

Table of Contents

Section 1 (Exhibits D-1 — D-3): Statements and Documentation sent by Defendants Nissen and Stewart regarding allegations of stalking and harassing Defendant Colville (on or around May–July 2022).	3
Exhibit D-1 — Statement by Defendant Nissen to the ICRC Regarding Allegations Against Plaintiff (on or around May–July 2022).	3
Exhibit D-2 — Stewart’s statement to ICRC re: stalking and harassing Colville (on or around May–July 2022).	5
Exhibit D-3 — Communication Between Plaintiff and Defendant Colville (Original vs. Altered Submission Sent to ICRC).	11
Section 2 (Exhibits D-4 — D-12): Timeline of Text Message Communications and Interactions Between Plaintiff and Defendant Colville (Nov. 22, 2021 – Mar. 17, 2022).	17
Exhibit D-4 — Ms. Colville to Plaintiff, “I consider us friends” (November 22, 2021).	17
Exhibit D-5 — Invitation to Friendsgiving at Lockwood Cafe from Colville to Plaintiff (on or around November 22, 2021).	18
Exhibit D-6 — Colville requests to purchase artwork from Plaintiff (December 17, 2021). ...	19
Exhibit D-7 — Colville requests more text messages from Plaintiff, then concludes the conversation with, ‘Super appreciate you.’” (February 16, 2022).	20
Exhibit D-8 — Plaintiff checks in on Colville, who responds, “I appreciate you so much” (February 22, 2022): approximately one month before the alleged tortious conduct began (March 31).	21
Exhibit D-9 — Colville requests Plaintiff to record her performance (March 8, 2022): approximately two weeks before the alleged tortious conduct began (March 31).	22
Exhibit D-10 — Plaintiff and Colville amicably discussing garden (March 16, 2022): Colville to Plaintiff, “I appreciate you a lot” approximately two weeks before the alleged tortious conduct began (March 31).	23
Exhibit D-11 — Plaintiff sends Colville Nissen’s Venmo to share costs on prairie seeds, as planned (March 17, 2022): Colville responds “Love you <3” (demonstrates friendly relationship and absence of boundary concerns prior to allegations).	24
Exhibit D-12 — Series of writings Lockwood Café employees wrote on Plaintiff’s to-go containers (between 2021 and 2022): cut outs saved by Plaintiff. Several are from Ms. Colville.	25

Section 1 (Exhibits D-1 — D-3): Statements and Documentation sent by Defendants Nissen and Stewart regarding allegations of stalking and harassing Defendant Colville (on or around May–July 2022)

Exhibit D-1 — Statement by Defendant Nissen to the ICRC Regarding Allegations Against Plaintiff (on or around May–July 2022).

¶ 1:

Shortly after this, the big complaints against her came out. The statement from Lockwood Cafe explains this in greater detail. Since I do not work at Lockwood, the employees took their concerns to Sharon Stewart, the cafe owner first. Sharon informed me of the situation and we had a meeting with two employees. The employee expressed that after being sick with pneumonia for a few weeks, she realized she no longer wanted to come to work. Sondra had become quite frankly obsessed with this woman. Coming into the cafe during every shift the woman had, constantly cornering her to talk about Sondra's personal issues and projects. The employee stated that she had started watching for Sondra and if she saw her coming, she would hide in the kitchen until Sondra left. She texted, emailed, anyway she could contact this woman constantly. We had no idea the extent to which Sondra had been stalking and harassing her. I fortunately was in a position where I could actually just walk away from Sondra. I could turn the other direction and leave if I didn't want to talk to her. This employee did not have that luxury.

¶ 2:

At the conclusion of this meeting Sharon and I asked the employees what they needed to feel safe and comfortable again on the property and at work. They both agreed that they felt Sondra should no longer be involved or come to the cafe or events. Being a safe place and community leaders, we have to sometimes exclude a person if they are creating big enough problems that make others decide they can no longer be in the space. It was not a decision we made lightly.

Produced as part of Iowa Civil Rights Commission investigative records.

See **Exhibit A-5** for the complete text of Defendant Nissen's ICRC statement.

Nissen's Statement to ICRC re: stalking and harassing Colville (D-1) — page 1 of 2.

Key Excerpts — Nissen’s ICRC Statement (May–July 2022)

¶1. Nissen alleged the following:

1. Nissen and Defendant Stewart met with Lockwood Café employees regarding complaints about Plaintiff.
(These employees are contextually identified as Defendants Colville and Martinez based on Exhibits A-4, A-5, D, and E.)
2. Plaintiff had allegedly become “obsessed” with Defendant Colville.
3. Plaintiff allegedly came into the café “during every shift the woman had,” “constantly cornering her.”
4. The employee allegedly stated she “started watching for [Plaintiff]” and would hide in the kitchen to avoid contact.
5. Plaintiff allegedly “texted, emailed, anyway she could contact this woman constantly.”
6. Nissen characterized the alleged conduct as “stalking and harassing” the employee.

¶2. Nissen further stated:

7. Two employees (“both employees”) lodged complaints against Plaintiff.
8. The complaints of these employees allegedly led to the decision to bar Plaintiff from the property.

Nissen’s Statement to ICRC re: stalking and harassing Colville (D-1) — page 2 of 2.

Exhibit D-2 — Stewart’s statement to ICRC re: stalking and harassing Colville (on or around May–July 2022).

This excerpt and summary are provided to identify and categorize the specific allegations and statements made by Defendant Stewart regarding Plaintiff during the relevant time period, for comparison with contemporaneous correspondence and witness communications.

¶ 1:

As a regular she began to build friendships with a few of the individuals who work at Lockwood Cafe, including myself. Two individuals in particular had similar interests including gardening

¶ 2:

Shortly thereafter, Willa spoke with me about feeling harassed by Sondra and didn’t know what to do but wanted to talk about it with me. Lyndsay, Denise, Willa, and I sat down for a conversation so we (Lyndsay and I) could better understand what was happening and discuss how to move forward. It was in this conversation that new information relating to how Denise and Willa were being treated that I became concerned for their health and well being while working in my business. I absolutely want to provide a safe space for customers that come to Lockwood, but providing a safe space for the employees of Lockwood is also vital.

¶ 3:

Willa spoke about how Sondra was affecting her health. She was overwhelmed with the communication. She didn’t want to hurt Sondra, but She also felt trapped. She explained that she didn’t want to come to work, because Sondra came in on her shifts and would wait until she could corner Willa and have her attention. Willa also opened up and told us that early on in her friendship with Sondra, she had asked Willa out. Willa explained to Sondra that she was in a relationship and was not interested in a romantic relationship but happy to be friends. As time went on, Willa began to be overwhelmed by the attention and amount of communication from Sondra but did not know how to approach it. I have spoken with others who were in abusive relationships and all of Willa’s body language was that of someone in an abusive relationship. Willa said that Sondra had recently sent her a link to a social media profile that was pornographic in nature and then questioned her if she had seen it and what she thought. She didn’t want to be a part of the garden any longer, she was fearful of coming to work, and she didn’t want to be forced to have a conversation with Sondra. Additionally Denise said she also no longer wanted to be a part of the community garden because of how Sondra had

communicated and the unwillingness to consider outside input. When we asked what outcome they would like to see, they both expressed that they would like her to no longer be in the space.

Stewart’s Statement to ICRC re: harassing Colville (D-2) — page 1 of 6.

¶ 4:

When we were made aware of Sondra's behavior and actions in relationship to Willa and Denise, it was decided by Lyndsay and I that at this point in time that to continue to provide a safe space we needed to ask her to no longer be involved. This decision was made not just because of what Denise and Willa said, but in combination with Sondra's other behaviors in the space. It seemed pertinent to communicate with Sondra as soon as possible. She and I had already had a meeting planned to discuss garden spending and talk about how to better communicate after she had approached both me and my husband seeking financial assistance for purchases she made relating to the prairie she wanted to plant. Lyndsay and I decided that we needed to talk with her in person and at the meeting that happened to be set for the following day. In the meantime I told Willa that if Sondra came in, she could do work in the back and that she did not need to engage with Sondra in any way.

¶ 5:

I decided the responsible thing to do was protect them from harassment by asking Sondra to no longer be in the space. But I also felt the need to protect their privacy for fear that Sondra might further harass Lockwood employees. Neither Denise nor Willa wanted any further communication with Sondra.

¶ 6:

Our conversation with Sondra was intentionally vague in terms of who spoke to us. While others had brought up concern over Sondra's behaviors, we decided the conversation we had with Willa and Denise was enough to make the decision and we did not want to bring anyone else into further conversation as it could potentially damage her reputation. Both Denise and Willa were concerned that if she knew it was them who said something, Sondra would slander their names and potentially harass them further. Sondra was adamant that she should know who said what. At the end of our conversation she said that she would not communicate with either of us any further. Days later I received the attached letter and a facebook message telling me that she had sent a letter. Additionally she continued to communicate with Lyndsay.

¶ 7:

After our conversation with Sondra neither Lyndsay nor I reached out to anyone to share what happened as we believed it should stay between the involved parties and not become part of a community dialog or turn into unproductive gossip. We hoped that by not saying anything, she would have the opportunity to grow and find other avenues of community connection and involvement. We were not trying to cause harm to Sondra, rather to maintain the safety of the spaces we are responsible for. However in the following days, numerous individuals reached out to us to inquire what had transpired because Sondra reached out to them asking if they said anything. She was clearly on a mission to find out who had said something to us. We did not slander her name or speak poorly to anyone about her. Even close friends were not told about what transpired as can be seen by the texts messages attached as well as the text messages she attached in her complaint. When she told people her version of events, no one had heard of what happened. Both Denise and Willa did not even tell co-workers, and it was agreed that we would not talk about what had happened to maintain the privacy of all involved parties. As time went on more and more friends and community members reached out to either Lyndsay or myself inquiring what had happened because Sondra had reached out to them. At some point Willa did respond to Sondra as she wanted her to stop messaging her. Willa acknowledged that she was one of the individuals that said something, attached are the messages Willa sent to Sondra. Sondra then began to slander Willa's name within the community.

Produced as part of Iowa Civil Rights Commission investigative records.

See **Exhibit A-5** for the complete text of Defendant Stewart's ICRC statement.

Stewart's Statement to ICRC re: harassing Colville (D-2) — page 3 of 6.

Exhibit D — Correspondence Records (Plaintiff and Colville) — Page 7 of 26

Key Excerpts — Stewart’s ICRC Statement (May–July 2022)

¶1. Stewart stated the following:

1. Plaintiff began to build friendships with several individuals at Lockwood Café, including Stewart.
2. Two individuals (Colville and Martinez) shared interests with Plaintiff in gardening and prairie restoration.

¶2. Stewart further stated:

3. Defendant Colville expressed to Stewart feeling harassed by Plaintiff and not knowing how to address the situation.
4. Stewart, Colville, Nissen, and Martinez held a meeting to discuss the matter.
5. Stewart claimed she became concerned for Colville’s health and wellbeing as well as the safety of Lockwood employees.

¶3. Stewart alleged the following:

6. Colville reported feeling overwhelmed by Plaintiff’s attention.
7. Colville allegedly explained she avoided Plaintiff by hiding in the kitchen when Plaintiff came in during her shifts.
8. Colville stated that early in their friendship Plaintiff had asked her out, which she declined.
9. Colville allegedly told Stewart she was not interested in a romantic relationship with Plaintiff but wanted to remain friends.
10. Stewart stated Colville described Plaintiff’s behavior as reminiscent of abusive relationships she had observed in the past.
11. Colville claimed Plaintiff sent her a link to pornographic material and questioned her reaction.
12. Colville allegedly expressed that she no longer wanted to be part of the community garden project because of Plaintiff’s actions.
13. Stewart stated that both Colville and Martinez expressed a desire for Plaintiff to be excluded from the space.

Stewart’s Statement to ICRC re: harassing Colville (D-2) — page 4 of 6.

¶4. Stewart asserted:

14. Stewart and Nissen decided to ask Plaintiff to disengage from the space, citing the need to provide a “safe space.”
15. Colville was instructed she could work in the back and avoid interaction with Plaintiff in the interim.
16. Stewart and Nissen planned to speak with Plaintiff about this the following day.

¶5. Stewart stated:

17. Stewart believed barring Plaintiff was necessary to protect Lockwood employees.
18. Stewart also felt it was necessary to protect the privacy of those involved, citing fear of Plaintiff retaliating against or harassing employees.

¶6. Stewart further alleged:

19. Stewart and Nissen decided not to disclose to Plaintiff which individuals complained, to avoid reputational harm to Plaintiff and to protect employees.
20. Stewart stated Colville and Martinez feared Plaintiff would slander them if their names were revealed.
21. Stewart claimed Plaintiff was “adamant” about knowing who accused her.
22. Stewart stated Plaintiff said she would not communicate with either Nissen or Stewart afterward.
23. Stewart claimed Plaintiff later sent a letter and continued to communicate with Nissen.

¶7. Stewart finally stated:

24. Neither Stewart nor Nissen contacted others after their conversation with Plaintiff.
25. Stewart claimed Plaintiff reached out to various community members, attempting to find out who had made statements against her.
26. Stewart asserted that neither Colville nor Martinez spoke to coworkers or others about the complaint to maintain privacy.
27. Stewart alleged that over time, more people became aware of the issue through Plaintiff's outreach.
28. Stewart claimed Colville ultimately confirmed to Plaintiff that she had made the complaint.
29. Stewart stated that Plaintiff then began to "slander" Colville's name in the community.

Stewart's Statement to ICRC re: harassing Colville (D-2) — page 6 of 6.

Exhibit D-3 — Communication Between Plaintiff and Defendant Colville (Original vs. Altered Submission Sent to ICRC).

This exhibit contains the original Discord messages exchanged between Plaintiff and Defendant Colville on April 4 and April 7, 2022, and the altered version of Plaintiff's April 4 message submitted to the ICRC by Defendant Stewart on June 28, 2022. The submitted version presents Plaintiff's April 4 communication in a manner that appears to place it after Defendant Colville's April 7 response. Plaintiff disputes the accuracy of that presentation.

The document that was submitted by Stewart is located on the following page, with the original, unaltered message on the page immediate afterward.

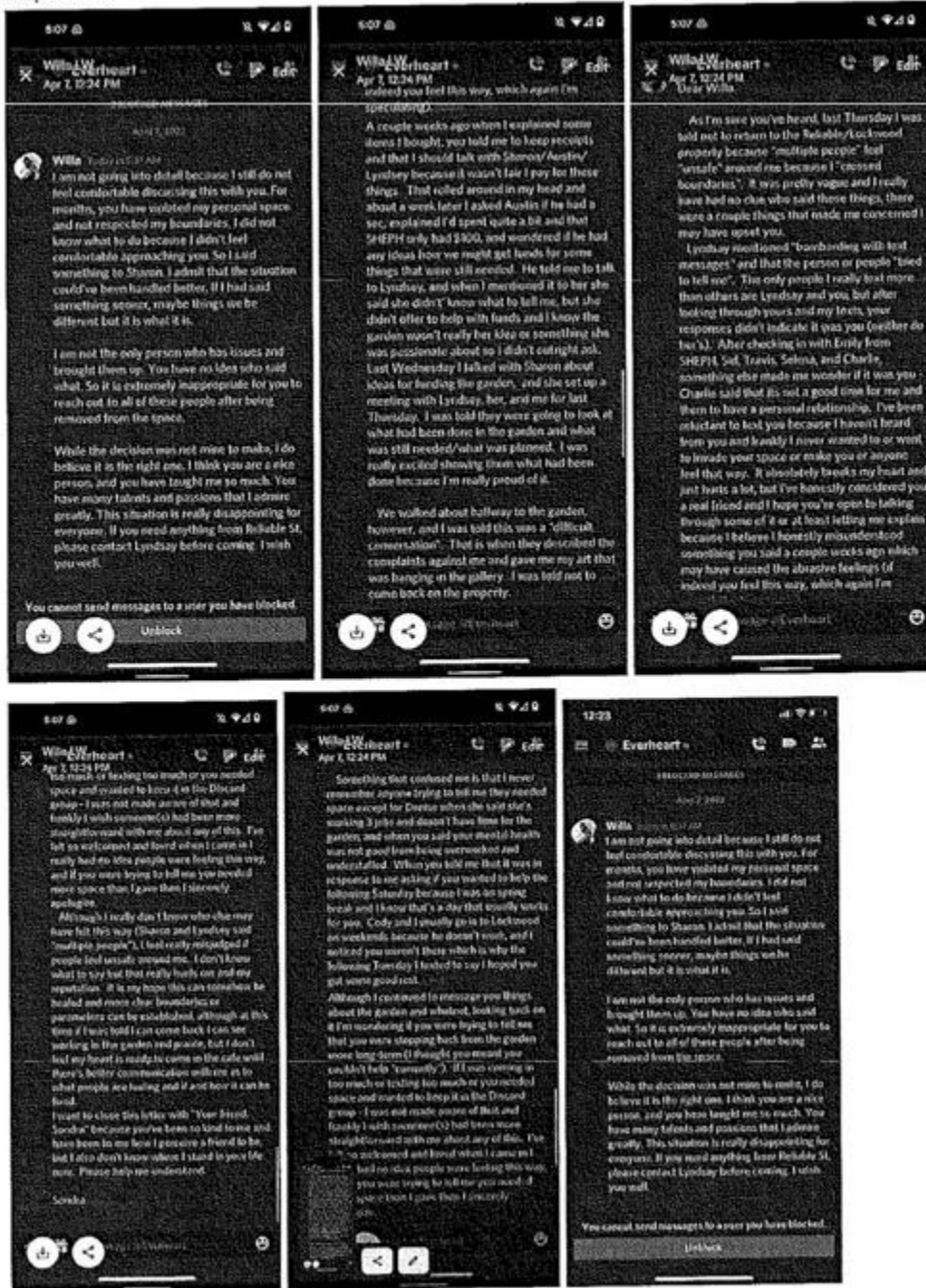
Relevance

This exhibit is offered to:

- Establish the **true chronological sequence** of communication between Plaintiff and Defendant Colville,
- Demonstrate that an altered document was submitted to the ICRC with **a falsified date and misleading framing**,
- Undermine the credibility of the allegations made by Defendants Nissen and Stewart, which relied on this misrepresented exchange,
- Highlight the absence of any prior communications from Colville raising concerns during the months she later claimed to have felt “violated.”

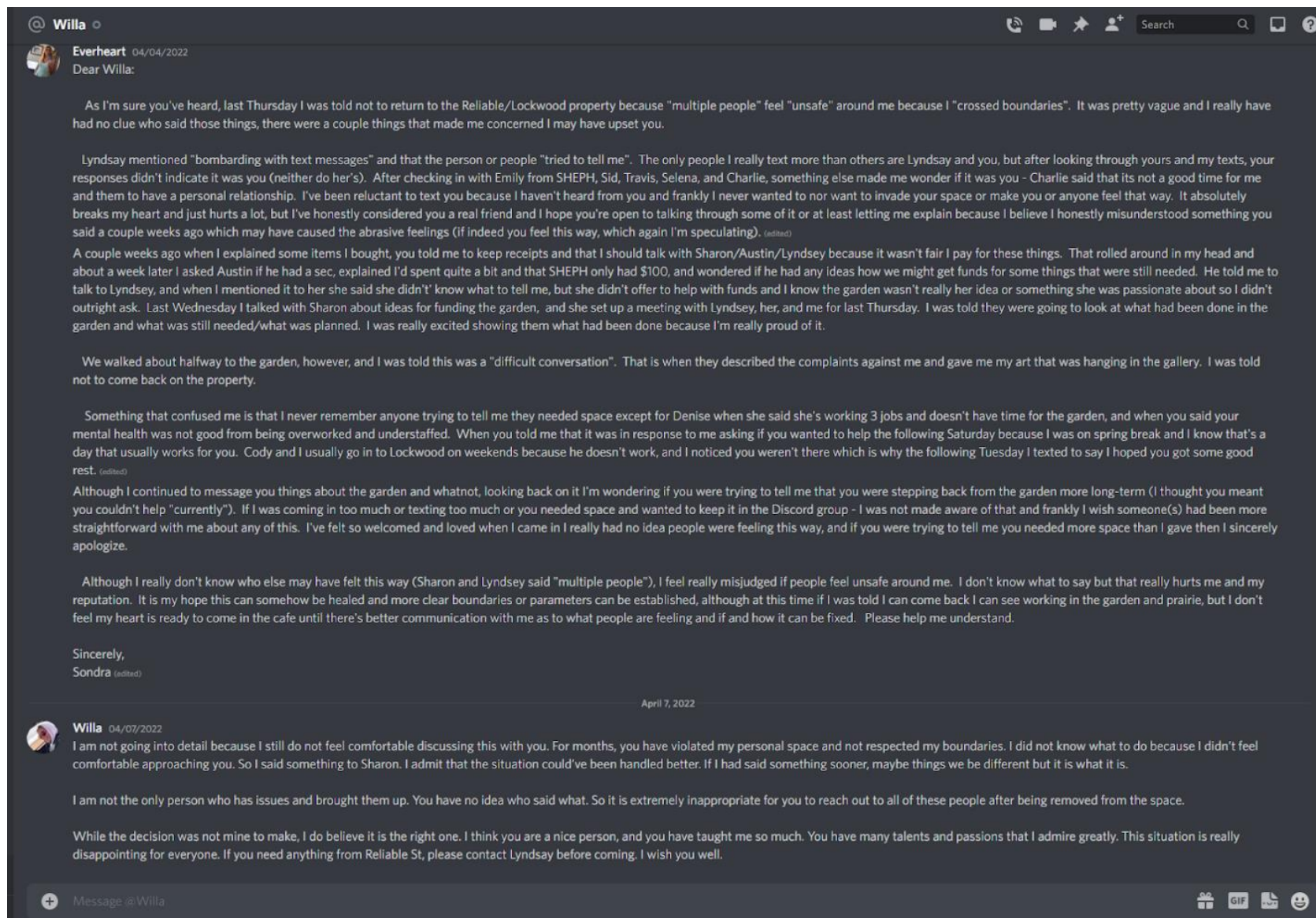
A. Altered Submission sent to ICRC by Stewart (stamped by ICRC on June 28, 2022):

Communication where Willa asked for no further communication, followed by Sondra's response.



ICRC RECEIVED
JUN 28 2022 4:09:32

B. Original Discord messages with timestamps (April 4 and April 7)



The screenshot shows a Discord chat window with a dark theme. At the top, the chat is titled "Willa". The first message is from "Everheart" dated "04/04/2022". The message text is as follows:

Dear Willa:

As I'm sure you've heard, last Thursday I was told not to return to the Reliable/Lockwood property because "multiple people" feel "unsafe" around me because I "crossed boundaries". It was pretty vague and I really have had no clue who said those things, there were a couple things that made me concerned I may have upset you.

Lyndsay mentioned "bombarding with text messages" and that the person or people "tried to tell me". The only people I really text more than others are Lyndsay and you, but after looking through yours and my texts, your responses didn't indicate it was you (neither do her's). After checking in with Emily from SHEPH, Sid, Travis, Selena, and Charlie, something else made me wonder if it was you - Charlie said that its not a good time for me and them to have a personal relationship. I've been reluctant to text you because I haven't heard from you and frankly I never wanted to nor want to invade your space or make you or anyone feel that way. It absolutely breaks my heart and just hurts a lot, but I've honestly considered you a real friend and I hope you're open to talking through some of it or at least letting me explain because I believe I honestly misunderstood something you said a couple weeks ago which may have caused the abrasive feelings (if indeed you feel this way, which again I'm speculating). (edited)

A couple weeks ago when I explained some items I bought, you told me to keep receipts and that I should talk with Sharon/Austin/Lyndsey because it wasn't fair I pay for these things. That rolled around in my head and about a week later I asked Austin if he had a sec, explained I'd spent quite a bit and that SHEPH only had \$100, and wondered if he had any ideas how we might get funds for some things that were still needed. He told me to talk to Lyndsey, and when I mentioned it to her she said she didn't know what to tell me, but she didn't offer to help with funds and I know the garden wasn't really her idea or something she was passionate about so I didn't outright ask. Last Wednesday I talked with Sharon about ideas for funding the garden, and she set up a meeting with Lyndsey, her, and me for last Thursday. I was told they were going to look at what had been done in the garden and what was still needed/what was planned. I was really excited showing them what had been done because I'm really proud of it.

We walked about halfway to the garden, however, and I was told this was a "difficult conversation". That is when they described the complaints against me and gave me my art that was hanging in the gallery. I was told not to come back on the property.

Something that confused me is that I never remember anyone trying to tell me they needed space except for Denise when she said she's working 3 jobs and doesn't have time for the garden, and when you said your mental health was not good from being overworked and understaffed. When you told me that it was in response to me asking if you wanted to help the following Saturday because I was on spring break and I know that's a day that usually works for you. Cody and I usually go in to Lockwood on weekends because he doesn't work, and I noticed you weren't there which is why the following Tuesday I texted to say I hoped you got some good rest. (edited)

Although I continued to message you things about the garden and whatnot, looking back on it I'm wondering if you were trying to tell me that you were stepping back from the garden more long-term (I thought you meant you couldn't help "currently"). If I was coming in too much or texting too much or you needed space and wanted to keep it in the Discord group - I was not made aware of that and frankly I wish someone(s) had been more straightforward with me about any of this. I've felt so welcomed and loved when I came in I really had no idea people were feeling this way, and if you were trying to tell me you needed more space than I gave then I sincerely apologize.

Although I really don't know who else may have felt this way (Sharon and Lyndsey said "multiple people"), I feel really misjudged if people feel unsafe around me. I don't know what to say but that really hurts me and my reputation. It is my hope this can somehow be healed and more clear boundaries or parameters can be established, although at this time if I was told I can come back I can see working in the garden and prairie, but I don't feel my heart is ready to come in the cafe until there's better communication with me as to what people are feeling and if and how it can be fixed. Please help me understand.

Sincerely,
Sondra (edited)

April 7, 2022

The second message is from "Willa" dated "04/07/2022". The message text is as follows:

I am not going into detail because I still do not feel comfortable discussing this with you. For months, you have violated my personal space and not respected my boundaries. I did not know what to do because I didn't feel comfortable approaching you. So I said something to Sharon. I admit that the situation could've been handled better. If I had said something sooner, maybe things we be different but it is what it is.

I am not the only person who has issues and brought them up. You have no idea who said what. So it is extremely inappropriate for you to reach out to all of these people after being removed from the space.

While the decision was not mine to make, I do believe it is the right one. I think you are a nice person, and you have taught me so much. You have many talents and passions that I admire greatly. This situation is really disappointing for everyone. If you need anything from Reliable St, please contact Lyndsay before coming. I wish you well.

At the bottom of the chat window, there is a text input field with a plus icon on the left and icons for emojis, GIFs, and attachments on the right. The text in the input field reads "Message @Willa".

Context

Following an indication from Defendant Esker that Defendant Colville may have lodged a defamatory complaint, on April 4, 2022, Plaintiff sent a message to Defendant Colville addressing the situation in a calm and explanatory manner, without knowing what the complaint was about or whether Colville had, in fact, made one.

Three days later, on April 7, 2022, Defendant Colville responded with a boundary-setting message, alleging that Plaintiff had “violated” her personal space “for months” and acknowledging that the situation “could have been handled better.”

Plaintiff viewed this response as unfounded given the nature of their interactions leading up to March 31, the date Plaintiff was barred from the property by Stewart and Nissen. Plaintiff subsequently wrote a letter to Reliable Street and Lockwood Café (see Exhibit A-1) to provide her perspective and to explain why the allegations made by Colville were inaccurate and damaging to her reputation. Plaintiff also requested mediation between herself and the businesses. After receiving no response, Plaintiff filed a complaint with the ICRC (see Exhibit A-3).

In or around June 2022, Defendant Stewart submitted to the ICRC a version of Plaintiff's April 4, 2022 message to Defendant Colville. The submitted version included an April 7, 2022 date stamp above Plaintiff's message and a caption stating, "Communication where Willa asked for no further communication, followed by Sondra's response." Plaintiff contends that this presentation was inaccurate and portrayed Plaintiff's April 4 message as though it had been sent after Defendant Colville's April 7 response, thereby reversing the actual chronology of the communications. Plaintiff further alleges that the submitted version was relied upon in conjunction with statements submitted by Defendants Stewart (Exhibit A-4), Nissen (Exhibit A-5), Martinez (Exhibit E), and Esker (Exhibit F).

Plaintiff alleges that the ICRC reviewed and relied upon these submissions, together with accompanying materials (see Exhibits C-23 and E-3), in administratively closing Plaintiff's complaint.

Key Points of Alteration and Misrepresentation

1. Plaintiff’s message was sent on **April 4, 2022** (Discord timestamp).
2. Defendant Stewart’s submitted version shows **April 7, 2022**, implying it was a *response* to Colville’s message.
3. A caption was added to the top of the altered document — “Communication where Willa asked for no further communication, followed by Sondra’s response” — which misrepresents the actual order of events.
4. The content of the message itself was unchanged, but the altered **date and framing** give a false impression that Plaintiff sent the message after being told to stop contacting Colville.

Timeline of Events

Date	Event	Actor	Medium	Notes
April 4, 2022	Plaintiff sends explanatory message	Plaintiff (Sondra)	Discord	Message later misrepresented as reply
April 7, 2022	Colville responds, alleging months of “violations”	Defendant Colville	Discord	Boundary-setting message
June 28, 2022	Altered version submitted to ICRC	Defendant Stewart	ICRC	Label and date changed to reverse order of communications

Relevant Allegations in Colville’s Message (April 7, 2022)

- Colville accuses Plaintiff of “violating personal space” for months.
- Admits: “I admit that the situation could have been handled better.”
- States: “I do not feel comfortable discussing this with you,” and instructs Plaintiff to contact Lindsay before coming.
- Acknowledges: “I didn’t know what to do because I didn’t feel comfortable approaching you.”
- Offers no prior record of raising concerns during the period in which the alleged violations occurred.

Modified Document (D-3) — page 5 of 6.

Plaintiff's Response and Context

Colville's April 7 statement stands in sharp contrast to her prior communications and conduct in the weeks leading up to Plaintiff's exclusion from the property. At no time prior to this message did Colville raise any concern, objection, or boundary regarding Plaintiff's conduct. On the contrary, her communications during this period were consistently friendly and affirming.

For example:

- On **March 17**, Colville responded "*love you <3*" to a benign message from Plaintiff containing Defendant Nissen's Venmo information (Exhibit D-11).
- On **March 16**, Colville stated "*I appreciate you so much*" during a discussion about cucumbers for the community garden (Exhibit D-10).
- On **March 8**, Colville messaged Plaintiff requesting a video of Plaintiff performing because she could not attend the open mic (Exhibit D-9).

These messages indicate that, in the period immediately preceding April 7, Colville conveyed warm and friendly sentiments toward Plaintiff rather than any expression of discomfort. Plaintiff asserts that Colville did not communicate any boundaries or objections during this time and later relayed allegations to Defendants Stewart and Nissen without prior notice to Plaintiff.

Subsequently, Plaintiff was barred from a public accommodation based on these allegations without any opportunity to respond. Plaintiff contends that the actions taken by the defendants were influenced by unsubstantiated allegations and resulted in discriminatory treatment.

This exhibit is submitted to document the discrepancy between the communications as they occurred and how they were presented to the Iowa Civil Rights Commission, and to support Plaintiff's claims of misrepresentation, retaliation, and discriminatory treatment.

Section 2 (Exhibits D-4 — D-12): Timeline of Text Message Communications and Interactions Between Plaintiff and Defendant Colville (Nov. 22, 2021 – Mar. 17, 2022)

This section contains text message communication between Plaintiff and Defendant Colville over a period of approximately four months. These communications demonstrate the nature and tone of their interactions during this period. They are offered to provide context for the allegations later made by Defendants to the Iowa Civil Rights Commission, including claims of stalking and harassment.

Relevance

This section contains text message communications between Plaintiff and Defendant Colville from November 22, 2021 through March 17, 2022. These records are relevant to:

- Establish the tone and character of Plaintiff and Defendant Colville’s communications in the months preceding the April 2022 incident.
- Demonstrate that Defendant Colville engaged in friendly and affirming communication during this period without raising any concerns or setting any boundaries.
- Undermine the credibility of subsequent claims submitted to the Iowa Civil Rights Commission alleging long-term stalking or harassment.

Exhibit D-4 — Ms. Colville to Plaintiff, “I consider us friends” (November 22, 2021).

From Lockwood Willa (515) 745-4817
To (515) 357-9725

* No don't be sorry. I'm sorry that you're feeling this way. I completely get it though. I consider us friends and I wanna be there for you in any way. This last month has been difficult for me... have not been very present and I'm trying to get out of this slump. I am the same way as you, I usually keep it all in when I'm going through it cause I don't wanna be an emotional drag. Obviously you don't wanna mess up a good thing but being open and honest is important and nobody would ever consider that a bother. At least I know Lyndsay and Sharon would never think that.

Nov 22, 2021
11:13 AM

Note: On November 22, 2021, Defendant Colville affirmatively expressed friendship and support to Plaintiff, with no indication of discomfort or objection.

Exhibit D-5 — Invitation to Friendsgiving at Lockwood Cafe from Colville to Plaintiff (on or around November 22, 2021).



Relevance:

This exhibit demonstrates Defendant Colville's inclusion of Plaintiff in a community holiday event (Friendsgiving) as a friend and community member. No concerns or objections regarding Plaintiff's presence or conduct were communicated at this time.

Exhibit D-6 — Colville requests to purchase artwork from Plaintiff (December 17, 2021).

From Lockwood Willa (515) 745-4817 To (515) 357-9725	Hey will you be around Lockwood at all today?	Dec 17, 2021 11:47 AM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	Didn't have plans to, but I can. What's up?	Dec 17, 2021 11:51 AM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	Now you got me curious.	Dec 17, 2021 12:08 PM
From Lockwood Willa (515) 745-4817 To (515) 357-9725	Haha sorry I just wanted to buy your artwork!	Dec 17, 2021 12:08 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	Really?	Dec 17, 2021 12:12 PM

Relevance:

This exhibit shows Defendant Colville voluntarily initiating contact to purchase Plaintiff's artwork. The friendly and supportive nature of this exchange reflects ongoing amicable interactions and is inconsistent with later claims of discomfort or harassment.

Exhibit D-7 — Colville requests more text messages from Plaintiff, then concludes the conversation with, ‘Super appreciate you.’” (February 16, 2022).

From Lockwood Willa (515) 745-4817 To (515) 357-9725	* Oh yes I think I heard you sing that one! I love all your songs Goodnight Sondra	Feb 15, 2022 8:23 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* Listening to lots of music on road trip. Do you like Billy joel? I can send you a few pig you're not familiar. One of my faves	Feb 16, 2022 3:14 PM
From Lockwood Willa (515) 745-4817 To (515) 357-9725	* Billy Joel is one of my all time favorites! Definitely send me your faves :)	Feb 16, 2022 3:39 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* Awesome! I was thinking I don't know many people who like what I do and was thinking that you should definitely hear some if you haven't. Also I'll see you at 5 at No Escape	Feb 16, 2022 4:15 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* https://youtu.be/Ha1SXnSbJys	Feb 16, 2022 4:16 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* https://youtu.be/YSvomXlbTUM	Feb 16, 2022 4:17 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* https://youtu.be/75TifVROTlg	Feb 16, 2022 4:18 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* https://youtu.be/a_XgQhMPeEQ	Feb 16, 2022 4:19 PM
From Lockwood Willa (515) 745-4817 To (515) 357-9725	* His voice is so angelic I could listen to him sing for hours. See you at 5 :)	Feb 16, 2022 4:21 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* I definitely feel that way too. https://youtu.be/dcmd55tLCv8	Feb 16, 2022 4:25 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* https://youtu.be/YHH3MfLI5Vs	Feb 16, 2022 4:51 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	* Super appreciate you Thanks for coming	Feb 16, 2022 6:05 PM
From Lockwood Willa (515) 745-4817 To (515) 357-9725	* Of course :) I'm excited for the event!!	Feb 16, 2022 6:05 PM

Relevance:

This exhibit shows Defendant Colville engaging in warm, voluntary, and sustained text communication with Plaintiff, including **requesting additional messages** and sharing personal interests. Defendant concludes the exchange with a friendly expression of appreciation. This interaction reflects an ongoing positive relationship without any indications of discomfort, boundaries, or harassment concerns at that time.

Exhibit D-8 — Plaintiff checks in on Colville, who responds, “I appreciate you so much” (February 22, 2022): approximately one month before the alleged tortious conduct began (March 31).

From (515) 357-9725
To Lockwood Willa (515) 745-4817

Hey Willa I hope you're okay. I was hurting today and it felt really bad to see you hurting or upset too. Here of you need to talk or not. Care about my friend.

Feb 22, 2022
2:31 PM

From Lockwood Willa (515) 745-4817
To (515) 357-9725

I appreciate you so much 💎💎 it was just a stressful day but it's looking up! I'll see you at open mic?

Feb 22, 2022
3:42 PM

Relevance:

This exhibit demonstrates Plaintiff reaching out with concern and emotional support to Defendant Colville, who responds with appreciation and reiterates plans to meet socially. This exchange reflects friendly and reciprocal communication less than one month before the alleged tortious conduct began, with no objection to Plaintiff's contact or presence.

Exhibit D-9 — Colville requests Plaintiff to record her performance (March 8, 2022): approximately two weeks before the alleged tortious conduct began (March 31).

From Lockwood Willa (515) 745-4817 To (515) 357-9725	I don't think I'll make it to open mic tonight. Record your song so I can listen!! Please..	Mar 8, 2022 6:35 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	Okay!! Thanks Wiila have a delicious evening :)	Mar 8, 2022 7:14 PM

Relevance:

This exhibit shows Defendant Colville voluntarily initiating contact to request a personal favor—asking Plaintiff to record her performance so she could listen later. This communication further demonstrates an amicable and trusting relationship less than one month before the alleged tortious conduct began.

Exhibit D-10 —Plaintiff and Colville amicably discussing garden (March 16, 2022): Colville to Plaintiff, “I appreciate you a lot” approximately two weeks before the alleged tortious conduct began (March 31).

From Lockwood Willa (515) 745-4817 To (515) 357-9725	I was gonna buy cucumber seeds cuz putting up the cucumber tips this week. Are they bush cucumbers or vine cucumbers? Ur plants look wonderful.	Mar 16, 2022 1:08 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	I'll have to double check when I get home, but hopefully they're the vine kind, I didn't think about that 💎💎💎💎 I am pretty exhausted tbh, I appreciate you a lot. I'm sorry I've been so distant	Mar 16, 2022 1:09 PM

Relevance:

This exhibit shows Plaintiff and Defendant Colville engaging in a warm, cooperative exchange about gardening plans approximately two weeks before the alleged tortious conduct began. Defendant Colville expresses appreciation toward Plaintiff and offers an apology for recent distance, which Plaintiff receives with understanding and support. This friendly communication directly contradicts any claim that Plaintiff’s presence or contact was unwelcome “for months” prior to March 31, 2022.

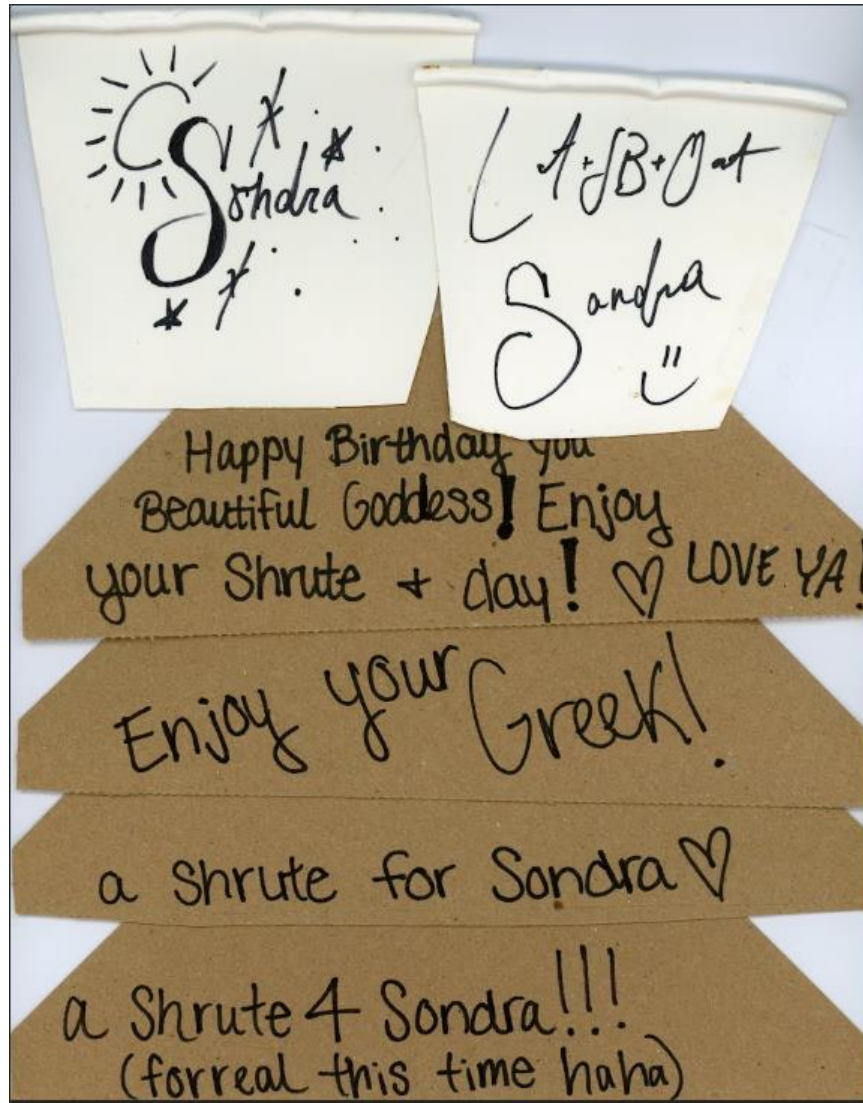
Exhibit D-11 — Plaintiff sends Colville Nissen’s Venmo to share costs on prairie seeds, as planned (March 17, 2022): Colville responds “Love you <3” (demonstrates friendly relationship and absence of boundary concerns prior to allegations).

From (515) 357-9725 To Lockwood Willa (515) 745-4817	Lyndsay-Nissen (Venmo)	Mar 17, 2022 3:40 PM
From (515) 357-9725 To Lockwood Willa (515) 745-4817	2907 (last 4 digits of her phone number)	Mar 17, 2022 3:40 PM
From Lockwood Willa (515) 745-4817 To (515) 357-9725	Love you 💎	Mar 17, 2022 3:56 PM

Relevance:

This exhibit shows Defendant Colville responding warmly and affectionately (“Love you <3”) after Plaintiff sent Defendant Nissen’s Venmo information as part of their shared prairie seed project. This message, sent just two weeks before the alleged tortious conduct began, reflects a friendly and cooperative relationship between the parties. It also demonstrates an absence of expressed discomfort, objection, or boundary-setting by Defendant Colville during the period in which she would later claim to have felt “violated for months.”

Exhibit D-12 — Series of writings Lockwood Café employees wrote on Plaintiff’s to-go containers (between 2021 and 2022): cut outs saved by Plaintiff. Several are from Ms. Colville.



Relevance:

This exhibit contains handwritten messages from Lockwood Café employees, including Defendant Colville, written on Plaintiff’s to-go containers between 2021 and 2022. These messages, which include friendly nicknames, affirmations, and celebratory notes, reflect a consistently warm and welcoming relationship between Plaintiff and café staff during this period. This evidence provides additional corroboration of the friendly context surrounding interactions with Defendant Colville and others prior to the alleged tortious conduct, undermining claims that Plaintiff’s presence was unwelcome “for months.”

Summary of Section 2 (Exhibits D-4 — D-12)

The communications and written messages documented in this section establish a consistent pattern of **friendly, voluntary, and affirming interactions** between Plaintiff and Defendant Colville from November 2021 through mid-March 2022. Throughout this period, Defendant Colville **initiated and engaged in warm, personal communication**, expressed appreciation and affection, and included Plaintiff in social and community activities **without expressing any concerns, boundaries, or objections**.

These exhibits **directly contradict Defendants' later assertions** to the Iowa Civil Rights Commission that Plaintiff's presence or communications were unwelcome "for months."

This pattern of conduct is relevant to demonstrate the **absence of contemporaneous objections**, the **amicable nature of the relationship** during the relevant time frame, and the **retaliatory and pretextual nature of later allegations** made after Plaintiff engaged in protected activity.

Clarifying March 16–31, 2022

Defendants may attempt to assert that Plaintiff engaged in harassing conduct toward Defendant Colville between March 16 and March 31, 2022. Plaintiff firmly denies these claims.

During this period, Plaintiff's **limited in-person interactions** with Defendant Colville **remained warm and friendly**, consistent with the tone and nature of all prior communications. Plaintiff received **no notice, boundary communication, or complaint** from Defendant Colville or any other party and had no reason to believe that any interaction during this period was unwelcome or inappropriate.

This absence of contemporaneous objection, communication, or corrective action by Defendant Colville or any other party is probative of the fact that no unwelcome conduct occurred, or, if any discomfort was subjectively experienced, it was **not reasonably conveyed to Plaintiff**.

This exhibit is offered to provide the Court with contemporaneous records relevant to the credibility of the allegations made against Plaintiff and to demonstrate the context in which the claims arose.