

EXHIBIT A
SAC Dkt. #180 Pages Re Miller

1 5.922. At both of the meetings on November 22nd and November 29th (2022) between
2 Ms. Alaimo and Ms. Campbell, Ms. Alaimo represented to Ms. Campbell that she was nominally
3 the human resources director, that she really reported to a woman attorney at Lane Powell.

4 5.923. Ms. Alaimo unequivocally stated to Ms. Campbell that she was in a position to
5 grant her confidentiality for anything she shared with Ms. Alaimo, that it would not be shared with
6 the Swedish Club, particularly Ms. Leander; in fact, that was one of the first statements Ms.
7 Alaimo made when her and Ms. Campbell met for the first time on November 29th.

8 5.924. After meeting with Ms. Alaimo on November 29th Ms. Campbell texted fellow
9 member Lorelei Stevens on the afternoon of November 30th and noted to her who it is that Ms.
10 Alaimo told Ms. Campbell she works for, “Turns out Sarah works for atty.”³⁰⁶

11 5.925. On December 12, 2022 Ms. Ross wrote to Ms. Campbell and repeated her
12 statements about Ms. Alaimo telling Ms. Ross she worked for the attorneys representing the
13 Swedish Club’s insurer, “I told you that was what she was there for...I wasn’t making it up... She
14 said and I quote... I’m her [sic] to get information to give to lawyer!” Ms. Ross continued on,
15 “Sarah.... Is not an HR person! She may be paid by SC.... But she reports back to the new
16 attorney.”

17 Ms. Campbell replied back to Ms. Ross, “When I talked to in [sic] her office, she tried
18 to tell me that our conversation was confidential – but the reality is the only person you have
19 confidentiality with is your own lawyer, not the HR person... Well personally these stories
20 across the board are not making sense – they lack ‘continuity’ shall we say, and defy
21 credulity.”

Q. THE SCBOD – DUTIES, STANDARDS OF CARE, LOYALTY

22 5.926. The present directors (*) of the Swedish Club have served for the following
23 number of years:
24
25

26 ³⁰⁶ Campbell, Elizabeth. Text message to Lorelei Stevens. Messages. Nov 30m 2022 at 5:00 PM

		Min. Years On		
Board Member		Board	Start	End
Gary Sund	*	9.31	11/1/2014	2/21/2024
Langdon Miller	*	4.14	1/1/2020	2/21/2024
Mary Emerson	*	7.90	4/1/2016	2/21/2024
Larry Omdal		2.25	1/1/2020	3/31/2022
Kris Johansson	*	4.14	1/1/2020	2/21/2024
Martin				
Johansson	*	3.73	6/1/2020	2/21/2024
Ib Odderson	*	4.14	1/1/2020	2/21/2024
Judith Peterick	*	8.82	5/1/2015	2/21/2024
Dale Roberts		3.00	1/1/2020	12/31/2022
Neil Snyder	*	4.23	12/1/2019	2/21/2024
Shama Albright	*	2.81	5/1/2021	2/21/2024
Molly Smith				
Olson	*	2.81	5/1/2021	2/21/2024
Lori Reinhall		1.67	5/1/2021	12/31/2022
Anna Faino	*	1.81	5/1/2022	2/21/2024
Don Wahlquist		0.75	1/1/2020	9/30/2020
Vi Reno		1.42	1/1/2020	6/1/2021

5.927. Select SCBOD Director's Professional Backgrounds:

Gary Sund, "He graduated from the UW with a degree in civil engineering and spent his career in the planning, design, construction and management of municipal facilities for several cities on the Eastside."³⁰⁷

Langdon Miller, "His background [is] as a consulting physician in the field of oncology."³⁰⁸ And President and CMO of Cleveland BioLabs, Inc.

Dr. Miller has been the President and Chief Medical Officer of Cleveland BioLabs, Inc. since 2015. He previously served as a strategic adviser to the Company beginning in 2014. Dr. Miller has maintained a drug development consultancy, Sound Clinical Solutions, SP, located in Seattle, WA since 2013 and has served as a consulting Chief Medical Officer to Oncernal Therapeutics, Inc., located in San Diego, CA, since August 2016. Dr. Miller has served on the board of Dunn Gardens, a private, not-for-profit organization, since 2013 and was appointed to the board of Swedish Club, a private, not-for-profit organization in April of 2019. Since April 2018, Dr. Miller has also served as Executive Vice President and Chief Medical Officer of VelosBio Inc., a private biopharmaceutical company.

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.

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Dr. Miller has more than 25 years of experience in the design and conduct of translational and clinical drug development programs in oncology (both in hematological and solid tumors) and orphan diseases (including cystic fibrosis, muscular dystrophy, and hemophilia). He has worked in all phases (phase 1-4) of drug development, from first-in-human studies through pivotal registration-directed trials to medical affairs programs and has filed multiple INDs, CTAs, NDAs and orphan drug applications. ...He has authored over 100 regulatory documents and publications.

Dr. Miller has held leadership positions in government and in large and small biopharmaceutical companies...He holds a Doctorate of Medicine from Northwestern University and completed his residency in internal medicine at the University of Minnesota and an oncology fellowship at Stanford University.^{309, 310, 311} Solve Therapeutics, Inc. (SolveTx), an oncology-focused biopharmaceutical company, has launched with the mission of developing novel antibody-based therapies targeting tumor-specific antigens. Solve Therapeutics' initial \$126 million Series A financing was completed with a syndicate of venture capital firms including Matrix Capital Management, Decheng Capital, General Atlantic, and Surveyor Capital/Citadel,

The company's formation reunites the former VelosBio Inc. team. SolveTx is fully operational with more than 25 employees and is actively pursuing discovery and development efforts at its 10,000-square-foot laboratory in San Diego.

Solve Therapeutics' management team is headed by chief executive officer Dave Johnson. The founding members of Solve Therapeutics from VelosBio who have worked with Johnson to establish the new company include Langdon Miller, executive vice president of development and chief medical officer."³¹²

Ib Odderson, "Dr. Ib Odderson, MD, PhD is a physical medicine & rehabilitation specialist in Bellevue, WA and has over 38 years of experience in the medical field. He graduated from Vanderbilt University in 1985."³¹³

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

1 Judith Peterick, Treasurer - City of Seattle Comptroller's Office lead (retired). "A
2 former CPA, has dedicated the past few years to professionally organizing the Club's
3 financial records."³¹⁴

4 Mary Emerson, Board Secretary - "She has a bachelor's degree in finance and
5 marketing, and has worked for many years in the insurance industry, both in underwriting
6 and marketing."³¹⁵

7 Molly Olson Smith, Vice President - "Co-owner automotive dealerships, IT and
8 networking infrastructure for same. Real estate investing. Small web business start-up."³¹⁶

9 Anna Faino, Director - "Is the manager of biostatisticians at Seattle Children's Core
10 for Biostatistics, Epidemiology and Analytics in Research (BEAR), and is a member of the
11 Biostatistics, Epidemiology and Research Design (BERD) consulting service within ITHS.
12 Anna has an educational background in biostatistics, mathematics and psychology. She has
13 extensive experience with risk prediction modeling, longitudinal data analysis, and causal
14 inference."³¹⁷

15 Martin Johansson, Senior Manager of Development Communications Seattle
16 Symphony - "Fundraising: I envision, plan and execute all aspects of the Friends of the
17 Seattle Symphony community fundraising campaign, generating \$1.72M in revenue during
18 fiscal year 2020. I manage special initiatives, including our monthly giving program, which
19 has the highest donor retention rate year-over-year.

20 Communications: I design, create and execute multi-channel communications to
21 drive successful revenue outcomes and deliver timely reporting on impact to stakeholders,
22 externally and internally. I craft executive-level messaging to the Seattle Symphony
23 community that distills our mission and motivates action. I collaborate cross-
24 organizationally with colleagues in marketing and press relations to ensure consistently
25 high-quality communications that serve all our constituents and the broader Seattle
26 community."³¹⁸

5.928. Former executive director, defendant Ms. Leander holds a Ph.D. Education.

5.929. In addition, Ms. Campbell is informed and believes and upon such information
and belief alleges that the club's current executive director, defendant Ms. Norgren, is alleged
to hold a BA in economics.

5.930. For over nine months in 2020 Ms. Leander and the SCBOD engaged in a
conspiracy of silence to keep the rest of the Swedish Club members from knowing about a

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

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

1 multi-million dollar real estate transaction they were putting together. Seven members of that
2 board are still on the present board of directors. As of 2024, defendants Mr. Sund, Mr. Miller,
3 Ms. Emerson, Mr. K. Johansson, Mr. M. Johansson, Mr. Odderson, and Mr. Snyder, and
4 unnamed director Ms. Peterick.

5 5.931. Also involved then and in the present are members of the club and contractors
6 to the Swedish Club that have deep ties and personal interests in real estate development in
7 Seattle, and specifically in the Dexter Avenue corridor; specifically, Brian Runberg, architect,
8 who now has aspirations to be a director; his candidacy is highly suspect and likely he is
9 ineligible to be on the board his conflicts with the provisions in the *Bylaws*, in Article 5.
10 Standards of Conduct for Officers and Directors, and Article 6. Interests of Directors and
11 Officers

12 5.932. Just before the purchase of the AVM property closed Ms. Leander and the then
13 SCBOD disclosed to the members that they were under contract to close the sale – they had to
14 because they needed according to the *Bylaws* the membership’s approval. The members at the
15 time were irate at the deception Ms. Leander and the board under defendant Mr. Sund had
16 engaged in; it was not the first time and it turned out to not be the last time.

17 5.933. At the time and since the purpose and need of the AVM investment was
18 described as critical, something that “will allow us to develop both plots into residential
19 housing...to develop an income stream for the Club.”³¹⁹

20 5.934. On September 21, 2020 to September 25, 2020 the purchase of the AVM
21 Biotechnology LLC’s 1751 Dexter Avenue N./King County Parcel #1925049038 by the
22 Swedish Club’s Swedish Club Properties LLC was closed. As part of the closing a statutory
23 warranty deed was executed, then a deed of trust, an assignment of rents, and a subordination
24
25

26 ³¹⁹ Leander, Kristin. “Executive Director’s Notes.” *Swedish Club News*. March 1, 2022.

1 of lease were executed in favor of Global Credit Union to secure a \$1.2 Million loan for the
2 property purchase.³²⁰

3 5.935. Ms. Campbell is informed and believes and upon information and belief alleges
4 that at a meeting of the board in mid-2023 the matter of the loan with Global Credit Union
5 came up. Certain board members expressed surprise that there was a balloon payment coming
6 up in just over a year's time; expressed concern that the Swedish Club likely wouldn't have the
7 money to pay it – given the state of the Club's finances. Suggestions were made by those at
8 the meeting that the property would likely need to be sold because the cash might not be
9 available for the balloon payment.

10 5.936. How could it be, that the seven directors that participated in the property
11 purchase and the arrangements for the necessary loan to close the sale in 2020, who remain on
12 the board, as well as how is it that the balance of the directors now on the board who are
13 obligated by duty to make informed decisions about and manage the Swedish Club's multi-
14 million dollar real estate portfolio "With the care an ordinarily prudent person in a like position
15 would exercise under similar circumstance,"³²¹ come to the table at this late date and claim
16 they didn't know about the loan's balloon payment?

17 5.937. How is it the SCBOD was presiding over the deficit spending by their executive
18 directors all this time, losing over \$1.2 Million in two years time, and this is the best they could
19 come up with, hand wringing and non-solutions; and no transparency in the bargain.

20 5.938. Given the high level of individual and collective education, business and
21 finance experience *and* given the high level of individual and collective of professional
22 experience and business knowledge of the directors of the Swedish Club, those listed above
23 and those omitted, and allegedly that of the executive directors, Ms. Campbell is astonished

24 ³²⁰ King County. Washington. King County Recorder's Office. Deed of Trust. Swedish Cultural Center,
25 Grantor, Global Credit Union, Grantee. Instrument #20200925002520. By Kristine Leander, Executive
26 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.

1 and concerned about the financial sink hole that has been created at the Swedish Club, as well
2 as the inability of the directors and executive director to program it and maintain it as a
3 financially stable, esteemed and treasured cultural center in Seattle.

4 **R. IMPAIRMENT OF MS. CAMPBELL'S RIGHTS,**
5 **HER DAMAGES AND DISTRESS**

6 5.939. The economic and operational instability and turmoil generated by the
7 defendants charged with the management and oversight of the Swedish Club has infringed
8 upon and impaired Ms. Campbell's right to, ability to enjoy the full benefit of her Swedish
9 Club membership for well over three years now.

10 5.940. The economic and operational instability and turmoil generated by the
11 defendants charged with the management and oversight of the Swedish Club has infringed
12 upon and ruined Ms. Campbell's ability to enjoy the full breadth of the employment
13 expectations that were hers as a Swedish Club employee for well over 16 months.

14 5.941. The economic and operational instability and turmoil generated by the
15 defendants charged with the management and oversight of the Swedish Club, the
16 licentiousness they have privileged themselves with, using the differential in power they
17 possessed against Ms. Campbell, conversely, the disregard they have visited upon Ms.
18 Campbell as both a member and an employee has resulted in Ms. Campbell experiences
19 anxiety, sleeplessness, loss of enjoyment of life, mental and physical anguish, reputational
20 harm, and even strained relationships with her family and friends.

21 It has also exacerbated her underlying conditions related to her osteoarthritis, panic and
22 anxiety disorder, as well as her agoraphobia.

23 5.942. The years long patterns and behaviors of the individuals who have engaged in
24 the tortious and illegal activities against Ms. Campbell, who have set her up in situations that
25 were distressing, intrusive into her personal life, humiliating her with repeated put downs and
26 dismissive treatment, both in front of others and to her face, when she was at the Swedish Club