

IN THE IOWA DISTRICT COURT POLK COUNTY

ALEXANDRA "SONDRA" WILSON,)	
)	CASE NO. 05771 LACL157953
<i>Petitioner,</i>)	
)	PLAINTIFF ALEXANDRA WILSON'S
v.)	AMENDED (I) MOTION TO
)	RECONSIDER RULING IN FAVOR OF
KIM REYNOLDS FOR IOWA and)	OF DISMISSAL and in the alternative
STATE OF IOWA)	(II) MOTION TO RECONSIDER "WITH
)	PREJUDICE" DETERMINATION
<i>Respondents</i>)	
)	

Pursuant to Iowa R. Civ. P. 1. 904(3), I file this motion to reconsider the Aug. 21 ruling (D0042) in favor of defendant State of Iowa's motion to dismiss. In the alternative, I respectfully request the court to reconsider the "with prejudice" determination.

Introduction

1. I request the court to reconsider the Aug. 21 ruling in favor of dismissing this suit with prejudice, and instead allow the case to proceed. State, county, and city officials, all of whom derived their authority from the State,¹ caused severe harm which I now live with every day.

2. Although § 1983 claims are typically filed against the county, city, and/or government official(s), due to the unique nature of this suit, wherein crimes and torts were performed by a wide variety of both state and local officials, the state appears to be the most appropriate party for this suit according to the longstanding, fundamental legal doctrine of *respondeat superior*.² The state is the principle, and officials are the state's agents.

1 Authority granted by Iowa Citizens.

2 The doctrine holding an employer or principal liable for the employee's or agent's wrongful acts committed within the scope of the employment or agency (Black's Law Dictionary 10th Ed.).

3. I humbly request the court to consider the potential dangers members of vulnerable classes who are protected by the Iowa Civil Rights Act may potentially face in retaliation for filing directly against local officials and/or agencies. Remember, local areas can hold great prejudice and dangers for minorities, as we witnessed during *Brown v. Board of Education*.³ The State of Arkansas, in that case, found that deploying the National Guard was necessary to protect Citizens from implicit and explicit dangers. Due to the fact that local authorities had shown prejudice and discrimination, and performed rights violations to me, I would not have felt safe filing locally. I felt much safer coming to the state's capitol to file, (hopefully) away from immediate danger. As written within my Amended Petition, I received an overt warning that such threat did in fact exist from a concerned Ames Police officer who was aware of such dangers.

4. Harm caused by the State of Iowa at large, via the passing HF766, was performed unlawfully and in a manner that was tortious and very harmful to transgender Iowans, including myself. After years of suffering from being unable to afford surgery, being cut off from access for four years while being simultaneously slandered by the Governor was extremely emotionally devastating and caused suicidal thoughts. Iowa's Legislative and Executive branches knowingly and willingly, in a premeditated manner, violated a class of persons' rights while the Governor, in both her official and unofficial capacity, slandered that same class of persons in order to turn public opinion against transgender people, thereby constituting violations of:

- 18 USC §§ 141-142
- Iowa Civil Rights Act (accommodations)
- Civil Rights Act

³ Such dangers have been exacerbated for transgender Iowans due to repeated acts of defamation by Governor Reynolds.

- Iowa's Ongoing Criminal Conduct Act
- Iowa Code § 708.7 (harassment)

and torts including:

- Rights violations for which § 1983 provides a right of recovery
- Defamation (libel per quod)
- Unjust enrichment.

5. Tortious acts and crimes performed by State (including local) officials in Ames back in 2006 and 2009 have haunted me since, significantly contributing to my PTSD. The hardships and injuries I suffered during the subsequent years of homelessness would not have occurred had the defendant not performed the tortious acts and crimes. The suffering I endure, including during the time of homelessness and subsequently (including ongoing), constitute a continuing injury for which the the State of Iowa is liable.

6. The fact that the State performed these actions and then (thus far) denied redress for harms done represents a current and ongoing threat to protected classes of Iowans, who, if and when such crimes and injuries occur in the future, now know and likely fear, as I do, that they may deliberately harmed by the state and then left without redress. Furthermore, the current denial of redress ensures transgender Iowans who were and are harmed by recent state actions will continue to suffer from injuries sustained, and not be provided redress. It appears that the State's current position is that officers, agencies, judges, legislators, and the Governor may knowingly and willingly violate the rights of Citizens, cause severe harm, then unjustly deny redress via wantonly applying various forms of immunity to the state and state (including local) officials. These denials of a our rights to a fair trial, to due process rights, to the right to redress,

and to the right of recovery amounts to extrinsic fraud⁴ performed by the State. If a standing ruling(s) is being used to deny Citizens redress, justice demands such rulings be overturned.

7. ¶ 4 of the court's ruling states, “[T]he defendant has summarized in its motion (which is not objected to by the plaintiff), the plaintiff’s claims can be distilled down to the following [twelve counts].” However, within my resistance (D0032 ¶ 45) to State's motion to dismiss, I pointed out that the state omitted sixteen claims and crimes not mentioned by the defendant. I do in fact object to the State's list of counts, which were not exhaustive, and was under the impression that such objection was implied via the recount within my resistance.

8. One of the reasons given for dismissing my suit was that I did not exhaust all possible administrative remedies due to not withdrawing my claim from the Attorney General's Office prior to filing suit, as required by the Iowa Tort Claims Act. Within my Amended Petition (D0030 ¶¶ 6–9) and Resistance (D0032 ¶¶ 2–3 and 58–59), I pointed out that, as a full-time student who could not afford an attorney, I did my best to navigate Iowa's extremely complex legal system and exhaust all administrative remedies, including filing with the:

- Iowa Judicial Qualifications Commission;
- Attorney Disciplinary Board;
- Iowa Civil Rights Commission
- Office of the Ombudsman;
- Ames Police;

4 Fraud which has prevented a party from having a trial, from presenting all his case to the court, or has so affected the manner in which the judgment was taken that there has not been a fair submission of the controversy of the court. *Farley v Davis*, 10 Wash 2d 62, 116 P2d 263, 155 ALR 1302 (Ballantine's Law Dictionary 3rd Ed.)

- Story County Attorney's Office;
- Two departments within the Iowa Attorney General's Office (*Victim's Services* and *Fraud*), and
- Calling the State Appeals Board to request a status report with regard to my claim (which was not responded to), prior to filing suit.

For the one administrative remedy I missed, I requested the opportunity to fulfill this requirement prior to resuming the suit. If the Aug. 21 ruling is not reversed, the fact that the court ruled “with prejudice” would unfairly permanently bar me from receiving redress even if I were to fulfill this one missed step and then refile. If the court does not reverse the dismissal, I request that, at the very least, the court changes the ruling to “without prejudice” in order to provide me the opportunity to fulfill that last administrative remedy prior to re-filing, if re-filing is still necessary.

9. The court's ruling pointed out the following reasons given by the defendant used to justify ordering the dismissal:

- i. Federal criminal statutes do not create a private right of action;
- ii. The acts of the Iowa legislative branch in passing a statutory amendment, or that of the executive branch in appealing a court decision, do not constitute either an act of violence or unspecified unlawful activity which would trigger a claim under either Iowa Code §729A or §706A;
- iii. The state is not a person for purposes of a claim brought pursuant to 42 U.S.C. §1983; s
- iv. The plaintiff has failed to exhaust her administrative remedies under the Iowa Tort Claims Act;²
- v. Plaintiff’s negligence claim regarding the regulation of attorneys pursuant to the Iowa Rules of Professional Conduct is barred by the public duty doctrine;

vi. Plaintiff's claims for defamation, fraudulent misrepresentation and due process violations are barred by the doctrine of sovereign immunity; and

vii. Plaintiff's abuse of power claim is barred by the doctrine of judicial immunity.

The court then wrote that "Plaintiff does not reply to the defendant's arguments with any of her own supported by contrary controlling precedent", then listed seven broad summaries of my arguments which did not accurately reflect some of the most crucial parts of my arguments. Within those, for number five, the court wrote, "her failure to exhaust her administrative remedies should be excused because of the 'spirit of the law' doctrine". The court did not include mention of my citing of *Case v. Olsen* 14 N.W.2d 717,234 Iowa 869, wherein the court 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..." Had the spirit of the law been applied, the resulting ruling would have been different. The court mistakenly stated that I did "not reply to the defendant's arguments with any of her own supported by contrary controlling precedent" when in fact I did respond with controlling precedent.

10. Within the Aug. 21 ruling, Your Honor, you wrote that you were "duly advised in the premises." This brings concern to me that whoever gave such advice may have been directly involved in the torts and crimes committed by the defendants, and/or may have had an interest in the suit being dismissed. If so, this would constitute a violation of Iowa Code. Jud. Cond. 51:2.9. Therefore I respectfully request the identity of the advisor(s).

11. Even if a statute does not provide a right of recovery, Citizens still have a natural right of recovery to the various injuries which harmed me.

Motion to reconsider ruling of dismissal with prejudice

12. I respectfully request the court to reconsider the Aug. 21 motion to dismiss. Here I will seek to controvert each of the defendant's arguments, and to show the court that the suit ought in fact moved forward, as a matter of law.

1.) Although federal criminal statutes do not create a private right of action, victims to such crimes are entitled to restitution and punitive damages

13. Although federal criminal rights statutes do not necessary create a private right of action, Citizens have a right to file a penal action in order to prove a crime which was not prosecuted by the state (or federal government) ought to be. If a plaintiff can show they were a victim of the crime, they may be entitled to restitution and punitive damages. Punitive damages may be recovered in Iowa with a showing by “clear, convincing, and satisfactory evidence” that “the conduct of the defendant from which the claim arose constituted willful and wanton disregard for the rights or safety of another.” Iowa Code § 668A. During the proceedings, I intend to show the court such evidence, although prima facie it is apparent aforementioned federal and state criminal statutes were in fact violated. I never claimed that criminal statutes cited in my petition provided for a private right of action; I did, however request punitive damages and multiple fitting equitable remedies due to the defendants' violations of Iowa Code Chapter 729A (hate crimes), § 708.7 (harassment), and 18 U.S. Codes §§ 241-242.

2. The State of Iowa's legislative and executive branches knowingly and willingly, in a premeditated manner, violated the rights of a class of Citizens explicitly protected by the Iowa Civil Rights Act (ICRA) and Civil Rights Act; § 1983 and ICRA provide a right of recovery

14. The government's position has been that plaintiffs may not sue in federal courts for § 1983 due to the 11th Amendment, which provides sovereign immunity to the state. However, the

11th Amendment provides no mention of immunity from federal suits by Citizens whose rights are violated by their own state. This was pointed out within my resistance (D0032 ¶ 61-66). The 11th Amendment was created to prevent states from being sued by citizens of other states or foreign countries. It was a response to the Supreme Court's 1793 decision in *Chisholm v. Georgia*, which ruled that citizens of one state could sue the government of another state in federal court. The amendment was proposed by Massachusetts Senator Caleb Strong after the Supreme Court ruled that a South Carolina citizen could sue Georgia for unpaid debts from the War of Independence. Georgia claimed that federal courts could not hear suits against states, but the Supreme Court ruled otherwise.⁵ The legislative intent of the 11th Amendment was not to bar suits in federal courts against their own states, nor was it to bar federal laws being employed in state courts by citizens of the state.

15. The cases cited by the defendant relied on obscure misinterpretations of the Eleventh Amendment, which gives no indication of sovereign immunity to states within its text, “**The Judicial power of the United States shall not be construed to extend to any suit in law or equity, commenced or prosecuted against one of the United States by Citizens of another State, or by Citizens or Subjects of any Foreign State.**” There is neither mention nor implication of sovereign immunity, nor of suits in federal courts against states.

16. Although current standing rulings have been used to bar federal suits for civil rights claims against states (by Citizens of those states), I have found no rulings which bar suits against the state for § 1983 claims wherein the state fails to hold itself accountable. If the Aug. 21 ruling is not reversed, it appears my only option will be to seek a third party (federal

⁵ “Mt. Healthy City Board v. Doyle.” *Encyclopædia Britannica*, Encyclopædia Britannica, inc., www.britannica.com/topic/Mount-Healthy-City-Board-of-Education-v-Doyle. Accessed 7 Sept. 2024.

government) to adjudicate. I trust the State of Iowa would not put its Citizens (taxpayers or victims of civil rights violations) in such a position, especially in light of the fact that such of a suit would amount to significantly (and unfairly) higher cost to Iowa's taxpayers.

17. The defendants ought be held liable for aforementioned torts, and they ought be held accountable for aforementioned crimes. I object to the defendant's position that it is not; denying my rights to due process, to a fair trial, to redress, and to recovery *de facto* amount to extrinsic fraud.

3. The state is in fact a person, and is liable according to the doctrine of respondeat superior

18. The state argued that it is not a “person” for the purposes of a claim brought pursuant to 42 U.S.C. §1983, relying on *Will v. Mich. Dept. of State Police*, 491 U.S. 58, 68-69 (1989); *Quern v. Jordan*, 440 U.S. 332, 345 (1979); *Kruger v. Nebraska*, 820 F.3d 295, 302 (8th Cir. 2016). In *Will v. Mich. Dept. of State Police* , the claims court ruled that respondents were persons for purposes of § 1983. The Court of Appeals, however, vacated the judgment, holding that a State is not a person under § 1983. The Michigan Supreme Court granted discretionary review agreed that the State itself is not a person under § 1983, but held that a state official acting in his or her official capacity also is not such a person. The Michigan Supreme Court's recent (1979) rogue holding that a State is not a person under § 1983 conflicts with a number of state and federal court decisions to the contrary. The courts in the following cases have taken the position that a State is a person under § 1983. See *Della Grotta v. Rhode Island*, 781 F. 2d 343, 349 (CA1 1986); *Gay Student Services v. Texas A&M University*, 612 F. 2d 160, 163-164 (CA5), cert. denied, 449 U. S. 1034 (1980); *Uberoi v. University of Colorado*, 713 P. 2d 894, 900-901 (Colo. 1986); *Stanton v. Godfrey*, 415 N. E. 2d 103, 107 (Ind. App. 1981); *Gumbhir v.*

Kansas State Bd. of Pharmacy, 231 Kan. 507, 512-513, 646 P. 2d 1078, 1084 (1982), cert. denied, 459 U. S. 1103 (1983); *Rahmah Navajo School Bd., Inc. v. Bureau of Revenue*, 104 N. M. 302, 310, 720 P. 2d 1243, 1251 (App.), cert. denied, 479 U. S. 940 (1986).

19. There was no mention within cases cited by the defendant of the fact that states are in fact “persons” according to longstanding legal interpretation. This was pointed out in ¶ 55 of my resistance. The type of artificial person which defines a state is “body politic and corporate”,

- “The government of certain political subdivisions, including towns, cities, and counties,” (Black's Law Dictionary 10th Ed.).
- “A term often applied to a municipal corporation. A county is such a body. *Waterbury v Board of Comrs.* 10 Mont 515, 26 P 1002,” (Ballantine's Law Dictionary 3rd Ed.).
- “The term is particularly appropriate to a public corporation invested with powers and duties of government. It is often used... to designate the state or nation or sovereign power, or the government of a county or municipality, without distinctly connoting any express and individual corporate character. *Munn v. Illinois*, 94 U. S. 124, 24 L. Ed. 77; *Coyle v. McIntire*, 7 *Houst.* (Del.) 44, 30 *Atl.* 728, 40 *Am. St. Itep.* 109; *Warner v. Beers*, 23 *Wend.* (N. Y.) 122; *People v. Morris*, 13 *Wend.* (N. Y.) 334.

The state is in fact a person, including in context with § 1983 claims, despite the fact that a few recent rogue rulings have attempted to warp this fact in order to unfairly shield states from liability for civil rights violations. It appears that the State of Iowa and other states shielding themselves unlawfully, throughout fraudulent means, are attempting to unconstitutionally operate a *de facto* confederacy via shielding themselves from federal law. If states want to avoid liability for civil rights violations, a better way is for governments and government officials to do this is to not violate the rights of Citizens.

20. It is in the public interest, and therefore the state's interest, not to violate the rights of Citizens. It is a conflict of interest for the state to violate the rights of Citizens.

21. The interests in "[E]nd[ing] a continuing violation of federal law," *ibid.*, outweigh the

interests in state sovereignty and justify an award under § 1983 of an injunction that operates against the State's officers or even directly against the State itself. See, e. g., *Papasan*, supra, at 282; *Quern v. Jordan*, 440 U. S. 332, 337 (1979); *Milliken v. Bradley*, 433 U. S. 267, 289 (1977).

4. The state's requirement for Citizens to withdraw their claims prior to filing suit is both arbitrary and capricious, and ought to be struck down as unconstitutional.⁶

22. See ¶ 8.

23. The state's requirement to withdraw one's claim prior to filing suit is both arbitrary and capricious. The only reason to withdraw a claim is to indicate to the claimee that one no longer holds the claim and therefore nothing is owed. For example:

- When filing against a private party, one does not file a claim and then withdraw it prior to filing suit, as doing so would indicate that nothing is then owed.
- Withdrawing a claim with the VA means that the claim is treated as if it was never filed.
- The IRS will treat withdrawn claims as if they were never filed.

In general, a claim remains filed and in force throughout the duration of lawsuits, and is never withdrawn unless to indicate to the claimee that the claimant no longer wishes to pursue the claim, or that the claim is not owed. The state could easily provide a final disposition without arbitrarily requiring Citizens to withdraw a perfectly valid claim. Withdrawing a claim is not standard practice in general. It appears that, in this case, this strange requirement is used to trip up plaintiffs in order to provide the state an excuse to shirk liability. I would be greatly surprised if other Iowans have not been unfairly been barred from having their cases moved forward due this arbitrary and capricious “requirement” which appears prima facie as a form of trickery.

⁶ The plaintiff acknowledges these lapses in her petition. D0030, Plaintiff’s Amended Petition at ¶¶4-6 (7/23/2024).

5. My negligence and reckless endangerment claims regarding the insufficiency of Iowa Rules of Professional Conduct, which enables attorneys to easily defraud clients, are not barred by the public duty doctrine

24. The public duty doctrine is “The rule that a government entity cannot be held liable for an individual plaintiff’s injury resulting from a government officer’s or employee’s breach of a duty owed to the general public rather than the individual plaintiff,” (Black’s Law Dictionary). Although State BAR attorneys are considered officers of the court, they are not considered a government officer or employee. Therefore the defendant appears to be referencing Iowa’s legislative and executive branches who authorized the code. The state has a duty to protect the public, including private Citizens who depend upon and trust attorneys to act in good faith based upon the fiduciary relationship between them. The state has a duty to ensure fiduciaries act in good faith, and that they are held accountable should a breach of duty and/or trust occur. This duty is owed to the public, and therefore it is the public duty of the state to amend the Iowa Rules of Professional Conduct to ensure the safety of all Iowans.

25. It is considered a matter of law that a plaintiff was not harmed, they do not have standing to sue. I was in fact harmed, and therefore I do have standing. I requested a reasonable equitable remedy to ensure the general public is safeguarded against the same and similar types of fraud which harmed me. My suit has brought this pitfall to the state’s attention. I requested a reasonable demand. It would represent malfeasance (or at the very least, nonfeasance) on the part of the state to continue to recklessly endanger the public via choosing not to amend the rules to protect attorney-clients against fraud.

6. My claims for defamation, fraudulent misrepresentation and due process violations are not barred by the doctrine of sovereign immunity

26. The state ought not have sovereign immunity from suits filed by its own citizens for situations in which state (including local) agencies and/or officials violate their rights and cause them harm. This was clearly expressed within my resistance (§§ 61-66), which showed hard evidence that the nation's founders and some of its greatest leaders clearly opposed and resented the concept of sovereign immunity as was practiced against the colonies by 18th century England, which appears to now wrongly being applied in the same manner by various states. Within the Aug. 21 ruling, the court wrongly dismissed the great significance of the passages and quotes I shared on this topic within my resistance, downplaying them as mere “[P]assages in a treatise that appear to support some loosely-based concept of equity.”⁷

27. In the ruling, the court also wrote, “It would unnecessarily lengthen this ruling by addressing each one of the defendant’s positions as expressed in its motion point by point.” I object, and contend that the remedies I sought were reasonable demands designed to remedy and prevent the exact and similar types of injuries and rights violations from happening to other citizens. The remedies I request from the court are reasonable demands which perfectly align with irreparable-injury rule and the principles of equity.

7. My abuse of power claim is not barred by the doctrine of judicial immunity, as such immunity does not extend to the state

28. First, I object to the holding within the 1967 ruling *Pierson v. Ray*, 386 U.S. 547, 553-54, “[Judicial] immunity applies even when the judge is accused of acting maliciously and corruptly, and it ‘is not for the protection or benefit of a malicious or corrupt judge, but for the benefit of the public, whose interest it is that the judges should be at liberty to exercise their functions with independence and without fear of consequences.’” Within *Pierson*, there

⁷ In the Aug. 21 ruling.

was no evidence shown that this finding in fact benefits the public. The public never voted on whether or not we want “absolute immunity” for judges; rather, the concept was imposed upon us without our consent. Much as with the *Will* ruling, *Pierson* represents a recent rogue ruling which contradicts basic principles of justice and the intent of the founders, as thoroughly discussed within my resistance.

29. Additionally, Citizens never voted on whether or not such immunity should extend to states. Citizens generally do not want state officials to violate our rights, and then to be left harmed and unfairly denied redress. If judges are given immunity by the state, the state ought to be held liable for harm done to citizens who are wrongly harmed by judges – especially for malicious acts.

30. I was harmed by a multiple malicious acts by the same judge, and the state ought to be held liable. The fact that an Ames Police officer warned to leave the state for my safety due to malicious intent toward me in which he was knowledgeable of due to what he was hearing about me from “behind the scenes” from multiple other government officials proves that local officials, including the judge, acted with malice toward me. The fact that Judge Van Marel ordered Officer Marshall to arrest me in 2006 showed collusion between members of the executive and judicial branch, and a clear violation of separation of powers.

8. Although the invocation of Iowa Rule of Appellate Procedure 6.901(3) was used to call into question the constitutionality of various sections of the Iowa Torts Claim Act, which the court deemed inappropriate for use in the trial court, the general principle remains that the various sections challenged are in fact grossly unconstitutional

31. I challenge the various sections of the Iowa Tort Claims Act discussed within ¶¶ 38-44 as unconstitutional.

32. If Iowa Rule of Appellate Procedure 6.901(3) did not read “or other proceeding” I

would not have cited it. Due to the way it is written, and because I did not find an equivalent for Federal Rules of Civil Procedure 5.1 *Notice of Constitutional Question* within the Iowa Rules of Civil Procedure, I cited the closest rule within the state which appeared to apply. If the state had a rule within the Iowa Rules of Civil Procedure which were the equivalent, I would have cited that. The principle of the matter, however, that the sections of law I challenged are in fact unconstitutional, outweigh a harmless procedural error caused by what appears to be a missing rule from within the Iowa Rules of Civil Procedure.

Your Honor, I request a reversal of your Aug. 21 ruling, lest continuing injuries caused by the state continue to harm me and other Iowans, both now and in the future.

If the court is unwillingly to change the ruling for whatever reason, I request the court to change the “with prejudice” determination to “without prejudice” in order to give me an opportunity to refile in the future. Dismissing this case with prejudice would result in various continuing injuries to continue to cause harm and undue suffering to me.

I request the court to strike down the various sections of the Iowa Tort Claims Act, including the arbitrary and capricious requirement for claimants to withdraw their claims prior to filing suit. Due to the fact that standing rulings appear to have caused this case to be dismissed unjustly, I request Iowa's judiciary to evaluate the following and make such a determination: “If a standing ruling, if applied, would cause a suit to unjustly be dismissed, the ruling shall not be applied to that case and ought be re-evaluated and overturned.”

Respectfully and with enduring trust and faith in the future of our beloved State of Iowa,
Alexandra Wilson

Dated: 9/7/2024

 /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 USPS or by email asap. I declare under penalty of perjury that the foregoing is true and correct.

 /s/ Sondra Wilson