

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

ALEXANDRA “SONDRA” WILSON,)	
)	
<i>Plaintiff,</i>)	Case No. 05771 EQCE092993
)	
v.)	In Equity
)	
PAUL D. PATE, in his official capacity as)	
Secretary of State of Iowa)	
<i>Defendant</i>)	
)	
_____)	

PLAINTIFF'S MOTION TO RECONSIDER BASED UPON SUBSEQUENTLY FILED EVIDENCE AND CLARIFICATION OF FACTUAL RECORD

COMES NOW Plaintiff Alexandra “Sondra” Wilson and respectfully moves the Court to reconsider its June 5, 2026 Order. In support, Plaintiff states:

1. The Court’s June 5, 2026 Order concluded that the burdens identified by Plaintiff arose from litigation Plaintiff herself initiated and therefore did not constitute the type of extraordinary external burden warranting equitable modification of the June 2 ballot-access deadline.

2. Plaintiff respectfully submits that, at the time of the Court’s ruling, the Court did not yet have before it the completed filings Plaintiff had repeatedly informed the Court she remained under court-imposed obligation to prepare and file in Case No. LACV053674.

3. Those filings—including Plaintiff’s Revised Second Amended Petition and Exhibits A–G—have now been completed and filed. They materially clarify the factual record and the nature, scope, and necessity of the litigation burdens at issue.

4. The newly filed materials demonstrate that Plaintiff’s litigation was not discretionary, recreational, or analogous to an unrelated personal project. Rather, Plaintiff alleges that the litigation was reasonably necessary to address allegations Plaintiff contends were false,

defamatory, selectively excerpted, altered, or otherwise misleading, and which had been submitted to the Iowa Civil Rights Commission and incorporated into an official administrative record.

5. The newly filed materials further show that these allegations accused Plaintiff of stalking, harassment, racist or culturally insensitive conduct, anti-LGBT+ comments, unauthorized conduct, and other serious misconduct. Once placed into an administrative record, such allegations were not dormant or inert; they were reasonably foreseeable to resurface during an active gubernatorial campaign through routine vetting, opposition research, and public scrutiny of prior filings. Because administrative records are accessible to the public and routinely reviewed in political contexts, Plaintiff alleges that the nature of these allegations made them particularly susceptible to future citation, reliance, repetition, and republication.

6. Plaintiff's litigation was therefore undertaken to obtain judicial adjudication concerning the truth or falsity of those allegations and to address continuing reputational, professional, educational, advocacy-related, publishing-related, and political harms arising from their incorporation into governmental records.

7. Plaintiff announced her candidacy for Governor of Iowa in 2023. Plaintiff respectfully submits that the allegations at issue, if left adjudicated, posed a continuing threat to Plaintiff's reputation, candidacy, and ability to participate meaningfully in the electoral process, thereby creating a practical necessity to pursue judicial relief during the same period in which ballot-access requirements had to be satisfied and leaving Plaintiff without any reasonable alternative means of addressing the allegations within the election cycle.

8. Plaintiff further notes that the litigation did not involve a single defendant or a single allegedly defamatory statement. The completed filings concern allegations and supporting materials attributed to five individual defendants and three entity defendants, multiple categories of alleged misconduct, extensive communications spanning numerous participants, and hundreds of pages of documentary materials. Plaintiff alleges that several defendants participated in, adopted, relied upon, transmitted, or repeated allegations concerning Plaintiff, requiring substantial effort to collect, organize, compare, and analyze communications and records from multiple sources in order to prepare the completed filings, which Plaintiff was required to do to comply with court-imposed deadlines.

9. The burden on Plaintiff's campaign therefore did not arise merely from the existence of litigation. Plaintiff contends that it arose from the underlying allegations, their incorporation into governmental records, and the need to seek judicial review while simultaneously complying with ballot-access requirements.

10. The completed filings further demonstrate the substantial scope and complexity of the litigation, including multiple defendants, extensive documentary records, allegations concerning administrative proceedings, and a multi-year procedural history involving repeated motion practice, venue disputes, service disputes, amendment proceedings, discovery disputes, and dispositive motion practice.

11. At the time the Court entered its June 5 Order, Plaintiff had not yet completed the filings she had informed the Court remained pending and which continued to consume substantial time during the ballot-access period.

12. The completed filings now permit the Court to evaluate the nature and scope of the litigation obligations discussed in Plaintiff's prior submissions based upon the completed record itself rather than upon Plaintiff's description of filings that remained unfinished at the time.

13. The litigation obligations affecting Plaintiff during the ballot-access period were not limited to preparation of the completed Revised Second Amended Petition and Exhibits A–G. During the signature-gathering period, Plaintiff was required to prepare and file an Amended Petition and Exhibits A–G (January 7, 2026), a Reply and Reply Brief (January 28, 2026), prepare for and attend a hearing (February 9, 2026), address additional procedural filings (February 11, 2026), review and respond to discovery obligations (March 2, 2026), prepare a Motion to Compel and Resistance to Summary Judgment (April 14, 2026), and prepare for and attend an additional hearing on May 26, 2026, immediately before the ballot-access deadline. Plaintiff further remained obligated to complete and file the revised pleadings and exhibits referenced herein, which were ultimately completed and filed on June 15, 2026. These obligations occurred during the same period in which Plaintiff was required to collect approximately 3,500 signatures across at least nineteen counties in order to obtain ballot access. Collectively, these obligations constituted a continuous series of court-imposed deadlines that directly overlapped with the statutory signature-gathering period.

14. Plaintiff respectfully submits that the completed record now before the Court demonstrates that the litigation burdens at issue cannot fairly be characterized as self-created in the sense contemplated by the Court's prior ruling. Rather, Plaintiff contends that those burdens arose from the underlying allegations, their incorporation into administrative records, and the resulting administrative and judicial proceedings, rather than from a freely chosen alternative use of Plaintiff's time.

15. Plaintiff further submits that the interests implicated extend beyond Plaintiff alone. As the United States Supreme Court has recognized, ballot-access restrictions affect not only candidates but also voters who wish to hear, support, associate with, and vote for those candidates. *Anderson v. Celebrezze*, 460 U.S. 780 (1983).

16. Plaintiff does not ask the Court to disregard Iowa's ballot-access laws generally, but to consider whether a narrowly tailored extension is warranted where strict enforcement would extinguish both Plaintiff's candidacy and voters' opportunity to consider that candidacy.

17. Plaintiff therefore respectfully requests that the Court reconsider its conclusion that the burdens identified were self-created and reconsider whether equitable relief is appropriate in light of the completed record now before the Court.

18. Plaintiff attaches the completed Revised Second Amended Petition and Exhibits A–G not for the purpose of requesting adjudication of the merits of Case No. LACV053674 in this proceeding, but to provide the Court with the completed record that was unavailable at the time of the Court's June 5 ruling. These materials demonstrate (a) the nature and seriousness of the allegations Plaintiff sought to adjudicate, (b) Plaintiff's contention that those allegations continued to affect her reputation and political activities during the 2026 election cycle, and (c) the substantial time and litigation obligations associated with preparing and filing the completed materials during the ballot-access period. They are offered solely to illustrate the nature, complexity, and scope of the court-imposed obligations that remained pending during the statutory signature-gathering period.

AFFIDAVIT

I, Alexandra "Sondra" Wilson, being first duly sworn upon oath, state as follows:

1. I am the Plaintiff in this action. I make this affidavit based on my personal knowledge.
2. On multiple occasions prior to June 2, 2026, I informed the Court that I remained under court-imposed obligations to prepare and file substantial materials in Case No. LACV053674, including a Revised Second Amended Petition and Exhibits A–G.
3. Those filings have now been completed and filed. They exceed sixty pages and include seven extensive exhibits documenting administrative proceedings, contemporaneous communications, and a multi-year procedural history.
4. The filings were not discretionary or recreational. They were required to address allegations submitted to the Iowa Civil Rights Commission that I allege were false, misleading, selectively excerpted, altered, or otherwise misrepresented my conduct.
5. These allegations were incorporated into administrative records and remained capable of future citation, reliance, repetition, and republication during my active gubernatorial campaign. Based on my experience in political advocacy and public-facing work, I believed—and continue to believe—that such allegations were reasonably foreseeable to resurface through routine vetting, opposition research, or public review of governmental records. In my experience, administrative filings and public records are routinely examined during statewide campaigns.
6. I believed, and continue to believe, that judicial adjudication of the truth or falsity of those allegations was reasonably necessary to protect my reputation, professional activities, educational opportunities, advocacy work, publishing activities, and political candidacy.

7. The time required to prepare the filings was substantial and occurred during the statutory ballot-access period. I exercised diligence in gathering signatures. The overlapping litigation obligations described herein substantially reduced the time, attention, and resources available for signature-gathering activities during the statutory period.
8. Had the completed Revised Second Amended Petition and Exhibits A–G been available to the Court at the time of its June 5 ruling, they would have provided additional context regarding the nature, scope, and necessity of the litigation obligations discussed in Plaintiff’s prior filings, and would have materially clarified the factual basis for Plaintiff’s request for equitable relief.
9. I make this affidavit to clarify the factual record and to support my Motion to Reconsider.

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

WHEREFORE, Plaintiff respectfully requests reconsideration of the Court’s June 5, 2026 Order and such other and further relief as the Court deems just and equitable.

Executed on this 16th day of June, 2026.

/s/ Alexandra “Sondra” Wilson
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CERTIFICATE OF SERVICE

I certify that on June 16, 2026, I served a copy of this Petition, attachments, and corresponding authorities on Defendant Paul D. Pate, Secretary of State of Iowa, by email at IVoters.Support@sos.iowa.gov and sos@sos.iowa.gov.

Defendant for Service Purposes

Paul D. Pate
Secretary of State of Iowa

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