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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

<p>ELIZABETH A. CAMPBELL, an individual,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>THE SWEDISH CLUB CULTURAL CENTER a Washington Nonprofit Corporation d/b/a THE SWEDISH CLUB, and ELIZABETH M. NORGRÉN, an individual,</p> <p style="text-align: right;">Defendants.</p>	<p>Case No. <u>2:24-cv-00816-JLR</u></p> <p>COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF</p> <ol style="list-style-type: none"> 1. TITLE II CIVIL RIGHTS ACT OF 1964, 42 U.S.C. 2000a et seq. 2. RCW 49.60.030(1)(b) 3. RCW 49.60.215 4. SMC 14.06 et seq.
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COMES NOW Plaintiff Elizabeth Campbell and with this complaint against Defendants the Swedish Cultural Center and Elizabeth Norgren, and alleges as follows:

I. INTRODUCTION

1.1 Plaintiff Elizabeth Campbell brings this action against Defendants Swedish Club and Elizabeth Norgren for alleged violations of Title II of the Civil Rights Act of 1964, 42 U.S.C. § 2000a et seq. (the “Civil Rights Act”), the Washington Law Against Discrimination, RCW 49.60 et seq., and the City of Seattle Public Accommodations Ordinance, SMC 14.06 et seq.

1 2.2.2 The Swedish Club has between 8 to 25 employees, and between 1,000 and 1,100
2 members.

3 2.2.3 At all relevant times the Swedish Club owns and operates a place of public
4 accommodation, as contemplated and defined by 42 U.S.C. 2000a(a), RCW
5 49.60.215, and by SMC 14.06.

6 2.2.4 Elizabeth Norgren is its registered agent and resides at 20415 81st Ave W,
7 Edmonds, WA 98026-6716.

8 2.3 Defendant Elizabeth Norgren is a resident of Snohomish County, Washington. at
9 the time of the acts and omissions alleged herein, and at all times relevant herein was a resident
10 of Snohomish County, in the state of Washington, and is a single person under the laws of the
11 State of Washington, her residential address is 20415 81st Ave W, Edmonds, WA 98026-6716.

12 2.3.1 At all relevant times, she was a member and employee of the Swedish Club.

13 2.3.2 Elizabeth Norgren is an employee of the Swedish Club. She is its executive
14 director.

15 2.3.3 Ms. Norgren was hired by the Swedish Club board of directors late in the month
16 of February 2023.

17 2.3.4 At all relevant times, Ms. Norgren was also supervised, managed by the board of
18 directors of the Swedish Club pursuant to the Swedish Club's November 2019
19 *Amended and Restated Bylaws*, and its *Articles of Incorporation*.¹

20 2.4 At all relevant times Ms. Norgren was acting not only in her capacity as the
21 executive director of the Swedish Club but was also or in the alternative acting against Ms.
22 Campbell as an individual for her own personal or pecuniary interests.

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¹ *Restated Articles of Incorporation Swedish Cultural Center*. Filed w/ Washington SOS Oct. 19, 1998.

1 4.6 The Swedish Club building has over thirteen event and meeting spaces² that are
2 available to and regularly accessed or used by the public, either when attending a Swedish Club
3 meeting or event, or they may be rented out by or used by the public by special arrangement.

4 4.7 It has three kitchens, any of which may be accessed or used by the public
5 attending a Swedish Club meeting or event, or they may be rented out or used by an individual or
6 business by special arrangement with the Swedish Club.

7 4.8 There is a dining room, a bar, six event/meeting spaces, and adjacent parking lots;
8 all of which also may be accessed, used by, or available to be used by the public when attending
9 a Swedish Club meeting or event, or other meeting or event at the Swedish Club when rented out
10 or otherwise occupied by a member of the public; be they individual, business, non-profit,
11 community organization, or other user.

12 4.9 The Swedish Club’s rooms, halls, kitchens, dining room, bar, and common lobby
13 areas are available for rent by the public; all of its cultural classes are open to the public, it has a
14 monthly pancake breakfast and a Sunday Brunch that are open to the public, Friday night dinner
15 and dances are also open to the public; a once a month members dinner is open to the public, and
16 the Swedish Club also hosts on-premises, bazaars and other market-type or cultural events that
17 are also open to the public – goods and services are sold by non-Swedish Club vendors, and no
18 admission fee is charged.

19 4.10 Consistent with 42 U.S.C. §2000a(b) the Swedish Club is a place of public
20 accommodation within the meaning of the title, “its operations affect commerce...(2) [it operates
21 a] restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility principally
22 engaged in selling food for consumption on the premises, including, but not limited to, any such
23 facility located on the premises of any retail establishment... (3) [and has] any...other place of
24 exhibition or entertainment; and (4) any establishment (A)(i) which is physically located within
25 the premises of any establishment otherwise covered by this subsection, or (ii) within the

26 _____
² Lobby, Dining Room, Bar, Board Room, Kitchen #1, Lobby, Kitchen #3, Viking Room, Svea Room, Library, Kitchen #2, Stockholm Hall, and Vasa Room.

1 premises of which is physically located any such covered establishment and (B) which holds
2 itself out as serving patrons of any such covered establishment.”

3 4.11 Consistent with RCW 49.60.040(2) the Swedish Club is licensed and provides
4 public spaces for accommodation, assemblage, or amusement, and may or may not charge
5 admission, an event rental fee, for service, occupancy or use of any of its property or facilities,
6 whether conducted for the entertainment...or for the benefit, use, or accommodation of those
7 seeking recreation,... or for the sale of goods, merchandise, services, or personal property, or for
8 the rendering of personal services.

9 4.12 In addition, the Swedish Club operates a restaurant where food or beverages are
10 sold for consumption on the premises, and at other times uses it spaces for the sale of food and
11 beverages for consumption on its premises; and is a place where public amusement,
12 entertainment...is offered with or without charge...where the public gathers, congregates, or
13 assembles for amusement, recreation, or public purposes, and it has public halls, public elevators,
14 and public washrooms in its buildings and structures, and is occupied by two or more tenants, in
15 addition to the owner.

16 4.13 Consistent with SMC 14.06.020, the Swedish Club has the following public
17 accommodation attributes – it is a place that is licensed where the public gathers, congregates,
18 or assembles for amusement, recreation or public purposes, it is an establishment which
19 supplies goods or services (classes) with or without charge to the general public.

20 4.14 As a "Place of public accommodation" the Swedish Club includes, but is not
21 limited to operating a restaurant and related facilities that are principally used for, engaged in
22 selling or offering for sale food for consumption upon or off the premises; it has public
23 restrooms; a public elevator; and has spaces that it produces in for itself or rents out to the
24 public for exhibition or entertainment activities; it holds bazaars and events where goods are
25 sold to the public at retail; and operates a bar and other facilities engaged in selling or offering
26 for sale alcoholic beverages for consumption upon the premises.

1 4.15 In August 2020 Ms. Campbell became a general member of the Swedish Club.
2 Her membership is paid through September 2024.

3 4.16 At the time she became a member Ms. Campbell, engaged in volunteer work at
4 the Swedish Club.

5 4.17 Because Ms. Campbell had a very obvious and medically diagnosed, by then over
6 13 years long mobility disability that substantially limits one or more of her major life activities,
7 walking and standing; she has a record of such an impairment, she is regarded as having such an
8 impairment.

9 4.18 Ms. Campbell disclosed her disability to the Club's executive director in July
10 2020 in case Ms. Campbell needed to ask for a chair, a place to sit, or other reasonable disability
11 accommodation when she was doing some of her volunteer work.

12 4.19 Beginning in the Spring of 2021 the Swedish Club's then executive director,
13 Kristine Leander, first discriminated against Ms. Campbell on the basis of National Origin – Ms.
14 Leander told Ms. Campbell she could not be hired as a cook at the Swedish Club because she
15 was not Swedish.

16 4.20 In August 2021 Ms. Leander denied Ms. Campbell the opportunity to even apply
17 for two open positions, cook and volunteer coordinator, Ms. Leander cited Ms. Campbell's
18 disability as a bar to her being eligible for both positions, and again her national origin as making
19 her ineligible for the cook position.

20 4.21 In August 2021 Ms. Leander also began limiting Ms. Campbell's member
21 participation rights/benefits she held in her membership contract with the Swedish Club after Ms.
22 Campbell inquired about construction costs and the work ethic of the Club's then general
23 contractor; a friend of the executive director's. She was denied the full benefit of her
24 membership from that point forward.

25 4.22 The denial of the benefits and impairment of her membership included Ms.
26 Leander denying Ms. Campbell access to monthly board committee meetings, those of the

1 building and finance committees, impairing her ability to run for and be on the Swedish Club
2 board of directors, and other abridgments of Ms. Campbell's club membership.

3 4.23 Ms. Campbell became a part time employee of the Swedish Club on November
4 24, 2021; her position was first, Cook, then Dessert Cook. On March 9, 2023 Ms. Campbell's
5 employment was wrongfully terminated following her having engaged in protected activities as a
6 member and as an employee related to Ms. Campbell's protected class status of national origin,
7 disability, gender, and age, and being subjected to retaliation, sexual harassment, hostile work
8 and social spaces, isolation, and other demeaning activities taken against her first by the
9 executive director, by its key employees, its facilities manager and staff accountant, then by the
10 HR director, followed by the Swedish Club's board of directors.

11 4.24 Beginning in January of 2022 Ms. Campbell first notified the Swedish Club board
12 of directors about a situation involving the executive director, other club members, that was
13 negatively affecting Ms. Campbell's rights as a member *and* as an employee - to be free from
14 sexual harassment.

15 4.25 Also, in January 2022 Ms. Campbell referred to the Swedish Club board, the
16 executive director, and the facilities manager a number of needed repairs and health and safety
17 improvements in the club's kitchens. Her suggestions were noted by the executive director, and
18 thereafter Ms. Campbell was excluded by the executive director from attending any monthly
19 board building committee meetings.

20 4.26 And, in January 2022 a new kitchen position had opened up for a foodservice
21 department manager. Despite being qualified for the position Ms. Leander refused to consider
22 Ms. Campbell for the position, citing Ms. Campbell's disability, then later on her age.

23 4.27 Throughout 2022 on into 2023 the foodservice manager position was opened,
24 filled, and opened repeatedly. Each time it opened the executive director refused to consider,
25 promote, or hire Ms. Campbell for the position – citing both the situation involving the sexual
26 harassment Ms. Campbell had complained about, *and* Ms. Campbell's disability.

1 4.28 Also in 2022 Ms. Campbell endured ongoing instances of harassment, gender
2 discrimination (pay, work, and hours), retaliation, hostile work and social spaces, and further
3 impairment of her membership rights ensued; the executive director not only discriminated
4 against Ms. Campbell as an employee based on disability, age, and sex, but also in March and
5 April 2022 continued to impair Ms. Campbell's membership rights and did so on into February
6 2023.

7 4.29 In late April/early May of 2022 Ms. Campbell filed separate complaints with the
8 U.S. EEOC, the Washington Human Rights Commission, and the Seattle Office of Civil Rights
9 about the discrimination, harassment, hostile workplace/social place, and retaliation she was
10 experiencing as both a member and as an employee, at the hands of first the Swedish Club's
11 executive director, then by its board of directors.

12 4.30 Ms. Campbell notified the Swedish Club board that she had filed the complaints
13 on May 4, 2022; and thereafter until March 1, 2023 Ms. Campbell from time to time provided
14 actual and constructive notice to the Swedish Club board, to its HR manager, in writing and in
15 meetings with both, about the ongoing discrimination by the executive director, Ms. Leander, but
16 also about subsequent retaliation, isolation, and the hostile workplace and social space created
17 and maintained by the executive director against Ms. Campbell.

18 4.31 On May 8, 2022 Ms. Campbell filed a complaint with the SeattleKing County
19 health department, citing ongoing health and safety violations in the Swedish Club's kitchens;
20 after having multiple times first notified her supervisor and upper management of the need for
21 remedial health and safety actions in the Club's foodservice spaces, then about her intent to make
22 a complaint to the Seattle/King County health department about the unsafe and unsanitary
23 conditions and practices in the Swedish Club's food service areas. Ms. Campbell provided the
24 Swedish Club executive director, facilities manager, and board a cc'd copy of her complaint to
25 the health department.

1 4.32 In May, July, August, and November of 2022, independently and/or as part of a
2 four months long investigation the Swedish Club had initiated against Ms. Campbell, Ms.
3 Campbell provided in writing and verbally to the Club’s attorneys and the board of directors’
4 chief officer handling the investigation, and later on from November 2022 on to the HR director,
5 notices and complaints about discrimination, retaliation, and hostile workplace and social space
6 incidents not just against Ms. Campbell, but that had occurred throughout 2022 against protected
7 classes of Swedish Club employees and members, those of color, sex, sexual preference,
8 disability (mobility and developmental).

9 4.33 In January, February, and March of 2023 Ms. Campbell provided the same and
10 similar notices and complaints as above to the HR Director, the president and vice president of
11 the Swedish Club’s board of directors.

12 4.34 Ms. Campbell throughout 2022 on into 2023 provided concurrently to the City of
13 Seattle Office of Civil Rights copies of the above complaints and notices to the Swedish Club
14 managers and board of directors.

15 4.35 After providing multiple written notices and having engaged in substantive talks
16 with board officers and the HR person about the mistreatment she was receiving at the hands of
17 the executive director as both a member and as an employee, and her entreaties to have that
18 conduct be stopped – the board had done nothing to alleviate or correct the mis-treatment, on
19 March 1, 2023 at a Swedish Club board meeting Ms. Campbell was attending as a member, she
20 spoke out and complained to the board and the executive director and HR manager – that the
21 mistreatment of Ms. Campbell had never ceased, instead the board had subjected Ms. Campbell
22 to an \$80,000 investigation into her personal and work life, the executive director had slowly
23 decimated Ms. Campbell’s job, by taking away her job duties and hiring someone new to do
24 those, assigning her to niche kitchen work, paying her disparately in relation to her sex, cutting
25 her hours, demoting her, isolating her from the other kitchen employees, and Ms. Campbell’s
26 membership remained impaired from 2021 to that day, March 1, 2023.

1 4.36 When Ms. Campbell complained of all of the above actions that had been taken
2 against her, the Swedish Club board, the executive director, and HR director in attendance said
3 nothing in response to Ms. Campbell’s recitation of the frustration and difficulty Ms. Campbell
4 had endured due to their failure to act and curtail the range of unlawful activities that the
5 executive director was subjecting Ms. Campbell to.

6 4.37 However, one meeting attendee, a Swedish Club employee/member/volunteer,
7 Sharon Lucas, chose to aggressively respond to Ms. Campbell – she verbally abused then
8 physically roughed up Ms. Campbell. Ms. Campbell promptly reported Ms. Lucas’ assault,
9 battery, and false imprisonment of her to the Seattle Police Department.³

10 4.38 On the morning of March 3, 2023, the HR manager notified Ms. Campbell by
11 phone and email that she was not to report to work, that until further notice/pending an
12 investigation into the March 1, 2023 board meeting related events Ms. Campbell was on paid
13 suspension from her job.

14 4.39 On March 6, 2023 Elizabeth Norgren assumed the duties of and officially
15 replaced Ms. Leander as executive director of the Swedish Club.

16 4.40 On March 9, 2023 Ms. Campbell received by email a letter signed by the Club’s
17 HR director, and on March 10th received the same letter via process server – that letter
18 terminated Ms. Campbell’s employment, attempted to terminate her membership, and the letter
19 also stated - “Until further notice, you are not to be on club premises as an employee, member,
20 volunteer, guest of a member, or in any other capacity.”

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26 ³ Unlike Ms. Campbell, Ms. Lucas suffered no sanction, discipline, or cessation of access to the Swedish Club premises for her engaging in such a violent manner with Ms. Campbell – instead she has gone on to be feted and held out by the executive director and board of directors as a valuable member of the Swedish Club.

1 4.41 Pursuant to 42 U.S.C. § 2000a-3(c),⁴ on March 9, 2023 Ms. Campbell 1) sent a
2 copy of the Swedish Club’s letter to, and 2) in mid-March 2023 in person, notified Katie Vail,⁵
3 the senior civil rights investigator with the City of Seattle Office of Civil Rights,⁶ about the
4 adverse actions the Swedish Club had taken against her, terminating of Ms. Campbell’s
5 employment and her being barred in any capacity and for any reason entry to the Swedish Club’s
6 premises.

7 4.42 A year and 60 days have passed since Ms. Campbell gave the requisite 42 U.S.C.
8 § 2000a-3(c) notice to the City of Seattle Office of Civil Rights.

9 4.43 Since March 9, 2023 the Swedish Club and Ms. Norgren, have published or
10 otherwise disseminated their March 9, 2023 letter, and other statements or communications to
11 others causing, directly or indirectly, the statement banning Ms. Campbell from the Swedish
12 Club, which indicates directly or indirectly that the full enjoyment of the Swedish Club’s goods,
13 services, facilities, privileges, advantages, and accommodations will be refused, withheld, denied
14 or in some manner limited or restricted in Ms. Campbell’s regard, and that Ms. Campbell's
15 patronage of or presence at the Swedish Club, a place of public accommodation is objectionable,
16 unwelcome, unacceptable or undesirable.

17 4.44 On April 13, 2023, the City of Seattle filed charges for civil rights violations
18 against the Swedish Club related to the Swedish Club’s discriminatory activities against Ms.
19 Campbell as an employee.⁷

20 _____
21 ⁴ The 42 U.S.C. § 2000a notice provision provides that “a plaintiff shall not bring a civil action ‘before the expiration
22 of thirty days after written notice of such alleged act or practice has been given to the appropriate State or local
23 authority; if such state has a law ‘prohibiting such act or practice and establishing or authorizing a State or local
24 authority to grant or seek relief from such practice.’ 42 U.S.C. § 2000a–3(c)… if the relevant state has an agency with
25 the authority to hear complaints of discrimination prohibited by Title II, then notification to that agency is a
26 ‘prerequisite for federal jurisdiction.’ *May v. California Hotel & Casino, Inc.*, No. 2:13- CV-00066-GMN, 2014 WL
1494231, at *3 (D. Nev. Apr. 14, 2014).”

⁵ WSBA #57026

⁶ Note: The Seattle EEOC, the Washington Human Rights Commission, and the City of Seattle Office of Civil Rights
are parties to a FEPA work share agreement. The City of Seattle Office of Civil Rights was designated in May/June
2023 by the EEOC and the Washington Human Rights Commission as the point agency for this matter.

⁷ Those charges were withdrawn when Ms. Campbell filed her lawsuits in Washington State King County
Superior Court against the Swedish Club, Case No. 23-25195-4 SEA.

1 4.45 In May 2023 Ms. Norgren authorized and summarily terminated the over 20 years
2 Swedish Club membership of James Skrinde in violation of RCW 24.03A et seq.; and on July
3 25, 2023 followed up with a Notice of Trespass letter through the Swedish Club’s lawyers
4 threatening him that the Club would seek state and city criminal charges against him if he that
5 stepped foot on the Swedish Club premises; and copied that letter to the Seattle Police
6 Department.

7 4.46 On July 25, 2023, Mr. Skrinde provided Ms. Campbell a copy of the letter
8 banning him from the Swedish Club premises, and especially threatening criminal charges
9 against him, and notifying the police of the same.

10 4.47 In October of 2023 Ms. Norgren requested and had the Swedish Club’s then
11 defense attorneys send Ms. Campbell a letter, a SLAPP letter threatening Ms. Campbell with a
12 lawsuit if Ms. Campbell did not cease to engage in the constitutionally and statutorily protected
13 activities she was engaged in, a historic landmark preservation permit process related to the
14 Swedish Club. Ms. Campbell in response to the letter threatened a counterclaim lawsuit against
15 the Swedish Club pursuant to RCW 4.24.525 if the Swedish Club sued her. The Swedish Club
16 did not respond back.

17 4.48 On December 13, 2023, Ms. Campbell and the Swedish Club went through
18 mediation sponsored by the City of Seattle Office of Civil Rights in order to resolve the above
19 matters. It was unsuccessful.

20 4.49 On December 19, 2023, Ms. Campbell filed a lawsuit against the Swedish Club,
21 its board of directors, and past and present key employees, including its executive directors (Ms.
22 Leander and Ms. Norgren), related to Ms. Campbell having been discriminated against and
23 mistreated *as both a member and as an employee*.

24 4.50 On January 30, 2024, the Seattle Office of Civil Rights administratively closed its
25 Case No. 2023-01536-PE against the Swedish Club.

1 4.51 In mid-March 2024 Ms. Campbell filed and served a *First Amended Complaint*
2 against the same parties.

3 4.52 The Swedish Club and Ms. Norgren are named as defendants for a portion of the
4 causes and actions pled in the *First Amended Complaint* – but neither defendant party herein is
5 named as a defendant for any of the causes of action complained of in this present 2024
6 complaint against the Swedish Club and Ms. Norgren.

7 4.53 Defendant Ms. Norgren’s cessation of certain unlawful practices after Ms.
8 Campbell filed her December 2023 lawsuit and amended complaint in March 2024 supports Ms.
9 Campbell’s claims herein rather than warrants their possible dismissal – for example, Ms.
10 Norgren and the former HR director, now people partnerships director, no longer summarily
11 terminate members’ memberships and ban them from the Swedish Club’s building and properties
12 like they improperly did to Ms. Campbell in March of 2023.

13 Ms. Norgren also no longer arbitrarily and capriciously seeks to and does exclude
14 members that displease her from the Swedish Club – as she did and continues to do to Ms.
15 Campbell.

16 4.54 Since March 1, 2023, Ms. Campbell has not set foot in the Swedish Club – despite
17 still being a member, but also despite her being a member of the public.

18 4.55 Moreover, she is afraid of even pressing the matter with the Swedish Club or Ms.
19 Norgren for fear she will not be just threatened as Ms. Norgren did to Mr. Skrinde, but that Ms.
20 Norgren will make a false report to the Seattle Police Department just as was done to Mr.
21 Skrinde when he properly challenged the legality of his Swedish Club membership being
22 terminated, and the exclusion from the Swedish Club of himself and the folk music band he is a
23 member of also.

24 4.56 Since March 2023 through May 2024, a period of over 15 months, the Swedish
25 Club has held over 235 events, *all of which have been open to the general public, none of which*
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1 Ms. Campbell was allowed to attend – either independently, as a guest of a member, or with a
2 non-Swedish Club member, family, friends – or as a member of the public:

- 3 • 15 Pancake Breakfasts
- 4 • 11 Sunday Brunches
- 5 • 12 Members Dinners
- 6 • 50 Film Series Showings
- 7 • 13 Book Club Meetings
- 8 • 64 Wednesday Dinners and Friday Lunches
- 9 • 56 Friday Night Dinners and Music/Dances
- 10 • 16 Special Events, Bazaars, Gala, Holiday Events and Dinners

11 4.57 Ms. Campbell likewise is not able to attend any cultural events at the Swedish
12 Club, including taking its language or craft courses, nor is she able to attend its lectures – all of
13 which are open to the public.

14 4.58 Neither can Ms. Campbell attend any non-Swedish Club sponsored event, such as
15 the monthly dance lessons NW Dance holds at the Swedish Club, nor go to any private meeting
16 or event at the Swedish Club that may be sponsored by non-Swedish Club members/individuals,
17 businesses, or organizations.

18 4.59 She likewise may not rent or arrange to use any of the Swedish Club’s kitchens,
19 as a licensed foodservice business owner, Ms. Campbell is not able to enjoy the same business
20 opportunities that other similarly situated business owners as herself are able to enjoy at the
21 Swedish Club.

22 4.60 Since March 9, 2023 Ms. Norgren has continuously refused or is withholding
23 from Ms. Campbell admission to the Swedish Club, a place of public accommodation, “and the
24 use of its facilities on an equal footing with all others.” *Evergreen Sch. Dist. No. 114 v.*
25 *Washington State Human Rights Comm'n*, 39 Wash. App. 763, 777, 695 P.2d 999 (1985),
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1 4.61 Because the public has greater rights than Ms. Campbell to access both Swedish
2 Club and non-Swedish Club meetings and events, to dine and socialize there, including with the
3 public-at-large, friends, and family, and fellow Swedish Club members, Ms. Campbell has found
4 her being barred from the Swedish Club premises humiliating, offensive, and degrading. It is an
5 ongoing source of emotional and mental distress and trauma – causing Ms. Campbell to seek and
6 need medical and behavioral health support, ongoing emotional support, and to suffer sleepless-
7 ness, sadness, depression, anxiety, and on-going, daily distress over the situation.

8 4.62 Ms. Campbell attributes her banishment from and the continued bar against her
9 being on the Swedish Club premises to her protected class status of national origin, disability,
10 age, and sex, and to the constitutionally and statutorily protected activities she engaged in as first
11 a Swedish Club member then as an employee, on her behalf and on behalf of others, and to the
12 discriminatory and related anti-personnel/member activities she was subjected to by the Swedish
13 Club’s executive directors, by its key employees, and by its board of directors, that she
14 complained of to the federal, state, and city authorities.

15 4.63 Ms. Campbell knows, but is also informed and believes and upon information and
16 belief alleges that in retaliation for Ms. Campbell’s having complained about the disruptive and
17 destructive employment and membership practices and situations she and others were being
18 subjected to in 2022 and 2023 by Ms. Leander, then Ms. Norgren, Ms. Campbell in
19 contravention to Federal, State, and City statutory law has been and is excluded from the
20 Swedish Club, a place of public accommodation.

21 4.64 Throughout the course of the 2023 *Campbell v. Lucas et al* litigation, Ms.
22 Campbell has made requests and entreaties to the Swedish Club’s and Ms. Norgren’s defense
23 counsels therein to lift the Swedish Club’s, Ms. Norgren’s restrictions against Ms. Campbell’s
24 full enjoyment of the Swedish Club. Ms. Campbell’s requests and entreaties to counsels have
25 been to no avail.

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1 **IV. CAUSES OF ACTION**

2 **FEDERAL LAW CLAIMS**

3 **1st CAUSE OF ACTION**

4 **TITLE II OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C. § 2000a**

5 ***As to the Swedish Club***

6 1.1 Plaintiff incorporates all of the allegations contained in the previous paragraphs of
7 this Complaint as though fully set forth herein.

8 1.2 Denying a person service, on account of his race, religion, or ethnicity, at a place
9 of public accommodation whose operations affect commerce is prohibited by 42 U.S.C. §2000a.

10 1.3 The Swedish Club is not operated by a bona fide religious organization

11 1.4 The Swedish Club is not a bona fide private club

12 1.5 At all relevant times, the Swedish Club was owned and operated as a place of
13 public accommodation, as contemplated by 42 U.S.C. 2000a, and is subject to the same.

14 1.6 At all relevant times, Defendant Norgren managed and operated the Swedish Club
15 and was its agent and employee.

16 1.7 Defendant Swedish Club is liable for the unlawful acts of its agents and
17 employees directly and/or und the doctrine of *respondeat superior*.

18 1.8 Ms. Campbell has attempted to afford herself of the full benefits and enjoyment of
19 the Swedish Club.

20 1.9 The Swedish Club has denied Ms. Campbell the full benefits and enjoyment of
21 the Swedish Club and instead has subjected Ms. Campbell to unwelcoming and offensive
22 conduct.

23 1.10 Similarly situated persons who are not members of Ms. Campbell's protected
24 class have received the full benefits and enjoyment of the Swedish Club and were treated better
25 than Ms. Campbell.

26 1.11 In denying Ms. Campbell the full use of Swedish Club property because of her
protected class status and because of the protected activities she has engaged in, the Swedish

1 Club's conduct constituted discrimination in a place of public accommodation in violation of the
2 Civil Rights Act of 1964.

3 1.12 As a direct and proximate cause of the Swedish Club's conduct described above,
4 Ms. Campbell has suffered damages in an amount to be proven at trial.

5 **2ND CAUSE OF ACTION**

6 **TITLE II OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C. § 2000a-2**

7 Prohibition against deprivation of, interference with, and punishment for exercising rights and
8 privileges secured by section 2000a or 2000a-1

9 ***As to the Swedish Club***

10 2.1 Plaintiff incorporates all of the allegations contained in the previous paragraphs of
11 this Complaint as though fully set forth herein.

12 2.2 The Swedish Club is not operated by a bona fide religious organization

13 2.3 The Swedish Club is not a bona fide private club

14 2.4 At all relevant times, the Swedish Club was owned and operated as a place of
15 public accommodation, as contemplated by 42 U.S.C. 2000a.

16 2.5 Defendant Swedish Club has intimidated, threatened Ms. Campbell through its
17 letters, communications, and conduct with the purpose of interfering with Ms. Campbell's right
18 to have access to and the full and equal enjoyment of the Swedish Club and the rights and
19 privileges secured by 42 U.S.C. 2000a or 2000a-1, and as part of an effort by the Swedish Club
20 to punish or attempt to punish Ms. Campbell for exercising Ms. Campbell's rights or privileges
21 secured by 42 U.S.C. 2000a or 2000a-1.

22 2.6 The Swedish Club has denied Ms. Campbell the full and equal enjoyment of the
23 Swedish Club, a place of public accommodation, but also subjected Ms. Campbell to
24 unwelcoming and offensive conduct in violation of the Civil Rights Act of 1964.

25 2.7 As a direct and proximate cause of the Swedish Club's actions described above,
26 Ms. Campbell has suffered damages in an amount to be proven at trial.

1 **3RD CAUSE OF ACTION**

2 **TITLE II OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C. § 2000a-2**

3 Prohibition against deprivation of, interference with, and punishment for exercising rights and
4 privileges secured by section 2000a or 2000a-1

4 ***As to Elizabeth Norgren***

5 3.1 Plaintiff incorporates all of the allegations contained in the previous paragraphs of
6 this Complaint as though fully set forth herein.

7 3.2 At all relevant times, Defendant Norgren managed and operated the Swedish
8 Club.

9 3.3 Defendant Norgren has intimidated, threatened Ms. Campbell through her letters
10 and conduct with the purpose of interfering with Ms. Campbell's right to have access to and the
11 full and equal enjoyment of the Swedish Club and the rights and privileges secured by 42 U.S.C.
12 2000a or 2000a-1, and as part of an effort by Ms. Norgren to punish or attempt to punish Ms.
13 Campbell for exercising Ms. Campbell's rights or privileges secured by 42 U.S.C. 2000a or
14 2000a-1.

15 3.4 Ms. Norgren denied Ms. Campbell the full and equal enjoyment of the Swedish
16 Club, a place of public accommodation, but also subjected Ms. Campbell to unwelcoming and
17 offensive conduct in violation of the Civil Rights Act of 1964.

18 3.5 As a direct and proximate cause of Ms. Norgren's conduct described above, Ms.
19 Campbell has suffered damages in an amount to be proven at trial.

20 **STATE LAW CLAIMS**

21 **4TH CAUSE OF ACTION**

22 **CIVIL RIGHTS VIOLATIONS - RCW 49.60.030(1)(B) AND RCW 29.60.215**

23 **Discrimination, Restriction, and Distinction in Place of Public Accommodation**

24 ***As to Elizabeth Norgren***

25 4.1 Plaintiff incorporates all of the allegations contained in the previous paragraphs of
26 this Complaint as though fully set forth herein.

4.2 The Swedish Club is not operated by a bona fide religious organization

1 4.3 The Swedish Club is not a bona fide private club

2 4.4 At all relevant times, the Swedish Club was owned and operated as a place of
3 public accommodation, as contemplated by the Washington law Against Discrimination
4 (WLAD) chapter 49.60 RCW.

5 4.5 At all relevant times, Defendant Norgren managed and operated the Swedish
6 Club.

7 4.6 Defendant Norgren subjected Ms. Campbell to unwelcoming and offensive
8 conduct.

9 4.7 Defendant Norgren subjected Ms. Campbell to the conduct described above
10 because of Ms. Campbell's disability, sex, and age, and because of Ms. Campbell's engagement
11 with constitutionally and statutorily protected activities on behalf of herself, and others.

12 4.8 Defendant Norgren knew or should have known but failed to restrain herself from
13 engaging in the discrimination, restriction, and distinction of Ms. Campbell at the Swedish Club.

14 4.9 Ms. Campbell's protected status related to disability, sex, and age was a
15 substantial factor in Ms. Norgren's discrimination of Ms. Campbell, and by virtue of the conduct
16 described above, Ms. Norgren did not treat Ms. Campbell in a manner comparable to the
17 treatment she provides to persons outside of Ms. Campbell's class, Ms. Norgren denied Ms.
18 Campbell the full and equal enjoyment of the Swedish Club, a place of public accommodation,
19 in violation of the WLAD, including RCW 49.60.030(1)(b) and RCW 49.60.215.

20 4.10 As a direct and proximate cause of Ms. Norgren's conduct described above, Ms.
21 Campbell has suffered damages in an amount to be proven at trial.

22 **5TH CAUSE OF ACTION**

23 **CIVIL RIGHTS VIOLATIONS - SEATTLE SMC 14.06 PUBLIC ACCOMMODATIONS**
24 **ORDINANCE**

25 **Discrimination and Retaliation**

26 ***As to Elizabeth Norgren***

1 5.1 Plaintiff incorporates all of the allegations contained in the previous paragraphs of
2 this Complaint as though fully set forth herein.

3 5.2 The Swedish Club is not operated by a bona fide religious organization

4 2.1 The Swedish Club is not a bona fide private club.

5 5.3 At all relevant times, the Swedish Club was owned and operated as a place of
6 public accommodation, as contemplated by the Seattle Municipal Code Chapter 14.06.

7 5.4 At all relevant times, Defendant Norgren managed and operated the Swedish
8 Club.

9 5.5 Defendant Norgren subjected Ms. Campbell to unwelcoming and offensive
10 conduct.

11 5.6 Since March 9, 2023 Elizabeth Norgren has directly and indirectly refused
12 Elizabeth Campbell admission to the Swedish Club; denied Ms. Campbell the full enjoyment of
13 any available goods, services, accommodations, facilities, privileges or advantages of the
14 Swedish Club.

15 5.7 Ms. Norgren has mailed or caused directly or indirectly a statement/statements
16 about Ms. Campbell, that Ms. Campbell's patronage of or presence at the Swedish Club is
17 objectionable, unwelcome, unacceptable or undesirable to be communicated to others.

18 5.8 Ms. Norgren has engaged in harassing, intimidating, or otherwise abusive
19 behavior against Ms. Campbell because of Ms. Campbell's disability, age, sex, and political
20 ideology;

21 5.9 Ms. Norgren has also harassed, intimidated, retaliated and obstructed Ms.
22 Campbell's access to the Swedish Club because Ms. Campbell filed a complaint, testified, and
23 assisted in an investigation under SMC 14.06 and SMC 14.04 against the Swedish Club, and Ms.
24 Norgren;

1 5.9 Such other appropriate remedy or relief as the Court deems just and proper.
2

3 DATED this 7th day of June, 2024
4

5 ELIZABETH A. CAMPBELL

6 

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