

## Petitioners

Kaylana Hoadley 194 S Grover Ave #405 Mason City, IA  
50401

Victoria Whitten 500 Kirkwood Ave  
DSM IA 50315

"Sondra"

Alexandra Distance Marie Wilson  
4733 Toronto St. #112  
Ames, IA 50014

Amelia Curell  
3020 Regency CT  
Ames, IA 50010

RECEIVED  
MAR 31 2025  
CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA

## NOTICE OF CLASS ACTION LAWSUIT:

If you are a transgender Iowan who is concerned that you have been and/or may be harmed in the future and left without legal recourse as a result of the State of Iowa passing of SF 418 (removal of civil rights protections from the Iowa Civil Rights Act) email WildWillpowerPAC@gmail.com with "CLASS ACTION" written in the subject line.

This Petition, commencing a Class Action Lawsuit on behalf of transgender Iowans who have been adversely impacted via numerous successive State Actions, performed by various conspirators acting under unlawfully under Color of Authority, will not be completed until after the CRIMINAL COMPLAINT is finished. The facts for the Complaint and this Class Action are very similar, so once the Complaint is finished, the facts will be copied and then pasted into this Petition. Therefore, although it looks like this Petition is not even close to being finished, that is not the case.

**United States District Court  
for the  
Southern District of Iowa**

**[Names of Plaintiffs]**

*Petitioners,*

v.

Donald Trump, Kim Reynolds, Brenna Bird, Christopher Deist, Kevin Alons, Mike Bousset, Doug Campbell, Mark Costello, Dan Dawson, Rocky De Witt, Adrian Dickey, Dawn Driscoll, Lynn Evans, Julian Garrett, Jesse Green, Kerry Gruenhagen, Dennis Guth, Mike Klimesh, Carrie Koelker, Tim Kraayenbrink, Mark Lofgren, Charli McClintock, Mike Pike,

**CASE NO.** \_\_\_\_\_

**PETITION and MOTION FOR  
LEAVE TO AMEND**

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Jeff Reichman, David Rowley, Ken Rozenboom, Sandy Salmon, Jason Schultz, Annette Sweeney, Tom Shipley, Dave Sires, Jeff Taylor, Kara Warne, Scott Webster, Cherielynn Westrich, Jack Whitver, Dan Zumbach, Jerry Behn, Brett Barker,, David Blom, Jane Bloomingdale, Brooke Boden, Jacob Bossman, Steven Bradley, Mark Cisneros, Taylor Collins, Tom Determann, Zach Dieken, Jon Dunwell, Samantha Fett, Dean Fisher, Jason Gearhart, Dan Gehlbach, Thomas Gerhold, Cindy Golding, Pat Grassley, Bill Gustoff, Helena Hayes, Robert Henderson, Christian Hermanson, Steven Holt, Heather Hora, Thomas Jeneary, Craig Johnson, Megan Jones, Bobby Kaufmann, Barb Kniff McCulla, Shannon Latham, Judd Lawler, Shannon Lundgren, Joshua Meggers, Ann Meyer, Gary Mohr, Tom Moore, Carter Nordman, Matthew Rinker, Mike Sexton, Jeff Shipley, Brent Siegrist, Travis Sitzmann, Jennifer Smith, Ray Sorensen, Henry Stone, Mark Thompson, Charley Thomson, Mike Vondran, Ryan Weldon, Sam Wengryn, Skyler Wheeler, Craig Steven Williams, John Wills, John Wilz, Matt Windschitl, Devon Wood, Derek Wu If, David Young, REPUBLICAN PARTY OF IOWA, REPUBLICAN NATIONAL COMMITTEE, and John and Jane Doe(s), *et al.*

*Respondents.*

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COMES NOW Petitioner, *pro se*, as a member of a class of persons protected against discrimination by the Civil Rights Act) and respectfully bringing this class action lawsuit pursuant to Fed. R. Civ. P. 23, against the Respondents, for violations of Congressionally-created rights secured by the Medicaid and Medicare Act and guaranteed under the Ninth Amendment of the Constitution of the United States.

### **Right of Recovery – 1985 and 1964 Claims**

1. 42 U.S.C. § 1985 *Conspiracy to Interfere with Civil Rights*, subsection (3) “Depriving persons of rights or privileges”, sets forth, “If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another,<sup>1</sup> for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived

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<sup>1</sup> e.g. public property, such as the Iowa State Capitol, for example.

42 U.S.C. § 1985 provides a right of recovery for legally injured parties. Plaintiff is a member of a class of persons injured in effectively the same manner.

### **§ 1985 Claim**

42 U.S. Code § 1985 - Conspiracy to interfere with civil rights

(3) Depriving persons of rights or privileges

If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

### **United States Code Title 42 § 1986 Action for Neglect to Prevent**

**42 U.S.C. § 1986:** Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title (Conspiracy to Interfere with Civil Rights), are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action....

### **Federal Rule of Civil Procedure, Rule 24 – Intervention of Right**

**Note from Author:** This rule could be used as part of a “code combo”. For example, “Your Honor, I claim an interest relating to this action. I have an unconditional right to intervene due to

the federal statute 42 U.S.C. § 1986 Action for Neglect to Prevent. If I do not intervene, I could be charged with 42 U.S.C. § 1985(3) Conspiracy to Interfere with Civil Rights. Pursuant to subsection (a), the Court must permit this intervention.”

Fed. Rule 24: (a) **Intervention of Right.** On timely motion, the court must permit anyone to intervene who:

(1) is given an unconditional right to intervene by a federal statute; or

(2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest.

(c) Notice and Pleading Required. A motion to intervene must be served on the parties as provided in Rule 5. The motion must state the grounds for intervention and be accompanied by a pleading that sets out the claim or defense for which intervention is sought.

## **§1964. Civil remedies**

(a) The district courts of the United States shall have jurisdiction to prevent and restrain violations of section 1962 of this chapter by issuing appropriate orders, including, but not limited to: ordering any person to divest himself of any interest, direct or indirect, in any enterprise; imposing reasonable restrictions on the future activities or investments of any person, including, but not limited to, prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in, the activities of which affect interstate or foreign commerce; or ordering dissolution or reorganization of any enterprise, making due provision for the rights of innocent persons.

(b) The Attorney General may institute proceedings under this section. Pending final determination thereof, the court may at any time enter such restraining orders or prohibitions, or

take such other actions, including the acceptance of satisfactory performance bonds, as it shall deem proper.

(c) Any person injured in his business or property by reason of a violation of section 1962 of this chapter may sue therefor in any appropriate United States district court and shall recover threefold the damages he sustains and the cost of the suit, including a reasonable attorney's fee, except that no person may rely upon any conduct that would have been actionable as fraud in the purchase or sale of securities to establish a violation of section 1962. The exception contained in the preceding sentence does not apply to an action against any person that is criminally convicted in connection with the fraud, in which case the statute of limitations shall start to run on the date on which the conviction becomes final.

(d) A final judgment or decree rendered in favor of the United States in any criminal proceeding brought by the United States under this chapter shall estop the defendant from denying the essential allegations of the criminal offense in any subsequent civil proceeding brought by the United States.

## **Facts**

1. Definitions for all terms which appear emboldened may be found within the Glossary of Terms.

2. All named defendants, and likely some unnamed, are **conspirators**. All such conspirators may also be referred to as **co-conspirators**.

3. Co-conspirators conspired and continue to conspire in order to violate the rights of, and cause **personal injuries** to, a class of persons currently protected against discrimination by the

Iowa Civil Rights Act (ICRA), Civil Rights Act (CRA),<sup>2</sup> Equality Clause<sup>3</sup> ( of the Iowa Constitution, Equal Protections Clause of the Fourteenth Amendment, and American Common Law.

4. The Iowa Civil Rights Act, modelled after the Civil Rights Act, is designed, in part, to provide **remedies** to civilians who may become adversely impacted via discriminatory acts: against discrimination in the areas of employment, housing, credit, education, and public accommodations. On March 8, 2019 the Iowa Supreme Court found, in Good and Beal v. Department of Human Services (2018), that (1) surgeries for transgender persons are in fact medically necessary, and (2) the Iowa Civil Rights Act prohibits discrimination against transgender persons from being able to receive access to Medicare or Medicaid. The Medicare and Medicaid Act guarantees that all US Citizens have the rights (1) to be treated with courtesy, dignity and respect at all times, (2) to be protected from discrimination, (3) to have personal and health information kept private, and (4) to have access to doctors, specialists, and hospitals for medically necessary services (Medicare.gov).

5. Co-conspirators have been working to violate all rights, deny access to all remedies at Law and Equity, and related Lawful Protections mentioned in 3; simultaneously, Defendants

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<sup>2</sup> The Supreme Court ruled, in Bostock v. Clayton County, Georgia, 590 U.S. \_\_\_, 140 S. Ct. 1731 (2020), that Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination based on sex, also prohibits discrimination based on sexual orientation and gender identity.

<sup>3</sup> When Alexander Clark sued the Muscatine Board of School Directors [*Clark v. Bd. of Sch. Dirs.*, 24 Iowa 266, 277 (1868)] so that his daughter, Susan, could attend the all-white public schools, the Iowa Civil Rights Act was not yet written, and there was no precedent for Clark to cite in Court. Therefore he relied heavily upon the Equality Clause of the Iowa Constitution. The Court articulated, in their ruling favorable to *Clark* (and all Iowans), that discrimination against categories of persons not even mentioned in today's Iowa Civil Rights Act, are in fact prohibited. The Court wrote that discrimination against someone based on their, "[N]ationality, religion, color, clothing or the like," is prohibited. *Clark* demonstrates that Iowa's legal protections extend beyond the **positive law**,



have actively worked to foster a political culture filled with fear and distrust of government throughout the State of Iowa, United States, and beyond which is hostile toward the protected class (victims). The REPUBLICAN PARTY OF IOWA, REPUBLICAN NATIONAL COMMITTEE, and STATE OF IOWA appear *prima facie* to be racketeering-influenced corrupt organizations (**RICO Laws**) used by co-conspirators to extort funds toward unlawful ends; all three organizations must be purged of any and all apparent and hidden infiltration, wherever it may lie. Special Elections may be required in order to fill necessary Governmental roles. There are likely other racketeering-influenced corrupt organizations involved whom prosecutors may become aware of during investigations; such organizations, and individuals involved, shall be added as defendants.

6. Shortly after the *Good* ruling, on May 3, 2019, numerous co-conspirators enacted HF 766, which included, on page 84, “Division XX”. This provision, subversively slipped into the lengthy bill, was devised to authorize the State of Iowa to deny medically-necessary services to the victims in this case, setting forth: “This section shall not require any state or local government unit or tax-supported district to provide for sex reassignment surgery or any other cosmetic, reconstructive, or plastic surgery procedure related to transsexualism, hermaphroditism, gender identity disorder, or body dysmorphic disorder.” Countless medically-necessary procedures for transgender Iowans were cancelled as a result. The enactment of HF 766/Div. XX, while knowingly and willingly violating the clearly-established rights of a class of persons via doing so, constituted a violation of the 18 U.S. Code §§ 241, 242; these **unenumerated rights** are facially secured by the Medicare and Medicaid Act and guaranteed by the Ninth Amendment.

7. In November 2021, Judge William Kelly struck down the HF766 provision, rightly pointing out that it was "discriminatory and unconstitutional", and that it "violates the Iowa Constitution and the Iowa Civil Rights Act".<sup>4</sup> Following the Iowa District court's 2018 ruling, Kim Reynolds' spokesperson stated that Ms. Reynolds was "disappointed in today's decision and disagrees with the district court's ruling on Medicaid coverage for transgender reassignment surgeries," and that were "reviewing the decision with our legal team and exploring all options [with regard to violating the rights of transgender Iowans] moving forward."<sup>5</sup> This statement, in conjunction with the repeated efforts toward the ends of violating the rights of transgender Iowans, indicates prejudice, discrimination, malice, premeditation, and animus by the various defendants, against their intended and *de facto* victims.

8. The ACLU of Iowa challenged HF 766/Div. XX in *Vasquez and Covington v. Department of Human Services* (2023). Meanwhile, transgender Iowans waited for the Court to rule a second time on the same issue, unable to schedule appointments for years as a result of continuing rights violations perpetrated by the defendants. In spring 2023 the Iowa Supreme Court declined to issue a ruling, however, pointing out that this issue had already been decided in *Good*, and that legal protections for persons based on their gender identity, as found in the Iowa Civil Rights Act, prevented the STATE OF IOWA from denying coverage.

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<sup>4</sup> Gruber-Miller, Stephen. (Nov. 22, 2021). *Iowa Can't Block Medicaid Coverage for Gender Confirmation Surgery, Judge Rules*. The Des Moines Register, Des Moines Register. [www.desmoinesregister.com/story/news/politics/2021/11/22/iowa-law-unconstitutional-ban-medicaid-coverage-transgender-transition-gender-confirmation-surgery/8722373002/](https://www.desmoinesregister.com/story/news/politics/2021/11/22/iowa-law-unconstitutional-ban-medicaid-coverage-transgender-transition-gender-confirmation-surgery/8722373002/).

<sup>5</sup> Clark Kauffman, Iowa Capital Dispatch November 22. "Reynolds 'disappointed' in Ruling on Transgender Medicaid Coverage." Iowa Capital Dispatch, 23 Nov. 2021, <https://iowacapitaldispatch.com/2021/11/22/reynolds-disappointed-in-ruling-on-transgender-medicaid-coverage/>.

8. On February 8, 2024, one of the victims in this case, Alexandra “Sondra” Wilson, filed a suit against the STATE OF IOWA and KIM REYNOLDS FOR IOWA, due to numerous acts of defamation, rights violations, and ongoing threats and conspiracy. *See* Attachment A – Amended Petition for case #LACL157953. Judge Huppert wrote incorrect information into the ruling, then ruled according to what he wrote instead of what Ms. Wilson wrote. Then the Iowa Supreme Court denied her right to appeal based upon legal shenanigans which may be explained in detail by this key witness.

9. After repeatedly slandering transgender persons, in collusion with numerous other parties who may be entered into this case as Defendants, after becoming elected, Donald Trump, acting under color of authority, greenlit tortious and illegal state actions which were then performed by numerous Defendants, also acting under color of authority, who became emboldened by Mr. Trump’s illegal, wrongful, collusive acts. Some, but not all, collusive acts, included the issuance of the following Executive Orders (EO) and political threats, nearly immediately following the Presidential inauguration:

- Jan. 20 EO, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government”, Trump falsely claimed that transgender women are “men who self-identify as women”. He then goes on to claim that his administration “[W]ill defend women’s rights and protect freedom of conscience” while in the same breath inciting sex and gender-based harassment against transgender women.
- Jan. 21 EO, “Ending Illegal Discrimination and Restoring Merit-Based Opportunity” rescinded President Truman’s landmark 1965 EO 11246, requiring affirmative action and forbidding federal contractors from discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. Conflating “civil rights protections” with “DEI”, Donald Trump rescinded this landmark civil rights order under the false pretense of promoting “Diversity, Equity, and Inclusion”.
- Jan. 27 EO, “Prioritizing Military Excellent and Readiness”, President Trump tortiously defamed transgender people, accusing them of “[E]xpressing a false ‘gender identity’”

and not living “[A]n honorable, truthful, and disciplined lifestyle.” He wrote, “A man’s assertion that he is a woman, and his requirement that others honor this falsehood.”

The Trump Admin also erased the “T” from LGBT+ related government websites, and scrawled harmful, defamatory language across the tops of HHS, CDC, and other federal websites, directed toward transgender people. Trump has similarly threatened to cut federal funding from universities who don’t comply with his ultimatums. He conflates and mislabels “civil rights protections” with “DEI” in his speeches, then eliminates civil rights protections and threatens safety while repeatedly slandering transgender Americans. The list goes on, and there is likely more behind the scenes which subpoenas may be used to locate and identify, including the identification of additional Defendants

9. Between February 24 and 28, State of Iowa officials rushed a bill through two subcommittees, the Iowa House and Senate, and, within 4 days, to the Governor’s desk. This bill, Iowa Senate File 418, was designed specifically to remove protections against discrimination from transgender people, leaving transgender Citizens without legal recourse, and opening the floodgates to allow open discrimination throughout the state. Upon signing the bill into law, and thus, committing extortion (thus violating 18 U.S.C. § 872), defendant Kim Reynolds, under color of authority, released a statement which clearly indicated the co-conspirators’ motive: to deny medically necessary services to transgender Iowans. Reynolds stated, “[Legal protections in the Iowa Civil Rights Act which prohibit discrimination against transgender Iowans] has... forced Iowa taxpayers to pay for gender reassignment surgeries. That is unacceptable to me, and it is unacceptable to most Iowans.... What this bill does accomplish is to strengthen protections for women and girls, and I believe that is the right thing to do.” Reynolds, under color of law,

violated the rights of a vulnerable class of persons explicitly protected against such discrimination by the Iowa Civil Rights Act and Civil Rights Act.

10. The Court is requested to immediately issue an injunctive protective order to prevent any behind-the-scenes actions targeting transgender persons; these are only some examples.

NOTICE TO GOVERNMENT OFFICIALS AND LAWYERS OF GOOD NATURE:

DUE TO MENTAL AND EMOTIONAL EXHAUSTION, the Author of this document, Sondra Wilson, has stopped, unable to write more into this at this time. We shall file this document as is. Sondra requests to work with Law Enforcement during the investigation, and is willing to finish this document.

## **Damages**

### **Senate File 418**

The Iowa Senate voted 33-15 along party lines to pass the bill.

According journalist ~~Stephen Gruber-Miller~~ **Tim Webber** of the Des Moines Register, the following natural persons, all members of the The Iowa Senate voted 33-15 along party lines to pass the bill.

Alons (R), Bousselot (R), Campbell (R), Costello (R), Dawson (R), De Witt (R), Dickey (R), Driscoll (R), Evans (R), Garrett (R), Green (R), Gruenhagen (R), Guth (R), Klimesh (R), Koelker (R), Kraayenbrink (R), Lofgren (R), McClintock (R), Pike (R), Reichman (R), Rowley (R), Rozenboom (R), Salmon

(R), Schultz (R), T. Shipley (R), Sires (R), Sweeney (R), Taylor (R), Warne (R), Webster (R), Westrich (R), Whitver (R), Zumbach ®

Iowa House members substituted Senate File 418 for House File 583, their version of the gender identity bill, voting on the Senate version.

The House voted 60-36 to pass the measure, with five Republicans, Reps. Michael Bergan of Dorchester, Austin Harris of Moulton, Brian Lohse of Bondurant, Norlin Mommsen of DeWitt and David Sieck of Glenwood joining Democrats in opposition.

Andrews (R), Barker (R), Behn (R), Blom (R), Bloomingdale (R), Boden (R), Bossman (R), Bradley (R), Cisneros (R), Collins (R), Determann (R), Dieken (R), Dunwell (R), Fett (R), Fisher (R), Gearhart (R), Gehlbach (R), Gerhold (R), Golding (R), Grassley (R), Gustoff (R), Hayes (R), Henderson (R), Hermanson (R), Holt (R), Hora (R), Jeneary (R), C. Johnson (R), Jones (R), Kaufmann (R), Kniff McCulla (R), Latham (R), Lawler (R), Lundgren (R), Meggers (R), A. Meyer (R), Mohr (R), Moore (R), Nordman (R), Rinker (R), Sexton (R), J. Shipley (R), Siegrist (R), Sitzmann (R), Smith (R), Sorensen (R), Stone (R), Thompson (R), Thomson (R), Vondran (R), Weldon (R), Wengryn (R), Wheeler (R), Williams (R), Wills (R), Wilz (R), Windschitl (R), Wood (R), Wulf (R), Young (R)

## **Glossary of Terms**

**conspiracy to injure** – A tort that occurs when two or more persons combine to harm someone else, whether physically, mentally, or economically.

**civil conspiracy** – A combination of two or more persons by concerted action to accomplish an unlawful purpose, or a lawful purpose by criminal or unlawful means, to the injury of another.

16 Am J2d Consp § 43. To sustain an action, damage must have resulted from the combination.

To warrant an injunction, damage must be threatened. *National Fireproofing Co. v Mason Builders' Asso.* (CA2 NY) 169 F 253. [1]

A combination of two or more persons acting together to accomplish an unlawful purpose, or to accomplish a lawful purpose by unlawful or criminal means, to the injury of another. To support a cause of action, for civil conspiracy, damage must have resulted from the combination. [2]

An agreement between two or more persons to commit an unlawful act that causes damage to a person or property. [3]

## References

Stephen Gruber-Miller and Tim Webber. (February 28, 2025). *These Iowa lawmakers cast the historic vote to repeal transgender civil rights protection*. Des Moines Register. <https://www.desmoinesregister.com/story/news/politics/2025/02/28/iowa-lawmakers-who-voted-to-repeal-transgender-civil-rights-protections-senate-file-418-hsb-242/80726306007/>.

## Motion for Leave to Amend

XX. Clearly this Petition, designed to commence a Class Action Suit at Law and Equity, is unfinished. Petitioners hereby move to amend this Petition as we work to gather testimonies and additional evidence as well.