

FOOTNOTES – FIRST AMENDED COMPLAINT

¹ Cancel culture exposes individuals to trials outside courtrooms. These individuals suffer damages for being tried and convicted by the general public without procedural guarantees ensuring impartiality, fairness and defense. Publicly judging a person before the matter is brought to a platform tailored for judicial purposes thus seems to impair due process, fairness, and impartiality. In fact, they tend to result in substantial damages (mostly reputational damages) that could be the reason for tort claims (libel and defamation claims). Source: Oliveira, Beatriz. “A Return to Public Square Trials? How Cancel Culture and Perp Walks May Undermine Trial Impartiality and Criminal Justice.” *Columbia Undergraduate Law Review*. July 21, 2021.

² Washington State Bar Association License #9385

⁴ Dunsmore, Lorri. “Articles of Incorporation of Swedish Club Foundation.” Article 3. Purposes Section 3.1 Purposes. January 4, 2016.

⁵ “Our attorney compares the relationship of the Foundation to the Club to handcuffs. The SCF can give money ONLY [to] the Swedish Club. Source: Leander, Kristine. “Executive Director’s Report SC Board Meeting Oct 6, 2021...Appendix III Why the Swedish Club Foundation was set up as a separate entity.” The Swedish Club. October 6, 2021.

⁶ Washington State Bar Association License #51802

⁷ Ms. Campbell is a Swedish Club member of (2020-2024), and a former Swedish Club employee (2021-2023) and volunteer (2020-2023) of the Swedish Club.

⁸ Article 2 Membership, Section 2.1 Members. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.

⁹ Great American Insurance Agency Inc. Swedish Club’s policies: Account #262426643: Policies - PAC556352716, UMB556352816, EPP579734115-00.

¹⁰ Incorporated March 24, 1897.

¹¹ IRS Employer Identification Number 91-0433730, Wash. Dept. of Rev. UBI # 178-031-553

¹² Swedish Club News. Vol. 62 / Issue 12 / December 2023.

¹³ *Restated Articles of Incorporation Swedish Cultural Center*. Filed w/ Washington SOS Oct. 19, 1998. https://drive.google.com/file/d/1fSSMMujqSYnGU9h6LBiDz67zCEPIGmIr/view?usp=drive_link

¹⁴ At all times relevant herein and at present the membership meetings are held once a month on the third Wednesday of the month. The annual membership meeting is held in April on the third Wednesday of the month.

¹⁵ Benson, Brandon. “President’s Message.” Swedish Club News. Vol. 52, Issue 7 : September 2013.

¹⁶ *General Membership Registration* <https://swedishclubnw.app.neoncrm.com/forms/membership> Accessed October 26, 2023.

¹⁷ *General Membership Registration* Accessed February 19, 2024. <https://swedishclubnw.app.neoncrm.com/forms/membership>

¹⁸ *General Memberships*. Swedish Club. <https://www.swedishclubnw.org/become-a-member> Accessed Oct. 26, 2023

¹⁹ Examples of membership being effective immediately are, many people often apply for Swedish Club membership “at the door,” when they arrive for an event. Swedish Club volunteers of staff are directed to offer “at the door” access to immediate membership If they sign up and pay for a membership, they are given on the spot status as a member, and any applicable discount or benefit, privilege that Club members receive/hold.

²⁰ In addition to paying membership dues/fees online, an applicant may mail or deliver in-person their application and fees to the Swedish Club.

- ²¹ The prospective member's declaration of support via their application was eliminated months ago in 2023.
- ²² *General Memberships*. Swedish Club. <https://www.swedishclubnw.org/become-a-member> Accessed Oct. 26, 2023
- ²³ Leander, Kristine. "Membership: Become a Member." Swedish Club. Mar. 17, 2023. <https://swedishclubnw.org/Membership/becomemember.htm>
- ²⁴ RCW 49.60.040(2). <https://app.leg.wa.gov/RCW/default.aspx?cite=49.60.040>. Accessed Oct. 31, 2023.
- ²⁵ Since the filing of this lawsuit on December 19, 2023, the Swedish Club has changed its website references about access to the bar, claiming that access to it is more exclusive, available only to members.
- ²⁶ The check-in desk is not regularly staffed because of an ongoing administrative aversion to having to pay someone to attend the desk; an aversion by staff members to having to staff the check-in desk.
- ²⁷ Leander, Kristine. "Executive Director's Report SC Board Meeting April 6, 2022." Swedish Club. April 6, 2022.
- ²⁸ There are 12 members' dinners per year, i.e., 12 potential gratis members per year.
- ²⁹ Campbell, Elizabeth. Text message to Gretchen Taylor. iPhone Messages. October 6, 2020 at 2:17 PM
- ³⁰ Article 3 Board of Directors, Section 3.21 Executive Director. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.
- ³¹ Article 3. Board of Directors, Section 3.21 Executive Director. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.
- ³² Article 2 Membership, Section 2.1 Members. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.
- ³³ Typically, in the month of April.
- ³⁴ Likewise, as a lead member of the Members Committee Mr. M. Johansson throughout 2021 and 2022 engaged in the same discriminatory and elitist activity, encouraging, and working on a set of criteria about who or what kind of people can be members of the Swedish Club.
- ³⁵ Lost on Ms. Leander, and the board, was the absurdity and irony of Ms. Leander inserting herself in the election of directors to the board – engaging in another successful attempt to control who was on the board, and as she had in the past, who was leading the board* – the board that presided over Ms. Leander as executive director. *In 2021 Ms. Leander bragged to Ms. Campbell during one of their many private conversations about Swedish Club people and business that she had been instrumental in preventing board member and defendant Langdon Miller from becoming the president of the board of directors – she expressed her animosity towards him, claimed he had aspirations to be the president of the board, but she had prevented that from happening.
- ³⁶ Albright, Shama. "President's Message." *Swedish Club Newsletter*. Vol. 61, Issue 3: March 2022.
- ³⁷ "To achieve that end, this Board shall be proposing forthwith an amendment to the Bylaws of the Swedish Cultural Center." Source: Emerson, Mary. "Swedish Club Board Meeting Minutes April5, 2022." Swedish Club.
- ³⁸ Campbell, Elizabeth. "Nominating Committee Follow Up." Gmail. Apr 18, 2022, 5:51 PM.
- ³⁹ Leander, Kristine. "Friday, June 21. Meet Me at *Midsommar*." *Swedish Club News*. Vol. 52, Issue 4 : June 2013.
- ⁴⁰ Ms. Faino was subsequently elected to her position in April of 2023.
- ⁴¹ Article 3. Board of Directors, Section 3. Regular Meetings. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.
- ⁴² Ms. Campbell is informed and believes and upon such information and belief alleges that the executive director's employment contract, job description, supplemental board guidance documents, and years of practices that are now

procedurally required dictate the documents the executive director is required to supply to the board each month; and by extension to the Club's members.

⁴³ Given Ms. Campbell's osteoarthritic condition and limited mobility, relocating is not without its attendant physical pain, and concomitant required effort to summon the energy to change from one location to the next.

⁴⁴ Alaimo, Sarah. "Volunteers of the Month." *Swedish Club News*. Vol. 63: Issue 3. March 2024.

⁴⁵ Campbell, Elizabeth. Text message to Christine Lea. iMessages. Thu, Oct 19, 2023 5:55 PM

⁴⁶ Campbell, Elizabeth. Text message to Christine Lea. iMessages. Thu, Oct 19, 2023 5:58 PM

⁴⁷ Campbell, Elizabeth. Text message to Christine Ross. iMessages. Nov 29, 2023 5:34 AM.

⁴⁸ "Also, to clarify the difference between an Executive Session and the Executive Committee. 'Executive Session' refers to a meeting with just the Board members and ED. 'Executive Committee' refers to just the officers. Source: Leander, Kristine. "RE: Swedish Club Board meeting, Wednesday, Sept. 1 2021, at 6 pm. Gmail.com. August 31, 2021 2:34 PM

⁴⁹ Albright, Shama. "President's Message." *Swedish Club News*. Vol. 62, Issue 2: February 2023.

⁵⁰ Jonsson-Borgström, Malin. Text message to Elizabeth Campbell. Messages. Jan 7, 2023, 9:04 AM.

⁵¹ Ms. Leander referenced the recording of the board meetings by handheld device on November 30, 2021, noting "Mary Emerson [SCBOD secretary] needs to be absent again tomorrow. I still have her recorder and will record the meeting. If Langdon [Miller, board member] wants to do so as well, I welcome it. Source: Leander, Kristine. "Board reports for Swedish Club Board meeting Wednesday, Dec 1, 6 p. m. by Zoom. Gmail. November 30, 2021 2:42 PM.

⁵² Ms. Campbell has also been present at Zoom meetings in 2021 wherein Ms. Leander made reference about her recording the Zoom meeting through the Zoom platform.

⁵³ Which would include the meetings when the board is in its executive sessions.

⁵⁴ Article 2 Membership, Section 2.5 Monthly Meeting of Members. *Amended and Restated Bylaws of The Swedish Club*. November 20, 2019.

⁵⁵ Leander, Kristine. "Club Notes." *Swedish Club News*. Vol. 58, Issue 10: October 2019.

⁵⁶ Norgren, Elizabeth. "Washington Secretary of State Annual Report – Swedish Cultural Center." Filed November 9, 2023.

⁵⁷ Leander, Kristine. "Executive Director's Report SC Board Meeting Aug 3, 2022." *Swedish Club*. August 3, 2022.

⁵⁸ RCW 49.60.040(2). <https://app.leg.wa.gov/RCW/default.aspx?cite=49.60.040>. Accessed Oct. 31, 2023.

⁵⁹ The Swedish Club rents space to two tenants, Arista Catering and the Swede Finn Historical Society.

⁶⁰ RCW 49.60.040 Definitions.

⁶¹ SMC 14.06.020 – Definitions.

⁶² Leander, Kristine. "Executive Director's Message". *Swedish Center News*. Swedish Cultural Center. September 2011. <https://swedishclubnw.org/newsletters/2011/september2011.pdf>

⁶³ 2022 Form 990 Swedish Cultural Center, Inc. Return, Schedule R

⁶⁴ Sund, Gary. "President's Notes." *Swedish Club News*. Vol. 60, Issue 3. March 2021.

⁶⁵ Emerson, Mary. "Swedish Club Board Meeting Minutes October 6, 2021." *Swedish Club*. October 6, 2021.

⁶⁶ Hayes, Toene. "03-03-21 2021 Jan SC Fin Report summary." *Swedish Club*. March 3, 2021.

⁶⁷ Hayes, Toene. "03-03-21 2021 Jan SC Fin Report summary." *Swedish Club*. March 3, 2021.

- ⁶⁸ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁶⁹ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁷⁰ Hayes, Toene. “03-31-2022 Detail Operations Board Report 202203 collapsed 20220422.” Swedish Club. April 22, 2022.
- ⁷¹ Hayes, Toene. “03-31-2022 Detail Operations Board Report 202203 collapsed 20220422.” Swedish Club. April 22, 2022.
- ⁷² Hayes, Toene. “05-31-22 Board Report 202205 collapsed 20220624.” Swedish Club. June 24, 2022.
- ⁷³ Hayes, Toene. “05-31-22 Board Report 202205 collapsed 20220624.” Swedish Club. June 24, 2022.
- ⁷⁴ Hayes, Toene. “09-01-21 Mtg 2021-07-31 SCC Financial Stmts, by Lao.” Swedish Club. September 1, 2021.
- ⁷⁵ Hayes, Toene. “2022-08 Fin Comm Report 20220922.” Swedish Club. September 22, 2022.
- ⁷⁶ Hayes, Toene. “2022-08 Fin Comm Report 20220922.” Swedish Club. September 22, 2022.
- ⁷⁷ Hayes, Toene. “2022-08 Fin Comm Report 20220922.” Swedish Club. September 22, 2022.
- ⁷⁸ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ⁷⁹ Hayes, Toene. “09-01-21 Mtg 2021-07-31 SCC Financial Stmts, by Lao.” Swedish Club. September 1, 2021.
- ⁸⁰ Hayes, Toene. “2022-07 Fin Comm Report 20220822.” Swedish Club. August 22, 2022.
- ⁸¹ Hayes, Toene. “2020-10 SC Updated Fin Report Summary.” Swedish Club. December 2, 2020.
- ⁸² Hayes, Toene. “2020-10 SC Updated Fin Report Summary.” Swedish Club. December 2, 2020.
- ⁸³ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ⁸⁴ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ⁸⁵ Hayes, Toene. “12-2022 Fin Comm Report 20230120.” Swedish Club. January 20, 2023.
- ⁸⁶ Hayes, Toene. “12-2022 Fin Comm Report 20230120.” Swedish Club. January 20, 2023.
- ⁸⁷ Hayes, Toene. “09-01-21 Mtg 2021-07-31 SCC Financial Stmts, by Lao.” Swedish Club. September 1, 2021.
- ⁸⁸ Hayes, Toene. “02-01-23 Dec 22 v Dec 21 Board Report.” Swedish Club. February 1, 2023.
- ⁸⁹ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁹⁰ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁹¹ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁹² Note: Example of diversionary notes and statements made by Ms. Hayes’ when presenting her financial reports; comments about extraneous subject(s) benefit accrues to Ms. Leander – draws attention from ongoing operating deficits.
- ⁹³ Hayes, Toene. “09-01-21 Mtg 2021-07-31 SCC Financial Stmts, by Lao.” Swedish Club. September 1, 2021.
- ⁹⁴ Hayes, Toene. “02-01-23 Dec 22 v Dec 21 Board Report.” Swedish Club. February 1, 2023.
- ⁹⁵ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁹⁶ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ⁹⁷ Leander, Kristine. “Executive Director’s Report SC Board Meeting Dec 1, 2021. Swedish Club. December 1, 2021
- ⁹⁸ Leander, Kristine. “Executive Director’s Report SC Board Meeting Dec 7, 2022. Swedish Club. December 7, 2022.

- ⁹⁹ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ¹⁰⁰ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ¹⁰¹ Sund, Gary. “President’s Notes.” *Swedish Club News*. Vol. 59, Issue 11: November 2020.
- ¹⁰² Hayes, Toene. “09-01-21 Mtg 2021-07-31 SCC Financial Stmts, by Lao.” Swedish Club. September 1, 2021.
- ¹⁰³ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ¹⁰⁴ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ¹⁰⁵ Leander, Kristine. “Executive Director’s Report SC Board Meeting Dec 1, 2021. Swedish Club. December 1, 2021.
- ¹⁰⁶ Hayes, Toene. “12-2022 Fin Comm Report 20230120.” Swedish Club. January 20, 2023.
- ¹⁰⁷ Ckg & Svg Cash \$165,502 + JILF Funds \$112,000 +SCF Pledge \$175,000 = \$452,502 Sources: See Footnotes #65 and #73.
- ¹⁰⁸ According to Ms. Leander, “Every time we request funds, we delineate what cultural expenses we expect the cultural funds to cover.” In 2021, 2022, and 2023, no written copies of the requests by Ms. Leander/Ms. Hayes to either the JILF or to the SCF have ever been put into the record of any finance committee meeting or board meeting attended by Ms. Campbell and other observers of those meetings.
- ¹⁰⁹ Leander, Kristine. “Executive Director’s Report SC Board Meeting Oct 6, 2021.” Swedish Club. October 6, 2021.
- ¹¹⁰ Emerson, Mary. “Swedish Club Board Meeting Minutes October 6, 2021 By Zoom.” Swedish Club. October 6, 2021.
- ¹¹¹ Hayes, Toene. “2021 March SC P&L.” Swedish Club. March-April 2021.
- ¹¹² “Related organizations are organizations that stand in a parent/subsidiary relationship, brother/sister relationship...or supporting/supported organization relationship. Supporting and supported organizations are defined in section 509(a)(3) and 509(f)(3). The first two relationships depend on a definition of control ...The definition of control depends on whether the organization has owners or persons with beneficial interests.” Source: IRS. “Exempt Organizations Annual Reporting Requirements – Form 990, Schedule R: Meaning of ‘Related’ Organization.” U.S. Treasury. Internal Revenue Service. December 2023.
- ¹¹³ Leander, Kristine. “The Club of a Lifetime.” *Swedish Club News*. Vol. 56. Issue 4: April 2017.
- ¹¹⁴ Jones, Floyd. “Last Will and Testament of Floyd U. Jones December 19, 2017.” King County Superior Court Probate 18-4-00512-1 SEA.
- ¹¹⁵ Hayes, Toene. “02-09-23 Dec 22 v Jan 22 202301 Fin Comm Report.” Swedish Club. January 22, 2023.
- ¹¹⁶ Sund, Gary. “President’s Message.” *Swedish Club News*. Vol. 59. Issue 11. November 2020.
- ¹¹⁷ Leander, Kristine. “October 2021 ED’s Report to the Board.” Swedish Club. October 6, 2021.
- ¹¹⁸ Leander, Kristine. “Executive Director’s Report SC Board Meeting July 6, 2022.” Swedish Club. July 6, 2022.
- ¹¹⁹ Leander, Kristine. “Executive Director’s Report SC Board Meeting Aug 3, 2022.” Swedish Club. August 3, 2022.

- ¹²⁰ LPL Financial LLC, a foreign limited liability company, 4707 Executive Dr. San Diego, CA 92121. LPL Financial 1448 NW Market St. Suite 500 Seattle, WA 98107 Jason Demarre account executive (represents numerous investment services companies).
- ¹²¹ Leander, Kristine. “Executive Director’s Report SC Board Meeting July 6, 2022.” Swedish Club. July 6, 2022.
- ¹²² SDCI. “1920 Dexter Ave N Mechanical Permit – 6965766-ME.” City of Seattle. Seattle Department of Construction & Inspections. 2023.
- ¹²³ Emerson, Mary. “Swedish Club Board Meeting Minutes January 4, 2023.” Swedish Club Board of Directors. January 4, 2023. https://docs.google.com/file/d/1TqgFfxiimdt_-dkvVxfhYY0aEcmLV6Fl/edit?usp=docslist_api&filetype=msword
- ¹²⁴ Defendant Toene Hayes, former staff account for the Swedish Club.
- ¹²⁵ Leander, Kristine. “Executive Director’s Report SC Board Meeting Dec 1, 2021. Swedish Club. December 1, 2021.
- ¹²⁶ Definition provided by Google Oxford Languages Dictionary.
- ¹²⁷ Leander, Kristine. “Executive Director’s Report SC Board Meeting Dec 1, 2021. Swedish Club. December 1, 2021.
- ¹²⁸ “We” is likely Ms. Leander and Ms. Hayes. The Swedish Club Foundation is likely who has or will be asked to provide the funds.
- ¹²⁹ Hayes, Toene. “2022-08 Fin Comm Report 20220922.” Swedish Club. September 22, 2022.
- ¹³⁰ Hayes, Toene. “2022-08 Fin Comm Report 20220922.” Swedish Club. September 22, 2022.
- ¹³¹ Hayes, Toene. “12-2022 Fin Comm Report 20230120.” Swedish Club. January 20, 2023.
- ¹³² Leander, Kristine. “Executive Director’s Notes”. *Swedish Center News*. Swedish Cultural Center. June 2011. <https://swedishclubnw.org/newsletters/2011/june2011.pdf>
- ¹³³ Washington SOS., Washington AG. “Chrity * Nonprofit Board Service in Washinton State: A Quick Guide.” Washington Secretary of State. Washington State Office of the Attorney General. Revised January 2023. <https://www.sos.wa.gov/sites/default/files/2023-01/2023%20QuickGuide%20for%20Board%20Service.pdf?uid=651da5e8e01a6#:~:text=Directors%20and%20officers%20must%20act,in%20the%20nonprofit's%20best%20interests>. Accessed February 8, 2024.
- ¹³⁴ Wideburg, Laura A. Facebook post. February 22, 2024.
- ¹³⁵ Cooper, Judy. Graves, Carol. Jones, Chris. Little, Eileen. McCann. Penhoet, Megan. Schilling, Monica. Schipull, Eckhart. Wahlquist. Yerkes, Todd. Yerkes, Valerie. “Important News About the Swedish Club. Email. Save Ourt Swedish Club “SOS”. February 17, 2024. <https://saveourswedishclub.org/our-concerns>
- ¹³⁶ Wideburg, Laura A. Facebook post. October 18. 2023.
- ¹³⁷ Vasa Park is where Ms. Norgren previously worked before coming to the Swedish Club.
- ¹³⁸ Cooper, Judy. Graves, Carol. Jones, Chris. Little, Eileen. McCann. Penhoet, Megan. Schilling, Monica. Schipull, Eckhart. Wahlquist. Yerkes, Todd. Yerkes, Valerie. “Important News About the Swedish Club. Email. Save Ourt Swedish Club “SOS”. February 17, 2024. <https://saveourswedishclub.org/our-concerns>
- ¹³⁹ Ibid.
- ¹⁴⁰ Ibid.

- ¹⁴¹ According to the *Amended and Restated Bylaws of the Swedish Club: Adopted by Members on November 20, 2019*, Article 2 Membership, Section 2.1 Members: “The corporation shall have two classes of members: (a) general members, entitled to all of the rights and privileges of membership, including voting on any and all matters.” They are also designated as and referred to as “Blue Card members.” Their rights as members are enumerated on the reverse side of the Swedish Club’s “blue membership card” the member is issued, including but not limited to the right to “Vote on Club matters and participate in committee work and Board Membership.”
- ¹⁴² Ms. Campbell holds a certificate for a free extra one month of membership past her membership anniversary date.
- ¹⁴³ See *Garvey v. Seattle Tennis Club*, 60 Wn. App. 930, 933, 808 P.2d 1155 (1991).
- ¹⁴⁴ RCW 24.03A.010(5). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.010>. Accessed Oct. 31, 2023.
- ¹⁴⁵ RCW 24.03A.010(47). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.010>. Accessed Oct. 31, 2023.
- ¹⁴⁶ RCW 66.04.010 (8) <https://app.leg.wa.gov/RCW/default.aspx?cite=66.04.010>. Accessed Oct. 31, 2023.
- ¹⁴⁷ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.1
- ¹⁴⁸ WAC 314.40.005 <https://apps.leg.wa.gov/wac/default.aspx?cite=314-40-005>. Accessed Oct. 30, 2023.
- ¹⁴⁹ Washington Nonprofit Corporations Act, RCW 24.03A. <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A> accessed Oct 31, 2023.
- ¹⁵⁰ *Amended and Restated Bylaws of The Swedish Club*. Approved by Board for submission to Members on Sep. 4, 2019. Adopted by Members on Nov. 20, 2019. https://drive.google.com/file/d/14SejUvzjPvg2nnnRhDQeILY-csPAv4ap/view?usp=drive_link
- ¹⁵¹ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.1
- ¹⁵² AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.3
- ¹⁵³ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.4
- ¹⁵⁴ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.5
- ¹⁵⁵ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.4, 2.9
- ¹⁵⁶ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.13
- ¹⁵⁷ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.6, 3.7
- ¹⁵⁸ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 2 § 2.4, 2.5, 2.6, 2.13
- ¹⁵⁹ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.20 ¶ 3.20.1
- ¹⁶⁰ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.20 ¶ 3.20.2
- ¹⁶¹ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 7 § 7.6
- ¹⁶² RCW 24.03A.215. <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.215>. Accessed Oct. 31, 2023.
- ¹⁶³ RCW 24.03A.210(1)(a). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.210>. Accessed Oct. 31, 2023.
- ¹⁶⁴ RCW 24.03A.210(1)(a). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.210>. Accessed Oct. 31, 2023.

- ¹⁶⁵ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.15
- ¹⁶⁶ RCW 24.03A.210(1)(b). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.210>. Accessed Oct. 31, 2023.
- ¹⁶⁷ RCW 24.03A.210(1)(a)(b). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.210>. Accessed Oct. 31, 2023.
- ¹⁶⁸ RCW 24.03A.210(3). <https://app.leg.wa.gov/RCW/default.aspx?cite=24.03A.210>. Accessed Oct. 31, 2023.
- ¹⁶⁹ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 7 § 7.6
- ¹⁷⁰ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 7 § 7.6
- ¹⁷¹ AMND. AND RESTATED BYLAWS OF THE SWED. CULT. CTR. ART. 3 § 3.17
- ¹⁷² Swedish Club. Memberships. <https://www.swedishclubnw.org/become-a-member> Accessed Oct. 31, 2023.
- ¹⁷³ ¹WAC 314.40.080. [HTTPS://APP.LEG.WA.GOV/WAC/DEFAULT.ASPX?CITE=314-40-080](https://app.leg.wa.gov/wac/default.aspx?cite=314-40-080). ACCESSED OCT. 31, 2023.
- ¹⁷⁴ WAC 314.40.060. <https://app.leg.wa.gov/wac/default.aspx?cite=314-40-060>. Accessed Oct. 31, 2023.
- ¹⁷⁵ The Swede Finn Foundation is an on-site tenant of the Swedish Club at 1920 Dexter Avenue North, Seattle, Washington.
- ¹⁷⁶ Non-disabled employees, including those holding positions of work and authority similar to Ms. Campbell did have a key to the door nearest to the parking – they did not use disabled parking.
- ¹⁷⁷ Campbell, Elizabeth. “Consider this?” Gmail. Sent to Kristine Leander, Mar 22, 2022 10:56 AM.
- ¹⁷⁸ Lower level, building doors were locked all day except on the days there were events at the Club, like on Friday and Wednesday evenings, for the Sunday pancake breakfast, or just before noon on Fridays for the lunch service.
- ¹⁷⁹ Leander, Kristine. “Consider this?” Gmail. Sent to Elizabeth Campbell, Mar 23, 2022 11:18 AM.
- ¹⁸⁰ Ancestry. “DNA: Elizabeth Campbell, Ethnicity Estimate.” Ancestry.com
- ¹⁸¹ Leander, Kristine. “Welcome Chef Carina.” Swedish Club News. Vol. 60. Issue 3. March 2021. <https://swedishclubnw.org/newsletters/2021/march2021.pdf>
- ¹⁸² Lea, Christine. Text message to Elizabeth Campbell. iMessages. Mon, Jan 15, 2024 6:04 PM
- ¹⁸³ Campbell, Elizabeth. “Re: Advice about our NY's party on Jan 7.” Gmail.com Thu, Dec 30, 2021 at 1:17 PM
- ¹⁸⁴ Lea, Christine. Text message to Elizabeth Campbell. iMessages. Mon, Jan 15, 2024 6:04 PM.
- ¹⁸⁵ Lea, Christine. Text message to Elizabeth Campbell. iMessages. Mon, Jan 15, 2024 6:04 PM.
- ¹⁸⁶ Campbell, Elizabeth. “Letter to Lars Matthiesen: What’s on my Mind”. Facebook, 28 Aug. 2021, 3:20 AM, <https://bit.ly/3D042Cx>
- ¹⁸⁷ Campbell, Elizabeth. “Letter to Lars Matthiesen: Switching it up further...”. Facebook, 16 Sep. 2021, 10:05 AM, <https://bit.ly/3ybLtqK>
- ¹⁸⁸ Leander, Kristine. “Gunnar & Birgitta Wallin's meatball recipe--Jan 28.” Gmail. Thu, Jan 6, 2022 at 3:41 PM

- ¹⁸⁹ Leander, Kristine. “Executive Director’s Report SC Board Meeting Sept 1, 2021.” Swedish Club. September 1, 2021.
- ¹⁹⁰ Leander, Kristine. “Executive Director’s Report SC Board Meeting Jan. 5, 2022.” Swedish Club. January 5, 2022.
- ¹⁹¹ Emerson, Mary. “Swedish Club Board Meeting Minutes January 5, 2022.” Swedish Club. January 5, 2022.
- ¹⁹² Norgren, Elizabeth. “Employee Spotlight.” Swedish Club News. Vol. 63, Issue 1. January 2024
- ¹⁹³ RCW 24.03A.490 Board of directors—Authority
- ¹⁹⁴ RCW 24.03A.495 Standards of conduct for directors.
- ¹⁹⁵ Campbell, Elizabeth. “Interview.” Gmail. Thursday, May 26, 2022 8:20 AM
- ¹⁹⁶ Campbell, Elizabeth. “EAC Complaint to SALaimo Re SC Employment Enviro 11-29-22.docx.” Page 14. November 29, 2022. Hand delivered to Ms. Alaimo and at in person meeting with her the same day.
- ¹⁹⁷ Campbell, Elizabeth. “EAC Complaint to SALaimo Re SC Employment Enviro 11-29-22.docx.” Page 5. November 29, 2022. Hand delivered to Ms. Alaimo and at in person meeting with her the same day.
- ¹⁹⁸ Campbell, Elizabeth. “EAC Complaint to SALaimo Re SC Employment Enviro 11-29-22.docx.” Page 15. November 29, 2022. Hand delivered to Ms. Alaimo and at in person meeting with her the same day.
- ¹⁹⁹ Campbell, Elizabeth. “EAC Complaint to SALaimo Re SC Employment Enviro 11-29-22.docx.” Page 13. November 29, 2022. Hand delivered to Ms. Alaimo and at in person meeting with her the same day.
- ²⁰⁰ It should be noted that Ann-Margret is an elderly woman over 75 years old, and a decades long member of the Swedish Club.
- ²⁰¹ Campbell, Elizabeth. “Complaint to City of Seattle Human Rights Department: Discrimination, retaliation, harassment.” April 20, 2022.
- ²⁰² Campbell, Elizabeth. “Discrimination Complaint to State of Washington Human Rights Commission.” April 29, 2022. Dropbox:
<https://www.dropbox.com/s/9m3mk5g4qid7d7o/EACampbell%20Complaint%20WA%20ST%20Human%20Rights%20Com%2004-29-2022.pdf?dl=0>
- ²⁰³ When Ms. Campbell returned the minute book to Ms. Leander, Ms. Leander said to Ms. Campbell, “I hope you found what you were looking for.
- ²⁰⁴ Coincidentally when Ms. Campbell sat down in Ms. Alaimo’s office for their meeting Ms. Campbell inadvertently pocket dialed her friend and fellow Swedish Club member, Lorelei Stevens (hereinafter “Ms. Stevens”). Ms. Stevens called Ms. Campbell later on and let her know that she had listened to the conversation between Ms. Alaimo and Ms. Campbell.
- ²⁰⁵ Source: Meeting Transcript 02-12-23 Shama Albright, Elizabeth Campbell, Molly Olson.
- ²⁰⁶ Campbell, Elizabeth. “EAC Statement Re LC Matthiesen 12-29-21 Final.” December 29, 2021.
- ²⁰⁷ Campbell, Elizabeth. “EAC Statement Re LC Matthiesen 12-29-21 Final.” Page 7, Par. 3. December 29, 2021.
- ²⁰⁸ Leander, Kristine. “Cultural Director’s Notes”. *Swedish Center News*. Swedish Cultural Center. December 2010. <https://swedishclubnw.org/newsletters/2010/december2010.pdf>
- ²⁰⁹ Leander, Kristin. “Club Notes.” *Swedish Club News*. Vol. 58, Issue 11: December 2019.

- ²¹⁰ Alaimo, Sarah. “Sharon Lucas / Volunteers of the Month.” *Swedish Club News*. Vol. 63 / Issue 3 / March 2024.
- ²¹¹ Alaimo, Sarah. “Sharon Lucas / Volunteers of the Month.” *Swedish Club News*. Vol. 63 / Issue 3 / March 2024.
- ²¹² Leander, Kristine. “Dear Swedish Club Board, Administration and Members.” Personal Letter. October 18, 2023.
- ²¹³ Ms. Hayes is referencing Kristine Leander the then executive director of the Swedish Club.
- ²¹⁴ “Happiness” references Ms. Alaimo’s penchant for touting herself as a certified happiness coach, in contrast to what later came into practice, her vindictive and ruthless behavior towards others.
- ²¹⁵ Former Swedish Club employees Stephanie Buley and Wendy Lundin Clark.
- ²¹⁶ Campbell, Elizabeth. Text message to Malin Jonsson. iMessage. April 18, 2022.
- ²¹⁷ Campbell, Elizabeth. “Elizabeth Campbell Discrimination Complaint to the Washington Human Rights Commission.” April 27, 2022.
- ²¹⁸ Campbell, Elizabeth. Text message to Candy Martin. iMessage. June 3, 2022.
- ²¹⁹ 1) 12-14-21 Malin Jonsson quits 2) 03-26-22 Jane Tacoma Doe quits 3) : Tom Perricone quits.
- ²²⁰ Prior to 2011 Ms. Leander served on the SCBOD as Secretary from 2007 to April 2008. She was the Club’s Cultural Director from April 2008 to March 2011; when she became executive director her role as cultural director was folded into the position of executive director. From October 2008 to March 2023 Ms. Leander was the editor of the *Swedish Club News* with exclusive editorial control over its content.
- ²²¹ Abuse by proxy is a less well known form of sexual harassment. Examples of abuse by proxy include spreading lies about the victim to their friends and family, sabotaging their career by communicating with their employer. It is a common assumption that “sexual harassment” in an employment situation is limited to direct engagement between parties, for example a work supervisor or colleagues pushing a sexual quid pro quo arrangement with an employee or colleague. However sexual harassment activity also includes the creation and maintenance of a hostile, abusive work environment, that is sufficiently severe or alters the conditions of the victim’s employment and creates an abusive working environment. *Meritor Savings Bank v. Vinson*.
- ²²² Campbell, Elizabeth. Message to Lars Matthiesen. Facebook Messages. May 2, 2021.
- ²²³ Campbell, Elizabeth. Private Facebook post to Lars Matthiesen. October 28, 2021.
- ²²⁴ Campbell, Elizabeth. Text message to Candy Martin. iMessage. January 12, 2022, 6:31 PM.
- ²²⁵ Leander, Kristine. “Executive Director’s Report SC Board Meeting Jan. 5, 2022.” Swedish Club. January 5, 2022.
- ²²⁶ Leander, Kristine. “Executive Director’s Report SC Board Meeting Feb. 2, 2022.” Swedish Club. February 2, 2022.
- ²²⁷ In conversations Ms. Campbell had with Lars Matthiesen in 2020 and 2021 about Arista, he said the negative impacts to the Swedish Club caused by Arista had been going on for years. He told her that he often spoke to Ms. Leander about this, the need to hold Arista to account for the damage they did to the Swedish Club building and their general negative impacts. Mr. Matthiesen said he had talked to Ms. Leander about this numerous times over the years however she never confronted Arista at any meaningful level. His comment was, “You ask for a businessman’s advice and then you refuse to follow that advice!”.

- ²²⁸ Leander, Kristine. Executive Director’s Report Board Meeting Mar 2, 2020.” Swedish Club. *March 3, 2020*
- ²²⁹ Leander, Kristine. “Executive Director’s Report SC Board Meeting Oct 6, 2021. Swedish Club. October 6, 2022.
- ²³⁰ Campbell, Elizabeth. “Suggested Path Forward.” Gmail. Mar 27, 2022, 4:27 PM. Received by Kristine Leander, Judith Dern, Lori Ann Reinhall, and RC Charles.
- ²³¹ Leander, Kristine. “Executive Director’s Report SC Board Meeting April 6, 2022.” Swedish Club. April 6, 2022.
- ²³² Campbell, Elizabeth. Text message to Candy Martin. iMessage. February 25, 2022, 9:28 PM.
- ²³³ Campbell, Elizabeth. “SC Letter Re Discrimination Complaints Filed 05-04-2022”.
- ²³⁴ Ms. Lillis while given the title of Food Service Manager never did the food service manager related tasks, she cooked at best
- ²³⁵ Leander, Kristine. “Executive Director’s Report SC Board Meeting July 6, 2022.” Swedish Club. July 6, 2022.
- ²³⁶ Ross, Christine. Text Messages to Elizabeth Campbell. Tue Oct 4, 2022 10:54 AM
- ²³⁷ Leander, Ms. Leander. “Responding to your application?”. Gmail. Aug 1, 2022 3:33 PM
- ²³⁸ Ms. Campbell checked her Indeed email account – there was no message from Ms. Leander in it.
- ²³⁹ Leander’s statement references two job types, “chef” and “food services manager” as one position.
- ²⁴⁰ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 10:54 AM
- ²⁴¹ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:16 PM
- ²⁴² Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:16 PM
- ²⁴³ Ross, Christine. Text Messages to Elizabeth Campbell. Tue, Oct 4, 1:15 PM
- ²⁴⁴ 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.
- ²⁴⁵ Leander, Ms. Leander. “Food Committee Meetings?” Gmail. April 14, 2022 4:38 PM
- ²⁴⁶ Elizabeth Campbell interview with Tom Perricone on August 15, 2022.
- ²⁴⁷ Ross, Christine. Text messages to Elizabeth Campbell.
- ²⁴⁸ The reality of Tom offering to be “very helpful”, appeared to be to curry favor with Ms. Leander.
- ²⁴⁹ 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.”
- ²⁵⁰ 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.
- ²⁵¹ See also discussion about this practice related to the hiring of Wendy Lundin Clark.

- ²⁵² 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.
- ²⁵³ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Sat, Oct 1, 10:39 PM
- ²⁵⁴ Ross, Christine. Text Messages to Elizabeth Campbell. Tue Oct 4 2022 10:54 AM
- ²⁵⁵ 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.”
- ²⁵⁶ 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.”
- ²⁵⁷ Campbell, Elizabeth. Text messages to Christine Ross. iMessage. Sat, Oct 1, 10:39 PM.
- ²⁵⁸ Campbell, Elizabeth. “Artificial Crisis – Solution”. Gmail. Tue, Aug 16, 2022 at 1:32 PM.
<https://www.dropbox.com/s/fxtqau6xuvpwnf/EAC%20Gmail%20Re%20Artificial%20Crises%20-%20Solution%208-16-22.pdf?dl=0>
- ²⁵⁹ Tom Perricone’s last day of employment at the Swedish Club was August 15, 2022.
- ²⁶⁰ The reference to the “long drive” is what RC told Ms. Campbell on August 26th, it is the reason he said that Ms. Ross had not come to work that day, because he said that Ms. Ross 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.
- ²⁶¹ Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022 10:39 PM
- ²⁶² Campbell, Elizabeth. Text message to Malin Jonsson-Borgstrom. Messages. Aug 25, 2022, 7:08 AM.
- ²⁶³ ClearChecks. “Information Requested for you Background Check”. Gmail. Fri, Aug 19, 2022 at 11:03 AM.
- ²⁶⁴ 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](#)
- ²⁶⁵ Hayes, Toene. “Swedish Club Finance Committee August 2022 Reports for the September meeting. Email. Fri, Sep 23, 2022 at 12:18 PM
- ²⁶⁶ Hayes, Toene. Email November 29, 2022
- ²⁶⁷ Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022
- ²⁶⁸ Ross, Christine. Text Message to Elizabeth Campbell. October 1, 2022 10:39 PM
- ²⁶⁹ Ross, Christine. Text message to Elizabeth Campbell. Mon, Oct 17, 9:19 PM
- ²⁷⁰ Ross, Christine. Text message to Elizabeth Campbell. Tue, Oct 4, 1:16 PM
- ²⁷¹ Ross, Christine. Text message to Elizabeth Campbell. Sun, Nov 20, 11:33 AM
- ²⁷² Ross, Christine. Text message to Elizabeth Campbell. Wed, Nov 16, 10:46 PM
- ²⁷³ Leander, Kristine. “Menu for Sept 27?”. Gmail. Wed, Aug 31, 1:00 PM
- ²⁷⁴ Leander, Kristine. “Your application for the Chef/Food Services Manager at the Swedish Club”. Gmail. Sep 7, 2022, 11:41 PM.
- ²⁷⁵ Tom’s last day at the Swedish Club was August 15th.
- ²⁷⁶ Leander, Kristine. “dessert menus for Sept?”. Gmail. Sep 14, 2022, 12:15 PM.

- ²⁷⁷ Campbell, Elizabeth. Text Message to Malin Jonsson. iMessage. Thu, Sep 8, 8:32 AM
- ²⁷⁸ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Mon, Oct 3, 9:36 AM
- ²⁷⁹ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Thu, Oct 13, 10:57 AM
- ²⁸⁰ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Sat, Oct 22, 9:20 AM
- ²⁸¹ Ross, Christine. Text messages to Elizabeth Campbell. iMessage. Tue, Nov 8, 8:39 AM
- ²⁸² Ross, Christine. Text Messages to Elizabeth Campbell. iMessage. Mon, Nov 14, 5:28 PM
- ²⁸³ Ross, Christine. Text Messages to Elizabeth Campbell. iMessage. Tue, Nov 15, 8:38 AM
- ²⁸⁴ Ross, Christine. Text messages to Elizabeth Campbell. Mon, Nov 21, 8:39 AM
- ²⁸⁵ Ross, Christine. Text messages to Elizabeth Campbell. Sat, Dec 3, 10:22 AM
- ²⁸⁶ 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 it out to Ms. Alaimo 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-gMLenhr9O-Dhj1Rv05vZnXA?e=32EQeq> is online here.
- ²⁸⁷ Leander, Kristine. “RE: Food Committee, Monday, March 28?” Gmail. Sat, 26 Mar 2022 20:54:59
- ²⁸⁸ Leander, Kristine. “Executive Director’s Report SC Board Meeting April 6, 2022.” Swedish Club. April 6, 2022.
- ²⁸⁹ Leander, Kristine. “Executive Director’s Report SC Board Meeting July 6, 2022.” Swedish Club. July 6, 2022.
- ²⁹⁰ Leander, Kristine. “Executive Director’s Report SC Board Meeting Feb. 2, 2022.” Swedish Club. February 2, 2022.
- ²⁹¹ Sisco, Chris. Text message to Elizabeth Campbell. Messages. May 7, 2022, 3:29 PM.
- ²⁹² Sisco, Chris. Text message to Elizabeth Campbell. Messages. May 9, 2022, 8:01 PM.
- ²⁹³ Sisco, Chris. Text message to Elizabeth Campbell. Messages. May 9, 2022, 6:58 PM.
- ²⁹⁴ Sisco, Chris. Text message to Elizabeth Campbell. Messages. May 10, 2022, 11:07 AM.
- ²⁹⁵ Sisco, Chris. Text message to Elizabeth Campbell. Messages. May 11, 2022, 12:22 PM.
- ²⁹⁶ Leander, Kristine. “Executive Director’s Report SC Board Meeting March 2, 2022.” Swedish Club. March 2, 2022.
- ²⁹⁷ Emerson, Mary. “Swedish Club Board Meeting Minutes October 6, 2021.” Swedish Club. October 6, 2021.
- ²⁹⁸ Leander, Kristine. “Text message to Elizabeth Campbell”. iMessage.
- ²⁹⁹ According to the *Swedish Club Employee Handbook May 2021* 6.0 General Policies § 6.1 Meetings and Communication, Swedish Club employee were encouraged to be members of and attend any of the Board’s committee meetings.
- ³⁰⁰ Campbell, Elizabeth. “Letter to Lars Matthiesen: Switching it up further...”. Facebook, 16 Sep. 2021, 10:05 AM, <https://bit.ly/3ybLtqK>
- ³⁰¹ Leander, Kristine. “Dear Swedish Club Board, Administration and Members.” October 18, 2023.

- ³⁰² Cooper, Judy. Graves, Carol. Jones, Chris. Little, Eileen. McCann. Penhoet, Megan. Schilling, Monica. Schipull, Eckhart. Wahlquist. Yerkes, Todd. Yerkes, Valerie. “Important News About the Swedish Club. Email. Save Our Swedish Club “SOS”. February 17, 2024. <https://saveourswedishclub.org/our-concerns>
- ³⁰³ Campbell, Elizabeth. “11-03-21 My Struggle”. Word. November 3, 2021.
- ³⁰⁴ According to Shannon McDermott, one of the Swedish Club’s attorneys, “Washington law provides that services performed by a musician or entertainer do not constitute “employment” if the musician or entertainer is under a written contract with a business that purchases their services. Accordingly, a business that wishes to engage a musician as an independent contractor must enter into a written independent contractor agreement with the musician; otherwise, the musician will be considered an employee.” Source: McDermott, Shannon. “Requirements for Engaging Musicians as Independent Contractors.” Perkins Coie. November 14, 2022. <https://www.perkinscoie.com/en/news-insights/requirements-for-engaging-musicians-as-independent-contractors.html#:~:text=Washington%20law%20provides%20that%20services,business%20that%20purchases%20their%20services>.
- ³⁰⁵ Alaimo, Sarah. “Swedish Club.” Email. Monday, May 22, 2023 10:51 AM.
- ³⁰⁶ Campbell, Elizabeth. Text message to Lorelei Stevens. Messages. Nov 30m 2022 at 5:00 PM
- ³⁰⁷ Leander, Kristine. “New Board Members.” *Swedish Club News*. Vol. 54, Issue 2 : February 2015.
- ³⁰⁸ Leander, Kristine. “New Board Members.” *Swedish Club News*. Vol. 58, Issue 4: April 2019.
- ³⁰⁹ “Directors, Executive Officers and Corporate Governance. Part III U.S. SEC “Cleveland Biolabs, Inc. Form 10-K/A (Amendment No. 1. https://www.sec.gov/Archives/edgar/data/1318641/000143774920008857/cbli20200428_10ka.htm
- ³¹⁰ Pursuant to the terms of the Miller Agreement, Dr. Miller will serve as the Company’s President and Chief Medical Officer until the earlier of July 9, 2020 or his termination pursuant to the terms of the agreement. Under the Miller Agreement, Dr. Miller will be classified as an hourly exempt employee and will receive an initial base salary of \$300,000, which is subject to review by the Board (or a committee thereof) in its sole discretion, but may not be decreased other than in the instance of an across-the-board salary reduction affecting all executive officers of the Company. In the event Dr. Miller works more than 1,000 hours during any annual period, upon approval by the Company, Dr. Miller shall thereafter be paid an hourly rate of \$350 per hour for work conducted for the remainder of the year. Additionally, Dr. Miller shall be eligible to participate in the Company’s Annual Executive Bonus Plan based on a base pay rate equal to 50% of Dr. Miller’s base salary, subject to the terms and conditions of such plan, as revised from time to time. The Company is required to reimburse Dr. Miller for all reasonable business expenses incurred by him in performing the services under the Miller Agreement.
- ³¹¹ See additional information re Dr. Miller’s financial prowess at <http://www.chinabiotoday.com/articles/exclusive-decheng-velosbio>
- ³¹² PRNewswire. “Solve Therapeutics Announces Mission to Advance Novel Antibody-Based Therapies Against Cancer-Specific Targets. Solve Therapeutics, Inc. PRNewswire.com. December 14, 2022.
- ³¹³ UW Medicine. Patient Resources. Uwmedicine.org/bios. January 2024
- ³¹⁴ Leander, Kristine. “New Board Members.” *Swedish Club News*. Vol. 58, Issue 4: April 2019.
- ³¹⁵ Leander, Kristine. “Annual Meeting Update.” *Swedish Club News*. Vol. 55, Issue 4: April 2016
- ³¹⁶ Smith, Molly. “About.” [LinkedIn.com](https://www.linkedin.com/company/swedish-club-news/)
- ³¹⁷ Lane, Aric. “How to Prepare for your Biostats Consult: Tips, Tricks and What to Expect. About the Speakers.” Institute of Translational Health Sciences. October 4, 2023.

- ³¹⁸ Johansson, Martin K. “Martin K. Johansson (He/Him).” LinkedIn.com
- ³¹⁹ Leander, Kristin. “Executive Director’s Notes.” *Swedish Club News*. March 1, 2022.
- ³²⁰ King County. Washington. King County Recorder’s Office. Deed of Trust. Swedish Cultural Center, Grantor, Global Credit Union, Grantee. Instrument #20200925002520. By Kristine Leander, Executive Director (Swedish Cultural Center d/b/a Swedish Club, manager of Swedish Club Properties, LLC). September 24, 2020.
- ³²¹ Washington Nonprofit Corporation Act. RCW 24.03A.495(b) Standards of conduct for directors.
- ³²² NIA. “Loneliness and Social Isolation – Tips for Staying Connected.” U.S. Department of Health & Human Services. National Institutes of Health. National Institute on Aging. January 2024. <https://www.nia.nih.gov/health/loneliness-and-social-isolation/loneliness-and-social-isolation-tips-staying-connected#:~:text=Older%20adults%20are%20at%20higher,loss%20of%20family%20and%20friends>.
- ³²³ This overview was generated with the help of AI. It’s supported by info from across the web and Google’s Knowledge Graph, a collection of info about people, places, and things.
- ³²⁴ According to defendant Lars Matthiesen.