

1  
2  
3  
4  
5  
6  
7 **IN THE SUPERIOR COURT OF WASHINGTON**  
8 **IN AND FOR KING COUNTY**

9 ELIZABETH A. CAMPBELL, an individual,  
10 Plaintiff,

11 vs.

12 LARS CHRISTIAN MATTHIESEN,  
13 SHARON LUCAS, TOENE HAYES,  
14 KRISTINE LEANDER, SARAH D.  
15 ALAIMO, SWEDISH CULTURAL CENTER  
16 d/b/a the SWEDISH CLUB, GARY SUND,  
17 SHAMA ALBRIGHT, MOLLY OLSON  
18 SMITH, MARY EMERSON, IB R.  
19 ODDERSON, LANGDON L. MILLER, NEIL  
20 SNYDER, KRIS E. JOHANSSON, MARTIN  
21 K. JOHANSSON, ANNA FAINO and LANE  
22 POWELL PC,  
23 Defendants.

**NO. 23-2-25128-8 SEA**

**DECLARATION OF ELIZABETH  
A. CAMPBELL RE: MILLER  
DOSSIER EXHIBIT**

24 I, Elizabeth A. Campbell, declare as follows:

- 25 1. I am the Plaintiff in this matter. I make this declaration in support of my Motion for  
26 Spoliation Sanctions and to provide the Court with a synthesized evidentiary analysis of  
Langdon Miller's role and conduct as a fiduciary leader of the Swedish Club.
2. Attached hereto as Attachment 1 is a document I compiled and authored, titled 'Miller  
Dossier Expanded.' This Dossier consolidates factual and evidentiary material drawn  
from case filings, discovery responses, and public records.

1 3. The Dossier is based on: (a) excerpts from the Second Amended Complaint (Dkt.  
2 #180); (b) interrogatory and RFP responses provided by Langdon Miller and the Swedish  
3 Club; (c) discovery correspondence and document control assertions by defense counsel;  
4 and (d) previously filed pleadings in the Swedish Club receivership and fiduciary duty  
5 case, which although voluntarily dismissed, remain factually relevant, and (e) King  
6 County Superior Court records.

7  
8 4. As Board President, Langdon Miller bore a statutory and fiduciary duty under  
9 Washington law (see RCW 24.03A.495 et seq. and guidance from the Secretary of State)  
10 to exercise loyalty, care, and oversight over Club operations and executive staff. His  
11 failures, as outlined in the Dossier and supported by exhibits, form a critical link in the  
12 damages to Plaintiff, the  
13 obstruction of discovery and potential destruction or misrepresentation of documents.

14 5. I certify that this document and its attachments were compiled in good faith and are  
15 intended to provide a clear evidentiary basis for the relief sought.

16  
17 I declare under penalty of perjury under the laws of the State of Washington that  
18 the foregoing is true and correct.

19 Executed this 21st day of May, 2025, at Seattle, Washington.

20 ELIZABETH A. CAMPBELL, MPA

21   
22

23 Plaintiff, Pro Se  
24 3826 24<sup>th</sup> Ave W  
25 Seattle, WA. 98199  
26 206-769-8459  
neighborhoodwarrior@gmail.com