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Polk County District 5 Court  
c/o Clerk of Court  
500 Mulberry Street  
Des Moines, IA 50309  
(515)-286-3772

**Petition to commence a civil action for *Wilson v. RELIABLE STREET INC, et al***

Your Honor, et al:

I, Alexandra Wilson, the Plaintiff, hereby submit this petition to commence a lawsuit against the following five Defendants, who may reasonably be contacted at 4625 Reliable St, Ames, IA 50014.

- RELIABLE STREET INC (nonprofit organization in Ames, IA)
- LOCKWOOD CAFE (business in Ames, IA)
- Ms. Lyndsay Nissen (President of Reliable Street, Inc.)
- Ms. Sharon Stewart (Owner of Lockwood Cafe and Vice President of Reliable Street, Inc.)
- Ms. Willa Colville (Employee or former employee of Lockwood Cafe)
- Ms. Denise Martinez (Employee or former employee of Lockwood Cafe)
- Charlie Esker, (co-conspirator)

The nature of this action involves the torts of discrimination, fraud, promissory estoppel, and multiple acts of defamation (libel per se) against me.:

- Between October 2021 and March 31, 2022 I performed approximately 6 months labor volunteering for RELIABLE STREET INC, including gardening, prairie restoration, and helping to run open mic . Defendant Nissen, President of RELIABLE STREET INC, entered into an agreement with me to help manage the garden located on the premises, and to lead a prairie restoration project I proposed. The agreement included my continued labor throughout the growing season.
- In March 2022 Defendants Colville and Martinez, LOCKWOOD CAFE employees, submitted defamatory statements against me to Defendant Ms. Sharon Stewart, Owner of LOCKWOOD CAFE. Stewart relayed statements to Nissen, causing Nissen to bar me from the premises, thus violating our agreement. I would not have performed six months of labor had I known our agreement would be violated.
- On April 29 2022 I filed a complaint with the Iowa Civil Rights Commission (ICRC) against RELIABLE STREET INC and LOCKWOOD CAFE for discriminating against me based on my gender identity; a non-transgender women complained about a transgender woman “violating her space”. Businesses summarily judged with without

investigating, asking questions, or offering opportunity for corrective action (there was not corrective action to take because that which I was accused of did not occur). No information other than “violating a woman's space” and “bombarding people with text messages” was given to me as reasoning for barring me from the premises. Neither accusation held merit.

- In August 2022 I received notice from ICRC that they were administratively closing (choosing not to investigate) my case. ICRC's reasoning pointed to approximately ten libelous statements submitted to them by all Defendants, who appear to have conspired against me in retaliation for filing against the businesses. Stewart submitted a falsified document to ICRC, presumably created and given to her by Ms. Colville. I suspect Ms. Colville commit fraud on behalf of LOCKWOOD CAFE. Defamatory statements severely damage my reputation, economically impact me, and jeopardize my safety throughout Ames due to common prejudices and misconceptions against transgender women. They were so severe they amount to a classification of defamation called character assassination. I was accused of stalking and harassing Ms. Colville, harassing multiple LOCKWOOD CAFE employees, saying racist comments, and other unsavory accusations I can prove to be false.

#### JURISDICTION:

This Court has jurisdiction over the subject matter of this action as due to the fact that the falsified evidence and fraudulent statements against me were submitted into the public record through the Iowa Civil Rights Commission, which is located within the jurisdiction of Polk County District 5.

#### CLAIM FOR RELIEF:

I am seeking damages to compensate me for:

- injuries to my reputation caused by extremely damaging statements and fraudulent document(s) being entered into the public record against me, Iowa Code §714.8 states that any person who “makes any entry in... any public records... knowing the same to be false,” is guilty of fraud. All five Defendants commit fraud against me.
- emotional pain and suffering caused by statements made against me, and the fear I lived with following the political attacks.
- six months labor (approximately 20 hr/day) on behalf of RELIABLE STREET INC which I would not have performed had I known our agreement would be breached. My labor and generosity was exploited.
- Labor performed between March 31, 2022 and [current date] in relation to building, filing, and representing this case pro se.
- breach of the agreement between myself and RELIABLE STREET INC.

I declare under penalty of perjury that the foregoing is true and correct.

Alexandra Distance Marie Wilson

