phone call from Kristine telling me I had the job...I also have all emails that were exchanged on Indeed regarding the position of Chef/Food Service Manager."

A couple of days later Ms. Ross received in the mail a copy of Ms. Dern's book about Scandinavian cooking. Ms. Leander had asked Judith to send the book to Ms. Ross. When Ms. Campbell heard that she was reminded once more about Ms. Leander's acerbic comment to her on March 21st, "We're not embracing you!" Now months later Ms. Campbell realized one more time what it was like to have been isolated by Ms. Leander as opposed to being "embraced" as an employee.

- **August 10, 2022**

At 5:49 PM on the 10th Ms. Campbell attended as a member the Swedish Club's Wednesday night Lilla Fredag supper. Ms. Campbell purchased the meal for \$15. Ms. Campbell was the only customer that entire night. Two staff people were there, the foodservice worker RC Charles and the bartender, Paul Jefferson. Since it was only the three of us, we spent the evening together talking while Ms. Campbell was eating my dinner, for just over one hour. Because Ms. Campbell was an employee also, they talked about things going on at the Club, including what was going on with the foodservice department, employees leaving, the problems with the food – the immense amount of food waste, and the general, what they believed was the poor management of both the food and bar departments by Ms. Leander.

After Ms. Campbell finished her meal she sat at the bar, there were no customers. RC was starting to shut down the dinner service, pick up the dishes, put away the food, doing general clean up. Paul and Ms. Campbell were talking. During this part of the conversation between Paul and Ms. Campbell he was musing about how things would be working out with the advent of the new chef, a woman, he said *a really old woman*.

Ms. Campbell had heard nothing about this, in fact Ms. Campbell had interviewed for that particular job on August 5th, under what she came to find out was the mistaken belief that the position was open, that Ms. Leander was possibly, genuinely considering her for that job.

When Paul told Ms. Campbell about this woman having been already hired to be the new food service manager/chef, at that point in time Ms. Leander had indicated that Tom was a loyal employee),^{22, 23} that he knew about it earlier in the previous week, that the then existing Chef Tom had told him about this woman being hired, and it sounded like Ms. Leander had also mentioned it to Paul also – Ms. Campbell was shocked to hear all this!

- **August 11, 2022**

On Thursday morning, August 11th, Ms. Campbell contacted Tom by text message and asked him about this other woman being hired for the chef job at the Club. Ms. Campbell asked him what was the name of the new woman cook – he texted back, "Christine with a C".

- **August 12, 2022**

Ms. Campbell visited Mr. Rahman and Ms. Hayes in their office when she arrived at the Swedish Club to see if there was a check for her and to explore with them the topic of what had really been going on with Ms.

²² July 27th email from Ms. Leander to Elizabeth, RC, Stephanie, Tom, and Wendy: "We have greatly appreciated his [Tom's] flexibility and loyalty to the Club's needs."

²³ July 27th email from Ms. Leander to Elizabeth, RC, Stephanie, Tom, and Wendy: "We have greatly appreciated his [Tom's] flexibility and loyalty to the Club's needs."

Campbell's so-called job interview on the 5th of August. This is what Ms. Campbell wrote about the exchanges between her, Mr. Rahman, and Ms. Hayes, "On the 12th of August Ms. Campbell was in the office with Toene and Anis, I think I was getting my expense check or something, and Ms. Campbell said something to them about the fake job interview on the 5th of August they had put me through, that Ms. Leander had already hired someone. Anis blew up and demanded to know who had told me. Then Toene blew up - she is always doing that - she kept repeating when Ms. Campbell asked her about it, she knew it was a fake interview, she kept angrily repeating, "Talk to Kristine!" "Talk to Kristine!". Of course Kristine is in Norway at that point."²⁴

At the August 12th Friday night dinner service Ms. Campbell was at the Swedish Club from 5:30 to 8:30. After dinner service was complete Tom and Ms. Campbell talked about his plans to leave his job, and what he thought about his employment stint at the Club, the foodservice operations, about Ms. Leander. It wasn't positive. They made an appointment for Ms. Campbell to come in and see him on Monday, August 15th, he was coming in to the Swedish Club to cook some crab and shrimp patties for the next Wednesday's dinner.

- **August 15, 2022**

On Monday, August 15th Ms. Campbell came into the Club at 2:49 PM to meet with Tom. He had just finished cooking off the last of the seafood cakes. As he was ending his shift, he told me some general information about his leaving the next day to go to Philadelphia, that he wasn't coming back to the Club. Even though he was scheduled to work August 17th and 19th, he said he was through as of the 15th.

Part way through the time that Ms. Campbell was there another situation came up about a possible shortage of food for the Wednesday dinner on the 17th. That turned into a big controversy because Tom told Anis he was done cooking for the day and was not going to make any more seafood cakes. The reality of the situation was Anis was loathe to use me to do any cooking, and leery of RC doing cooking on his own, and so Ms. Campbell felt turned it all into a big dilemma that there was going to be not enough food for the Wednesday dinner.

Ms. Campbell thought it was an "artificial crisis" – Anis had two people in front of him, myself, and RC, he had the opportunity to put me to good use to either make the additional patties myself, or to have me support RC in doing them. Anis did not want to do anything that involved having me cook and so no solution at that point was arrived at.

Ms. Campbell felt the whole situation was uncalled for and just was another example of how Ms. Campbell was being isolated and marginalized by Ms. Leander at the Swedish Club. The next day Ms. Campbell wrote about that and how Ms. Campbell felt Ms. Campbell had been mis-treated on the 15th and even over the course of 2022, in an email to Ms. Leander, Anis, to Shama the president of the Club's board of directors, and to the Swedish Club's lawyers.²⁵

Part of what Ms. Campbell wrote in the email addressed the isolation and marginalization of me that had been going on at the Club, how it was affecting me as an employee, "Ms. Campbellt was an artificial crisis that was predicated on ensuring that whoever's personal desire it is to ensure that certain people, myself included, are marginalized, not allowed to cook, are not treated as a respected member of cooking staff. This is so much of a setup, this eight month long, multiple cycles of cooks wanted claims that has been repeating itself based on that premise.

²⁴ Campbell, Elizabeth. Text messages to Christine Ross. iMessage. Sat, Oct 1, 10:39 PM.

²⁵ Campbell, Elizabeth. "Artificial Crisis – Solution". Gmail. Tue, Aug 16, 2022 at 1:32 PM.

<https://www.dropbox.com/s/fxtqau6xuvpwlnf/EAC%20Gmail%20Re%20Artificial%20Crises%20-%20Solution%208-16-22.pdf?dl=0>

“Ms. Campbell even holds true related to the food service manager...it is offensive even having to go through this conversation about having to justify, or prove, or defend my well known capabilities to cook and serve anything at the Swedish Club. Because at this point - it is not about that at all. Yesterday, 8/15, once more the angry contempt in which Ms. Campbell am held by the executive staff was demonstrated; and Ms. Campbell documented it...for me, it was just palpable yesterday how much Anis Ms. Campbell feel hated the idea that he might have to ask me to cook anything.”

After Tom told me that “Ms. Ross with a ‘C’” was starting on August 26th. He said that Ms. Leander had planned on him coming in on the 26th and working with the new chef. However, Tom said that he was not inclined to follow through and do that, to not tell Ms. Leander, but that he was going to tell Ms. Leander something and not show up to onboard Ms. Ross.

Other topics we covered were the discrimination complaints that Ms. Campbell had filed against the Club, Tom said he knew about those, Ms. Leander had told him her side about them, but he wanted me to know that he supported me in my endeavors related to those. He said he had suffered age discrimination elsewhere and that it was difficult to be subjected to that.

Tom and Ms. Campbell also talked at length about all of what we thought were the crazy goings on related to the food department, particularly Ms. Leander’s management of it. One of Tom’s complaints was the never-ending problem of not knowing how many guests would attend an event, thus planning meals was always difficult, and Ms. Leander continued to change the numbers clear up to the day of an event.

Tom discussed the challenge of working with Anis to purchase, pickup, and deliver the pancake breakfast food supplies, he said Anis’s handling of it was not something he wanted to get involved in – it was beyond him why the orders were always so difficult to process, not to mention the pancake situation dovetailed with a major problem in the regular food service arena – Tom referenced the stunning amount of food leftovers from the meals, most of which was thrown away.

- **August 16, 2022 (Date Approximate)**

Sometime after the 15th Ms. Leander gave Ms. Ross a start date of August 26th. According to Ms. Ross, “After Tom left^[26] KL texted me and said Ms. Campbell was not to report to work until the 26th.... No matter what. All that crap about a long drive was BS.^[27] She instructed me....(Ms. Campbell have it on my phone). Do not go to work until the 26. Ms. Campbell was a bit upset, as Ms. Campbell had already been put off for weeks.”²⁸

The further context for the August 16th communication was that by August 25th Ms. Leander had already met with RC and Ms. Ross together, that he was also privy to the “visiting chef” cover up.

- **Wednesday, August 17, 2022**

After the Members dinner meeting was over Shama Albright and Ms. Campbell spent some time together talking about how things were going at the Club. Ms. Campbell told her that Ms. Leander had hired someone for the food service manager position. She told me she did not believe that was so. Shama told me several times, that “no decisions have been made”. Ms. Campbell shared with her the events and my conversations over the preceding two and a half weeks, that this woman “Ms. Ross with a ‘C’” had been hired and she was

²⁶ Tom Perricone’s last day of employment at the Swedish Club was August 15, 2022.

²⁷ The reference to the “long drive” is what RC told me on August 26th, it is the reason he said that Ms. Ross had not come to work that day, because he said that she had decided to not take the job after all. When Ms. Campbell asked why he said Ms. Ross had decided the drive from Everett to Seattle was too much to take on.

²⁸ Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022 10:39 PM

supposed to start on Friday the 26th. Ms. Campbell also told Shama that Ms. Campbell felt my application had not really been genuinely accepted, that the job interview on the 5th of August with Ms. Leander, Toene, and Anis was a fake. That Ms. Campbell hadn't been in the running for the food manager job.

Shama told me again that she had not heard about Ms. Leander hiring anyone. Shama repeated, her understanding was that "no decisions had been made".

We talked a little bit about assorted things that could be done to improve meal service, about problems with staff discontent, and she mentioned this to me – that she had been thinking about maybe the Club needed to hire a human resources director, someone that could work with the employees in a more collaborative way than Ms. Leander. Ms. Campbell thought that might be a possible solution.

After exchanging some personal stories with each other our visit was over.

- **August 19, 2022**

Ms. Campbell receive an email notifying her that Ms. Hayes had ordered a comprehensive, national criminal background check on Ms. Campbell.^{29, 30}



Ms. Campbell arrived at the Swedish Club around 1:46 PM. When Ms. Campbell got to the kitchen, Ms. Campbell found Keita the housekeeper was helping RC make meatballs. Ms. Campbell was quite upset when she saw what was going on - Keita the housekeeper was being used to do cooking, while Ms. Campbell who was a cook had been cut out of doing any cooking except desserts.

It underscored to her what Ms. Campbell believed to be a fact, that Ms. Leander/Mr. Rahman were so loathe to allow Ms. Campbell to do anything other than desserts, if they couldn't outright extinguish her title of cook, they would go about marginalizing her some other way, including using the housekeeper with no food experience much less with no food handlers permit to do cooking.

The message seemed loud and clear to Ms. Campbell, having anyone do the cooking was better than allowing her to carry out any regular cooking duties.

From a practical standpoint, Mr. Rahman, who was in charge while Ms. Leander was in Norway, using the housekeeper to do cooking had nothing to do with there being no other alternative either, i.e. it was not because that there was no other kitchen staff person available to assist RC. Ms. Campbell was available, the same as RC, Ms. Campbell was a cook, and Ms. Campbell held a valid food handler's permit.

- **Mid to Late August 2022**

Mid-August Ms. Leander asked Ms. Ross to make batches of meatballs at her home and deliver them to the Swedish Club for the Friday night dinners, with the proviso that Ms. Ross was not to let anyone at the Club know she was making the meatballs. Ms. Leander told Ms. Ross not to take the meatballs into the building, she was to call Ms. Leander or Mr. Rahman and have one of them come out to the parking lot and they would get the pans of meatballs from her and bring them to the kitchen. On or about August 19, 2022 and August 26th Ms. Ross made meatballs at her home for the two Friday night dinners at the Swedish Club. The first Friday she delivered the meatballs Mr. Rahman came out to the parking lot and got them; the second Friday

²⁹ ClearChecks. "Information Requested for you Background Check". Gmail. Fri, Aug 19, 2022 at 11:03 AM

³⁰ Detailed information about the ClearChecks, criminal background check has been provided in a previous submittal to the City of Seattle, [CoS KV Response to 12-01-22 Qc 12-19-22.pdf](#)

Ms. Leander came out and got them.

Ms. Hayes covered up Ms. Ross's home cooking work for the Club, which was also covering up the fact that Ms. Ross was employed by the Swedish Club, by noting on Ms. Ross's \$208 payment check for the meatballs that Ms. Ross was providing "Kitchen Setup" services; and Ms. Hayes classified the expenditure as a "Professional Fee".³¹

- **August 24, 2022**

According to Ms. Ross, "On Aug 24,22.... She [Ms. Leander] said she needed me to come talk with her and Toene. That is when she informed me she could not actually hire me."

"It was the 24th of September [sic - August] that she called and had me come to the club.... That's When Kristine and Toene told me they could not hire me.... Due to an attorney being contacted by you [Ms. Campbell]. That's the true timeline if that helps!! Two days prior to my start date."^{32, 33}

According to Ms. Ross, at the beginning of the meeting on August 24th after Ms. Leander told Ms. Ross she was walking back her hiring of her, Ms. Leander turned to Ms. Hayes and said to her in a knowing voice, said to Ms. "I can hire a visiting chef though can't I?" Ms. Hayes replied "Yes!" Ms. Leander went on to tell Ms. Ross that the visiting chef arrangement would be of short duration, that it was a work around, subterfuge intended to gain Ms. Leander an advantage related to the discrimination complaints Ms. Campbell had filed.

Afterwards, Ms. Ross has made multiple text message statements to Ms. Campbell describing and affirming what she was told by Ms. Leander and Ms. Hayes on August 24th about the so called visiting chef ruse: "I was assured it would be short term until it was resolved. That is not the case."³⁴

"I was told it would be visiting chef drill until the situation with you [Ms. Campbell] was resolved. That was in meeting with KL and Toene! Obviously the visiting chef deal is a wy of covering their asses. They know they are in the wrong."³⁵

Ms. Ross has also told Ms. Campbell multiple times that at the meeting on the 24th, Ms. Leander, Ms. Hayes, and Ms. settled on the plan to call Ms. Ross a visiting chef, that she would not be an employee, she would get paid on a 1099 basis. Ms. Ross would be called a "vendor" to the Club, an independent contractor.

Ms. Ross readily admits she is not an independent contractor, not a vendor, and she certainly is not an employee:

"I am screwed. I am not a vendor..... there are requirements to be that..... I'm sure you know that...I have no contract with SC and therefor no protection!...I am not a Vendor Elizabeth. That requires insurance and a contract.... Be it ongoing or daily."³⁶

"I am not an employee..... not even a vendor!"³⁷

³¹ Hayes, Toene. Email November 29, 2022

³² Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022

³³ Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022 10:39 PM

³⁴ Ross, Christine. Text message to Elizabeth Campbell. Mon, Oct 17, 9:19 PM

³⁵ Ross, Christine. Text message to Elizabeth Campbell. Tue, Oct 4, 1:16 PM

³⁶ Ross, Christine. Text message to Elizabeth Campbell. Sun, Nov 20, 11:33 AM

³⁷ Ross, Christine. Text message to Elizabeth Campbell. Wed, Nov 16, 10:46 PM

- **August 26, 2022**

Two days after the meeting with Ms. Ross, sent and [email to Ms. Campbell, RC, facilities manager Anis, and Board president Ms. Albright](#). In it Ms. Leander officially demoted Ms. Campbell from a cook to a dessert cook, and promoted RC from a cook to a sous chef; and rewarded him with additional cooking duties, making the Wednesday night suppers, which translated into more work hours for him, “We plan that Wednesday soups and Friday dinners will be easy for RC to prepare and therefore successful for him to present to our members and guests.”

Ms. Leander also launched the start of her “visiting chef” narrative, that for the foreseeable future there was going to be a visiting chef program as opposed to her hiring a food service manager, “I’m reaching out to some chefs to be our invited ‘guest chefs’ on a random basis *for the next few months*. (We don’t have a guest chef for Friday, Aug 26, but we do have a guest chef for Friday, Sept. 2.)” Emphasis added.

- **September 2, 2022**

For the second Friday in a row RC cooked the dinner. Chris Potter had been scheduled to cook and serve the dinner that night, but came down with Covid (he would later show up and serve, not cook a dinner on September). According to Ms. Leander, “The second entree changed to be entree salad with salmon on top. I know that RC can handle it, particularly since historically it is the lightest Friday dinner of the year!”³⁸

As the dinner service got underway the guests who had the salmon started returning their dinners to RC. It turned out he had undercooked the salmon. The situation with the raw salmon was not surprising – consistently RC produced meals that would have one or more mix-ups or fatal flaws to them. Kristine had known since early January about this tendency, and yet in the spite of successive embarrassing and costly failures she continued to give RC dinners to lead and the concomitant additional hours and prestige that went with her decision to continue to rely on him.

On September 8th Ms. Campbell wrote Malin Jonsson, former lead chef at the Swedish Club about what Ms. Campbell believed was Ms. Leander’s fake visiting chef program and about RC’s failed salmon dinner, “And, as usual, there was a new spin on the recent exit of her last two kitchen hires [Tom and at the time Ms. Campbell thought Ms. Ross had declined to take the FSM job] - to promote a new program - the guest chef program. Which promptly collapsed before it got started. The first person got sick with Covid - leading to last Friday’s dinner debacle, poorly prepared and cooked salmon salad’s the salmon was way undercooked - ending up being microwaved plate by plate in the middle of dinner service. The salmon was bad – I literally threw the whole salad away - it smelled in the bargain.”

- **September 7, 2022**

On September 7th Ms. Leander sent an email to Ms. Campbell to let her know that Ms. Campbell was not going to be hired for the food services Manager/Chef position. Ms. Leander claimed that she wanted someone with more restaurant experience, “At this time, we are continuing to look for someone for the position who has a fair amount of restaurant experience.”³⁹ Ms. Leander’s claim defied credulity – that person that Ms. Leander had hired, then claimed she hadn’t hired, then hired with a different job title, Ms. Ross, had decades of substantial restaurant experience, in large hotels, casinos, and busy bar/restaurant and municipal golf food operations – as a chef and as a manager.

³⁸ Leander, Kristine. “Menu for Sept 2?”. Gmail. Wed, Aug 31, 1:00 PM

³⁹ Leander, Kristine. “Your application for the Chef/Food Services Manager at the Swedish Club”. Gmail. Sep 7, 2022, 11:41 PM.

- **September 8, 2022**

Ms. Campbell shared the details of her phone conversation with Ms. Leander the day before, with Malin Jonsson. Malin had been the lead chef at the Swedish Club who quit her job in December of 2021 after over a decade at the Swedish Club. Ms. Campbell wrote Malin, “Tom left August 13th [sic⁴⁰], the new woman, this Ms. Ross that was to replace him, she was scheduled to start August 26th. Yesterday Kristine walked back everything - saying that Tom had messed everything all up, she never hired anyone, despite three people directly saying she had, and her favorites - Anis and Toene and their antics supporting the fact that she had.

“Now the story is that she never hired anyone, Tom was misleading me, she says he wasn’t telling me the truth but she won’t say he was lying.

“The job has been reposted, she told me she’s looking for someone with more restaurant experience, despite that being the very thing she had in hand with Jocelynn and Tom, and the new woman, Ms. Ross, who dumped the job before she even started.”

[Important Note: Ms. Campbell is telling Malin about all the things that Ms. Campbell had been told by Tom, Paul Jefferson, Ms. Leander, and RC Charles about Kristine hiring Christine Ross; about what Ms. Campbell believed – from August 26th to when Ms. Campbell was writing Ms. Jonsson on September 8th.]

Ms. Leander had vehemently denied to Ms. Campbell the day before that she had hired anyone for the foodservice manager job. At the time too Ms. Campbell felt she had even been misled by RC of all people, when Christine Ross didn’t start work on the 26th Ms. Campbell had wondered to RC about what must have happened. RC told her that Ms. Ross had not taken the job because her commute from Everett where she lived to the Swedish Club was too far. Ms. Campbell believed what RC told her.

Ms. Campbell sent a text message to Ms. Ross about these things on October 1st, “So Tom had said you were supposed to start on August 26th - it sounded like it was a day or so before [the 26th] that things went sideways, RC cooked the Friday dinner - he had been given short notice. I asked RC what had happened, why you hadn’t come to work that day - he said oh, it had something to do with it being too far of a drive from Everett to Seattle - so they told him something - probably at the point in time they spun it to him. I had been waiting to see how it panned out, whether you started on the 26th of August - because Kristine had told the President of the Swedish Club board, and the president of the board [Shama Albright] told me KL hadn’t hired anyone - she said ‘No decisions have been made’.”

[Ms. Leander the executive director not only insisted during the phone conversation that she had not hired Ms. Ross – but even wrote Ms. Campbell an email on September 14th, chastising her for even doubting her word on the subject – “In the phone conversation on Sept. 7, you again accused me of not being honest with you all the way back to 2020. I need you to address me respectfully and with anticipation that I will do the same to you.”⁴¹]

Ms. Campbell continued on to Ms. Jonsson, “And, as usual, there was a new spin on the recent exit of her last two kitchen hires [Tom and at the time Ms. Campbell thought Ms. Ross had declined to take the FSM job] - to promote a new program - the guest chef program. Which promptly collapsed before it got started. The first person got sick with Covid - leading to last Friday’s dinner debacle, poorly prepared and cooked salmon salad’s the salmon was way undercooked - ending up being microwaved plate by plate in the middle of dinner service.

“The salmon was bad - I literally threw the whole salad away - it smelled in the bargain.

⁴⁰ Tom’s last day at the Swedish Club was August 15th.

⁴¹ Leander, Kristine. “dessert menus for Sept?”. Gmail. Sep 14, 2022, 12:15 PM.

"Yesterday I confronted Kristine about the fake job interview she did with Anis and Toene and I. I said to her flat out that I had it brought to my attention that she had hired someone long before that interview. She denied it, was 'visibly' upset - she wanted to know how I could believe Tom and Paul over her. Frankly I said to her why that would be.

"Really quickly she ended the conversation. I believe she had told Shama that she hadn't done what she had done, and now she is pulling out all the stops to walk back the events and put everyone in the know in a bad light, except for Toene and Anis, they won't break ranks with her.

"And I was just thinking also - Wendy confirmed the hiring - she just said that she hadn't seen the woman, but when I asked her about it, she said she had heard about it but not seen the woman.

"Anyway, there's more but it is all as it has been for quite some time."⁴²

- **October 3, 2022**⁴³

Ms. Ross: "Why does KL not just give you the position. It seems she is just cutting her nose off to spite her face. When sh told me in netting with Toene, that she could not hire me, she said that the complaint filed could cost her everything.

"I am shocked that KLs Attorney has not advised her to settle with you???!! It makes no sense!"

- **October 13, 2022**⁴⁴

Text exchange between Ms. Ross and Ms. Campbell about Ms. Leander's claims to Ms. Ross why Ms. Leander is continuing with the subterfuge that she is running a visiting chef program and cannot hire Ms. Ross as a Swedish Club employee, as the Food Service Manager.

Ms. Ross: "I am not the F@B [FSM] manager according to them, so I'm not going to give orders to anyone...She said nothing to me. She did tell me last week that they were fulfilling your demands and I would need to work around that!"

Elizabeth: "Well look at it this way they're fulfilling their version of my demands. In fact they didn't even meet the accommodation that I asked for."

Ms. Ross: "I don't know everything, obviously. What I do know is, the Problem is KL, when it comes to you. It's personal. The powers that be, want to settle with you! She is the hold out!"

- **October 22, 2022**⁴⁵

Ms. Ross: "Initially when they changed my so called title they said they hope it would shake out within a couple months."

- **November 8, 2022**⁴⁶

⁴² Campbell, Elizabeth. Text Message to Malin Jonsson. iMessage. Thu, Sep 8, 8:32 AM

⁴³ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Mon, Oct 3, 9:36 AM

⁴⁴ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Thu, Oct 13, 10:57 AM

⁴⁵ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Sat, Oct 22, 9:20 AM

⁴⁶ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Tue, Nov 8, 8:39 AM

Ms. Ross: “The most hilarious part of their hiring process is, they can’t and won’t hire me. KL made that clear again Sunday [11/6/22, Holiday Bazaar]!”

“Well the clinging [sic] is going to come to an end. I’m going to have my attorney send a letter to the Board. I think I have done my part. This past weekend, I had a number of members ask me why I was the only one working. They specifically said there normally was three or four! I think it’s time to bring in the army, and demand some answers. I did tell her [Ms. Leander] Sunday that I did not believe my situation was ever going to be resolved to which she said it would. I reiterated that she and Toene said it would resolve within a couple months... which it has not and I’m certain will not. I have declined a number of positions.... Based on their statements and I intend to hold them accountable. They wanted to pay you off to back off..... I’ll tell you what....I’m more than happy to take that offer!

“She told me last week that they hired a new attorney.... That they spent \$70 grand so far dealing with you! Why would they spend \$70 grand with no result!!”

Elizabeth: “The reality of that how much simpler would just some general kindness have gone to the situation, there’s no money that you have to spend to just be kind decent and thoughtful. And wouldn’t that have been nice to spend the money on maybe fixing the ovens heck you could even have new ovens for that kind of money! You could have some new knives for the kitchen you could have some new pots and pans, but no one talk to me about that instead it’s all been done in a vacuum with Kristine apparently running that show.”

Ms. Ross: “Well....It would have made more sense to offer you a settlement. It’s done every day. I sure would take it!!! For whatever the reason, they don’t want the kitchen to succeed. That is pretty obvious to me!”

- **November 14, 2022** ⁴⁷

Ms. Ross: “So she [Kristine] just texted me and said what ads... she said she is trying to get lawyer to approve my being hired. They she tried to call. I told her I do not want to talk.

Elizabeth: “You know I just thought about something - the lawyer is on the subterfuge then - that’s why KL walked back the job offer and acceptance, that’s why she’s doing the ‘visiting chef’ scenario, the whole setup, ‘I can’t hire you’. Like really - isn’t that what is known as conspiring? Seems to me that Kristine just implicated the lawyer in the coverup.”

- **November 15, 2022** ⁴⁸

Ms. Ross: “I forgot to tell you she called twice last night stating that she [Ms. Leander] is doing all she can to get lawyer approval to hire me formally. She told me this 2 months ago Elizabeth. I’m pretty certain this so called lawyer could do something with that time frame. The same lawyer that she swears has already charged them #70 grand to deal with you!

“She better just stop the lying!!!! \$70 grand for what??? What has this guy done. Have you ever gotten anything from their attorney.???? It’s all pretty strange.... She is adamant that they have never gotten a thing from the city or state pertaining to your legal action!

⁴⁷ Ross, Christine. Text Messages to Elizabeth Campbell. iMessage. Mon, Nov 14, 5:28 PM

⁴⁸ Ross, Christine. Text Messages to Elizabeth Campbell. iMessage. Tue, Nov 15, 8:38 AM

"I do not understand what is going on and frankly I am absolutely fuming about this!

"I was told by KL that the Board and Attorney wanted to settle.... She said SHE told them no!!"

- **November 21, 2022** ⁴⁹

Ms. Ross: "I feel that the way they have dealt with you, is despicable. AM [Ms. Lightle] told me how she felt Malin situation was so unfair. If she [Ms. Lightle] has so much standing, why did she not step forward? Also, why did she not know what transpired with my lack of position, until Saturday. She was totally surprised. Sh was on the panel that hired me initially!"

- **December 3, 2022** ⁵⁰

Ms. Ross: "I am not an employee...I am a vendor... that HR person [Sarah Alaimo] clarified that to me! Well she asked me what my position was when I spoke with her, which she approached me . I told you that, on a Sunday [11/27/22 Volunteer Dinner]. So I told her the story.... How they hired me and then a week later said they could not due to your lawsuit.⁵¹

Acronyms

AM Ann-Margret Lightle
KL Ms. Leander Leander
SC Swedish Club

ⁱ The Food Committee is a Swedish Club board of directors' ad hoc committee, an officially sanctioned committee authorized by the Club's bylaws. In February Ms. Leander invoked a right for her to convene the committee, it's first meeting was scheduled for February 22nd but held on February 21st. The committee's charter was to define the scope of the committee, to start small. Source: Leander, Ms. Leander. "Food committee commences!". Gmail. February 15, 2022, 1:50 PM. Recipients: Lori Ann Reinhall, Judith Peterick [latter sent in error, should have been to Judith Dern], and Elizabeth Campbell.

The Food Committee met three times in person or by Zoom on February 21st, March 10th, and on March 28th, its last meeting. On April 14th Ms. Leander disbanded the Food Committee, "Hello, I'm sorry that Ms. I haven't pulled any meetings together in the last few weeks. The decisions I need to make must be made with urgency, so I don't have time to pull the group together. Source: Leander, Ms. Leander. "Food Committee meetings?". Gmail. April 14, 2022 4:38 PM.

During its short duration the Food Committee discussed and/or suggested menu items, staffing for the Food Department, hiring a food service manager, sources for hiring the manager, hiring profiles for possible job candidates (young, eager, starting out), the food services business model, in-house food service versus catering company provided, and general

⁴⁹ Ross, Christine. Text messages to Elizabeth Campbell. Mon, Nov 21, 8:39 AM

⁵⁰ Ross, Christine. Text messages to Elizabeth Campbell. Sat, Dec 3, 10:22 AM

⁵¹ Sarah Alaimo the Swedish Club's HR person's insistence to Ms. Ross that Ms. Ross is in fact a vendor defies the facts of the matter – including that Ms. Campbell thoroughly dispelled that notion and spelled out to Sarah in her written complaint that Ms. Campbell gave to Ms. Alaimo at her and Ms. Alaimo's meeting on November 29, 2022. A copy of Ms. Campbell's statements and documentation that absolutely refuted this subterfuge about Ms. Ross being a vendor/independent contractor <https://1drv.ms/b/s!AgveSP-gMLenhr90-Dhj1Rv05vZnXA?e=32EQeq> is online here.

attempts and progress Ms. Leander was making towards hiring both a pancake manager, two hires, 3/16 hired Faith, 4/14 hired Tom Perricone, Sources: Respectively: Leander, Kristine. "Pancake Overseer". Gmail. March 16, 2022 2:12 PM.; Leander, Kristine. "Food Committee Meetings?". Gmail. April 14, 2022 4:38 PM and hiring a Food Service Manager/Chef - hired March 21st.

According to Ms. Leander on March 25th or 26th the woman hired less than a week before declined to proceed with the job, as per Ms. Leander's March 26, "Food Committee, Monday, March 28?" email - "said 'no go' to me today."