

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, LYND SAY	)	
NISSEN, SHARON STEWART, WILLA	)	
COLVILLE, DENISE MARTINEZ, and	)	
CHARLIE ESKER	)	
<i>Defendants</i>	)	
	)	

Exhibit F — Statement prepared by Defendant Esker, then sent by Defendant Stewart to Iowa Civil Rights Commission (“ICRC”) (on or around May–July 2022)

This exhibit contains statements submitted by Defendant Esker to the Iowa Civil Rights Commission, together with contemporaneous communications referenced elsewhere in the record.

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Section 1 (Exhibits F-1): Defendant Esker’s Statement to ICRC (on or around May 1 through July 20, 2022).

Exhibit F-1 — Esker’s Statement to the ICRC (on or around May 1 through July 30, 2022).

Nature of Document: Third-party letter of support for Defendants, submitted to the Iowa Civil Rights Commission.

Author: Charlie Esker — Nonbinary transgender artist, frequent exhibitor in Reliable Street gallery, close associate of Defendant Colville.

To whom it may concern,

My name is Charlie Esker. I am a trans resident of Ames, graduate of ISU, regular at Lockwood cafe, community member, and artist. I fervently support Lockwood Cafe, Reliable St., Sharon Stewart, Lyndsay Nissen, and all lockwood staff. I reject wholeheartedly any accusations of discrimination or slander by Sondra Wilson.

In principle and in practice, Reliable St. has been and is a safe space for all people. Lockwood cafe and Reliable St. have time and time again donated their time, energy, space, and money to the queer community. Hosting a trans vigil, queer renaissance show, multiple pride events, and a queer singles mingle. All of my queer friends and I have always felt accepted and bolstered by the community at Lockwood and Reliable St., and these are all examples of the community that has been cultivated around Reliable St., a community that welcomes everyone with open arms.

Sondra, too, was welcomed into this community; it was through her own actions that she had to be removed from the space. This has nothing to do with Sondra being trans, and I am confident that Sondra was not discriminated against nor was her reputation "slandered." Only those of us unfortunately involved know anything about why or how Sondra was banned. *Sondra is not the victim in this situation.* Sondra made Lockwood staff, along with queer and POC community members uncomfortable, constantly. Sondra would call and text me often, and I witnessed Sondra do the same to my best friend everyday, multiple times a day, with no response. I witnessed Sondra make racially insensitive comments and display culturally appropriated artwork. I witnessed her harass the Lockwood staff at their place of work nearly every day of the week. I witnessed her insert herself into leadership positions without listening to the input of the community. In these positions, she spent her own money without asking anyone

or getting prior acknowledgement that she would be refunded and expected compensation for her unnecessary purchases. She went as far as asking people in Lockwood cafe, at the open mics, and *highschoolers* in SHEPH for money. It is abundantly clear that any "volunteering" or "community work" she did was for her own selfish gain: to build *her* portfolio, to grow *her* skills, and to give *her* a space to express *herself*.

This is a sad situation, one that could have been a wakeup call to a woman who was harming the community of which she was a part. An opportunity for her to learn from her mistakes and take that knowledge into the next community she is in so she doesn't hurt people again. Sondra's perception of everything that has happened, her claims of discrimination and slander, are so disconnected from reality that it is genuinely shocking. Instead of apologizing even once, she immediately went on a crusade to discover who reported her and how to get revenge. All of which only confirms that asking her not to return to Reliable St. was the correct and only response.

Relevance and Context

This exhibit contains a written statement by Defendant Charlie Esker submitted to the Iowa Civil Rights Commission in support of co-Defendants. Esker portrays themselves as a regular patron of Lockwood Café and Reliable Street, but **not a participant in any of the garden or organizational meetings** central to Plaintiff's complaint.

Esker nonetheless claims to have **personally witnessed multiple serious acts** by Plaintiff, including:

- Harassment of Lockwood Café staff and community members,
- Making racist comments,
- Soliciting money from staff, patrons, and students, and
- Other conduct framed as disruptive and discriminatory.

These assertions are **categorical fabrications**. There is no evidence — contemporaneous or otherwise — that these alleged incidents occurred, and Esker had **no plausible opportunity** to witness such conduct firsthand.

Pattern of Fabrication and Collusion

Esker is a close associate of Defendant Colville, who, as shown in **Exhibit C**, altered a document used to craft false allegations of stalking and harassment. Esker's statement tracks the **same false narrative themes** advanced by Colville, Nissen, and others, indicating a **coordinated effort to corroborate a retaliatory and defamatory storyline**.

Esker's statement attempts to establish Plaintiff as a disruptive, bigoted, and predatory figure, but:

- Esker **was not present** at the meetings or events where the alleged behavior supposedly occurred.
- No contemporaneous messages, complaints, or witness corroboration exist.
- The tone and timeline of communications between Plaintiff and Defendants during the relevant period — including text messages, emails, and social media interactions — are inconsistent with the allegations.

Defamation Per Se and Evidentiary Weight

Esker's false statements are not mere opinion or misinterpretation — they are **presented as firsthand factual observations**, asserting that Plaintiff engaged in acts that would expose her to **hatred, contempt, and reputational harm** within the community.

Such statements constitute **defamation per se**, as they directly impugn Plaintiff's character, allege morally reprehensible conduct, and are verifiably false.

Esker’s attempt to frame their testimony through personal identity (e.g., “as a transgender person who supports Lockwood”) does not insulate them from accountability. This rhetorical device serves to **bolster the credibility of false allegations**, but does not supply factual evidence.

Section 2 (Exhibits F-2 and F-3): Esker’s prior communications contradict their statement (March – April 2022).

The following contemporaneous text messages between Plaintiff and Defendant Esker, dated **March 16 and April 1, 2022**, demonstrate that Esker:

- Maintained friendly, casual communication with Plaintiff;
- Expressed no concern or objection regarding any alleged racist or harassing conduct;
- Stated directly that they were “not really involved in any of that” when informed about Plaintiff’s exclusion; and
- Made no reference to having personally witnessed any misconduct.

This is **irreconcilable with the claims** Esker later submitted to the Iowa Civil Rights Commission, in which they asserted they had witnessed repeated incidents of racism, harassment, and other misconduct by Plaintiff.

Had these claims been true, such **serious accusations would likely have been raised during these contemporaneous communications.**

Exhibit F-2 — Friendly exchange between Plaintiff and Esker (March 16, 2022).

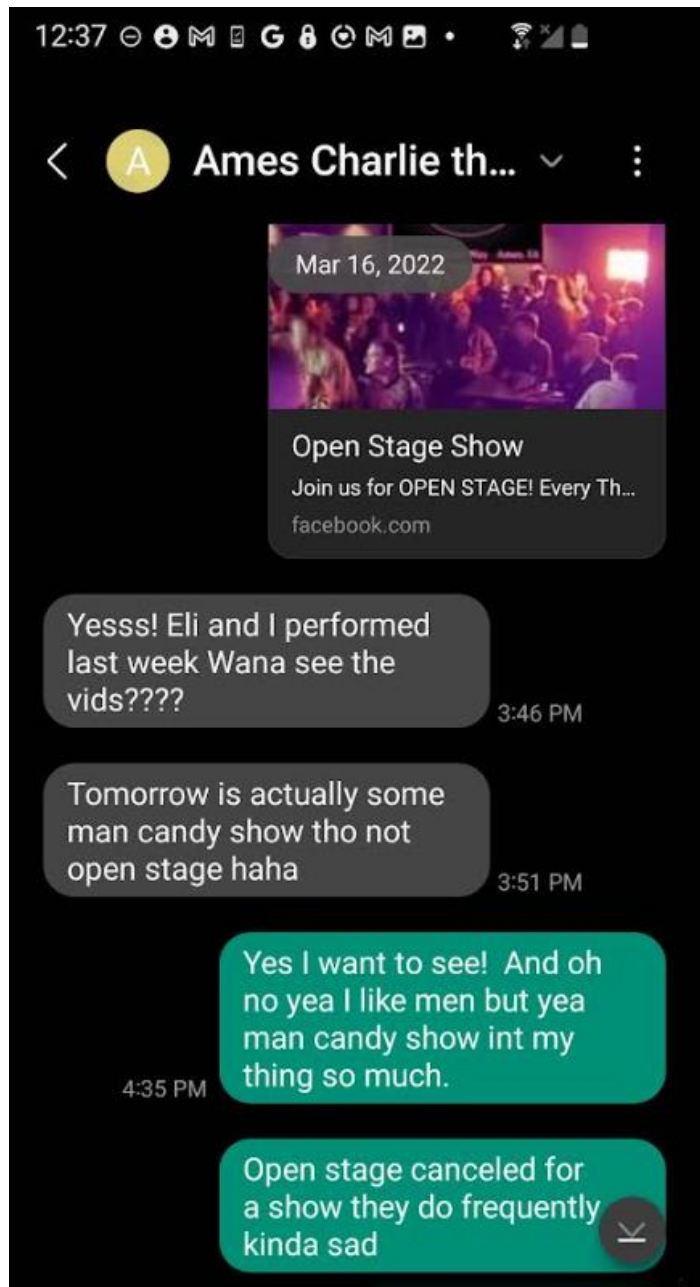
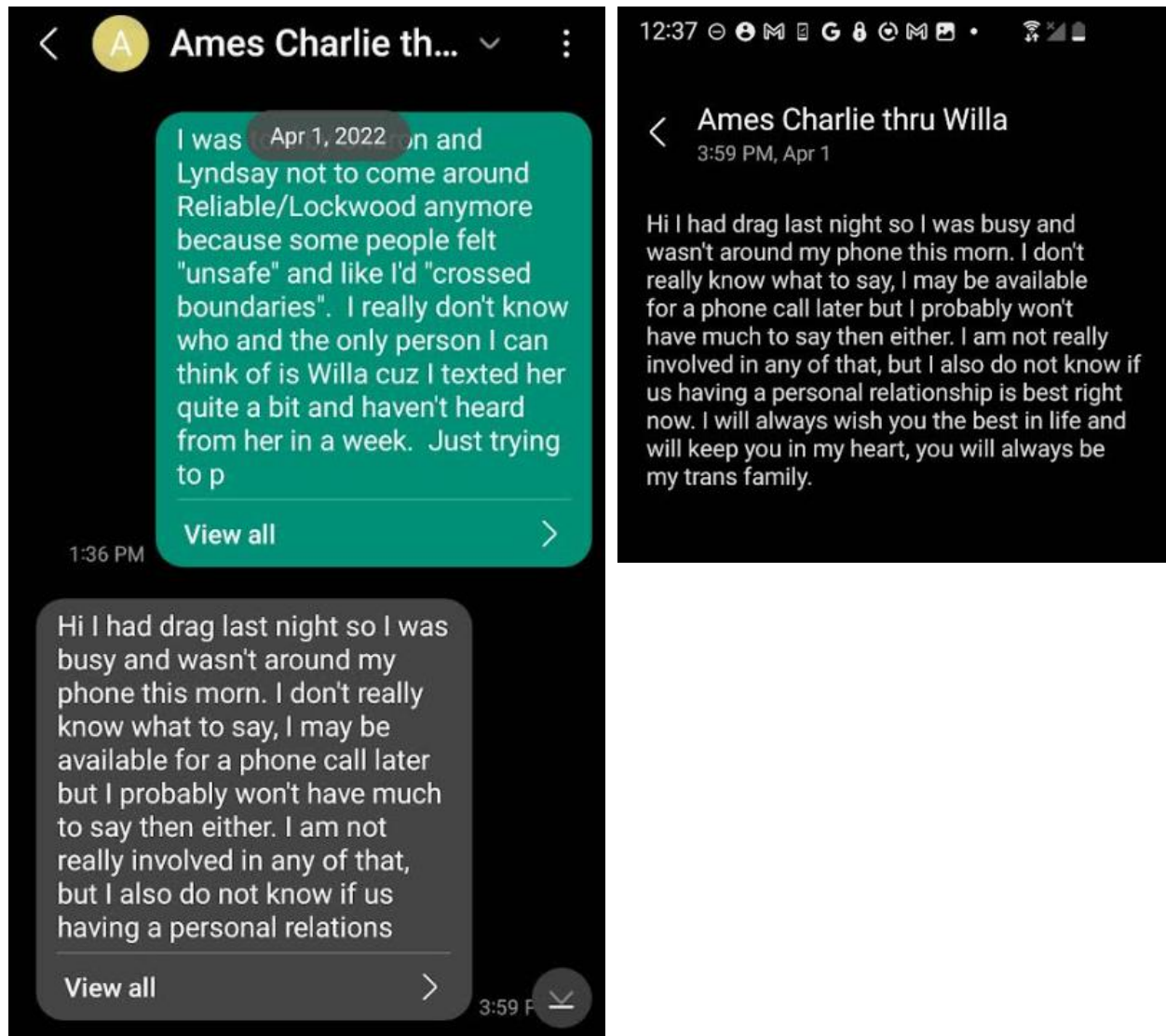


Exhibit F-3 — Plaintiff inquires about being barred from Reliable/Lockwood; Esker responds kindly with no reference to allegations later used in statement to ICRC (April 1, 2022).



Because Esker's statements impute criminal, predatory, or racially discriminatory conduct to Plaintiff and were presented as firsthand fact, they constitute defamation per se under Iowa law.

Relevance to Defamation Per Se

Esker's claims (Exhibit F-1) were knowingly false, as evidenced by their own prior statements and behavior. These false claims:

- Were presented as firsthand factual accounts of misconduct, not mere opinion;
- Concern alleged conduct that would expose Plaintiff to hatred, contempt, and reputational injury in the community; and
- Were advanced only after Plaintiff initiated legal action, strongly indicating retaliatory motive and collusion with other Defendants.

This evidence severely undermines Esker's credibility and demonstrates their statement to the ICRC was fabricated with actual malice.

Timeline

- **March 16, 2022:** Friendly conversation with no mention of alleged misconduct.
- **April 1, 2022:** Esker affirms they "don't know much about it" and were not involved.
- **Post-ICRC Filing:** Esker submits a statement asserting they personally witnessed multiple incidents of misconduct.

Conclusion

Defendant Esker's statement is a **fabricated account designed to support and legitimize Defendants' coordinated retaliation** against Plaintiff after she asserted her rights. It is unsupported by any contemporaneous documentation, inconsistent with timelines, and made by someone without direct involvement in the relevant events.

This statement constitutes a **key piece of evidence of defamation per se and collusive fabrication**, and should be weighed accordingly.

This exhibit demonstrates that Defendant Esker's ICRC statement is factually baseless, contradicted by their own contemporaneous communications, and part of a coordinated retaliatory effort. These false statements meet the criteria for defamation per se and should be weighed accordingly.