

TABLE OF CONTENTS

TABLE OF AUTHORITIES	xviii
INTRODUCTION	2
I. JURISDICTION.....	12
II. VENUE AND GOVERNING LAW	13
III. PARTIES	15
IV. FACTS.....	22
General Allegations as to all Causes of Action.....	22
1. Defendants’ Relationship to the Swedish Club and its Alter Egos	23
A. SWEDISH CLUB GENERAL PROFILE.....	24
1. History and Mission,	24
2. Swedish Club Governance and Management.....	25
3. Amending the Swedish Club’s <i>Bylaws</i> and <i>Articles of Incorporation</i>	26
B. MEMBERSHIP IN THE SWEDISH CLUB	27
i. Perquisites and Benefits of Swedish Club Membership.....	30
ii. Additional Distinctions Between Membership Levels	32
1. No Provisions in the Bylaws for the Regulation of Members or Termination of Swedish Club Memberships	35
2. No Provisions in the Swedish Club’s Contract with the Executive Director for the Regulation or Termination of Swedish Club Memberships by the Executive Director or Any Other Person(s)	35
ADDITIONAL FACTS.....	37
C. SWEDISH CLUB BOARD OF DIRECTORS ETHICS, ELECTIONS AND ETHOS	37
1. The Executive Director’s Not So Invisible Hand.....	37

2.	Executive Director and Board Corrupt the Qualifications For and Election of Swedish Club Board Directors	39
3.	2021-2022 Corruption of the Board Director Elections Process Rigging of Elections.....	41
4.	Election Rigging Post Script – Swedish Club Brand and Experience	49
5.	Other Irregular Board Election Activities	50
6.	Board Corruption Continues	52
D.	THE BOARD’S AND EXECUTIVE DIRECTORS’ CAMPAIGNS OF AGGRESSION AND INTIMIDATION AGAINST MEMBERS	53
1.	Board Meetings - Limiting Access, Obstructing Access, Making Access Difficult	54
2.	Abuse by Board, Executive Staff – Consequences to Members	58
3.	Additional Intimidation and Threats Against Members.....	62
4.	Additional Exclusionary Tactics by the SCBOD and Executive Director and Impairment of Members’ Rights to be Informed and to Participate	64
5.	Swedish Club Deep State 2022-2023 Secrecy Surrounding Selection of New Executive Director.....	66
6.	Turns Out, Elizabeth Norgren was <i>not</i> the Best Choice, However She Has the Requisite National Identity.....	67
7.	Recording Keeping Deficiencies.....	71
8.	The Usurpation of the Members’ Monthly Meeting by the SCBOD	72
9.	Board Errata	74
E.	SWEDISH CLUB EMPLOYMENT.....	75
F.	SWEDISH CLUB BUSINESSES & ACTIVITIES PLACE OF PUBLIC ACCOMMODATION – PUBLIC ACCESS	75
G.	SWEDISH CLUB FINANCES.....	80
1.	The Money Trail.....	80

i.	Origin of Jane Isakson Lea Foundation	81
ii.	Ms. Leander’s Conflict of Interest.....	83
iii.	Lack of Oversight by the Swedish Club’s Board of Directors	84
iv.	The True Purpose and Nature of the Swedish Club Foundation	85
v.	Swedish Club Foundation – Abuse of the Corporate Form.....	86
2.	Swedish Club Operations, Expenditures, and Fundraising	87
3.	Floyd Jones Restricted Endowment for “Cultural Expenses” HVAC Building Project Fundraising	92
i.	And Just Like That - HVAC Project Cost Drops \$1 Million	94
4.	The Sources of Operating Capital, Burn Rate, Operational Losses	97
5.	2023 – From Spendthrift to Profligate Spending	98
i.	Lost Fiscal Awareness, Constraint, and Accountability	99
6.	The Ongoing Financial Mismanagement of the Swedish Club 2023 -- 2024.....	100
7.	Administration and Oversight of Finances Undermined; Key Accounting Staff and Contract Accountant Terminated	102
8.	Neil Snyder, the Swedish Club’s New Treasurer Falters.....	102
9.	Lack of Consistency in Financial Reporting, Delinquent Reporting, and Failures to Produce Required Budgets	104
10.	Campbell’s Actual and Constructive Notice and Demands to SCBOD to Produce Credible Financial Information; Oversight of the Executive Directors/Finances.....	105
11.	Executive Directors’ and SCBOD’s Resistance to Audit and Accountability	109
ii.	Failure to Inventory the Swedish Club’s Assets	110
12.	Ex Post Facto Finances – SCBOD and Executive Director Attempting to Cover Up Not Really Distant Past	111
13.	The Swedish Club’s Now Multiple of Restaurant and Event Concepts	112

H.	PLAINTIFF ELIZABETH CAMPBELL.....	117
	1. Ms. Campbell’s Protected Status – Age, Disability Related.....	121
	2. Ms. Campbell’s Protected Status – National Origin Related.....	126
	3. Ms. Campbell’s Member and Employee Advocacy Activities at the Swedish Club.....	133
	4. Ongoing Culture of Violence and Abuse of Swedish Club Employees.....	150
	5. Ms. Campbell’s Actual and Constructive Notices and Requests.....	151
I.	THE SWEDISH CLUB – A DISCRIMINATORY, HOSTILE WORKPLACE.....	168
	1. Workplace Status Conflict, Task Conflict, Process Conflict, and Relationship Conflict.....	168
J.	THE SWEDISH CLUB A DISCRIMINATORY AND HOSTILE MEETING PLACE	174
	1. Inter-Member Status Conflicts, Relationship Conflicts	174
K.	DEFENDANT SHARON LUCAS	176
A.	DEFENDANT MOLLY OLSON SMITH.....	191
B.	DEFENDANT TOENE HAYES	195
	1. The Fake Job Interview of Ms. Campbell	203
	2. Ms. Haye’s and Mr. Rahman’s Retaliation Against Ms. Campbell.....	205
	3. Ms. Campbell’s Requests for Reasonable ADA Work Related Accommodations.....	208
	4. Ms. Leander and Ms. Hayes – Law Abiding Citizens Sworn to Uphold the Laws	212
	5. Ms. Haye’s False Claims of Verbal Abuse by Ms. Campbell.....	214
L.	DEFENDANT KRISTINE LEANDER	216
	1. Introduction	216
	2. Ms. Leander’s Initial Harassment of Ms. Campbell	220

3.	Discrimination – National Origin.....	224
4.	The Foodservice Manager Job	224
5.	The Food Service Manager Job – January to July 2022	226
6.	Ms. Campbell’s Notice to the Board Re FSM Job	238
7.	Round 2 Food Service Manager Job – August 2022 to January 2023 – The Conspiracy	239
8.	Ms. Leander In Charge - the Leander Projects, Facility Failures	254
9.	The No Go Catering Project – Swedish Club Business Taken Away by an Employee.....	256
10.	Nordic House Project Giveaway and AVM Failing Lease Coverup	257
11.	The Cherry Picked Financial Reports 2021, 2022, 2023	262
12.	Solar Panel Project	262
13.	Dropping Necessary Health and Safety Projects - Covering up for Anis Rahman, Failure to Maintain the Building.....	263
14.	Ms. Campbell’s Continued, Actual and Constructive Notices to the SCBOD.....	265
15.	First and Representative Notice to the SCBOD	266
M.	DEFENDANT GARY SUND AND KRISTINE LEANDER	270
1.	Events Leading Up to the April 20, 2022 Public Denunciation of Ms. Campbell	274
i.	Defendant Leander’s Campaign to Impair and Extinguish Ms. Campbell’s Swedish Club Membership	274
2.	Obstructing Ms. Campbell’s Candidacy for Board Director: Rigging the Election.....	280
3.	The Evening of April 20th	281
N.	ELIZABETH NORGREN.....	287
O.	LARS MATTHIESEN	296

P.	SARAH ALAIMO	301
Q.	THE SCBOD – DUTIES, STANDARDS OF CARE, LOYALTY	307
R.	IMPAIRMENT OF MS. CAMPBELL’S RIGHTS, HER DAMAGES AND DISTRESS	313
S.	SWEDISH CLUB SUPERVISORY PREMISES AND RELATED CLAIMS	315
T.	MONEY OWED – WAGE AND HOUR CLAIMS	318
V.	CAUSES OF ACTION	321
1.	FIRST CAUSE OF ACTION ASSAULT	321
	Against Sharon Lucas.....	321
2.	SECOND CAUSE OF ACTION BATTERY	322
	Against Sharon Lucas.....	322
3.	THIRD CAUSE OF ACTION FALSE IMPRISONMENT	323
	Against Sharon Lucas.....	323
4.	FOURTH CAUSE OF ACTION INVASION OF PRIVACY – FALSE LIGHT	324
	Against Sharon Lucas.....	324
5.	FIFTH CAUSE OF ACTION DEFAMATION	324
	Against Sharon Lucas.....	324
6.	SIXTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	325
	Against Sharon Lucas.....	325
7.	SEVENTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	325
	Against Sharon Lucas.....	325

8.	EIGHTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	326
	Against Sharon Lucas.....	326
9.	NINTH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	327
	Against Sharon Lucas.....	327
10.	TENTH CAUSE OF ACTION INVASION OF PRIVACY – FALSE LIGHT.....	327
	Against Molly Olson Smith.....	327
11.	ELEVENTH CAUSE OF ACTION DEFAMATION	328
	Against Molly Olson Smith.....	328
12.	TWELFTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	329
	Against Molly Olson Smith.....	329
13.	THIRTEENTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	329
	Against Molly Olson Smith.....	330
14.	FOURTEENTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	330
	Against Molly Olson Smith.....	330
15.	FIFTEENTH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	331
	Against Molly Olson Smith.....	331
16.	SIXTEENTH CAUSE OF ACTION DEFAMATION	331
	Against Toene Hayes	331
17.	SEVENTEENTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH A CONTRACT – MEMBERSHIP.....	333

	Against Toene Hayes	333
18.	EIGHTEENTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	334
	Against Toene Hayes	334
19.	NINETEENTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	334
	Against Toene Hayes	334
20.	TWENTIETH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	335
	Against Toene Hayes	335
21.	TWENTY-FIRST CAUSE OF ACTION INVASION OF PRIVACY (PUBLICITY GIVEN TO PRIVATE FACTS)	335
	Against Kristine Leander	335
22.	TWENTY-SECOND CAUSE OF ACTION	336
	Against Kristine Leander	336
23.	TWENTY-THIRD CAUSE OF ACTION DEFAMATION	337
	Against Kristine Leander	337
24.	TWENTY-FOURTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	337
	Against Kristine Leander	338
25.	TWENTY-FIFTH CAUSE OF ACTION	338
	Against Kristine Leander	338
26.	TWENTY-SIXTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	339
	Against Kristine Leander	339
27.	TWENTY-SEVENTH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	339

	Against Kristine Leander	339
28.	TWENTY-EIGHTH CAUSE OF ACTION INVASION OF PRIVACY (PUBLICITY GIVEN TO PRIVATE FACTS)	340
	Against Gary Sund	340
29.	TWENTY-NINTH CAUSE OF ACTION INVASION OF PRIVACY – FALSE LIGHT	341
	Against Gary Sund	341
30.	THIRTIETH CAUSE OF ACTION DEFAMATION	341
	Against Gary Sund	341
31.	THIRTY-FIRST CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	342
	Against Gary Sund	342
32.	THIRTY-SECOND CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	343
	Against Gary Sund	343
33.	THIRTY-THIRD CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	343
	Against Gary Sund	343
34.	THIRTY-FOURTH CAUSE OF ACTION TORT OF OUTRAGE (NIED)	344
	Against Gary Sund	344
35.	THIRTY-FIFTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	345
	Against Elizabeth Norgren	345
36.	THIRTY-SIXTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	345
	Against Elizabeth Norgren	345

37.	THIRTY-SEVENTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	346
	Against Elizabeth Norgren	346
38.	THIRTY-EIGHTH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	347
	Against Elizabeth Norgren	347
39.	THIRTY-NINTH CAUSE OF ACTION INVASION OF PRIVACY (PUBLICITY GIVEN TO PRIVATE FACTS)	347
	Against Lars Matthiesen.....	347
40.	FORTIETH CAUSE OF ACTION INVASION OF PRIVACY – FALSE LIGHT	348
	Against Lars Matthiesen.....	348
41.	FORTY-FIRST CAUSE OF ACTION DEFAMATION	348
	Against Lars Matthiesen.....	348
42.	FORTY-SECOND CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	349
	Against Lars Matthiesen.....	349
43.	FORTY-THIRD CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	350
	Against Lars Matthiesen.....	350
44.	FORTY-FOURTH CAUSE OF ACTION TORT OF OUTRAGE (IIED).....	351
	Against Lars Matthiesen.....	351
45.	FORTY-FIFTH CAUSE OF ACTION TORT OF OUTRAGE (NIED).....	351
	Against Lars Matthiesen.....	351
46.	FORTY-SIXTH CAUSE OF ACTION INVASION OF PRIVACY (PUBLICITY GIVEN TO PRIVATE FACTS)	352

	Against Sarah Alaimo, Lane Powell PC, and Priva Vivian	352
47.	FORTY-SEVENTH CAUSE OF ACTION INVASION OF PRIVACY – FALSE LIGHT	352
	Against Sarah Alaimo, Lane Powell PC, and Priva Vivian	352
48.	FORTY-EIGHTH CAUSE OF ACTION DEFAMATION	353
	Against Sarah Alaimo, Lane Powell PC, and Priva Vivian	353
49.	FORTY-NINTH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH AN EMPLOYMENT EXPECTANCY	354
	Against Great American Insurance Agency Inc., Lane Powell PC, Priya Vivian, and Sarah Alaimo	354
50.	FIFTIETH CAUSE OF ACTION TORTIOUS INTERFERENCE WITH CONTRACT – MEMBERSHIP.....	354
	Against Great American Insurance Agency Inc., Lane Powell PC, Priya Vivian, and Sarah Alaimo	354
51.	FIFTY-FIRST CAUSE OF ACTION AIDING AND ABBETTING	355
	Against Great American Insurance Agency, Inc., Lane Powell PC, Priya Vivian, and Sarah Alaimo	355
52.	FIFTY-SECOND CAUSE OF ACTION NEGLIGENT RETENTION OF SHARON LUCAS	356
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	356
53.	FIFTY-THIRD CAUSE OF ACTION NEGLIGENT SUPERVISION OF SHARON LUCAS.....	357
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivan, and Lane Powell PC	357
54.	FIFTY-FOURTH CAUSE OF ACTION VICARIOUS LIABILITY – SHARON LUCAS.....	358

	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	358
55.	TWELFTH CAUSE OF ACTION NEGLIGENCE, PREMISES LIABILITY – SHARON LUCAS	359
	Against the Swedish Club, Swedish Club Foundation.....	359
56.	FIFTY-SIXTH CAUSE OF ACTION NEGLIGENT RETENTION – KRISTINE LEANDER.....	361
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	361
57.	FIFTY-SEVENTH CAUSE OF ACTION NEGLIGENT SUPERVISION – KRISTINE LEANDER	362
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	362
58.	FIFTY-EIGHTH CAUSE OF ACTION VICARIOUS LIABILITY – KRISTINE LEANDER	363
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	363
59.	FIFTY-NINTH CAUSE OF ACTION NEGLIGENT HIRING - SARAH ALAIMO	364
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Vivian, and Lane Powell PC	364
60.	SIXTIETH CAUSE OF ACTION NEGLIGENT SUPERVISION OF SARAH ALAIMO.....	365
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Vivian, and Lane Powell PC	365
61.	SIXTY-FIRST CAUSE OF ACTION NEGLIGENT RETENTION OF SARAH ALAIMO	366

	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Vivian, and Lane Powell PC	366
62.	SIXTY-SECOND CAUSE OF ACTION VICARIOUS LIABILITY – SARAH ALAIMO.....	367
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Vivian, and Lane Powell PC	368
63.	SIXTY-THIRD CAUSE OF ACTION NEGLIGENT HIRING - ELIZABETH NORGRN.....	368
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, and Lane Powell PC	368
64.	SIXTY-FOURTH CAUSE OF ACTION NEGLIGENT SUPERVISION OF ELIZABETH NORGRN.....	369
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, and Lane Powell PC	370
65.	SIXTY-FIFTH CAUSE OF ACTION NEGLIGENT RETENTION OF ELIZABETH NORGRN	371
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	371
66.	SIXTY-SIXTH CAUSE OF ACTION VICARIOUS LIABILITY – ELIZABETH NORGRN	372
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	372
67.	SIXTY-SEVENTH CAUSE OF ACTION	373
	National Origin-based Discrimination in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	373

	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson	373
68.	SIXTY-EIGHTH CAUSE OF ACTION.....	373
	Disability-based Discrimination – Failure to Accommodate in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	373
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	374
69.	SIXTY-NINTH CAUSE OF ACTION	374
	Age-based Discrimination in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	374
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	374
70.	SEVENTIETH CAUSE OF ACTION	375
	Discrimination on the Basis of Gender in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	375
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	375
71.	SEVENTY-FIRST CAUSE OF ACTION	375
	Retaliation, Disparate Treatment in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	375
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	375
72.	SEVENTY-SECOND CAUSE OF ACTION	376

	Retaliation Under SMC 14.20	376
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	376
73.	SEVENTY-THIRD CAUSE OF ACTION.....	377
	Hostile Work Environment in Violation of Title VII of the Civil Rights Act of 1964 et seq.	377
	Against the Swedish Club, Swedish Club Foundation, Leander, Norgren, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	377
74.	SEVENTY-FOURTH CAUSE OF ACTION.....	378
	Hostile Work Environment in Violation of the Washington Law Against Discrimination RCW 49.60 et seq.....	378
	Against the Swedish Club, Swedish Club Foundation, Leander, Norgren, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	378
75.	SEVENTY-FIFTH CAUSE OF ACTION.....	379
	Freedom from discrimination—Declaration of civil rights RCW 49.60.030(3)	379
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	379
76.	SEVENTY-SIXTH CAUSE OF ACTION	379
	Failure to Provide Rest and Meal Periods Violations of RCW 49.12.020 and WAC 296-126-092	379
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	379
77.	SEVENTY-SEVENTH CAUSE OF ACTION.....	380

	Payment of Wages Less than Entitled To Violation of RCW 49.46.090 & RCW 49.46.130	380
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	380
78.	SEVENTY-EIGHTH CAUSE OF ACTION	381
	Discrimination and Retaliation Under Seattle Fair Employment Practices Ordinance Seattle Municipal Code 14.04 as amended.....	381
	Against the Swedish Club, Swedish Club Foundation, and Jane Isakson Lea Foundation	381
79.	SEVENTY-NINTH CAUSE OF ACTION.....	382
	Wage Theft Under SMC 14.20	382
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	382
80.	EIGHTHIETH CAUSE OF ACTION.....	382
	Unfair or Deceptive Acts in Violation of the Consumer Protection Act RCW 19.86.020 in Violation of Washington Law Against Discrimination RCW 49.60.030(3)	382
	Against the Swedish Club and the Swedish Club Foundation, Defendants Norgren, Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	383
81.	EIGHTY-FIRST CAUSE OF ACTION	384
	Washington Law Against Discrimination – Public Accommodation RCW 49.60.215.....	384
	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	384
82.	EIGHTY-SECOND CAUSE OF ACTION VIOLATION OF SMC 12. PUBLIC ACCOMMODATION.....	385

	Against the Swedish Club, Swedish Club Foundation, and Defendants Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	385
83.	EIGHTY-THIRD CAUSE OF ACTION BREACH OF CONTRACT – COURTESY SIGN.....	385
	Against the Swedish Club, Swedish Club Foundation, and Defendants Norgren, Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	385
84.	EIGHTY-FOURTH CAUSE OF ACTION BREACH OF CONTRACT	386
	Against the Swedish Club, Swedish Club Foundation, and Defendants Norgren, Sund, Albright, Smith, Emerson, Odderson, Miller, Snyder, K. Johansson, M. Johansson, Faino, Alaimo, Vivian, and Lane Powell PC	386
	PRAYER FOR RELIEF	387
	DECLARATION OF ELIZABETH CAMPBELL VERIFYING THE FOREGOING COMPLAINT	390
	INDEX – PEOPLE	1
	FOOTNOTES – FIRST AMENDED COMPLAINT.....	1

TABLE OF AUTHORITIES

State Statutes (RCW)

RCW 2.08.010	12
RCW 4.12.025 (1)	16
RCW 4.12.025 (3)	16
RCW 4.12.025(1)	13
RCW 4.12.025(3)(a)(c)(d)	13
RCW 19.86.	389
RCW 19.86.02	2

RCW 19.86.080	385, 389
RCW 19.86.140	390, 385, 389
RCW 49.12.005	381
RCW 49.12.010	381
RCW 49.12.020	381
RCW 49.12.150 Industrial Welfare	13
RCW 49.46.090	2, 382, 383
RCW 49.46.130	2, 382
RCW 49.60 ET SEQ	2
RCW 49.60.020	13
RCW 49.60.030(2)	13, 390
RCW 49.60.030(3)	380
RCW 49.60.215	2
WAC 296-126-002	381
WAC 296-126-092	381, 382
Washington State Consumer Protection Act	13
Washington State Law Against Discrimination	13
<u>Federal Statutes</u>	
Title VII of the Civil Rights Act of 1964 et seq	2, 377
<u>Municipal Code</u>	
Public Accommodations Ordinance	13

Seattle Municipal Code 14.04	381
SMC 12. PUBLIC ACCOMMODATION	385
SMC 12.0	2
SMC 14.04	381
SMC 14.060.040(A)(C)(D)	13
SMC 14.20	2, 376, 377, 382