

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

ALEXANDRA "SONDRA" WILSON,

Plaintiff,

v.

RELIABLE STREET INC, LOCKWOOD
CAFE, [REDACTED],

and [REDACTED]

)
) CASE NO. LACV053674
)

) PLAINTIFF ALEXANDRA WILSON'S
) (I) MOTION TO ESTOP (II) RESISTANCE
) TO DEFENDANTS' MOTION TO
) DISMISS (III) REQUEST TO
) RESCHEDULE FOR AN IN-PERSON
) HEARING TO PRESENT EVIDENCE
)
)
)
)

Pursuant to Iowa R.. Civ. P. 1. 431(4), I resist the Defendants' motion to dismiss filed on July 5.

I also file a motion to estop. My previous motion to estop was not yet ruled upon, however after reading the Defendants' recent motion to dismiss, it became apparent that the estoppel is still in order.

Per your May 28 order, Your Honor, I request an in-person hearing so that evidence may be presented and discussed. I anticipate this taking approximately an hour and a half because there is so much relevant, concrete evidence.

Introduction

1. In line 1 of Defendants' motion to dismiss, the various parties introduced themselves with regard to how each of their roles relate to the causes of action. I would like to add additional relevant information about each of the parties with regard to the time I knew them and worked

on the property in accordance with our agreements. Afterward I will introduce myself.

- “Defendant Reliable Street Inc. is a non-profit that operates an art gallery and community space in Ames, Iowa.”
- “Defendant Lockwood Café is a café that operates in the same building as Reliable Street.”
- “Defendant [REDACTED] [REDACTED] is President of Reliable Street Inc.”
- “Defendant [REDACTED] [REDACTED] is owner and operator of Lockwood Café.”
 - According to an article in the Iowa State Daily from 2020, [REDACTED] and her husband [REDACTED] are co-owners of Lockwood Cafe.¹ This is what I was told when I met them, and to my knowledge that has not changed. According to Reliable Street Inc's response to the Iowa Civil Rights Commission, [REDACTED] was Vice President of Reliable Street Inc. at the time the torts were performed. I do not know if she is still VP. This is relevant because it was [REDACTED] who requested me to help restore and manage Reliable Street Inc's community garden. I think this is very relevant information that the Defendants ought o have included in their filings. I filed a motion to estop on March 15 to alert the court about [REDACTED] roles and request accuracy from the defense, however my motion was not yet ruled on. See line 52.
- “Defendant [REDACTED] [REDACTED] is a current employee of Lockwood Café.”
- “Defendant [REDACTED] [REDACTED] is a former customer at Lockwood Café.”
 - At the time I knew them, [REDACTED] was also close friends with [REDACTED] [REDACTED]. They were frequently together at community events, and on multiple occasions invited me to join them on nights out. [REDACTED] had their art showcased in RELIABLE STREET INC's art gallery on multiple occasions. My art was also showcased at some of these, and as [REDACTED] [REDACTED] and I set up the gallery it was apparent that [REDACTED] and [REDACTED] were friends. They seemed to know each other well when I first saw them together. I pointed some of this out in line 52 of the motion to estop. See lines 113–114 within the Amended Petition I filed on June 17 for additional information about [REDACTED] role which pertains to this case. [REDACTED] and I worked together to organize the “Singles Mingle” event put on by RELIABLE STREET INC. [REDACTED] was popular – well known and liked by the other Defendants, including [REDACTED]. Saying that [REDACTED] was merely a customer of LOCKWOOD CAFE is deceitful because it omits their relationship with RELIABLE STREET INC and their personal relationships with the other

¹ Mattson, Nicole. “Places to Get Coffee around Ames: Lockwood Cafe.” *Iowa State Daily*, iowastatedaily.com/231690/lifestyle/places-to-get-coffee-around-ames-lockwood-cafe/. Accessed 26 July 2024.

Defendants. [REDACTED] letter of support that was sent in the ICRC, wherein [REDACTED] bore false witness about having seen multiple actions I performed which never occurred, was motivated by their friendship with the other Defendants, and to protect their relationship and benefits they received from RELIABLE STREET INC as a frequently-showcased artist.

- “Defendant [REDACTED] [REDACTED] is a former employee of Lockwood Café.”
 - It was apparent [REDACTED] was also friends with the other Defendants.

2. To me Defendants [REDACTED] [REDACTED] [REDACTED] and [REDACTED] seemed like a clique of friends who for whatever reason decided they didn't want me around anymore. At first – and even up until I submitted the Amended Petition – [REDACTED] appeared to me to have been pressured and emotionally manipulated by the other Defendants. However, assuming Paul [REDACTED] gave a copy of the Amended Petition to the Defendants to give them the opportunity to review, as appears to be required by Iowa R. Prof. Cond. 32:1.4(a)(3) and (b), I must now conclude that [REDACTED] is in fact aware of the falsified document that was submitted alongside multiple fraudulent testimonies to the ICRC, that she, too, is actively attempting to cover up what happened and unjustly get the Defendants' attorneys fees assigned to the victim, myself, whilst urging the court to dismiss the case prematurely in a manner which would violate my due process rights. I am extremely disappointed in the Defendants' conduct, in that no responsible party has come forth to try to make things right, and instead Defendants have doubled down via wrongly asserting that I harassed them, which I have never done. It appears to me Defendants are attempting to sweep their wrongs against me under the rug via getting this dismissed prior to due process taking place, and retaliating against me for coming forward via attempting to get their attorney's fees assigned to the victim of their malicious and discriminatory fraud scheme. It also appears, through continued wrongful assertions that I harassed LOCKWOOD CAFE's customers and

employees, which I did not, that the Defendants are attempting to set up a countersuit to punish me for coming forward with regard to their malicious fraud scheme.

3. Although the court ought not be persuaded by my testimony alone, I do suspect that after the discovery phase, upon reviewing the evidence, the court will in fact find that punitive damages are in order for all seven Defendants. I am currently carefully studying and organizing for my own personal understanding and application, the Iowa Rules of Civil Procedure and Iowa Rules of Evidence. Currently, to my understanding, after our August 12 hearing, an in-person discovery conference will be scheduled, and I will need to provide disclosure in accordance with Iowa R. Civ. P. 1.500(1)(a) within 14 days after the conference unless a different time is set by stipulation or court order.

4. Now I would like to introduce myself. It may seem a bit long of an introduction at first, but I think the court will find all this relevant. My name is Sondra Wilson. I was voted Class President of Nevada High School, Class of 2000. I probably got elected because I was outgoing, kind to people, had a sense of humor, and hung out with various crowds. I played several sports, played Magic; the Gathering in the lunchroom with the gamers, went to parties, attended church and Sunday School with several classmates, and was friends with students who would have been seen as unpopular to others. I was raised in the Methodist faith in Nevada, Iowa, and believed and still believe today in treating others as you would like to be treated. Back then, I went by Alex (Sondra is short for Alexandra), and both lived and presented as a male. I had never heard the word “transgender”; we were not taught about it in schools, and the concept of a transgender woman – at least in the political culture I was raised into – would have only been talked about as a slur or locker room joke. I was into sports – following the footsteps of my older brothers. Back

then – in the 90s – students teased each other about being “gay” using a negative connotation. Not aware of the meaning behind the words or harm we caused, students stupidly repeated condescending slurs regularly. This led to extreme embarrassment and shame as I got older, because in middle school I had grown breasts which I tried to hide throughout high school via wearing tight shirts with loose shirts over the top. As I got older I did not develop body hair nearly to the extent my brothers did, and experienced other physiological characteristics which left me more “in the middle” both physically and emotionally. The physiological characteristics were known only to myself because I was too embarrassed to let anyone know. After graduating, I learned that medical transition was an option. I had known since I was very young that I did not want to be a boy at all. The more I researched, after looking down at my body and thinking about the thoughts that had caused me shame for so long, it came to me as a great relief to know that there was a medical solution available. Although I knew it was something I felt I needed, it was also at a time that I was exploring my faith and attempting to commune with God because all this was so confusing to me. *Are these thoughts being caused by sin? If I live a more righteous life, will these thoughts go away?* I wondered. I became sober, changed to a more natural diet, fasted from media, and ended up leaving Iowa to get away from friends and family I was sure would not be accepting or supportive if I talked to any of them about what I was going through and what I was considering doing. In the spring of 2002, I believe it was, I had the fortune of meeting US Army Veteran and wilderness survival expert Richard Lonewolf, who for months began teaching some of my friends and me to live in the Mojave Desert. I foraged wild plants every day, practiced qi gong meditation I learned in a class at Iowa State University when I was just out of high school, prayed, played the sitar I bought out beneath the stars in the desert

sands, and Lonewolf conducted sweat lodge ceremonies and sang prayer songs on a near daily basis with my friends and me. Lonewolf is of Lakota, Northern Cheyenne, and Cherokee descent, so I heard cultural perspectives from all three backgrounds, none of which I had ever been exposed to before, especially not firsthand. I had not told him about the thoughts about medically transitioning, however he had a way of knowing things. He explained to me that to many Native American cultures – including his ancestors – there is a deep respect, spiritual understanding, and tribal role for what the Lakota call *winyanktehca*,² which in English translates “two spirit person”. It was relieving and beautiful to be accepted by his family immediately, and to have the opportunity to live alongside a man who dedicated his life to working hard to recover and create lived experiences using the plant uses and cultural knowledge of his ancestors. While studying Hormone Replace Therapy (HRT) online, I learned that that estradiol (estrogen) was developed using the molecule of the wild yam, and medroxyprogesterone was synthesized using an earlier medication called Premarin, which as many people are aware was developed using premenstrual mare urine (hence the name Premarin). Although HRT seemed unnatural and shameful to me previously, learning that the chemicals are simply derived from natural resources overshadowed the previous dogmas and fears that I had held. After approximately six months, I left Lonewolf’s family and sought medical care. Due to commonplace bigotry against transgender people within America’s political culture at the time, medically transitioning caused me to become estranged from many friends and family members. I remained homeless for much of the time I lived in California, where it felt much safer, and there was more support for transgender people than in Iowa. Although it was safer, on many occasions I was violently

2 “BACK Winyanktehca: Two-Souls Person Paper Presented to the European Network of Professionals in Transsexualism, August 1994.” *GENDYS Conference Papers: WINYANKTEHCA: Two-Souls Person*, www.gender.org.uk/conf/trilogy/winkte.htm. Accessed 29 July 2024.

attacked by strangers due to their prejudice, to which I am extremely fortunate to have escaped from. Verbal abuse from strangers happened frequently. I was fired from one job after my boss learned I was transgender. He said he felt “uncomfortable” around me. I showed up to another job interview one time and the Manager, upon seeing me, told me he felt “uncomfortable” around me and thus he would not be interviewing me. It required unpaid time and energy on my part to then contact the Better Business Bureau (“BBB”), who met with the business and helped them write a non-discrimination policy. (As mentioned in line 97 of my Amended Petition, after contacting the BBB about the Lockwood/Reliable situation to see if they would help them set up a set up a fair problem resolution procedure, the BBB advised me to file a complaint with the Iowa Civil Rights Commission, because they believed I was discriminated against.) While visiting Iowa in 2006 and 2009, as mentioned in line 5 of the Amended Petition, I was repeatedly falsely arrested and harassed by an Ames Police Officer, wrongly prosecuted by a Judge who performed a malicious prosecution, and given an off-the-record warning by a different police officer that I should leave the state for my safety. These traumatic experiences were largely the reason I remained homeless from 2009 until 2018, which are described in detail in part one of *ATTACHMENT A – Amended Petition for Wilson v. STATE OF IOWA and KIM REYNOLDS FOR IOWA*. I encourage the court to read this attachment because, as alluded to by the Defendants in lines 10–15 within their motion to dismiss, this lawsuit is directly related and relevant to that one, and vice versa. As mentioned, I had many traumatic experiences over the years. There are a lot of both positive stories and negative stories I am omitting, but in summary, in about 2011 I began to learn that there are laws in place, such as 18 U.S.C. §§ 241 and 242, for example, which could have helped me had I known about them in past circumstances. I thought

about how these laws applied to the experiences I had back in Iowa in 2006 and 2009 if only I had known about them. The more I learned, the more I realized I needed to learn how to apply the law system not for career purposes, but rather for self-defense. I knew I would be intentionally harmed by someone in the future, whether by an officer acting under color of law (this happened on multiple occasions while homeless in California), or by a business discriminating against me, which had also happened enough times that I would have been naive to think it would not happen again. Inspired by Henry Campbell Black, who dropped out of the legal profession in order to compile thousands of legal term definitions into what would become Black's Law Dictionary,³ I transcribed and organized thousands of definitions, from multiple law dictionaries currently recommended on US and state courthouse websites, to create www.ReUniteTheStates.org. Much of this was funded via street performing, and by small donations from people who learned what I was doing and offered help in some way, even if it was just a meal and a shower. Although I was able to defend myself in court against false charges in one such instance in Nevada County, California around 2012, I remained dedicated to learning the civil law system as well. It takes a lot of time and energy to defend one's self in court from a predator who knows the system and abuses others through it; it became important for me to learn how to take civil action in such instances in order to be able to recover from losses instead of repeatedly being harmed, suffering losses, and remaining trapped in a cycle of poverty. During the majority of this time, between 2010 and 2017, I continued to study and document alongside Richard Lonewolf, who taught me a plethora of knowledge pertaining to wild plant uses and wilderness survival skills as I helped him set up classes, built and maintained his website

³ “Who Was Henry Campbell Black?” *The Law Dictionary*, 30 Sept. 2013, thelawdictionary.org/article/who-was-henry-campbell-black/.

(www.RichardLonewolf.com), and wrote our book together. He and I also gardened together. He showed me many skills in relation to this! As recounted in lines 29–30 in the Amended Petition, these skill sets were known to RELIABLE STREET INC and LOCKWOOD CAFE at the time they asked me to help restore and manage the community garden. When I returned to Iowa in 2018, prior to meeting the Defendants, I had hoped that enough time had passed that I was off the radar with regard to the local officials who violated me on multiple occasions years prior. I began attending and working at DMAACC, met my boyfriend of almost five years now, and as recounted in my Amended Petition, met the Defendants in 2021. For so many years up until that time, I ran when things got awry. When I was legitimately scared to stay in Iowa back in 2002, I ran and began hitchhiking the country with my guitar, determined to learn to live in the wilderness so that I would not need to depend upon the labor of others, and so I could experience living with nature for the first time in my life while reflecting upon the difficult decision ahead of me. As times became harder following the 2008 recession, when an area became unsafe, I ran, hitchhiking, writing songs and street performing with my guitar, foraging wild plants, and continuing to develop the organization I founded, Wild Willpower PAC, which was originally designed to sponsor indigenous teachers who possess the types of skills Lonewolf does. I believe it is important for the honor of America that we not forget our history and promises with regard to Native American nations. Even though promises and trust have been severely violated on multiple occasions both in modern times and historically by people who wrongly bore the American flag while doing so, I believe it is good to try to bridge culture gaps and try to be a part of healing if possible and appropriate, if the help is wanted. I was at Standing Rock when hundreds of veterans from across the United States took a knee and begged for forgiveness for

crimes committed toward indigenous people in the name of the U.S. Military.⁴ I volunteered alongside Oceti Sakowin Media and the medic tent in Cannonball, North Dakota at that time, where we helped care for the veterans after they arrived, and helped care for the many indigenous people and Americans who had been pepper sprayed while protesting against the pipeline that was being built across Lake Oahe, which endangered the Missouri River and the tribe's primary source of drinking water. I have learned to speak some of the Tza la gi (Cherokee), Diné (Navajo), Lakota, and Dakota languages, and have been honored at more than one Pow Wow ceremony in recognition for my efforts over the years in trying to be of aid. Although Wild Willpower never received the financial support I had always hoped for, I am grateful to have lived a meaningful life, and to have learned so much rare and beautiful knowledge, and witnessed and met so many amazing people during my work developing the organization over the years. In 2017 I received an apology letter from my mom, wherein she told me that she saw me speaking up and volunteering to help Native Americans, and that she was proud of me. This letter was a big reason I returned to Iowa. Since returning, I enrolled and have excelled at DMACC. The faculty has been amazing and supportive. Even though they have are not at license to assist me with the two lawsuits I am currently involved with, many faculty members witnessed the amount of deep pain I experienced, especially in Fall 2022 after reading about the terrible and false things the Defendants wrote into the public record about me – statements which severely harmed my reputation throughout Ames, and which have caused me to not attend many local events I would have otherwise attended due to safety concerns. I have worked very diligently on my schoolwork these past few years because I want Wild Willpower to

4 Froelich, Amanda. Veterans apologize to Indigenous on behalf of U.S. Army at Standing Rock. December 7, 2016. Yale University: <https://fore.yale.edu/news/Veterans-apologize-Indigenous-behalf-US-Army-Standing-Rock>.

grow and become a successful organization long after I am gone. I was on the President's List for the past four semesters, graduated with Honors, am a member of Phi Theta Kappa Honors Society, and was a silver medalist on the All-Iowa Academic Team in 2023. As a first year Entrepreneurship major transferring this fall to Iowa State University, I know that how I treat others is extremely important toward leaving the legacy I hope to one day leave behind. As my father, Herb Wilson, said to me on many, many occasions when I was young, "Your reputation precedes you." He instilled this in me since I was very young as a warning that I should always act mindfully toward others. It is perhaps my greatest dream that the organization I leave behind, Wild Willpower (www.WildWillpower.org), will lead toward greater acceptance, safety, and compassion toward transgender people than what my generation was born into. I do my best to be considerate toward others and treat people with kind regards in order to try to build the relationships and legacy that will help make this dream a reality. Thus, the fact that the Defendants attacked my reputation in such a severe and harmful manner, while creating a political tool they could draw upon in the future to attack my political endeavors (see line 14(iii) in Amended Petition), is something I cannot stand for. Their fraudulent scheme attacks everything I have worked to achieve and am still working to achieve this lifetime. While hitchhiking forty-three US states and part of Mexico between 2002 and 2017, I believe it was the respect I try to give others, which I learned here in Iowa, which kept me safe. I gave this same respect to the Defendants, and after I cleaned up and restored their garden area, applying the expertise I learned from Lonewolf and expanded upon with years of private study, for whatever reason the Defendants decided they didn't want me around anymore, and I was removed from the property under false pretenses. After filing a discrimination complaint with the Iowa Civil Rights

Commission so we might find mediation, instead of coming to the table and trying to make things right, they retaliated against me for filing the complaint, creating a political tool which holds unfair leverage over me and the organization I founded. The Defendants have threatened my safety and causes me severe financial harm, including prospective damages to Wild Willpower.

Background

5. A hearing is scheduled for August 12 at 1:30 pm at the STORY COUNTY COURTHOUSE in Nevada, Iowa to determine whether the Defendants' motion to dismiss will be granted, or if this case will move forward.

6. With all due respect, to dismiss this case prior to the discovery phase, wherein the claims I made within the Amended Petition will be shown to have merit, would violate my right to a fair trial. Discovery is a part of the right to a fair trial.

7. I have a filing deadline set for August 5, and a hearing scheduled for August 9 for case # LACL157953. See **ATTACHMENT B – flier for Aug. 9 hearing**. Updates on that lawsuit may be found here:

<https://wildwillpower.org/cases-in-progress/iowa-cases-2/wilson-v-state-of-iowa-and-kim-reynolds-for-iowa>

As soon as this resistance is filed, I must immediately write the August 5 filing. If this resistance seems lacking in any manner, I request continued grace from the court. I am absolutely exhausted from these two lawsuits, and am doing my best to keep up.

8. I have organized and labeled most of the evidence for this case, as referenced throughout the Amended Petition. I request the court provide to me approximately one week

after our August 12 hearing to allow me time to finish organizing the Iowa Rules of Procedure, and to prepare disclosure.

Motion to Estop

9. In line 3 of Defendants' motion to dismiss, Defendants wrote, “Defendants have been subject to years of harassing conduct by Plaintiff, both inside and outside of the legal system.” The above statement by the Defendants is false. I have never harassed any of the Defendants. As detailed within the Amended Petition, false allegations against me – accusations of harassment – are one of several libelous statements made against me for which I am suing the Defendants. I move to estop the Defendants from continuing to make false, defamatory statements against me, including allegations of harassment. I will be vindicated after the court examines the evidence, and learns that them Defendants did make numerous libelous statements, including false allegations of harassment; see lines 113–121 in my Amended Petition.

10. In line 5, Defendants wrote, “In early 2022, Reliable Street Inc. and Lockwood Café barred Plaintiff from the premises due to reports of harassing conduct towards customers and employees.” I did not harass, or have harassing conduct, toward customers and/or employees of Lockwood Cafe and/or Reliable Street Inc. These allegations toward me appear to have been caused by slander from [REDACTED] [REDACTED] and possibly [REDACTED] who were a clique of friends. I suspect the other Defendants may have had other motives for barring me from the property, and those reasons have never been disclosed by the parties. False allegations of harassment caused me to be barred from the property under false pretenses. Assuming all the Defendants read the Amended Petition, and now know about the falsified document, for example, it is evident to me that all the defendants are acting with malice, and are trying to further harm me via getting this

case dismissed, presumably to be followed by a counter suit to sue me for harassment and defamation by me against them, which never occurred. If the court dismisses the case, it will enable the Defendants to get away with fraud and continue to severely harm me. I move to estop the Defendants from continuing to attempt to get this case dismissed without trial. I have a right to a fair trial.

11. In line 15, Defendants wrote, “Defendants also seek assessment of costs to Plaintiff, as well as assessment of the attorneys’ fees associated with the change of venue—a ruling on which the Polk County District Court previously held in abeyance. (See D0001, p. 5)” Attorney’s fees should not be assessed to me. On March 19 I filed a motion for Judge Gronewald to recuse herself, and requested that the new Judge who is appointed then rule on the motion to transfer. There were a multitude of legitimate reasons I filed in Polk County which appear to have made it a more appropriate venue. These reasons are detailed in lines 3–6 of the Amended Petition. Although Her Honorable Judge Gronewald did not recuse herself at that time, following multiple filings she did in fact recuse herself from case # LACL157953 on July 9, as shown in **ATTACHMENT C – order to recuse**. As mentioned by the Defendants and myself, these two lawsuits are directly related. According to Iowa Code. Jud. Cond. 51:2.11, Judge Gronewald was “disqualified” from ruling on the motion to transfer. I don’t see how it would be just to assign these fees to me. It is evident that I have made allegations about the Defendants, and they have made allegations against me. I propose fees be assigned after the trial to the parties who are found to be at fault, following the trial.

RESISTANCE

Unjust Enrichment

12. Within line 24 of their July 5 motion to dismiss, Defendants wrote, “The claim for Unjust Enrichment appears on pages 29 – 31 of the Petition.” The claim is brought into context by the rest of the Amended Petition, by this resistance, and by evidence I have yet to present to during the discovery phase of the proceedings.

13. The Petition specifically alleges that the following Defendants were unjustly enriched:

a. Reliable Street

b. Lockwood Café

c. [REDACTED]

d. [REDACTED]

14. The unjust enrichment claims against all four of these defendants should not be dismissed.

15. “Recovery based on unjust enrichment can be distilled into three basic elements of recovery. They are:

(1) defendant was enriched by the receipt of a benefit;

(2) the enrichment was at the expense of the plaintiff; and

(3) it is unjust to allow the defendant to retain the benefit under the circumstances.” *State, Dep't of Hum. Servs. ex rel. Palmer v. Unisys Corp.*, 637 N.W.2d 142, 154–55 (Iowa 2001).

16. [REDACTED] and [REDACTED] were enriched in their personal capacities because they earn their livelihoods from the businesses. As a co-owner, [REDACTED] owns controlling interest in LOCKWOOD CAFE. Due to the fact that they are located in the same building and coordinate on events together, RELIABLE STREET INC attracts customers to LOCKWOOD

CAFE, and LOCKWOOD CAFE attracts volunteers and donations to RELIABLE STREET INC. Both organizations are tenants, and thus presumably pay rent, to the property owner, LOVE CLUB LLC. See **ATTACHMENT D – LOVE CLUB LLC owns 4625 Reliable Street**. According to **ATTACHMENT E – approval of Love Club LLC's liquor license by CITY OF AMES**, LOVE CLUB LLC is owned by [REDACTED] [REDACTED] and Elliot Thompson, both of whom own 50% interest. Therefore [REDACTED] [REDACTED] as a presumed recipient of RELIABLE STREET INC and LOCKWOOD CAFE's rents, was enriched via my approximately 6 months of labor I would have not performed had I known my agreements with RELIABLE STREET INC and LOCKWOOD CAFE were going to be breached. I would not have agreed to the terms had I known the agreements were going to be prematurely breached, especially in a manner which left me harmed by harmful and false allegations against my character. As an owner of LOCKWOOD CAFE, [REDACTED] [REDACTED] must receive a substantial percentage of the profits the business earns, and therefore she was personally enriched by the improvement I made to the property as well.

17. Due to the fact that [REDACTED] [REDACTED] and [REDACTED] [REDACTED] were personally enriched by the labor I was exploited for, the unjust enrichment claim should not be dismissed against Ms. [REDACTED] or Ms. [REDACTED]

18. In lines 32–35 of Defendants' motion to dismiss, Defendants alleged that Defendants RELIABLE STREET INC and LOCKWOOD CAFE were not unjustly enriched due to the fact that my labor was performed voluntarily. However, as mentioned in line 18, 62, and 78, and 83 of my Amended Petition, as well as within other lines, I only performed the volunteer labor in accordance with our agreements, which were breached by the four unjustly enriched Defendants.

19. In line 33, Defendants wrote, “Plaintiff does not appear to allege any unjust

enrichment for the gardening supplies that she purchased, because she acknowledges that she was reimbursed for these expenses.” However, as mentioned in line 62 of my Petition, the \$300 did not cover all of the supplies, nor did it cover any of the labor.

20. In line 34, Defendants stated, “[T]he Petition, on its face, demonstrates that no injustice has occurred with regard to Plaintiff’s volunteer gardening efforts.” This was a preposterous statement for the Defendants to make. Severe injustices against me were performed by the Defendants which would not have occurred had I not volunteered for and entered into agreements with RELIABLE STREET INC and LOCKWOOD CAFE.

21. In sum, the unjust enrichment claims should not be dismissed. Doing so would create a miscarriage of justice and enable the Defendants to form a countersuit against their victim whom they have already severely harmed. I fear this because the Defendants have already shown their vindictive natures following the discrimination complaint I filed with ICRC, at which time they retaliated against me in a complex fraud scheme for having done so, wherein they completely trashed my reputation by entering libelous statements against me into the public record.

The Defamation Claim

22. In line 38–39 within their motion to dismiss, Defendants stated, “[A]ll allegations on pages 48–58 should be dismissed because they are quotations from statements made to the ICRC,” and “Statements submitted to the ICRC should be dismissed because they do not qualify as the “publication” of a statement. However, libelous statements submitted to the ICRC, which were therefore submitted to the public, do in fact qualify as “publication”. According to Black's Law Dictionary 10th Ed., publication is defined as, “Generally, the act of declaring or announcing

to the public.” This is exactly what was done by the Defendants due to the fact that statements submitted to the ICRC are available to the public. Black's Law Dictionary goes on to define publication specifically within the context of defamation cases, “The communication of defamatory words to someone other than the person defamed.” Salmond on the Law of Torts 154 (17th ed. 1977) states, “Publication means the act of making the defamatory statement known to any person⁵ or persons other than the plaintiff. It is not necessary that there should be any publication in the popular sense of making the statement public. A private and confidential communication to a single individual is sufficient.”

23. Whereas filing a false police report can in fact lead to a defamation claim to a party or parties who are injured,⁶ therefore entering libelous statements to the ICRC can lead to a defamation claim by injured parties.

24. In line 40 Defendants stated, “[A]n ICRC staff person receiving a statement from a witness would not “understand” a statement to “tend to injure a person’s reputation,” however ICRC's qualified staff would in fact understand a statement to injure a person's reputation if they knew such statements were in fact false and had a defamatory effect upon the person, especially in context with the fact that such statements are simultaneously made available to the public via their office.

25. In line 41 Defendants stated, “Public policy considerations also strongly counsel against a finding that a statement made to the ICRC can give rise to a defamation claim,” however it would create bad public policy to enable businesses to retaliate against and punish

5 Note that the ICRC is an ARTIFICIAL PERSON, and thus a “person”, and the investigator and any processors who may have read the defamatory statements, although acting in their official capacities, are in fact persons, by definition.

6 *Filing a False Police Report - Findlaw*, www.findlaw.com/criminal/criminal-charges/filing-a-false-police-report.html. Accessed 30 July 2024.

victims of discrimination for coming forward via allowing them to enter libelous statements against the victim into the public record without liability including punitive damages for doing so.

26. In line 42 Defendants argued, “If statements to the ICRC can give rise to a cognizable defamation claim, it will have a substantial chilling effect on the willingness of witnesses to speak with ICRC investigators, which will hinder the ICRC’s ability to investigate claims.” This statement, however, is not true. It would encourage witnesses to answer truthfully, and would deter them from submitting false statements and/or falsified documents to the ICRC.

27. In line 43–44, Defendants argued, “Separately, the defamation allegations in paragraphs 71–72 (pages 31–32) should be dismissed because they are merely conclusory statements, or recitations of the elements of defamation. For example, paragraph 72 states “██████████ and ██████████ . . . allegedly submitted defamatory statements against me to ██████████ and then to ██████████ (Petition at 32). See *Krise v. Cota*, 2000 WL 1825447, *1 (Iowa Ct. App., Dec. 13, 2000) (“While a motion to dismiss admits the truth of all well-pleaded, issuable and relevant facts, it does not admit mere conclusions of fact or law not supported by allegations of ultimate facts”). These two issues are sufficient to dispense with all defamation allegations against the following four defendants: a. ██████████ b. ██████████ ██████████ c. ██████████ ██████████ d. ██████████ ██████████ However, after the discovery phase, when evidence is brought forth and then examined, it will become evident that I was in fact defamed. They are allegations until they are proven true. I reserve my right to a fair trial so that facts may be established and matters of law applied following the discovery phase. At that point the above argument will be shown inapplicable.

28. In line 45–47 Defendants referenced paragraph 73 of my Petition, wherein I wrote, “According to [REDACTED] [REDACTED] statement to the ICRC, [REDACTED] accused me of both stalking and harassing her, and of intentionally coming in during her shifts. I absolutely never stalked or harassed [REDACTED] nor did I know when she was working, nor did I come in or attempt to intentionally come in during her shifts.” Defendants argued that Defendant [REDACTED] [REDACTED] made statements to third parties other than the Iowa Civil Rights Commission, and therefore my petition failed to state a claim for defamation, however, as shown in line 22 above, [REDACTED] false, harmful statements to [REDACTED] and [REDACTED] to qualify as defamation according to the legal definition as applies to defamation claims.

29. In line 48 Defendants pointed out that the Iowa Supreme Court has identified six elements of defamation: “(1) publication, (2) of a defamatory statement, (3) which was false and (4) malicious, (5) made of and concerning the plaintiff, (6) which caused injury.” *Bierman v. Weier*, 826 N.W.2d 436, 444 (Iowa 2013). In line 49 Defendants argued that the Petition, on its face, fails to allege facts sufficient to establish elements (1), (2), or (4) of defamation as it relates to the allegation that [REDACTED] made statements relating to Plaintiff’s “stalking and harassing” behavior. We have established that [REDACTED] statements, whether made to [REDACTED] [REDACTED] and/or the ICRC, do in fact qualify as defamation. Once I present evidence to the court, including the falsified document which was presumably created by [REDACTED] it will become apparent that the defamation she performed was in fact malicious. I reserve my right to due process, which includes the discovery and trial phases of the proceedings.

30. In line 51. Defendants argued that the “third person” who received Ms. [REDACTED] defamatory statements failed to “injure a person's reputation and good name,” however it is

evident that the allegations did in fact lead to breaches of the agreements due to the harm the statements caused to my reputation to the recipients of the statements. Statements were so injurious that punitive action was taken against me as punishment for actions I never performed (stalking and/or harassment). Numerous pieces of evidence referenced throughout the Petition will prove that I never in fact stalked or harassed [REDACTED] and that her malicious statements did in fact cause me harm including harm to my reputation, in the eyes of the recipients.

31. In line 52 Defendants argued that the Petition demonstrates that Ms. [REDACTED] did not understand the intention of the statements to be causing injury to Ms. Wilson's reputation, and that Ms. [REDACTED] understood the purpose of Ms. [REDACTED] statements was to protect her livelihood and safety at work. While it may have been true at the time that Ms. [REDACTED] did not know Ms. [REDACTED] was in fact slandering me with false allegations during the initial acts of defamation for which I am suing (see lines 71–73 of Amended Petition), it will become abundantly clear following the discovery phase that Ms. [REDACTED] actively participated in defamation and fraud against me, as detailed in lines 111–121 within the Petition.

32. In line 54 Defendants argued that Ms. [REDACTED] Ms. [REDACTED] and Ms. [REDACTED] all assiduously avoided broadcasting the situation in a manner that would cause injury to Ms. Wilson, however this is not true. Via entering false, injurious statements about me to the ICRC, Ms. [REDACTED] Ms. [REDACTED] LOCKWOOD CAFE, RELIABLE STREET INC, did in fact broadcast the situation via entering it into the public record. Documents submitted to the ICRC are available to the public upon request. It is safe to assume that Ms. [REDACTED] knew her falsified document and false testimony against me would be submitted to ICRC, and therefore she did not avoid broadcasting the situation. Her statements were in fact broadcast, and are currently available to

review by members of the public.

33. In line 55 we see where Defendants appear to be seeking to set up a countersuit against me in retaliation for exposing their wrongdoing, stating “Plaintiff appears to have gone to great lengths to disseminate the statements that she now alleges were defamatory” because I “contacted friends from the space to inform them what happened.” I must be given the opportunity to present evidence and to prove my claims, lest the Defendants be enabled to harm me further in retaliation for coming forward.

34. In line 57, Defendants argued, “[T]he Petition’s allegations regarding Ms. [REDACTED] do not satisfy the requirement of a “defamatory statement” because the alleged statements by Ms. [REDACTED] are mere statements of opinion, however, in context with the falsified document used to bolster the defamation in the eyes of the recipient(s), it becomes apparent that Ms. [REDACTED] allegations were not mere opinion, but rather they were part of a malicious and premeditated attack against my reputation. Ms. [REDACTED] statement that I was “stalking and harassing her” was not a mere statement of opinion. Rather, her premeditated attacks demonstrate actual malice and that she ‘acted with knowing or reckless disregard of the truth of the statement.’” *Bandstra v. Covenant Reformed Church*, 913 N.W.2d 19, 48 (Iowa 2018) (quoting *Barreca v. Nickolas*, 683 N.W.2d 111, 118 (Iowa 2004)). My Petition did in fact point all this out within lines 119 – 121.

[REDACTED] *defamation and fraud*

35. I don't know anyone else from Iowa who has experienced anything like what I have described in line 4. It should be evident from what I have told about myself that [REDACTED] [REDACTED] defamatory acts including false allegations of racism, as described in lines 115 – 116

of the Amended Petition are an affront to my beliefs and a wrongful disparagement of my character. I am from Nevada, Iowa, where every year we celebrated Lincoln Highway Days. I was instilled with anti-racist and anti-slavery values in the Nevada Public School system and by my parents. My teachers read to us Abraham Lincoln's Gettysburg Address, and the sentiment with which we were taught about Rosa Parks and Martin Luther King, Jr. was done so with the reverence, respect, and awe they deserve. **Exhibit Q2**, which I shall seek to admit during the discovery phase, is a Google Doc folder containing evidence that [REDACTED] screenshotted out-of-context statements I made alongside a phony testimony accusing me of making anti-LGBT+ and racist comments toward her. Once the out-of-context statements are shown in within their proper context, it will become evident to the court that [REDACTED] is in fact liable for defamation and fraud, and had malicious intent toward me. It is imperative that this case not be dismissed. My right to due process guarantees a fair trial. With all due respect, Your Honor, a dismissal by the court without due process would constitute a violation of my right to a fair trial.

The Promissory Estoppel Claims

36. In line 68 of their motion to dismiss, Defendants argued, “The promissory estoppel claim should be dismissed out of hand in light of Plaintiff’s concession that all of her work on the garden and prairie “was done as a volunteer,” and that “equitable principles require dismissal of a promissory estoppel claim that is based on a “volunteer” project. However, as mentioned in lines 1 and 18 above and in my Petition, my volunteer labor was performed only in accordance with the agreements which Defendants breached.

37. In line 70 Defendants argued, “[T}he Petition does not allege any clear and definite

promise of ongoing compensation for gardening or prairie management or restoration, or any other services, or guarantee an ongoing relationship.” However, as mentioned in line 35, I possess two emails wherein Ms. [REDACTED] affirms that Emily Poag and I were “in charge” of the garden throughout the 2022 growing season. Regarding compensation, it has been truthfully reiterated by myself that I would not have performed the labor had I known the agreements would be prematurely breached. I was exploited for approximately twenty hours per week for labor for six months of labor. Losing six months of labor is a loss! I should absolutely be reimbursed for my time and labor. What's worse, is that instead of being able to add my the results of my labor and volunteerism into my resume and portfolio, which would have added value to my life, instead I left the property after being unfairly discriminated against, with my reputation marred by horrendous and false allegations which jeopardize my safety. Therefore I suffered substantial detriment at the hands of RELIABLE STREET INC and LOCKWOOD CAFE's termination of my volunteering, especially in light of the circumstances and aftermath I've had to deal with.

38. Defendants breached both agreements. It would create further injustice against me to dismiss the promissory estoppel claims.

The Discrimination Claim

39. I was unlawfully barred from the premises at Reliable Street and Lockwood Café – i.e. discrimination in public accommodation; and (2) employment discrimination pursuant to the “Threshold Remuneration Test for Volunteers.” In line 77 of their motion to dismiss, Defendants asserted that the Petition fails to state a claim that shows any “right of recovery [for discrimination] under any state of facts.” Tate, 510 N.W.2d at 887. The Iowa Civil Rights Act

provides me, as a member of a protected class (a transgender woman whose gender identity qualifies me as a member of the protected class), the right to recovery due to the discrimination I faced, and the related discriminatory acts which harmed me.

40. In line 78 Defendants point out that “[U]nlawful discrimination in public accommodations can be proven through direct evidence...” *Butler v. Crittenden Cty., Ark.*, 708 F.3d 1044, 1050 (8th Cir. 2013) (citing *Young-Losee v. Graphic Packaging Int’l, Inc.*, 631 F.3d 909, 912 (8th Cir. 2011); *Price Waterhouse v. Hopkins*, 490 U.S. 228, 242 109 S. Ct. 1775 (1989)). In line 79 Defendants wrote, “The Petition first fails to state a claim of discrimination via direct evidence.” If it is not already apparent that I was discriminated against, and that unfair preferential was given to Ms. [REDACTED] with a presumption of guilt and punitive action resulting against me due to commonplace prejudices against transgender women, direct evidence of discrimination will be shown to the court following the discovery phase, at which point direct evidence may be submitted to the court. The fact that I am a transgender woman led to a prejudicial determination of guilt and punitive action being taken against me by [REDACTED] [REDACTED] LOCKWOOD CAFE, and RELIABLE STREET INC. Although I was allowed accommodations at first, I was allowed to use them but was subjected to markedly hostile conduct. *Kirt v. Fashion Bug #3253*, 479 F. Supp. 2d 938, 959 (N.D. Iowa 2007). The markedly hostile conduct was the discrimination I faced after Ms. [REDACTED] and Ms. [REDACTED] barred me from the property based upon their prejudicial determination against me, in favor of one or two non-transgender woman, who appear to have worked in collusion to pressure [REDACTED] and [REDACTED] and thus RELIABLE STREET INC and LOCKWOOD CAFE, to bar me from the property. Had [REDACTED] and [REDACTED] first asked me or talked with me about the very serious allegations against me prior

instead of making a prejudicial determination, it is likely they would have made a more fair decision with regard to how to handle the matter.

41. In line 83 Defendants wrote, “Plaintiff does not allege that similarly situated persons outside the protected class were not deprived of services at Reliable Street or Lockwood Café. In particular, Plaintiff fails to allege that non-transgender persons who had generated employee complaints were allowed to continue to patronize Reliable Street or Lockwood Café.” To my knowledge, there were no non-transgender persons who generated employee complaints, however, as the Defendants noted in line 54 of their motion to dismiss, they “Assiduously avoided broadcasting the situation.” It is reasonable to conclude that if there were any such situations, I would not have been informed of them. Furthermore, to my knowledge no one else had ever been invited to help restore and help manage the garden, so no such correlation can possibly be made.

42. Thus, any claim for public accommodation discrimination should not be dismissed as to Defendants Reliable Street and Lockwood Café.

43. In line 85 of their motion to dismiss, Defendants wrote, “Iowa Courts have not adopted any 'Threshold Remuneration Test For Volunteers’” (“TRTV”). However, the Iowa Civil Rights Act (ICRA) was modeled after Title VII, so our courts have consistently employed federal analysis when interpreting the ICRA.⁷ Therefore the test ought be considered with regard to this case because it demonstrates that in some instances, volunteers have in fact been protected against discrimination.

44. The TRTV falls short of being a just standard however. What the TRTV gets right is

⁷ ANTOINETTE MARIE JOHNSON, Plaintiff-Appellant, vs. MENTAL HEALTH INSTITUTE, STATE OF IOWA, GEORGEANNE CASSIDY-WESCOTT, MARK LYMAN, IOWA DEPARTMENT OF HUMAN SERVICES, page 11: https://www.iowacourts.gov/static/media/cms/161447_Johnson_v_Mental_Health_Inst_55D745384326B.pdf

that volunteers “can” be protected against discrimination. Where the test falls short is that *of course volunteers should be protected against discrimination!! Everyone should!* It is a complete failure of the law, and an attempted corruption of justice to state otherwise. Can you imagine asking someone on the street, “Should volunteers for nonprofits be protected against discrimination?” *I cannot think of anyone who would say no!*

45. This proceeding is taking place inside the Story County Courthouse in Nevada, Iowa. We celebrate Lincoln Highway Days every year because we honor Abraham Lincoln and the end of slavery, and “Old Lincoln Highway” or “Old 30” which passes through our town. If Honest Abe were alive today, he would likely tell us, “Of course volunteers for nonprofits should be protected against discrimination!!” That was his character. For example, one story from Lincoln's Black Hawk War involves a Potawatami who wandered into Captain Lincoln's camp. Lincoln's men assumed him a spy and wanted to kill him. Lincoln threw himself between the Native American and the men's muskets, knocking their weapons upward and protecting the Potawatami. The militia men backed down after a few heated seconds.”⁸ If the court rules that volunteers are not protected against discrimination, I have no doubt Lincoln will be banging on the top of his casket.

46. Iowa courts ought consider that volunteers naturally derive implied and direct benefits, and contribute enough time and energy that they deserve respect just like any human being deserves. The TRTV failed to truly acknowledge various important factors with the level of consideration they merit. For example, volunteers:

- Gain experience and crucial insights which may be applied to future business and

⁸ Arnold, Isaac N. *The Life of Abraham Lincoln*, (Google Books), Digital Scanning Inc, 2008, pp. 34–35, (ISBN 1-58218-759-2).

personal endeavors. This has value.

- Can build portfolios which can be used to find jobs and/or start their own business. This has value.
- After years of service, might become known, honored, and appreciated by the community at large. Your reputation precedes you. This has value.
- Build relationships within the community. For a so-called “community space” which Reliable Street Inc claims to offer (e.g. community garden, community events), to suddenly bar you from a space due to life-ruining, false allegations, without notice or appeal, is to destroy your reputation within the community. Anyone who heard what happened likely has some level of doubt about my character now. Volunteers gain good reputations, and people who get kicked out of establishments due to offensive, perverted, and heinous accusations such as stalking and harassing gain bad reputations. It's that simple.

47. It seems to me like the Defendants have been grabbing at straws trying to get this case dismissed on a technicality (e.g. arguing that entering libelous statements and fraudulent documents into the public record in order to destroy their reputation should not constitute defamation) while the simple fact remains: if everything I have told the court is true, the spirit of the law demands me justice and restitution. Iowa Courts uphold the *spirit of the law doctrine*: 14 N.W.2d 717,234 Iowa 869 *Case v. Olsen* held “The court should give effect to the spirit of the law rather than the letter, especially so where adherence to the letter would result in absurdity, or injustice, or would lead to contradiction, or would defeat the plain purpose of the act...” It would result in absurdity and injustice to dismiss any of the claims I set forth within my Amended Petition, even if the “letter of the law” in this case was not a statute, but a standing ruling. If a standing ruling, if applied in this case, were to cause absurdity or injustice, the spirit of the law should prevail, and the ruling ought be overturned.

The Fraud Claim

48. [REDACTED] falsified document and the out-of-context statements alongside [REDACTED] false

testimony, after admitted as evidence, will prove the fraud claim I set forth.

49. In line 92 Defendants wrote, “Iowa Code § 714.8 is a criminal statute and is not relevant.” However, in line 133–134 of my Amended Petition, I requested that the court consider this action, in part a penal action, and urged the court to apply punitive damages accordingly. Albeit I could have worded that section of the Petition better, the content is all there, and that is what I meant. Compiling court documents for two lawsuits, without funding for doing so, has been physically and emotionally [REDACTED]

50. Evidence will show fraudulent misrepresentation by the Defendants (previously described on multiple occasions as a “fraud scheme”). As pointed out by the Defendants “[A] preponderance of the evidence, satisfactory and convincing evidence for each of the following elements: (1) representation; (2) falsity; (3) materiality; (4) scienter; (5) intent to deceive; (6) reliance; and (7) resulting injury and damage.” *Cornell v. Wunschel*, 408 N.W.2d 369, 374 (Iowa 1987); *Arthur v. Brick*, 565 N.W.2d 623, 625 (Iowa Ct.App.1997). Evidence I will present will also show that “[A]ll seven elements of fraudulent misrepresentation [are] met.” *Arthur*, 565 N.W.2d at 625. 95.

51. The false, damaging lies the Defendants wrote about me into the public record, and the malicious way they attempted to bolster those lies via submitting a falsified document and grossly out-of-context statements alongside those lies, in retaliation for me filing a legitimate discrimination complaint with the Iowa Civil Rights Commission, demonstrates malicious, premeditated fraud by the Defendants. The Defendants are liable, and I have a right to recover damages. Punitive damages are in order, as will become evident as we move through the discovery phase.

52. I respectfully request the Court enter an Order dismissing the Defendants' motion to dismiss in its entirety, and instead we schedule an in-person hearing so evidence may be presented. I request additional time so I can finish studying and organizing the rules so that I may properly follow the Iowa Rules of Procedure without burden to the court.

Request to reschedule for an in-person hearing to present evidence

53. Your Honor, in your May 28 order, you wrote, “As a reminder, this is not the trial and the Court does not expect to receive 30 exhibits or for the Plaintiff to 'prove the claims specified within her Amended Petition.' If the parties anticipate that 30 exhibits will be admitted and extensive testimony will be needed at this hearing, the Court is inclined to hold the hearing in person to ensure that all parties have the exhibits in front of them and can present their evidence in a commonsense fashion.” After diligently working on my Amended Petition for this case, I tirelessly worked to write *ATTACHMENT A – Amended Petition for Wilson v. STATE OF IOWA and KIM REYNOLDS FOR IOWA* and related filings. Now that I have had some time to read about rules pertaining to discovery and disclosure, I re-read your May 28 order. In order to have time to present all my evidence, which currently includes 19 folders of categorized text messages, electronic communications between myself and the Defendants, messages between various parties and the ICRC, photographs, and similar documents. I anticipate being able to move through the evidence fairly quickly if there are no or few interruptions. However, there is so much relevant and crucial evidence which must be presented in order to expose the complexity and breadth of the Defendants' fraudulent acts, I anticipate needing approximately one and a half hours. Evidence will indicate actual malice by the Defendants. I have never been involved in a civil lawsuit before, or witnessed a hearing like this, so I don't know whether or not

an hour and a half is too long to ask for. I will leave it up to the court's discretion.

54. I request the court reschedule the hearing so that I have time to study the Iowa Rules of Procedure and Iowa Rules of Evidence prior to entering the next phase of the proceedings. I have a resistance due for the other lawsuit six days from now, and a hearing for that case on August 9. I propose we reschedule the August 12 hearing to a later date in order to provide me enough time to study the rules and submit any related documents I may find I need to file before the hearing.

Thank you,
Sondra Wilson

Dated: 7/30/2024

/s/ Sondra Wilson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of this document will be served upon the persons listed on this document at the addresses indicated on EDMS by transmitting a copy via Royal Mail on April 2, 2024, at which time I will have access to a printer (my school and the post offices are closed today due to Easter Monday). I declare under penalty of perjury that the

foregoing is true and correct.

 /s/ Sondra Wilson