

I. PROFILE OF LANGDON MILLER

Title: President, Board of Directors

Affiliation: Swedish Club, Seattle

Role Duration: 2024–2025 (continuing)

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Swedish Club Status: Langdon Miller has held governance authority over the Swedish Club during the period of its most significant collapse in fiduciary integrity, cultural health, and financial operations. As a long-standing board member and as Board President since April 2023, Miller's presence is a constant through mismanagement scandals, retaliatory actions, and operational disarray. The Second Amended Complaint and May Complaint describe him as one of the Club's most professionally capable board members, particularly in finance. Yet, at every key inflection point, Miller either remained silent, issued cosmetic statements, or actively reinforced systems of abuse.

Board Leadership Style: Centralized, public-facing, strategically deferential to select staff and volunteer figures (notably Stina Cowan and Kim Jacobs). Frequently issues grand, affirmational language minimizing institutional conflict. SAC describes Miller as "a wealthy and successful doctor who is both seasoned in finance and known in the community for his intelligence and stature," compounding the gap between capacity and failure (SAC, p. 22).

Miller's Professional Pedigree and Financial Acumen:

Dr. Miller holds an M.D. from Northwestern, completed an oncology fellowship at Stanford, and has held senior roles in major biotech companies including Cleveland BioLabs and Solve Therapeutics. SolveTx launched with a \$126 million Series A financing. His base compensation has exceeded \$300,000 with additional bonuses, benefits, and consulting income (SAC, pp. 308–309).

Miller's background heightens expectations for competent oversight, particularly as Miller served not only as Board President but at one point also Interim Treasurer. Despite his elite credentials, the Club's financial records went unreconciled for more than 16 months, bylaws revisions lacked transparency, club management and operations, membership, governance deteriorated.

II. FINANCIAL GOVERNANCE AND ACCOUNTING CONCERNS

A. Failure to Reconcile Financial Records (16+ Months)

- **Observation:** Reconciliation of financial accounts had not occurred since **August 2023**, with the issue identified only in early **2025**.
 - (Source: February 2025 Newsletter, p. 3 (VOL. 64, ISSUE 2)
“It appears that reconciliation of our financial accounts has not been performed since August 2023.”)
- Miller acknowledges this lapse in February 2025 and attributes corrective action to incoming Treasurer **Gunilla Luthra**, consulting bookkeeper **Kathy Preston Ehrlich**, and the accounting firm **Traner-Smith**.
- Despite his role as Interim Treasurer in January 2025, Miller **discloses no personal responsibility** for the prolonged failure to maintain financial records or oversight of IRS Form 990 compliance.

B. Delayed or Faulty IRS 990 Filings

- The Club's **2023 Form 990 had not been filed properly or timely**, and the 2024 form was pending correction as of March 2025.
 - _ (Source: February 2025 Newsletter, p. 3
“...correct our IRS Form 990 for 2023 and submit our 2024 IRS Form 990 in a timely fashion.”)
- Public framing in Miller’s letters positions these issues as institutional rather than tied to individual failures in governance.

C. Overlap of Roles—President & Treasurer

- **Observation:** Langdon Miller was serving as both **President** and **Interim Treasurer** as of early 2025.
 - _ (Source: January 2025 Newsletter, p. 8 (VOL. 64, ISSUE 1)
“INTERIM TREASURER | Langdon Miller”)

D. Successive Treasurers—Collapse of Rudimentary Financial Management¹

- **Observation:** Langdon Miller was serving as both **President** and **Interim Treasurer** as of early 2025.²

¹ Swedish Club. Swedish Club News. 2022, 2023, 2024, 2025.

² Source: January 2025 Newsletter, p. 8 (VOL. 64, ISSUE 1 “INTERIM TREASURER | Langdon Miller”)

- In January of 2022 the board was looking for a successor treasurer to Larry Omdahl. It is not until August that year that former treasurer and then current board member Judith Petrick assumed the position. In 2023 she was replaced by Neal Snyder in April who served until March of 2024.
- In September 2023 then director Elizabeth Norgren fired Toene Hayes the Swedish Club's staff accountant/bookkeeper. Norgren informed the board that she and the facilities manager would do the bookkeeper work Toene had taken care of. Based on the statement by Miller, Norgren's management of the Club's financial records never materialized.
- Following Neal Snyder's resignation in March, for a brief six month period board member Ib Odderson was the Club's treasurer. He and two other board members resigned in November, 2024.
- Following Ib Odderson's resignation as treasurer, Anna Faino was treasurer until she resigned from the board along with Odderson and the board's secretary, Mary Emerson.
- In December 2024 Kim Jacobs was treasurer for that month only followed by Langdon Miller serving in January and February 2025 as interim treasurer. In March 2025 Gunilla Luthra succeeded Miller as treasurer.

III. EMPLOYMENT AND STAFFING DECISIONS

A. Appointment of Kim Jacobs

Kim Jacobs, a former employee of the Swedish Finn Historical Society, was hired without a competitive process after volunteering for several weeks.

Her hire by Interim Executive Director Stina Cowan occurred while she was an active Board Trustee, triggering her resignation from the board — a potential conflict of interest, which **Miller attempts to neutralize by emphasizing gratitude and necessity.**

B. Overlapping Roles and Concentrated Power

Multiple operational roles appear concentrated among a small inner circle: Cowan (Interim ED turned Cultural Director), Jacobs (Board member turned Assistant ED), and Luthra (Treasurer). Miller, at one point, held both President and Treasurer roles.

These concentrated assignments suggest a pattern of board insularity, with unclear adherence to transparent hiring or oversight norms.

IV. GOVERNANCE AND BYLAWS ACTIVITIES

A. Lack of Transparent Governance Reform Process

Under Miller, the Governance and Bylaws Committee met biweekly, with long-serving board members or members deeply embedded in operations, but detailed results of governance reform were not shared with members in writing. Revisions were vaguely referenced and no timeline or transparent review process was disclosed. (February 2025 Newsletter, Vol. 64, Issue 2, p. 3: '...working hard on putting together more resilient and useful bylaws...')

B. Bylaws Revisions and Committee Control

- Proposals regarding board structure, “conduct of conduct,” and procedures were in progress for much of 2025, but no timeline or member-led review process was disclosed.
- **Deliberative opacity** is implied — detailed results of governance reform are promised but not shared until after the fact (members’ monthly dinner”, and “legal counsel consultation” is cited as a reason for slow progress.
- **Observation:** The Governance & Bylaws Committee met frequently, but reforms were vaguely referenced and not shared with the membership.³

C. Entrenched Board Composition with Minimal Turnover

- **Observation:** Miller notes that all 12 current directors, including himself, intend to continue serving, with 8 standing for election in April 2025.⁴

D. Board Consolidation and Role Redundancy

- Multiple operational roles appear concentrated among a small inner circle: Cowan (Interim ED turned Cultural Director), Jacobs (Assistant ED), and Luthra (Treasurer). Miller, at one point, held both President and Treasurer roles.
- These concentrated assignments suggest a **pattern of board insularity**, with unclear adherence to transparent hiring or oversight norms.

V. FACILITIES, MAINTENANCE, AND PROPERTY ISSUES

³ Source: February 2025 Newsletter, p. 3

⁴ Source: February 2025 Newsletter, p. 4

A. Deferred Maintenance at Club-Owned Dexter Avenue Property (1749–1751)⁵

- A professional inspection (Dec. 2024) found the Club’s secondary property in “fair to average” condition; including nominal upkeep, required maintenance and upkeep hadn’t been done since **January 2023**.
- Repairs were estimated at \$43,000, but no line-item budget or timeline was shared.

B. Lender Involvement and Financial Exposure

- **Observation:** The Club’s mortgage lender expressed interest in refinancing; discussions of the property's future are ongoing.
- Miller’s board met with Global Credit Union regarding mortgage extension past September 2025 — suggesting **ongoing financial obligations** with minimal disclosure to members.

C. Boiler and Electrical Panel Work

- Surprise health inspection (Jan. 2025) found minor sanitation issues. Meanwhile, the **Club’s electrical panels were flagged by its insurer** due to old FPE circuit breakers, necessitating external bids.

These multiples of property management lapses raise **questions of deferred maintenance** under Miller’s presidency.

VI. PUBLIC MESSAGING AND SELECTED CONTRASTS AND SELF-PRAISE THEMES

A. Retaliatory Narrative Against Dissenting Member

- In February 2025, Miller addresses unnamed "false allegations" made by a former leader — clearly referring to litigation matters (i.e., your case) — and **labels them disingenuous, angry, and misleading**, without naming the speaker or addressing substance.

B. Glossing Over Structural Gaps

⁵ Source: February 2025 Newsletter

- **Observation:** Miller frequently celebrates volunteerism and minor achievements while sidestepping the broader governance or financial gaps.⁶
- Miller's messaging is crafted to **frame internal dissent as personal resentment**, reinforcing a narrative of harmony and gratitude among members.
- This is a **strategic deflection**, signaling potential reputational management or pre-litigation positioning.

VII. MILLER'S RESPONSE TO CRITICISM AND WHISTLEBLOWERS

A. REFUSAL TO REINSTATE PLAINTIFF AND CONTINUED RETALIATION

- "In December 2024, Plaintiff requested reinstatement, which was rejected by Defendants Swedish Club, its board officers (Langdon Miller... etc.), retaliating for her protected activities."
 - _(Source: May 2025 Complaint, ¶18)
- "Plaintiff's exclusion... contrasts with Skrinde's reinstatement, showing disparate treatment and retaliation."
 - _(Source: May 2025 Complaint, ¶23)
- Despite the departure of nearly all staff associated with the alleged incident, Miller and co-defendants refused Plaintiff's request for reinstatement. This retaliation was perpetuated in communications involving Bigos, but with board consent and direction — including Miller.

B. DEFAMATORY NARRATIVES MAINTAINED

- "Defendants Swedish Club, Miller... defamed Plaintiff by perpetuating Smith's 'dangerous' slur... claiming Plaintiff's attendance would be 'socially uncomfortable' and cause 'disruption'..."
 - _(Source: May 2025 Complaint, ¶31)
- Miller was among the parties responsible for maintaining the defamatory justification for Plaintiff's exclusion — one that originated from a fabricated disciplinary record, now carried forward as institutional lore.

⁶ Source: January 2025 Newsletter, p. 3

VIII. FAILURE TO RESPOND TO LEGAL NOTICES AND PROTECTED DISCLOSURES

A. EEOC, SOCR, AND OTHER FILINGS PROVIDED TO DEFENDANTS

“Ms. Campbell complained to the Defendants’ management, managers, and legal counsel about the hostile workplace, the harassment and discrimination... Defendants had verbal and written notices from Ms. Campbell and others about the harassment and discriminatory conduct, and the hostile environment, and failed to undertake prompt, effective remedial action reasonably calculated to end the complained of conduct and hostile environment against Ms. Campbell.”

Source: 2nd Amend COAs Only 05-12-25.pdf, FORTY-FIFTH COA – Hostile Work Environment (Title VII)

“In violation of the Washington Law Against Discrimination (WLAD), Defendant’s actions and/or omissions constitute disparate treatment, a hostile work environment, and discrimination in Ms. Campbell’s terms or conditions of employment... [based on] complaints to the U.S. Equal Employment Opportunity Commission, Washington State Human Rights Commission, and Seattle Office of Civil Rights, and to the Swedish Club’s attorney’s and board of directors.”

Source: 2nd Amend COAs Only 05-12-25.pdf, FORTY-THIRD COA – Retaliation

Plaintiff provided multiple layers of notice to both legal counsel and the board — including President Langdon Miller — regarding unlawful conduct occurring at the Swedish Club. These included filings with federal and state enforcement agencies such as the EEOC, SOCR, and WSHRC, and direct written and verbal disclosures to the Club’s board and retained attorneys.

Despite this, there is no documented evidence in the newsletters or public-facing records of the Club acknowledging the filings or initiating remedial internal investigations — a lapse of leadership responsibility that falls squarely within Miller’s purview as Board President.

B. LEGAL AND FIDUCIARY CONSEQUENCES OF NON-ACTION

Under Washington law and federal anti-discrimination statutes, a board president who is notified of protected disclosures and fails to initiate corrective action may be held individually liable under theories of aiding and abetting, negligence, and retaliation. The SAC further alleges that this inaction was not due to ignorance, but strategic indifference — or worse, deliberate suppression.

“Defendants and their supervisors and employees created and perpetuated a hostile work environment... refused to eliminate harassment and discrimination... Ms. Campbell complained... [they] failed to undertake prompt, effective remedial action reasonably

calculated to end the complained of conduct.”

Source: 2nd Amend COAs Only 05-12-25.pdf, FORTY-SIXTH COA – Hostile Work Environment (WLAD)

“By terminating Ms. Campbell after and because she complained about discrimination... Defendants violated SMC 14.20.035.”

Source: 2nd Amend COAs Only 05-12-25.pdf, FORTY-FOURTH COA – Retaliation under SMC 14.20

IX. OBSTRUCTION THROUGH DISCOVERY NON-COMPLIANCE

A. BLANKET OBJECTIONS IN INTERROGATORY RESPONSES

In his responses to Plaintiff’s First Set of Interrogatories, Miller refused to substantively answer nearly every question. Even where topics were directly relevant to causes of action—such as Plaintiff’s exclusion from the Club, defamatory narratives, or board committee activities—he cited overbreadth, burdensomeness, and irrelevance.

Examples:

- Interrogatory No. 3: Refused to answer questions about Kristine Leander’s actions in Plaintiff’s termination.
- Interrogatory No. 6: Refused to disclose knowledge of actions leading to Plaintiff’s firing.
- Interrogatory No. 9: Refused to identify any coordinated efforts among defendants regarding Plaintiff’s exclusion.

(Source: Campbell - L. Miller’s.pdf)

These evasions form the basis for a motion to compel and further support a motion for spoliation, as they frustrate discovery of basic facts central to the claims.

B. REFUSAL TO DISCLOSE CUSTODIAL RESPONSIBILITY

Miller refused to provide specific details about the governance and bylaws committee, despite holding board authority. In conjunction with the Club’s RFP responses, which repeatedly state that documents are “not in the possession, custody, or control” of the Swedish Club, this obstructs accountability.

(Source: Group 2 SC Resp Re Custody.pdf)

X. MISREPRESENTED DOCUMENT CONTROL AND DATA CUSTODY

Plaintiff's prior correspondence with counsel for Leander and Hayes in 2024 confirmed that critical records were housed on the Swedish Club's servers. Kristen Barnhart, then representing Group 2 defendants, acknowledged these documents were stored internally and subject to possible exchange in a proposed settlement.

Nonetheless, current defense responses disclaim custody and suggest those materials are unavailable—a stark contradiction undermining defense credibility and supporting relief for document loss.

XI. LEGAL CLAIMS NAMING MILLER

A. FROM THE SECOND AMENDED COMPLAINT (SAC)

- Thirty-Ninth COA – National Origin Discrimination (Failure to hire and differential treatment)
(Source: SAC, COA 39)
- Fortieth COA – Disability Discrimination (Failure to accommodate and adverse actions)
(Source: SAC, COA 40)
- Forty-First COA – Age Discrimination (Denial of opportunity, demotion)
(Source: SAC, COA 41)
- Forty-Second COA – Gender Discrimination (Pay disparity, fewer hours, promotion denial)
(Source: SAC, COA 42)
- Forty-Third COA – Retaliation under WLAD (Adverse actions due to complaints)
(Source: SAC, COA 43)
- Forty-Fourth COA – Retaliation under SMC 14.20 (Municipal law protections violated)
(Source: SAC, COA 44)
- Forty-Fifth COA – Hostile Work Environment under Title VII (Ongoing workplace abuse)
(Source: SAC, COA 45)
- Forty-Sixth COA – Hostile Work Environment under WLAD (Sustained hostility, failure to intervene)
(Source: SAC, COA 46)
- Forty-Seventh COA – Freedom from Discrimination Declaration (Broad-based discrimination)

(Source: SAC, COA 47)

- Forty-Eighth COA – Failure to Provide Rest and Meal Periods (Labor law violations)
(Source: SAC, COA 48)
- Forty-Ninth COA – Unpaid Wages (Minimum wage act violations)
(Source: SAC, COA 49)

B. FROM THE MAY 2025 COMPLAINT

- RCW 49.60.215 and SMC 14.06 Violations (Discriminatory exclusion and retaliation)
- (Source: May 2025 Complaint, ¶¶27, 29)
- Defamation (Knowingly or recklessly perpetuating falsehoods)
(Source: May 2025 Complaint, ¶31)
- Civil Conspiracy (To exclude Plaintiff in retaliation for litigation)
(Source: May 2025 Complaint, ¶34)
- Aiding and Abetting (Substantial assistance in illegal conduct)
(Source: May 2025 Complaint, ¶36)

These legal claims against Miller elevate him from an alleged enabler to a direct actor in discriminatory, retaliatory, and potentially unlawful employment practices. His leadership during these events is the common thread of continuity linking board awareness with executive harm.

XII. CONCLUSIONS AND LITIGATION-RELEVANT THEMES RE MILLER

Key Findings:

1. **Financial mismanagement or neglect** persisted through Miller’s tenure, masked by later appointments and superficial transparency.
2. **Employment practices lack formal documentation**, with key roles filled by insiders during transitional periods.
3. **Property and insurance risks** were under-addressed or delayed, exposing liability.
4. **Miller’s public letters downplay conflict and frame accountability as collective**, even when failures clearly link to his board presidency.

5. His tone routinely **amplifies appreciation, volunteers, and celebration**, while **dismissing serious critique** as emotional or misinformed.

This dossier supports legal arguments about **misrepresentation, fiduciary lapses, governance opacity**, and potentially retaliatory narratives aimed at silencing dissenting voices.

XIII. SUMMARY—STRATEGIC APPLICATIONS

This dossier will be used in support of:

- **Spoliation Motion:** Miller’s obstructive responses, failure to disclose, and the Club’s misstatements about document control support an inference of intentional concealment or destruction.
- **Motion to Compel**:** As a primary fiduciary and governance leader, Miller’s blanket objections and refusal to supply factual responses hinder Plaintiff’s ability to obtain core discovery.
- **Trial Narrative:** Demonstrates a disturbing pattern—an elite, capable leader who, instead of exercising oversight, facilitated or tolerated decay, retaliation, and opacity.

Additional Sources:

- SAC excerpts, Dkt. #180, filed 04-21-25
- Miller Discovery Responses (Campbell - L. Miller’s.pdf)
- Group 2 SC Discovery Responses (Group 2 SC Resp Re Custody.pdf)

Exhibits Pages 1 To 104

Exhibit A – Second Amended Complaint, Dkt. #180 (SAC, filed 04-21-25) **Pages 1 To 7**

Exhibit B – Defendant Langdon Miller’s Responses to Plaintiff’s First Interrogatories and Requests for Production **Page 8 To 48**

Exhibit C – Swedish Club’s Responses to Plaintiff’s Requests for Production re: Custody of Documents **Page 49**

Exhibit D – May 2024 Email Chain with Kristen Barnhart regarding server location of Swedish Club documents **Pages 50 To 104**

WITNESS DOSSIER