

IN THE IOWA DISTRICT COURT IN AND FOR STORY COUNTY

|                                |   |                     |
|--------------------------------|---|---------------------|
| ALEXANDRA “SONDRA” WILSON,     | ) |                     |
| <i>Plaintiff,</i>              | ) | CASE NO. LACV053674 |
|                                | ) |                     |
| <i>v.</i>                      | ) |                     |
|                                | ) |                     |
| RELIABLE STREET INC, LOCKWOOD  | ) |                     |
| CAFE, LOVE CLUB LLC, LYNDSEY   | ) |                     |
| NISSEN, SHARON STEWART, WILLA  | ) |                     |
| COLVILLE, DENISE MARTINEZ, and | ) |                     |
| CHARLIE ESKER                  | ) |                     |
| <i>Defendants</i>              | ) |                     |
|                                | ) |                     |

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**Exhibit B — Open Mic and Flier Agreements: communications between Plaintiff, Defendant Nissen, and Iowa Civil Rights Commission (“ICRC”) (Sept. 2021–Mar. 2022)**

This exhibit is offered to document contemporaneous communications relevant to Defendants’ later characterizations of Plaintiff’s conduct.

This exhibit contains contemporaneous written communications between Plaintiff and Defendant Nissen from September 2021 through March 2022, documenting collaborative efforts to organize and promote open mic events and related flier agreements.

These communications are juxtaposed with key excerpts from Defendant Nissen’s statement to the ICRC to highlight discrepancies between contemporaneous communications and later representations. Section 4 sets forth Plaintiff’s responses to those statements.

Collectively, these materials provide critical context regarding the parties’ relationship and interactions in the months leading up to the events giving rise to Plaintiff’s claims.

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## **Section 1 — Defendant Nissen’s Statement to the ICRC Regarding Open Mic and Flier Agreement (Exhibit B-1)**

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*Exhibit B-1 — Statement by Defendant Nissen to the ICRC (on or around May 1–July 30, 2022) alleging that Plaintiff assisted with Open Mic and flier distribution without authorization and characterizing Plaintiff as “desperate” and invasive.*

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14) First, since I have only known Alexandra as Sondra, I will refer to her as her name she presented to us. Sondra first appeared to me at the Open Mic I host every Tuesday. She is a musician so I was very encouraging to have her continue to come to that event. She was an immediate fixture, showing up early, wanting to help with the event and taking on other unsolicited responsibilities. For example, she created a flier for the Open Mic to hang around town without me asking or even asking me if I wanted that. Yet I am always grateful for people to help with it because it's a free event and therefore it does not create any capital. I run it every week and do not pay myself and have no employees. She seemed in desperate need of a community and we welcomed her with open arms. Unfortunately being that welcoming sometimes has consequences.

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

- Defendant Nissen alleged that Plaintiff’s assistance with the Open Mic event was unsolicited.
- Defendant Nissen alleged that Plaintiff created and distributed a promotional flier without authorization.
- Defendant Nissen characterized Plaintiff as “desperate” and invasive.

### **Rebuttal Summary — Plaintiff’s Position:**

- **Nissen** personally requested Plaintiff’s assistance with Open Mic events, delegated responsibilities to Plaintiff, and repeatedly expressed gratitude for Plaintiff’s contributions.
- Plaintiff offered to design a promotional flier at Nissen’s request; Nissen approved the concept, provided input, and personally posted the final version on social media.
- Nissen’s communications and conduct established a personal rapport that led Plaintiff to reasonably believe they were friends.

The full, unredacted version of Defendant Nissen’s statement to the ICRC is included in Exhibit A-4. Only key excerpts relevant to this issue are reproduced here for the Court’s convenience.

## Section 2 (Exhibits B2 – B13): Key Evidence Leading Up to Defendant Nissen’s ICRC Statement: Context Contradicting Later Characterizations

*Exhibit B-2 — Plaintiff’s offer to create a flier for the Open Mic (September 21, 2021). Defendant Nissen responds, “Awesome!” and expresses interest in showing Plaintiff how to run the event in her absence, indicating cooperation and mutual understanding.*

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These contemporaneous text messages directly contradict Defendant Nissen’s later ICRC statement that Plaintiff assisted with the Open Mic “without permission.” At the time, Defendant expressed approval and support for Plaintiff’s involvement.

|                                                                         |                                                                                                         |                          |
|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|--------------------------|
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | YAY open mic!! Lmk of you want help setting up.                                                         | Sep 21, 2021<br>12:32 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | Also I could make a flyer for the open mic if you like. I'm pretty good at that sort of thing.          | Sep 21, 2021<br>12:36 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | Awesome!                                                                                                | Sep 21, 2021<br>12:41 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | Sweet will do!                                                                                          | Sep 21, 2021<br>12:41 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | I was just going to post that I'm sick so I won't be able to run it tonight                             | Sep 21, 2021<br>12:41 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | Oh dear I'm sorry :*                                                                                    | Sep 21, 2021<br>12:41 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | : (                                                                                                     | Sep 21, 2021<br>12:41 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | But if you want to still do it acoustic or like a song circle type of thing y'all are welcome to        | Sep 21, 2021<br>12:42 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | Sweet. I mean I'd like that. I'll show up.                                                              | Sep 21, 2021<br>12:42 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | I know! I wish I'd been able to show y'all how to set it up all ready so someone else could just run it | Sep 21, 2021<br>12:43 PM |

**Lockwood Cafe**  
**presents**

**Open Mic  
& Poetry Slam**

The town of Ontario was founded by the railroad in 1869, then annexed into the west side of the City of Ames in 1962.  
In 1914 the Farmers' Grain Company erected a mill (below), and in 1954 the processing plant was added (background photo)..



Although the plant and community gathering space for farmers closed in the 1960s, the buildings were purchased and began being restored in 2020. Come visit the historic Lockwood Cafe to get your morning coffee, lunch, and to see nightly events!

**7pm every Tuesday**  
**@ Lockwood Cafe**

**Beer, Wine, and Live Music**  
**in a family-friendly establishment**

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
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Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

Lockwood Cafe  
Open Mic & Poetry Slam  
Tuesdays 7pm

*Exhibit B-4 — Text exchanges between Plaintiff and Defendant Nissen (September 29–30, 2021). Plaintiff requests feedback on the first draft of the flier; Defendant Nissen responds positively and requests a name change from “Lockwood Café” to “Reliable Street.”*

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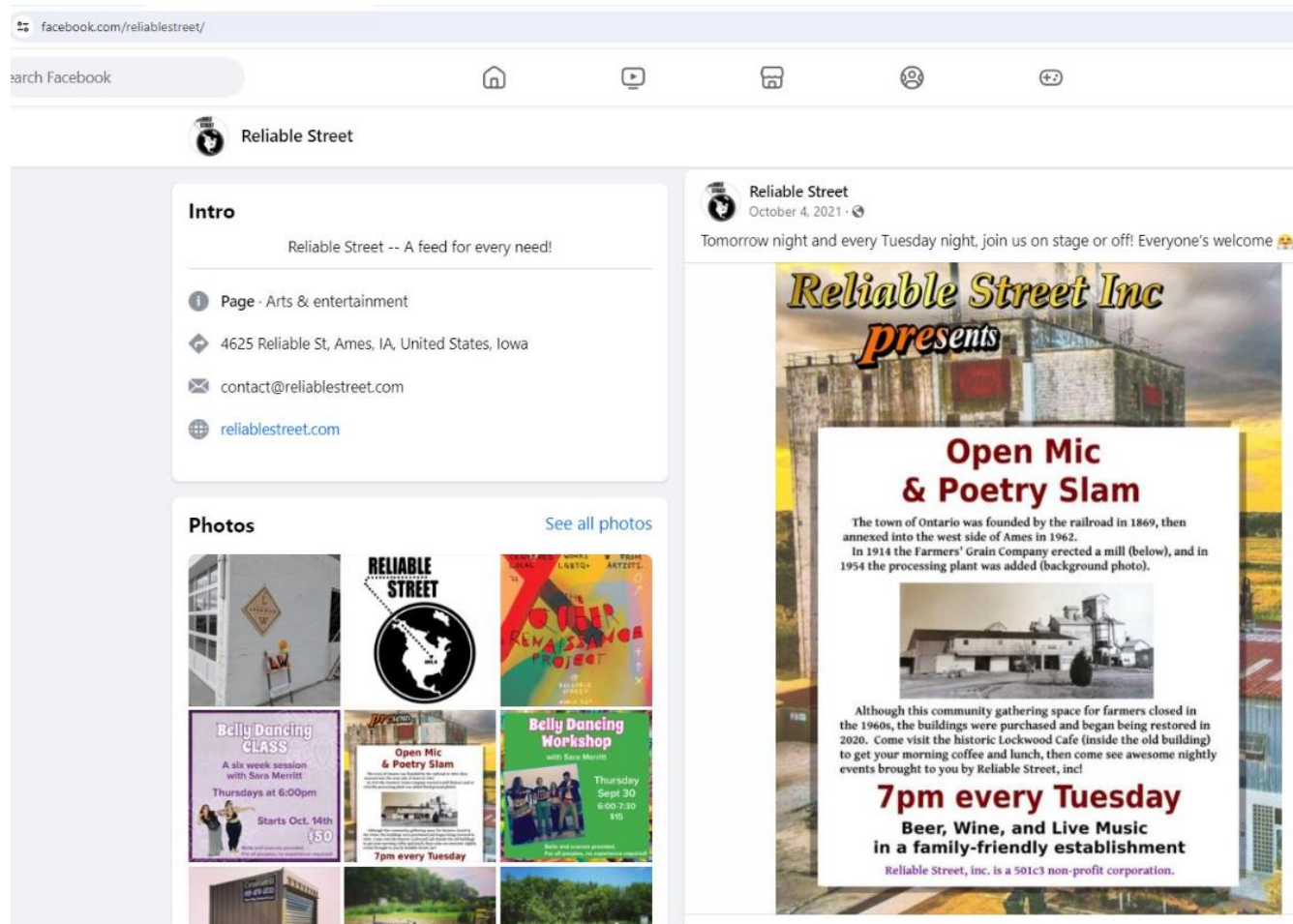
|                                                                         |                                                                                                                                           |                         |
|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | * Flyer emailed to you                                                                                                                    | Sep 29, 2021<br>4:08 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * Yay! Thank you!                                                                                                                         | Sep 29, 2021<br>4:12 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | * Sent another email - if we can get a photo of the next open mic I could use that photo.                                                 | Sep 29, 2021<br>4:32 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | * If you want a simpler flyer without the history stuff just lmk. I'll stop bugging you lol just checking in on case you want it changed. | Sep 30, 2021<br>1:53 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * Sorry! I'm backed up                                                                                                                    | Sep 30, 2021<br>3:14 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * Just got a chance to look                                                                                                               | Sep 30, 2021<br>3:15 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * I like it!                                                                                                                              | Sep 30, 2021<br>3:15 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * The only thing is, it's not Lockwood cafes event                                                                                        | Sep 30, 2021<br>3:15 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * It's our non profit                                                                                                                     | Sep 30, 2021<br>3:15 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * Reliable Street Inc                                                                                                                     | Sep 30, 2021<br>3:15 PM |



Exhibit B-5 — Reliable Street's official Facebook page posts Plaintiff's promotional flier (October 4, 2021).

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This public post demonstrates that Defendant's organization used Plaintiff's flier to promote the event, further evidencing mutual participation and approval of the promotional materials.





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*Exhibit B-6 — Plaintiff requests input on flier design; Defendant Nissen requests pull tabs and approves final version, stating “It looks great!” (October 13, 2021).*

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This exchange demonstrates Defendant’s direct input and approval of the flier’s design details, including specific requested edits, underscoring mutual collaboration.

|                                                                            |                                                                                                 |                          |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------|
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907    | • I redid the flyer 8 can send you.<br>Do you want your phone number<br>on the pull tabs or no? | Oct 13, 2021<br>12:37 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907    | • Emailed updated flyer                                                                         | Oct 13, 2021<br>1:30 PM  |
| From Ames Lockwood Lyndsay open mic<br>(515) 231-2907<br>To (515) 357-9725 | • Awesome! Yeah I think people<br>like the pull tabs                                            | Oct 13, 2021<br>3:02 PM  |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907    | • Rad sauce.                                                                                    | Oct 13, 2021<br>3:05 PM  |
| From Ames Lockwood Lyndsay open mic<br>(515) 231-2907<br>To (515) 357-9725 | • It looks great!                                                                               | Oct 13, 2021<br>3:09 PM  |

Exhibit B-7 — Finalized promotional flier incorporating Defendant Nissen’s requested changes, including name and design edits, created on or around October 13, 2021.

This flier reflects Nissen’s requested edits, including rebranding to “Reliable Street Inc” and the addition of specific design elements, underscoring Defendant’s active participation in the promotional process.



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*Exhibit B-8 — Plaintiff informs Defendant Nissen that she distributed event fliers around town; Nissen replies, “Awesome!” (October 22, 2021).*

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This exchange reflects Defendant’s ongoing approval of Plaintiff’s promotional efforts and active awareness of the marketing campaign in support of the event. This stands in direct contrast to Defendant Nissen’s later statements to the Iowa Civil Rights Commission (see Exhibit A-1), in which she alleged Plaintiff distributed fliers without authorization or approval.

|                                                                         |                                                                                                                             |                         |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------|
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | * Plastered the rest of downtown and campustown. Got some of west Ames today. Hopefully we get some turnout. Enjoy ur night | Oct 22, 2021<br>5:10 PM |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------|

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|                                                                         |                                                                      |                         |
|-------------------------------------------------------------------------|----------------------------------------------------------------------|-------------------------|
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515) 231-2907 | * Gave a bunch to students that are going to "hang it in their dorm" | Oct 22, 2021<br>5:15 PM |
| From Ames Lockwood Lyndsay open mic (515) 231-2907<br>To (515) 357-9725 | * Awesome!                                                           | Oct 22, 2021<br>5:45 PM |

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*Exhibit B-9 — Text message exchange between Plaintiff and Nissen referencing Nissen honoring Plaintiff at open mic (November 11, 2021).*

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This exchange reflects Defendant Nissen’s acknowledgment and appreciation of Plaintiff’s contributions to both the open mic events and substantial improvements made on the property — including clearing weeds, removing debris, hauling brush, restoring the compost area, and other site preparation work — as documented in Exhibit A-3 (ICRC complaint) and Exhibit C-19 (Garden and Prairie Agreements). Plaintiff had recently cleared all the weeds from in front of the garden in accordance with those agreements, a major task she began on Halloween and completed shortly thereafter.

From (515) 357-9725  
To Ames Lockwood Lyndsay open mic (515)  
231-2907

• You're wonderful. I really appreciate the sweet intro you gave me Tuesday. It meant a lot. I forgot to say that.

Nov 11, 2021  
11:09 AM

From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725

• Awwwww. I meant it💎💎

Nov 11, 2021  
11:13 AM

*Exhibit B-10 Defendant Nissen expresses appreciation for Plaintiff's encouragement and active role in building the open mic community, thanking Plaintiff for "continuously affirming that we're gonna make this amazing" and stating "it's so nice to have another person who believes" (October 12, 2021).*

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|                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                  |                          |
|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| From Ames Lockwood Lyndsay open mic<br>(515) 231-2907<br>To (515) 357-9725 | * Wow. That was something else.<br>So intimate and sweet. Thank<br>you for continuously affirming<br>that we're gonna make this<br>amazing. It's so nice to have<br>another person who believes💎                                                                                                                                                                                                                 | Oct 12, 2021<br>10:21 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515)<br>231-2907 | * I'm still reeling too!! And I<br>definitely believe it's going to be<br>fantastic. This was a perfect<br>little nexus of amazing fun<br>people tonight. Loved we<br>witnessed Travis get the courage<br>to sing in front of people for the<br>first time and my goddess<br>Chelsea and Kathryn did hip<br>thrusts on the travel lmao! We<br>met gems tonight! Amazing<br>night! See you Friday. Sleep<br>well! | Oct 12, 2021<br>10:36 PM |
| From (515) 357-9725<br>To Ames Lockwood Lyndsay open mic (515)<br>231-2907 | * Hip thrusts in the gravel *                                                                                                                                                                                                                                                                                                                                                                                    | Oct 12, 2021<br>10:37 PM |
| From Ames Lockwood Lyndsay open mic<br>(515) 231-2907<br>To (515) 357-9725 | * Right?! We're inspiring a new<br>generation💎goodnight. I hope<br>you and Cody sleep tight 💎                                                                                                                                                                                                                                                                                                                    | Oct 12, 2021<br>10:38 PM |

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*Exhibit B-11 — Defendant Nissen entrusts Colville and Plaintiff with responsibility for the Open Mic in her absence (February 8, 2022), thanking them for “always being so amazing and helpful!!!”*

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From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725  
Lockwood Willa (515) 745-4817

Hey you two! I'll probably be in  
the air tonight during open mic  
so I hope it all goes smooth. That  
you again for always be so  
amazing and helpful!!!

Feb 8, 2022  
1:37 PM



*Exhibit B-12 — Plaintiff provides input to improve Open Mics (February 9, 2022), following the event where Nissen entrusted Plaintiff and Colville to run the Open Mic in her absence (see Exhibit B-11). Colville and Nissen agree; Nissen agrees with Plaintiff's suggestions and expresses gratitude for her contributions.*

-----

From (515) 357-9725  
To Ames Travis Open Mic (319) 560-1572  
Ames Lockwood Lyndsay open mic (515)  
231-2907  
Lockwood Willa (515) 745-4817

Sorry I sent this to Charlie  
instead of Willa last time so just  
resending it:

Feb 9, 2022  
1:14 PM

Hey Willa, Lyndsay, and Travis!

Hope ur day is going wonderful.

Travis mentioned a couple things  
last night and I'm kind of glad he  
did cuz I was secretly thinking it:

1. Wondering if we should say 3  
songs/poems or 15 minutes. We  
had a couple people up last night  
for more than 20 minutes each.

2. One of the 20 min  
performances was Ellie - she  
talked for quite awhile before  
finally playing. We had 4-5 first  
time audience members and  
some left during. I really like her  
performance part but especially  
for first time people not sure  
that's what they come to see.  
Knda sucks for the later  
performers when the audience  
clears out before they get to go  
up.

From Lockwood Willa (515) 745-4817  
To Ames Travis Open Mic (319) 560-1572  
Ames Lockwood Lyndsay open mic (515)  
231-2907  
(515) 357-9725

I definitely agree. I was sad to see  
a couple people leave before they  
got a chance to perform. Since  
it's been pretty busy lately, it  
might be worth it o have a sign  
up sheet. We could cap it at 15  
people and they each can  
perform one or two songs/  
poems/comedic set. Then if there  
is extra time at the end we could  
open it up. But definitely want  
everyone who wants to have the  
opportunity to perform in front of  
an audience!! -Willa

Feb 9, 2022  
1:47 PM

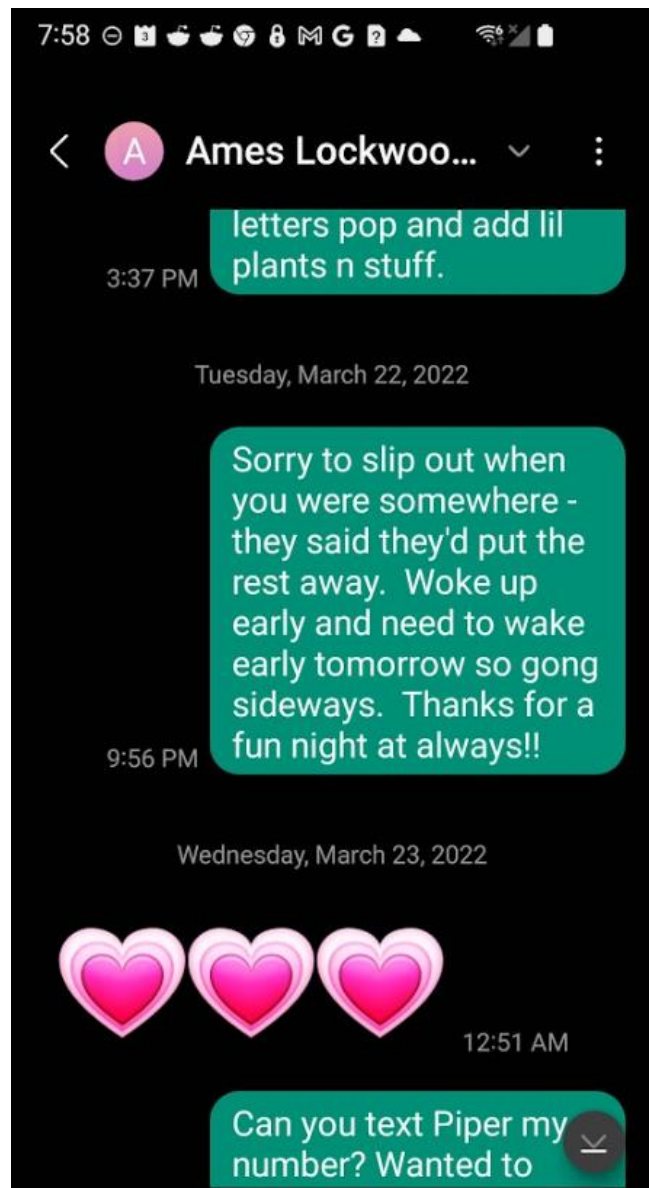
From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To Ames Travis Open Mic (319) 560-1572  
(515) 357-9725  
Lockwood Willa (515) 745-4817

Yeah with more regulars coming  
we probably have to start  
making it more structured.  
Thanks for the feedback and  
caring about making it a good  
experience for everyone ♦

Feb 9, 2022  
2:35 PM

*Exhibit B-13 — In accordance with the parties' ongoing Open Mic agreement, Plaintiff apologizes for not having time to clean up after the event (March 22–23, 2022). Nissen responds with three heart emojis, expressing warmth and appreciation just nine days before the events giving rise to several of Plaintiff's claims.*

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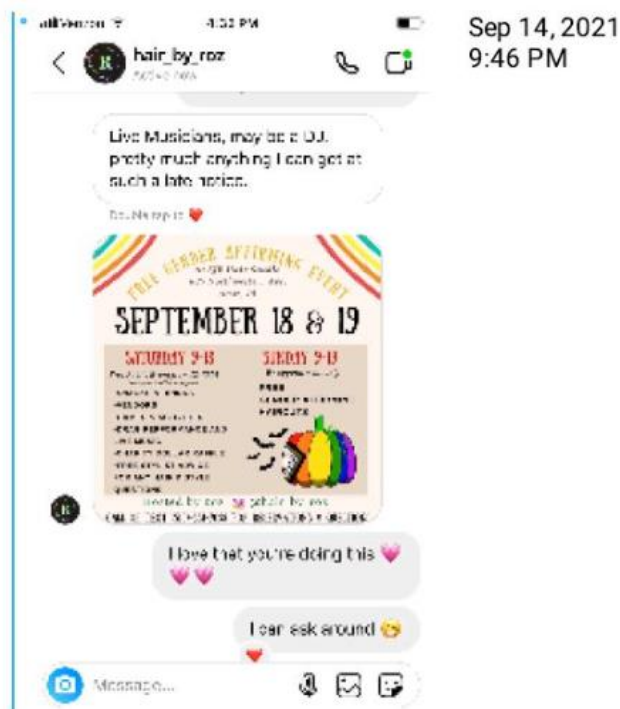


**Section 3: Supporting Evidence depicting nature of Nissen and Plaintiff's relationship (on or around September 2021 – March 2022): (Exhibits B14-B16).**

As documented in Exhibits B-14 through B-16, Defendant initiated and maintained a positive and encouraging relationship with Plaintiff over several months, directly contradicting Defendant's later characterization of Plaintiff's participation as unsolicited or unwelcome.

*Exhibit B-14 — Nissen invites Plaintiff to perform at an LGBT+ event (September 14, 2021), reflecting Defendant's active encouragement of Plaintiff's involvement prior to the Open Mic events.*

From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725



From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725

\* Would you be interested in playing at this? Sep 14, 2021 9:46 PM

From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725

\* I'm going to play a few songs and I'm looking for other people tooooo💎 Sep 14, 2021 9:47 PM

*Exhibit B-15 — Nissen responds to Plaintiff's holiday greeting and photo of her Open Mic performance (December 24, 2021), expressing warmth and appreciation for Plaintiff.*

---

From (515) 357-9725  
To Ames Lockwood Lyndsay open mic (515)  
231-2907



Dec 24, 2021  
4:43 PM

From (515) 357-9725  
To Ames Lockwood Lyndsay open mic (515)  
231-2907

Merry Christmas, beautiful friend!

Dec 24, 2021  
4:44 PM

From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725

Awww you sweet angel 💎 I  
hope you are having a wonderful  
holiday 💎

Dec 24, 2021  
8:35 PM

From Ames Lockwood Lyndsay open mic  
(515) 231-2907  
To (515) 357-9725

I appreciate you 💎

Dec 24, 2021  
8:36 PM

*Exhibit B-16— Informal text exchanges between Plaintiff and Nissen (January 26, 2022) showing ongoing friendly rapport, contradicting later claims that Plaintiff's involvement was unwanted.*

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