IN THE IOWA DISTRICT COURT IN AND FOR STORY COUNTY

ALEXANDRA "SONDRA" WILSON,	)	
Plaintiff,	)	CASE NO. LACV053674
	)	
v.	)	
	)	
RELIABLE STREET INC, LOCKWOOD	)	
CAFE, LOVE CLUB LLC, LYNDSAY	)	
NISSEN, SHARON STEWART, WILLA	)	**SECOND AMENDED PETITION**
COLVILLE, DENISE MARTINEZ,	)	
and CHARLIE ESKER	)	
Defendants	)	
	)	

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COMES NOW Plaintiff Alexandra "Sondra" Wilson, appearing pro se, and for her Second Amended Petition states as follows:

I. PRELIMINARY STATEMENT:

1. Plaintiff exhausted her administrative remedies before the Iowa Civil Rights Commission and was issued a Right-to-Sue Letter on September 6, 2023 (Exhibit A-9, p. 45), authorizing commencement of this civil action.

2. This action arises from Defendants' express authorization of Plaintiff's participation in community and business activities, their sustained reliance on Plaintiff's labor and leadership, and their abrupt exclusion of Plaintiff without notice, explanation, or opportunity to respond. After Plaintiff sought administrative redress in spring 2022, Defendants escalated their conduct through the retaliatory and abusive use of administrative and judicial processes, embedding stigmatizing allegations into official records and repeatedly leveraging those allegations to justify exclusion, foreclose factual adjudication, and impose procedural and reputational harm. This pattern of conduct continued throughout the pendency of this civil action without any adjudication on the merits of the underlying allegations.

3. From approximately September 2021 through March 2022, Defendants invited Plaintiff to participate in, contribute to, and lead projects associated with Reliable Street Inc. and Lockwood Café. Plaintiff's involvement was not informal, incidental, or unsolicited. Defendants expressly authorized Plaintiff to design promotional materials, coordinate events, and manage physical improvement projects on the premises, including a community garden and native prairie installation. Defendants represented Plaintiff to

third parties as a project lead, relied upon her planning and labor, and retained the benefits of her work. During this period, Defendants repeatedly expressed appreciation, encouragement, and trust. At no time did any Defendant advise Plaintiff that her participation was unwelcome, unauthorized, or inappropriate.

4. On March 31, 2022, Defendants abruptly barred Plaintiff from the premises and affiliated activities based on undisclosed complaints. Defendants did not identify the complainants, describe specific conduct, or provide Plaintiff with notice or an opportunity to respond or modify her behavior. The exclusion occurred without warning and in a manner materially inconsistent with Defendants' prior course of conduct. After excluding Plaintiff, Defendants retroactively recharacterized her previously authorized participation as informal or unauthorized, while continuing to retain the benefits of her labor and permanent property improvements.

5. Plaintiff sought clarification and attempted to resolve the matter in good faith. When those efforts were ignored, Plaintiff engaged in protected activity by filing a complaint with the Iowa Civil Rights Commission in spring 2022. Only after Plaintiff sought administrative relief did Defendants advance allegations portraying Plaintiff's prior authorized conduct as harassment, stalking, racism, or other misconduct—allegations that had not been raised contemporaneously and that directly contradicted months of written communications reflecting consent, encouragement, and reliance.

6. During the administrative process, Defendants submitted statements and documentary materials to the Iowa Civil Rights Commission that denied prior authorizations, altered chronology, omitted material context, or selectively excerpted

communications. Those submissions were relied upon by the Commission, resulting in an official administrative record that stigmatized Plaintiff and impaired her academic, professional, and civic opportunities without adversarial testing or any meaningful opportunity to respond. Defendants thereafter adopted, repeated, and expanded the same narrative in judicial filings associated with this action, notwithstanding the absence of any adjudicated finding that Plaintiff engaged in misconduct.

7. The defamatory allegations lodged by Defendants were not confined to private communications or internal dispute resolution. They were embedded into the official records of a state administrative agency and later repeated in public judicial filings, rendering them durable, discoverable, and capable of ongoing dissemination. At the time these allegations were institutionalized, Plaintiff was the founder and public-facing principal of a political organization and engaged in civic and advocacy work dependent upon credibility, trust, and public standing. Plaintiff is now a declared candidate for statewide public office. The continued existence of unadjudicated allegations of harassment, stalking, racism, and misconduct in administrative and judicial records poses an ongoing and concrete threat to Plaintiff's reputation, civic participation, and eligibility for public trust. Absent adjudication on the merits, Defendants' narrative remains capable of being leveraged through institutional repetition rather than evidentiary proof, creating continuing harm that cannot be remedied through dismissal, procedural disposition, or private clarification.

8. Since spring 2022, Plaintiff has been compelled to devote extraordinary and sustained time, labor, and personal capacity to responding to Defendants' allegations across administrative and judicial forums in an effort to correct the record and clear her

name. This burden did not arise from ordinary litigation participation or good-faith defense, but from Defendants' repeated escalation, narrative repetition, and resistance to factual adjudication. Plaintiff has been required to engage in continuous damage-control activities—including administrative appeals, record reconstruction, litigation compliance, motion practice, and procedural defense—over a multi-year period. The cumulative effect of this compelled effort has imposed severe and substantial costs. Those costs include emotional distress, stress-related impairment, exhaustion, and ongoing mental and emotional anguish. These harms were foreseeable, ongoing, and directly caused by Defendants' conduct in institutionalizing and perpetuating unadjudicated allegations rather than submitting them to timely merits determination.

9. Defendants' conduct further interfered with Plaintiff's existing and prospective contractual, academic, and institutional obligations. Because Defendants repeatedly escalated procedural activity unrelated to adjudication on the merits—requiring compliance with mandatory administrative and judicial deadlines—Plaintiff was compelled to divert substantial time and capacity away from third-party commitments in order to preserve her rights and respond to Defendants' filings. These disruptions were foreseeable and flowed directly from Defendants' use of administrative and judicial processes for purposes beyond those for which such processes are designed, including retaliation, leverage, and narrative entrenchment rather than timely merits resolution.

10. Defendants' actions were not isolated or independent. They reflected a coordinated course of conduct in which Defendants adopted, reinforced, and relied upon a shared factual narrative across administrative and judicial forums, using formal

processes not to resolve disputes on the merits, but to justify exclusion, insulate prior conduct from scrutiny, and impose collateral harm.

11. Plaintiff's claims arise from this sequence of events. Plaintiff's promissory estoppel claims address Defendants' breach of express and implied promises upon which Plaintiff reasonably relied. Her unjust enrichment claim addresses Defendants' retention of the benefits of Plaintiff's labor and property improvements after excluding her. Her discrimination and retaliation claims address Defendants' unequal treatment of Plaintiff and their escalation of adverse conduct after she engaged in protected activity. Her abuse-of-process and conspiracy claims address Defendants' coordinated misuse of administrative and judicial proceedings to impose reputational harm, procedural exhaustion, and coercive pressure unrelated to lawful adjudication.

12. At its core, this case concerns whether Defendants may invite participation, rely on labor, abruptly exclude a participant without process, and then use administrative and judicial mechanisms to retroactively justify that exclusion and punish the exercise of legal rights. Plaintiff seeks adjudication of her claims on a complete evidentiary record and relief sufficient to remedy the harms caused by Defendants' conduct.

13. The exhibits incorporated into this Petition are not ancillary or illustrative. Each is a primary source document that substantiates material factual allegations, documents procedural history, and reveals contradictions between sworn statements and contemporaneous communications. Together, they form a coherent evidentiary record that enables the Court to adjudicate the underlying facts rather than rely on contested characterizations. To streamline readability and reduce redundancy, Plaintiff has placed

the Exhibit Index immediately following this Statement of Facts. While appendices are typically located at the end of pleadings, the Appendix in this Petition is deliberately positioned near the beginning to reflect the central role of these materials. The Petition is designed to be read in close coordination with its exhibits, which are incorporated by reference and indexed by content and relevance in Appendix A.

14. Where false allegations have been institutionalized in public records and continue to impose reputational and civic harm, dismissal without merits adjudication operates not as neutrality, but as ratification of an untested narrative.

II. APPENDIX A — EXHIBIT INDEX AND RELEVANCE SUMMARY:

(Located here by design, for integration with Statement of Facts)

Positioning Note

While appendices are customarily placed at the end of pleadings, Appendix A is deliberately positioned near the beginning of this Petition. The documentary exhibits in this case are not supplementary—they are central to verifying factual allegations, resolving credibility disputes, and evaluating the legal sufficiency of Plaintiff's claims. Each exhibit is incorporated by reference and must be read alongside its corresponding factual and legal sections.

To minimize redundancy and improve clarity, this Petition does not include extensive in-line exhibit citations. Instead, each major subsection of the Statement of Facts corresponds directly to one or more exhibits identified below.

Exhibit A — ICRC Administrative Record and Correspondence

Contents:

- Plaintiff's mediation request and ICRC filings
- Defendants' formal ICRC submissions
- Administrative closure, right-to-sue letter

Relevance:

Establishes Plaintiff's exhaustion of administrative remedies, and contains material misrepresentations made by Defendants in official filings to a government body.

Supports:

- Count I – Promissory Estoppel (ICRC mediation denial)
- Count III – Defamation
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation to a Government Agency
- Count VIII – Abuse of Process
- Count IX – Civil Conspiracy

Exhibit B — ICRC Correspondence and Prior Consent Documentation

Contents:

- Event planning, text threads with Nissen and others
- Express authorization for participation and event leadership

- Contradictions with Defendants' ICRC claims

Relevance:

Establishes that Plaintiff's involvement in events and projects was authorized, invited, and documented, directly contradicting post-hoc mischaracterizations. Supports:

- Count I – Promissory Estoppel
- Count II – Detrimental Reliance / Estoppel-in-Fact
- Count III – Defamation
- Count V – Unjust Enrichment
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation
- Count IX – Civil Conspiracy

Exhibit C — Authorization and Course of Conduct (2021–2022)

Contents:

- Authorizations for Lockwood garden and prairie projects
- Co-authored communications and collaborative planning
- Evidence of normalcy and cooperation up to March 2022

Relevance:

Underscores mutual collaboration, with Defendants actively engaging Plaintiff in the very projects later misrepresented. Supports:

- Count I – Promissory Estoppel
- Count II – Detrimental Reliance / Estoppel-in-Fact
- Count III – Defamation
- Count V – Unjust Enrichment
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation
- Count IX – Civil Conspiracy

Exhibit D — ICRC Allegations and Contemporaneous Communications (Colville)

Contents:

- Allegations of harassment and stalking made to ICRC
- Texts and interactions showing friendliness and consent
- Pre-exclusion relationship between Plaintiff and Colville

Relevance:

Demonstrates material inconsistency and falsity in Defendants' claims, and helps prove malicious motive. Supports:

- Count III – Defamation
- Count IV – Violation of Iowa Constitution Equality Clause
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation
- Count VIII – Abuse of Process
- Count IX – Civil Conspiracy

Exhibit E — ICRC Submissions and Contextual Communications (Martinez)

Contents:

- Stewart and Nissen's statements to ICRC referencing Martinez
- Allegations of racism and anti-LGBT+ comments
- Friendly, contradictory communications between Plaintiff and Martinez

Relevance:
Documents the use of false allegations of bias and harassment to justify Plaintiff's exclusion and retaliate against her protected conduct. Supports:

- Count III – Defamation
- Count IV – Violation of Iowa Constitution Equality Clause
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation

- Count IX – Civil Conspiracy

Exhibit F — Esker Statement and Contradictory Communications

Contents:

- Statement submitted to ICRC by Esker
- Friendly communications disproving any alleged misconduct
- Esker's ties to Defendants Colville and Nissen

Relevance:

Evidences a pattern of collusion and narrative amplification using false third-party allegations. Supports:

- Count III – Defamation
- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation
- Count IX – Civil Conspiracy

Exhibit G — Procedural History and Narrative Framing (Phases I–III)

Contents:

- Full procedural record (notices, objections, filings, correspondence)
- Mapping of Defendants' litigation strategy to narrative entrenchment
- Weaponization of process to delay or avoid merits adjudication

Relevance:

Illustrates a pattern of procedural misuse that substitutes litigation friction for factual adjudication. Supports:

- Count VI – Retaliation
- Count VII – Fraudulent Misrepresentation
- Count VIII – Abuse of Process
- Count IX – Civil Conspiracy

Integration Guidance for the Court

This Petition is structured to allow side-by-side reading of factual allegations and evidentiary exhibits. The Statement of Facts and each Count should be read in conjunction with the corresponding exhibits listed above. The attached materials provide a coherent, contemporaneous, and documentary record sufficient for the Court to assess plausibility, credibility, and pretext without reliance on contested summaries alone.

III. PARTIES:

15. **Plaintiff Alexandra "Sondra" Wilson** ("Plaintiff") is an individual residing in Ames, Iowa. Plaintiff is a transgender woman and the founder of Wild Willpower PAC. On April 22, 2022, Plaintiff filed a complaint with the Iowa Civil Rights Commission ("ICRC") against Love Club LLC, Reliable Street Inc., and Lockwood Café alleging discrimination on the basis of sex and gender identity.

16. **Defendant Love Club LLC** is an Iowa limited liability company and the titleholder of the real property located at 4625 Reliable Street, Ames, Iowa 50014, where the events giving rise to this action occurred. Love Club LLC was named as a respondent in Plaintiff's 2022 ICRC complaint, which included allegations relating to unpaid labor under federal law; Plaintiff does not assert a Fair Labor Standards Act claim in this action.

17. **Defendant Reliable Street Inc.** is an Iowa nonprofit corporation operating at 4625 Reliable Street, Ames, Iowa 50014. According to a 2022 statement submitted to the ICRC by Defendant Nissen (Exhibit A-5, p. 27), Reliable Street is a tenant of Love Club LLC. Reliable Street was named as a respondent in Plaintiff's 2022 ICRC complaint.

18. **Defendant Lockwood Café** is a for-profit business co-owned and operated by Sharon and Austin Stewart. Lockwood Café operates in the same building as Reliable Street and, according to the same 2022 ICRC statement (Exhibit A-5, p. 27), is also a tenant of Love Club LLC. Lockwood Café was named as a respondent in Plaintiff's 2022 ICRC complaint.

19. **Defendant Lyndsay Nissen** is an individual residing in Ames, Iowa. Nissen is the President of Reliable Street Inc. and a co-owner of Love Club LLC. Nissen submitted a response to the ICRC on behalf of both entities.

20. **Defendant Sharon Stewart** is an individual residing in Ames, Iowa. Stewart is a co-owner of Lockwood Café and Vice President of Reliable Street Inc. Upon information and belief, Stewart collected, compiled, and transmitted materials to the ICRC relating to Plaintiff. Stewart is sued in her personal capacity. To the extent any

such conduct occurred within the scope of her employment, Plaintiff alleges that it also gives rise to employer and entity liability. The scope of Stewart's conduct will be determined through discovery.

21. **Defendant Willa Colville** is an individual who was employed by Lockwood Café during the events described herein. Upon information and belief, Colville provided materials to Defendant Stewart for submission to the ICRC. Colville is sued in her personal capacity, and Plaintiff alleges that any conduct undertaken within the scope of her employment also gives rise to derivative liability for Lockwood Café. The nature and extent of Colville's involvement will be determined through discovery.

22. **Defendant Denise Martinez** is an individual who was employed by Lockwood Café during the relevant period. Upon information and belief, Martinez provided a written statement and related materials to Defendant Stewart for submission to the ICRC. Martinez is sued in her personal capacity, and Plaintiff alleges that any conduct undertaken within the scope of her employment gives rise to derivative liability for Lockwood Café. The content and purpose of Martinez's submissions will be determined through discovery.

23. **Defendant Charlie Esker** is an individual who resided in Iowa during the events relevant to this action. Esker submitted a third-party statement to the Iowa Civil Rights Commission in support of Love Club LLC, Reliable Street Inc., and Lockwood Café.

IV. JURISDICTION AND VENUE:

24. This Court has subject matter jurisdiction over this action pursuant to the laws of the State of Iowa. Plaintiff asserts claims arising under Iowa common law and the Iowa Civil Rights Act, and seeks relief authorized by statute and equity.

25. Venue is proper in Story County, Iowa pursuant to Iowa Code § 616.18, as one or more Defendants reside in Story County and substantial portions of the alleged conduct occurred therein.

26. Plaintiff previously filed this action in Polk County, Iowa, based on good-faith allegations that substantial injury and wrongful conduct occurred through submissions made to the Iowa Civil Rights Commission ("ICRC"), which is located in Des Moines, Polk County. The case was subsequently transferred to Story County. Plaintiff does not seek interlocutory relief regarding venue in this Petition.

27. Plaintiff exhausted all applicable administrative remedies prior to commencing this action. The Iowa Civil Rights Commission issued a Right-to-Sue Letter on September 6, 2023, authorizing Plaintiff to pursue civil claims in district court. All conditions precedent to suit have been satisfied or are otherwise excused.

V. PROCEDURAL POSTURE AND BASIS FOR AMENDMENT:

28. Plaintiff files this Second Amended Petition concurrently with a Motion for Leave to Amend, consistent with the Court's January 13, 2025 order and pursuant to Iowa Rule of Civil Procedure 1.402(4), which provides that leave to amend shall be freely given when justice so requires. Justice requires amendment here.

29. Plaintiff previously filed an Amended Petition on June 17, 2024. On October 4, 2024, the Court granted Defendants' Motion to Dismiss in part and denied it in part. In its ruling, the Court expressly noted that it did not consider evidentiary exhibits referenced by Plaintiff because those materials were not physically attached to the pleading. As a result, several claims were dismissed without the Court having access to the contemporaneous communications, administrative records, and documentary materials underlying Plaintiff's allegations.

30. Following the October 4 ruling, the Court preserved Plaintiff's ability to seek corrective relief, including reconsideration and amendment, and the parties engaged in court-supervised settlement efforts during which deadlines were stayed. When settlement efforts concluded without resolution, the Court granted Plaintiff leave to amend and authorized the filing of a renewed pleading.

31. As set forth in Section VII and detailed in Exhibit G, Defendants' subsequent litigation conduct materially interfered with Plaintiff's ability to timely and meaningfully pursue the corrective procedures preserved by the Court. Defendants retroactively reframed Plaintiff's prior continuances, compliance efforts, and court-authorized reliance during earlier phases of the litigation as dilatory or abusive, notwithstanding that those actions had been undertaken in good faith and pursuant to Court order.

32. That reframing was then leveraged to oppose continuances, assert waiver and untimeliness, escalate fee exposure, and force Plaintiff into sustained defensive motion practice during the post-dismissal period preserved by the Court, including the need to respond simultaneously to service objections and merits-based filings adopted through

joinder, thereby diverting Plaintiff's limited capacity away from amendment. The cumulative effect was to divert Plaintiff's limited time and capacity away from preparing a motion to reconsider or a responsive second amended petition and toward preserving procedural rights and correcting mischaracterizations of the record.

33. Defendants' use of overlapping pre-answer motions, fee-shifting requests, and venue challenges during this period had the practical effect of consuming the procedural window preserved by the Court for amendment, necessitating the present filing once Plaintiff was able to comply fully with procedural requirements.

34. This Second Amended Petition is therefore not the product of strategic delay, but of procedural obstruction and attrition that consumed the response period the Court had preserved. Plaintiff submits this pleading now that she is able to comply with the Court's procedural requirements and present a complete and properly supported amended pleading.

35. This Second Amended Petition corrects the procedural deficiencies identified by the Court by:

a. Pleading ultimate facts rather than anticipated proof;

b. Attaching and incorporating by reference the documentary exhibits previously referenced but not considered;

c. Clarifying the legal theories asserted and their factual bases; and

d. Reframing Plaintiff's claims to reflect the role of administrative and judicial processes in the alleged misconduct.

36. This Second Amended Petition is submitted for purposes of amendment and pleading and does not request reconsideration of the October 4, 2024 order through this procedural vehicle. Plaintiff preserves all rights available under law.

37. Plaintiff complies with all mandatory confidentiality requirements governing court-supervised settlement proceedings and does not disclose or rely upon any confidential settlement communications in this pleading. Plaintiff notes only that such confidentiality constraints necessarily limit the degree of factual detail that may be pled regarding procedural posture and resulting prejudice.

A. Rule 1.403 and Pleading Necessity

38. Plaintiff acknowledges the length of this Second Amended Petition. The scope and level of detail are not offered for purposes of argument, redundancy, or harassment, but because Defendants' alleged misconduct consists of a multi-phase course of conduct spanning administrative and judicial proceedings over several years. The sequence, timing, and interaction of those actions bear directly on elements of Plaintiff's claims, including notice, intent, retaliation, equitable tolling, causation, and abuse of process.

39. Plaintiff has structured the pleading to minimize burden on the Court by organizing allegations chronologically, segregating procedural history by phase, and incorporating primary source documents through indexed exhibits rather than reproducing them in full within the body of the Petition. The Petition is intended to provide sufficient factual context to permit fair notice and meaningful evaluation of Plaintiff's claims at the pleading stage. Further compression would risk omission of

material facts necessary to understand the sequence of events, the relationship between Defendants' actions across forums, and the procedural effects alleged.

40. The procedural history relevant to Plaintiff's claims, including Defendants' conduct across Phases I through III, is set forth in Section VIII and Exhibit G, which are incorporated by reference for that limited purpose.

VI. STATEMENT OF FACTS:

41. The facts are organized chronologically. Section A describes Plaintiff's authorized participation and Defendants' reliance. Section B summarizes contemporaneous communications reflecting consent. Section C addresses Plaintiff's exclusion and the absence of prior notice. Section D describes Defendants' post-exclusion escalation and the administrative record. Section E summarizes the procedural consequences.

A. Plaintiff's Authorized Participation and Entrusted Responsibilities

(See Exhibits B, C)

42. Plaintiff is a transgender woman whose gender identity and presentation were known to Defendants throughout her participation. Plaintiff's involvement occurred in a mixed-gender community space in which cisgender women and men routinely participated without restriction. At no time during Plaintiff's authorized participation did Defendants communicate any gender-neutral policy governing boundaries, supervision, or exclusion, nor did they articulate standards applied equally to all participants. Plaintiff's participation was visible, open, and conducted with Defendants' express

knowledge and approval. These contextual facts bear directly on Defendants' later differential treatment of Plaintiff following unparticularized complaints.

A.1. Invitations and Authorization

(See Exhibit B)

43. From approximately September 2021 through early 2022, Plaintiff participated in activities associated with Reliable Street Inc. and Lockwood Café through invitations and encouragement from Defendants, including Lyndsay Nissen, Sharon Stewart, and Willa Colville. Plaintiff's involvement arose from express authorization, delegated responsibilities, and Defendants' reliance on Plaintiff's labor, planning, and leadership.

44. In September 2021, Defendant Nissen explicitly accepted Plaintiff's offer to design promotional fliers for Reliable Street events and provided feedback and approval during the drafting process. Plaintiff distributed finalized materials only after receiving affirmative responses from Nissen, who described Plaintiff's efforts as helpful and appreciated. Nissen subsequently posted Plaintiff's work on Reliable Street's official social media page, evidencing adoption and authorization.

45. Over the following months, Nissen continued to solicit Plaintiff's assistance with events and expressed gratitude for Plaintiff's involvement. In February 2022, Nissen entrusted Plaintiff with responsibility for running the Open Mic event in her absence, reinforcing that Plaintiff's presence and participation were welcomed and authorized.

A.2. Reliance and Course of Conduct

(See Exhibits B, C)

46. During this same period, Defendant Stewart requested and approved specific project-related work by Plaintiff. Defendant Colville reviewed and approved the Prairie Proposal and related planning materials. Third-party organizations, including SHEPH, worked with Plaintiff as the designated project lead, in coordination with SHEPH's President, Emily Poag, in reliance on Defendants' representations and their established course of conduct.

47. Plaintiff performed substantial work in reliance on these authorizations over a period of months, including planning, coordination, design, outreach, and labor. During this period, Plaintiff was often the only individual consistently available to perform on-site work—a fact known to Defendants and reflected in their continued reliance on her efforts.

48. Defendants knew or reasonably should have known that Plaintiff's reliance would involve substantial time, labor, and reputational investment, and that abrupt withdrawal of authorization without notice would carry foreseeable consequences.

49. Throughout this period, Defendants expressed appreciation, encouragement, and trust. At no point did any Defendant advise Plaintiff that her involvement was unwelcome, unauthorized, or inappropriate.

50. Plaintiff's participation was undertaken without a formal employment or compensation agreement, but not gratuitously. Plaintiff conferred labor and permanent property improvements in reasonable reliance on Defendants' authorizations,

inducements, and representations, with the expectation of continued involvement, recognition, or equitable treatment.

51. The use of the term “volunteer” reflected the absence of formal compensation, not an intent to donate substantial labor gratuitously. All work was performed pursuant to express authorizations and mutual understandings communicated by Defendants.

A.3. Authorization of Property Use and Improvements

(See Exhibit C)

52. During the same period, Defendants authorized Plaintiff to undertake physical improvement projects on the premises used by Lockwood Café and Reliable Street. In mid- to late-September 2021, Stewart, after consulting with Nissen, authorized Plaintiff to manage and rehabilitate the on-site garden and informed her that she and Poag were “in charge” of the project and “taking the lead” for the year.

53. Stewart, co-owner of Lockwood Café and Vice President of Reliable Street, also provided Plaintiff a 50% discount at Lockwood Café during this period, reinforcing that Plaintiff’s role was active and ongoing. Plaintiff made limited out-of-pocket purchases for project supplies with Defendants’ knowledge and encouragement, including using Reliable Street’s mailing address provided by Nissen for that purpose.

54. These expenditures were transparent and discussed in coordination with project partners. When funding issues arose, Plaintiff requested a group meeting to resolve remaining needs, consistent with her role as project coordinator.

55. Defendants' authorization was repeatedly reinforced through conduct. Nissen publicly represented Plaintiff as the lead on the garden project and coordinated with her regarding logistics, decisions, and volunteers. At no time did any Defendant object or limit Plaintiff's authority.

56. In October 2021, Nissen approved Plaintiff's proposal to install a native prairie. Plaintiff undertook work on both the garden and prairie projects from October 2021 through March 2022, with Defendants' knowledge and consent. Plaintiff was not informed of Love Club LLC's ownership; Defendants held out the property as associated with Reliable Street and Lockwood Café.

57. Although overlapping in some respects, the garden and prairie were distinct projects with separate approvals. Both independently induced Plaintiff's reliance.

58. Plaintiff was informed by Defendant Sharon Stewart, who scheduled the March 31, 2022 meeting, that the purpose of the meeting was to review project progress and discuss remaining logistical needs, and Plaintiff attended the meeting with that understanding.

59. These authorizations and representations form the basis of Plaintiff's reliance and the foreseeability of harm from Defendants' abrupt reversal.

B. Contemporaneous Communications Reflecting Consent

(See Exhibits B–F)

B.1. Communications with Nissen and Colville

(see Exhibits B, D)

60. During the period of Plaintiff's authorized involvement, contemporaneous written communications between Plaintiff and Defendants reflected voluntary, friendly, and mutually affirming engagement. These occurred while Plaintiff was actively participating in projects and before her exclusion.

61. Nissen's communications included repeated expressions of gratitude and continued requests for Plaintiff's help. Colville initiated contact, requested interaction, and used affectionate language, including "Love you <3," without any indication of discomfort or boundary-setting.

B.2. Communications with Martinez

(See Exhibit E)

62. Martinez likewise engaged in friendly communications with Plaintiff. In a February 2022 exchange—later cited as evidence of racist conduct—Martinez responded in real time that Plaintiff's message was fine, raising no objection or concern. No contemporaneous complaint was made regarding that interaction.

B.3. Communications with Esker

(See Exhibit F)

63. Esker communicated amicably with Plaintiff and, after Plaintiff's exclusion, stated they had no involvement and did not know what was happening. Esker's later ICRC submission alleging firsthand observation of misconduct directly contradicted these prior communications.

64. Across these interactions, Defendants did not document objections, initiate corrective action, or express discomfort. The record reflects ongoing voluntary interaction until after Plaintiff engaged in protected activity.

VII. EXCLUSION, ADMINISTRATIVE RETALIATION AND INSTITUTIONALIZATION OF A FALSE NARRATIVE:

A. March 31, 2022 Meeting and Immediate Exclusion

(See Exhibits A, C, D, E)

65. On March 31, 2022, following a meeting scheduled by Defendant Sharon Stewart to review the status of the garden and prairie projects and discuss remaining supply needs, Plaintiff met in person with Defendants Stewart and Nissen. At the time of the meeting, Plaintiff had received no prior notice of any concerns, complaints, or discomfort regarding her conduct.

66. Leading up to this meeting, Plaintiff had regularly checked in with Defendants and collaborators regarding communication, coordination, and project logistics. Defendants responded with continued approval, encouragement, and requests for Plaintiff's further involvement. Based on those interactions, Plaintiff reasonably believed her presence and participation were welcome and authorized.

67. During the March 31 conversation, Defendants informed Plaintiff for the first time that complaints had been made alleging Plaintiff made others uncomfortable or violated personal space. They did not identify the complainants, describe any specific incident, or provide details supporting the allegations. When Plaintiff asked for

clarification or an opportunity to respond, Defendants declined, citing a need to protect the identities of those who complained.

68. Defendants initially characterized the complaint as involving one person and later claimed that multiple people had expressed concern. These shifting accounts were inconsistent with Plaintiff's recent communications with others, which reflected friendly and reciprocal interactions.

69. Defendants then informed Plaintiff she was no longer permitted on the premises or at affiliated events. When Plaintiff asked whether her behavior could be modified to address concerns, Defendants stated it was "too late" to do so.

70. Plaintiff was immediately excluded from a community space where she had previously been invited to participate with express authorization and trust. At the conclusion of the meeting, Nissen provided Plaintiff with $300 in cash as partial reimbursement for project-related purchases.

71. The exclusion occurred shortly after Plaintiff requested a collaborative discussion regarding remaining funding logistics and supply needs—a step consistent with her authorized coordination role.

A.1. Absence of Prior Notice or Contemporaneous Complaints

(See Exhibits C, D, E)

72. Prior to March 31, Plaintiff had received no notice—formal or informal—of any concern with her conduct. No Defendant, employee, or participant had warned,

disciplined, or asked Plaintiff to alter her behavior during the months of authorized participation.

73. Defendants Martinez, Colville, and Nissen continued to engage with Plaintiff in a friendly, affirming manner through late March, including in personal communications. No boundaries or concerns were expressed at that time.

74. Upon learning of the exclusion, third parties who had worked with Plaintiff confirmed they had no concerns and welcomed Plaintiff's participation.

75. Allegations about Plaintiff violating personal space "for months" were raised only after Plaintiff sought clarification. These assertions were inconsistent with the contemporaneous record.

76. Plaintiff was excluded without any identification of applicable standards, without a corrective process, and without a meaningful opportunity to respond. Plaintiff further alleges that the absence of neutral standards and the immediacy of the exclusion support an inference of differential treatment based on gender identity.

A.2. Sudden Reversal in Characterization of Conduct and Plaintiff's Good-Faith Response

(See Exhibit D)

77. Following her exclusion, Plaintiff was left without any detail as to the nature or basis of the complaints. Concerned about possible reputational harm, she engaged in limited, good-faith outreach to those familiar with her prior role to prevent misunderstanding and explain that she did not know why she had been excluded.

In response, Defendant Colville sent Plaintiff a message accusing her of violating personal space "for months" and admonishing her for contacting others. This message represented a stark departure from Colville's prior friendly and affirming interactions.

78. At that time, Plaintiff had no knowledge of any representations made to third parties and no way of correcting potential mischaracterizations.

B. Plaintiff's Good-Faith Efforts to Resolve the Dispute

(See Exhibit A)

79. Plaintiff submitted a written request for mediation on April 12, 2022, along with supporting documentation demonstrating her authorized role and a lack of any prior objections. She followed up on April 18. Defendants did not respond.

80. Only after these good-faith efforts failed did Plaintiff consult with legal and administrative resources and proceed to file a complaint with the Iowa Civil Rights Commission.

C. Protected Activity and the ICRC Administrative Process

(See Exhibit A)

81. Plaintiff alleges a clear escalation in Defendants' conduct following her protected activity. Prior to her administrative complaint, no allegations of harassment, racism, or stalking had been documented or conveyed.

82. After filing her complaint with the ICRC in April 2022, Plaintiff was denied access to Defendants' submissions during the investigation and appeal. The ICRC relied

on those untested submissions and issued a Tier One closure, creating an official administrative record institutionalizing the disputed allegations.

83. Plaintiff was thus denied a meaningful opportunity to review or rebut the evidence relied upon against her.

D. Post-Complaint Narrative Shift

(See Exhibits A–F)

84. Only after Plaintiff filed her ICRC complaint did Defendants submit statements reframing previously consensual and authorized conduct as misconduct. These assertions contradicted contemporaneous communications showing authorization, trust, and mutual cooperation.

85. Plaintiff alleges that these narratives were developed post hoc to justify her exclusion and retaliate against her protected activity.

E. Submission of Materially Misleading Documents

(See Exhibits A, A-1, D, E)

86. Defendants submitted altered and misleading documents to the ICRC. These included reversed message chronology, selective excerpts, and misdated communications. Plaintiff had previously provided the accurate versions of these communications directly to Defendants, who nonetheless submitted misleading versions to the agency.

87. Such submissions materially distorted the factual record and were relied upon by a state agency.

F. Adoption of the Narrative

(See Exhibits A–F)

88. Each Defendant adopted the post-complaint narrative, despite having access to contemporaneous records that contradicted it. Agents of the organizational Defendants contributed to or transmitted the narrative, and each entity benefited from its institutionalization.

G. Categorical Falsity of Defendants' Allegations

(See Exhibits B, C, D, E, F)

89. Plaintiff unequivocally denies all allegations of stalking, harassment, racism, boundary violations, or unauthorized labor. These allegations were not raised contemporaneously, contradict written records, and were first advanced after Plaintiff engaged in protected activity.

90. Plaintiff alleges that Defendants knowingly or recklessly disregarded the falsity of their claims and used the resulting narrative to inflict reputational harm, retaliate, and avoid scrutiny of their own conduct.

91. This categorical denial is pleaded affirmatively to preserve the issue across all relevant causes of action.

VIII. ABUSE OF PROCESS AND RETALIATORY USE OF JUDICIAL PROCEDURE:

92. Plaintiff's abuse-of-process claims are directed at Defendants' intentional use of procedural mechanisms for collateral purposes and do not require adjudication of the propriety of any judicial ruling.

A. Institutionalization of a Retaliatory Narrative Across Forums

93. As set forth in Section VI.G, the underlying allegations advanced by Defendants across administrative and judicial forums were categorically false. Defendants' abuse of process consisted not merely of aggressive litigation tactics, but of the intentional institutionalization and procedural weaponization of allegations Defendants knew or recklessly disregarded were untrue.

94. Defendants' conduct did not conclude with Plaintiff's exclusion or with the assertion of post hoc allegations. Rather, Defendants advanced and institutionalized a retaliatory narrative through successive formal processes—first administratively and then judicially—deploying those processes not as neutral forums for adjudication, but as mechanisms to impose reputational injury, procedural exhaustion, and coercive leverage.

95. As detailed in Exhibit G, Defendants carried the same narrative across forums, adapting it to procedural posture while preserving its core framing: Plaintiff as an aggressor abusing process, and Defendants as victims burdened by her actions. Once embedded in an administrative record, that narrative was redeployed in judicial filings to justify procedural compression, venue transfer, and fee escalation, thereby transforming formal process itself into the instrument of harm alleged herein.

B. Phase I — Retaliatory Initiation and Coordinated Procedural Compression (Polk County)

96. Immediately after Plaintiff filed this civil action, Defendants initiated a coordinated series of procedural filings that functioned not to resolve threshold issues in an orderly manner, but to compress response time, escalate financial exposure, and impose immediate procedural disadvantage on a Plaintiff at the inception of the case.

B.1. Same-Day Procedural Flooding

97. On a single day—February 29, 2024—Defendants filed six separate pre-answer motions, including venue challenges, service objections, a motion to dismiss, and multiple alternative pleading motions. Each filing independently triggered response deadlines under the Iowa Rules of Civil Procedure.

98. Filed simultaneously rather than sequentially, these motions functioned collectively to overwhelm the procedural field at the inception of the case, forcing Plaintiff to respond to multiple dispositive and quasi-dispositive filings within the same compressed response period and before any discovery could occur.

B.2. Misrepresentation of Venue Law as a Leveraging Mechanism

99. Within this coordinated filing set, Defendants advanced a venue-transfer theory that misrepresented Iowa venue law by asserting that Polk County was improper while omitting Plaintiff's pleaded statutory basis for venue under Iowa Code § 616.18. Plaintiff alleged that the operative injury flowed from Defendants' submissions to the

Iowa Civil Rights Commission in Des Moines, located in Polk County—an allegation that, under Iowa law, supports venue where the legal injury is sustained.

100. Defendants nevertheless invoked Iowa Rule of Civil Procedure 1.808(1), which applies only when an action is commenced in the "wrong county," and sought not only transfer but cost-shifting and attorney's fees predicated on that interpretation. Defendants advanced this theory despite Plaintiff having articulated a statutory venue basis on the face of the Petition and again in her resistance.

101. The Court granted the venue motion "for the reasons stated" in Defendants' filing, without expressly addressing Plaintiff's pleaded statutory grounds. The resulting order immediately altered the procedural posture of the case and created the predicate for Defendants' subsequent escalation of fee-seeking and cost-shifting efforts.

B.3. Early Narrative Reframing at the Pleading Stage

102. From the outset of Phase I, Defendants' coordinated pre-answer motions did not merely seek procedural relief, but embedded a narrative framing Plaintiff's claims as "unsubstantiated," "harassing," or abusive of process. These characterizations appeared in Defendants' initial omnibus motion and service-related filings, notwithstanding that no adjudication had occurred and no counterclaims were asserted.

103. Defendants paired this framing with demands for expedited dismissal, heightened pleading, and evidentiary specificity ordinarily associated with trial or summary judgment practice, while simultaneously opposing Plaintiff's requests for leave to amend or continuance. These demands were advanced in a notice-pleading jurisdiction and before any discovery had occurred.

104. Plaintiff alleges that the introduction of this framing at the pleading stage—combined with overlapping pre-answer motions seeking venue transfer, dismissal, and fee-shifting—contributed to an early procedural environment in which Plaintiff's compliance efforts were recast as obstruction and her claims were evaluated within a procedural environment shaped by that framing before factual development.

B.4. Tactical Escalation Following Favorable Ruling

105. Following the venue-transfer order—and only after Defendants secured favorable threshold rulings altering Plaintiff's chosen forum—Defendants abandoned their prior service objections, accepted service, and promptly sought attorney's fees and costs under the same venue theory they had advanced.

106. This sequence reflects a tactical pivot: Defendants first deployed service objections and venue challenges simultaneously, then, after obtaining a favorable venue ruling, reversed position on service and escalated fee-seeking efforts. The escalation occurred only after Defendants obtained procedural leverage through the venue ruling and did not precede it.

107. Defendants were at all times represented by experienced counsel and framed their venue and fee arguments as matters of law, invoking statutory and rule-based authority. Plaintiff alleges that the misrepresentation of venue law, when coupled with same-day procedural flooding and subsequent fee escalation, functioned as stacked leverage rather than good-faith threshold litigation.

B.5. Retaliatory Purpose and Procedural Effect

108. Plaintiff alleges that this sequence—same-day procedural flooding; advancement of a venue-transfer theory that misrepresented Iowa venue law and carried fee consequences; grant of venue transfer without addressing Plaintiff's pleaded statutory basis; abandonment of prior service objections; and Defendants' subsequent motion to enlarge seeking costs and attorney's fees—was not undertaken to resolve genuine threshold defects in an orderly manner.

109. Rather, Plaintiff alleges that Defendants used procedural mechanisms as stacked leverage: first to remove Plaintiff's chosen forum, and then to escalate financial exposure through fee-seeking and cost-shifting motions, while simultaneously opposing Plaintiff's requests for continuance and minimizing documented constraints communicated to the Court. The cumulative effect was to raise the cost of participation, compress response windows, and deter pursuit of Plaintiff's claims before discovery or merits adjudication could occur.

B.6. Narrative Reinforcement Through Procedural Framing

110. Throughout Phase I, Defendants consistently reinforced a narrative framing Plaintiff's filings as abusive, burdensome, or improper, notwithstanding that the procedural congestion was created by Defendants' own coordinated motion practice. Defendants repeatedly characterized Plaintiff's compliance efforts as obstruction or delay while invoking that characterization to justify further procedural escalation, including cost-shifting requests.

111. This framing functioned to convert Defendants' affirmative use of procedure into alleged misconduct by Plaintiff, reinforcing the retaliatory narrative originally

advanced in the administrative forum and transplanting it into judicial pleadings at the outset of the case.

C. Phase II — Proof-Based Framing Coupled With Proof Foreclosure

(Story County / Judge Currie)

112. Following transfer to Story County, Defendants altered the form—but not the substance—of their litigation strategy. While preserving the narrative introduced in Phase I, Defendants shifted from threshold procedural attacks to repeated assertions that Plaintiff's claims were "unsubstantiated" and failed for lack of proof, notwithstanding that the case remained at the pleading stage and discovery had not occurred.

113. Although framed as motions to dismiss under Iowa Rule of Civil Procedure 1.421, Defendants' filings repeatedly characterized dismissal as warranted based on the absence of "proof" or "disproof," importing evidentiary concepts ordinarily associated with summary judgment or trial into notice-pleading motion practice. These arguments were advanced before Plaintiff had access to discovery or an evidentiary record.

C.1. Court-Contemplated Evidence and Plaintiff's Good-Faith Reliance

114. During Phase II, the Court issued a series of orders contemplating a consolidated hearing on pending motions and inviting the parties to indicate whether they intended to present evidence in connection with that hearing. Subsequent orders acknowledged that evidentiary materials might be presented, while emphasizing that the proceeding was not a trial and that the Court did not expect extensive exhibits or proof of claims at that stage.

115. In addition, the Court expressly directed Plaintiff, as a self-represented litigant, to familiarize herself with and comply with the Iowa Rules of Civil Procedure and the Iowa Rules of Evidence, including Chapter 5 (Evidence). Viewed collectively, these orders created a procedural framework in which evidentiary preparation was reasonably contemplated.

116. Plaintiff relied on this framework in good faith. She organized exhibits, reviewed the Rules of Civil Procedure and Evidence, and consulted publicly available judicial guidance for pro se litigants. Nothing in the Rules or in public-facing court guidance indicated that evidentiary attachments were required or appropriate at the pleading stage. Plaintiff repeatedly informed the Court that she was preparing responsive materials consistent with the Court's scheduling communications and sought limited continuances to do so.

117. Plaintiff's reliance was not speculative or strategic; it was grounded in the Court's orders, the procedural posture of the case, and the need to respond simultaneously to overlapping dispositive motions carried forward from Phase I.

C.2. Defendants' Opposition to Evidentiary Development and Continuances

118. Despite having framed dismissal around Plaintiff's alleged lack of proof, Defendants expressly disclaimed any intent to present evidence themselves and opposed Plaintiff's efforts to prepare or present evidentiary materials. Defendants objected to continuances sought for compliance-related preparation and urged the Court to resolve dispositive motions without factual development.

119. At the same time, Defendants characterized Plaintiff's compliance-driven efforts—undertaken in reliance on the Court's orders and instructions—as burdensome, improper, or abusive. This posture created a procedural bind: Plaintiff was criticized for alleged insufficiency of factual support while being denied a meaningful opportunity to develop or present such support through discovery or evidentiary proceedings.

C.3. Proof Foreclosure and With-Prejudice Dismissals

120. The Court ultimately declined to receive evidence in connection with Defendants' motions to dismiss and resolved dispositive issues on the pleadings alone. Multiple claims were dismissed with prejudice without discovery or evidentiary hearing, foreclosing Plaintiff's ability to substantiate those claims through factual development.

121. Plaintiff alleges that the cumulative effect of these rulings had the practical effect of carrying Defendants' proof-based narrative—introduced at the pleading stage—into dispositive outcomes while insulating that narrative from adversarial testing. The dismissals with prejudice functioned not merely to terminate claims, but to preclude factual adjudication altogether.

C.4. Reliance, Extensions, and Subsequent Narrative Reframing

122. During Phase II, the Court granted extensions and continuances while Plaintiff prepared an amended petition and responsive materials in accordance with the procedural framework then in place. Those extensions reflected contemporaneous recognition that Plaintiff's requests were grounded in compliance and procedural fairness rather than delay.

123. Plaintiff alleges that Defendants later sought to reframe these same continuances and compliance-based efforts as dilatory or abusive after the Court declined to receive evidence and resolved dispositive motions without factual development. This reframing disregarded the procedural context created by the Court's own orders and Plaintiff's documented good-faith reliance on them.

C.5. Phase II Procedural Effect

124. Plaintiff alleges that Phase II converted Phase I's narrative framing into a mechanized dismissal process:

- proof-based insufficiency was asserted at the pleading stage;
- Plaintiff's good-faith reliance on court-contemplated procedures was induced;
- evidentiary development was opposed and ultimately foreclosed; and
- claims were dismissed with prejudice without discovery or evidentiary hearing.

125. This sequence set the conditions for Phase III, in which Defendants would attempt to erase the procedural context of Phase II and recast Plaintiff's reliance on court-structured processes as procedural misconduct, further entrenching the retaliatory narrative across forums.

D. Phase III — Procedural Entrapment, Narrative Inversion, and Foreclosure of Due Process

(Story County / Judge Doyle)

126. Following entry of the October 4, 2024 dismissal order, the Court extended deadlines to preserve Plaintiff's opportunity to seek reconsideration and amendment. Defendants were aware that Plaintiff had been granted additional time to respond to the dismissal, and that the Court had expressly authorized further filings as part of an orderly post-ruling process.

127. Plaintiff alleges that, rather than allowing those court-authorized response windows to function as intended, Defendants exploited the subsequent judicial transition to escalate pressure, inject procedural confusion, and invert responsibility for the very delay and congestion Defendants themselves had created.

D.1. Knowledge of Extensions and Strategic Obscuring of Procedural Context

128. After Judge Currie extended post-dismissal deadlines and the case was reassigned, Defendants advanced arguments asserting untimeliness, waiver, and procedural default — arguments that depended on disregarding the extensions already granted and the procedural posture explicitly preserved by prior orders.

129. Plaintiff alleges that Defendants knowingly leveraged the loss of judicial continuity to obscure the Phase II record, forcing Plaintiff to divert time and effort away from substantive corrective filings and toward reconstructing docket history to demonstrate compliance. This tactic transformed court-authorized response periods into contested terrain and converted procedural preservation into alleged misconduct.

D.2. Plaintiff's Attempt to De-Escalate and Defendants' Refusal

130. On March 18, 2025, Plaintiff directly contacted Defendants' counsel in an effort to avoid further procedural escalation. In that correspondence, Plaintiff explained that she was facing extraordinary external pressures arising from rapidly unfolding state and federal actions affecting transgender Iowans, that she was actively engaged in urgent civic and academic obligations, and that she intended to seek a motion to continue so she could responsibly comply with the Court's deadlines. Plaintiff expressly requested that Defendants not resist such a motion, explaining that opposition would force unnecessary motion practice and further derail substantive resolution.

131. Defendants declined that request and instead opposed Plaintiff's subsequent Motion to Continue, filed March 28, 2025, notwithstanding their awareness that the Court had already extended deadlines and that Plaintiff was attempting to preserve her right to seek reconsideration and amendment rather than abandon her claims.

D.3. Escalation Through Resistance and Narrative Inversion

132. In their Resistance to Plaintiff's Motion to Continue, Defendants reframed Plaintiff's court-authorized reliance as "dilatory prosecution," asserted that Plaintiff was seeking "extreme relief," and amplified claims of stress and harm to Defendants — despite the fact that the procedural congestion at issue arose from Defendants' own repeated oppositions, overlapping filings, and continued fee-seeking.

133. Defendants' Resistance ignored the procedural context established in Phases I and II, including court-directed evidentiary preparation, granted continuances, and preserved response windows. Instead, Defendants cast Plaintiff's effort to comply with

court-authorized deadlines as abusive, while positioning themselves as victims of delay they had actively resisted resolving.

134. This framing reflects a pattern in which Defendants denied the procedural bind created by their own conduct, attacked Plaintiff for attempting to comply, and reversed responsibility for systemic delay and stress onto Plaintiff.

D.4. Coercive Effect of Fee Exposure and Forced Defensive Motion Practice

135. Plaintiff further alleges that Defendants compounded this escalation by filing an Answer asserting entitlement to attorney's fees and costs, materially altering the procedural posture at a moment when Plaintiff was attempting to prepare a motion to reconsider or a second amended petition. The introduction of fee exposure forced Plaintiff into immediate defensive filings to preserve her rights and respond to court orders requiring clarification of the procedural record.

136. As a result, Plaintiff was diverted away from substantive corrective relief and into reactive motion practice — a diversion Defendants then cited as evidence of delay or abuse.

D.5. External Constraints Known to Defendants and Resulting Prejudice

137. At the time of this escalation, Plaintiff's academic semester at Iowa State University was underway, substantially increasing her time constraints and cognitive load. Plaintiff disclosed these constraints to the Court and to Defendants, including the fact that the cumulative stress of the litigation had already forced her to withdraw from coursework.

138. Plaintiff alleges that Defendants knowingly exploited these constraints by opposing continuances, escalating fee threats, and multiplying procedural disputes — thereby increasing exhaustion, compressing response windows, and impairing Plaintiff's ability to pursue reconsideration or amendment in a meaningful way.

D.6. Formalization of the Trap

139. On April 14, 2025, the Court granted Plaintiff a limited extension to file a motion to reconsider but simultaneously declared that no further extensions would be granted. Plaintiff alleges that this ruling — entered after Defendants' resistance and narrative escalation — had the practical effect of ratifying a procedural environment in which Plaintiff had been forced to expend critical time defending against Defendants' reframing rather than preparing the very filings the extension ostensibly preserved.

D.7. Phase III Procedural Effect

140. Plaintiff alleges that Phase III completed Defendants' abuse-of-process pattern by:

- exploiting a judicial transition to erase procedural context;
- resisting continuances Defendants knew were necessary for compliance;
- escalating pressure through fee assertions and adversarial resistance;
- forcing Plaintiff into defensive motion practice at the expense of corrective relief; and

- amplifying character attacks to portray reliance on court-authorized procedures as abuse.

141. When viewed cumulatively and in light of Phases I and II, Plaintiff alleges that Defendants' conduct in Phase III transformed procedural mechanisms into instruments of coercion and exhaustion, effectively denying Plaintiff a meaningful opportunity to be heard and foreclosing due process through attrition rather than adjudication.

D.8. Ongoing Deprivation, Forced Delay, and the Necessity of Present Corrective Relief

142. Plaintiff alleges that Defendants' Phase III conduct did not merely prejudice past proceedings, but directly prevented Plaintiff from exercising the corrective rights the Court purported to preserve following the October 4, 2024 dismissal order.

143. As described above, Defendants' resistance to continuances, escalation of fee exposure, filing of an Answer asserting costs, and amplification of character-based attacks forced Plaintiff into sustained defensive motion practice during the Spring 2025 academic semester at Iowa State University. Rather than being able to prepare a substantive motion to reconsider or a fully developed second amended petition responsive to the October 4 ruling, Plaintiff was compelled to divert her limited time and capacity to preserving procedural rights, correcting the record, and responding to Defendants' escalating filings.

144. When the Spring 2025 semester ended, Plaintiff did not transition into a period of availability for corrective litigation. Instead, Plaintiff spent the Summer 2025

term engaged in basic recovery and survival, addressing the cumulative personal, financial, and emotional consequences of prolonged litigation pressure and reputational harm stemming from Defendants' conduct dating back to 2022. Plaintiff alleges that this period was not one of strategic delay, but of necessary stabilization after years of continuous damage control precipitated by Defendants' actions.

145. Plaintiff then returned to Iowa State University as a full-time student during the Fall 2025 semester, again without the capacity to complete the substantive corrective filings she had intended to prepare the prior spring. Throughout this period, Plaintiff continued to bear the unresolved effects of the October 4 dismissal without having ever received a meaningful opportunity to respond to it on the merits through a motion to reconsider or a properly supported second amended petition.

146. Now, during the interval between academic semesters, Plaintiff is finally able to complete and submit the second amended petition she originally sought to prepare in Spring 2025. Plaintiff alleges that denial of this filing would ratify the very abuse-of-process tactics described in Phases I through III by allowing Defendants to benefit from procedural obstruction that succeeded not only in delaying, but in effectively nullifying, Plaintiff's opportunity to respond.

147. Plaintiff further alleges that if Defendants' tactics are permitted to operate as a permanent bar to this filing, the result would be a denial of due process effected not by adjudication on the merits, but by attrition, exhaustion, and procedural entrapment — amounting to extrinsic fraud as a matter of procedural effect, in that Plaintiff was prevented from fully and fairly presenting her claims

148. Across all phases, Defendants' conduct reflects a consistent pattern: the use of formal process not to resolve disputes on the merits, but to impose pressure, shift narrative blame, and exhaust Plaintiff procedurally. The harm alleged arises not from any single motion or ruling in isolation, but from the cumulative deployment of administrative and judicial mechanisms as tools of retaliation, leverage, and reputational harm.

IX. HARM AND CONTINUING EFFECTS:

A. Reputational, Professional, and Personal Harm

149. As a direct and proximate result of Defendants' statements, administrative submissions, and litigation conduct, Plaintiff **suffers and continues to suffer** substantial reputational, professional, and personal harm. Plaintiff **remains barred** from Defendants' premises and **continues to be excluded** from a community space in which she previously participated with express authorization, encouragement, and reliance. Plaintiff's sudden and sustained absence from that space **is noticed and remarked upon** by friends, acquaintances, fellow artists in the local arts community—including individuals who attend Reliable Street–affiliated open mics—and volunteers who previously worked with Plaintiff on the garden and prairie projects.

150. Following her exclusion, Plaintiff informs and continues to inform friends and family of what occurred. Plaintiff does so not to disseminate gossip, but because a sudden exclusion from a visible leadership role—based on serious and false allegations—creates ongoing reputational risk. Under such circumstances, a reasonable person affirmatively denies false accusations to protect personal safety, reputation, and the

integrity of the factual record, particularly where harmful rumors are likely to circulate and persist absent clarification.

151. False allegations of harassment, stalking, racism, and related misconduct are embedded in the official records of a state administrative agency and are repeated and relied upon in judicial filings. The institutionalization of these allegations impairs Plaintiff's standing within local arts, advocacy, and community-organizing spaces; interferes with her ability to participate in community programming and leadership; and forecloses and chills prospective opportunities dependent upon trust, credibility, and reputation.

152. Reliable Street and Lockwood Café remain well-known community hubs within Ames. Individuals who work at, attend events at, or regularly associate with those spaces also participate in other local community and arts events. The existence of serious allegations coupled with Plaintiff's visible exclusion from the premises continues to create reputational stigma, even in the absence of detailed explanation. Given the predatory nature of the allegations, Plaintiff continues to fear attending local events for her personal safety and continues to avoid many community gatherings she otherwise would attend. Plaintiff limits her participation in public events in Ames to avoid confrontation and further harm, particularly after observing the aggressive and expansive manner in which Defendants continue to pursue reputational injury through formal processes.

153. Plaintiff has spoken and continues to speak with individuals who indicate they have "heard the other side," are uncertain what to believe, and elect to disengage

from Plaintiff as a result. At least one acquaintance has disassociated entirely and remains disengaged. Even where individuals are not provided explicit details of stalking or harassment allegations, they are exposed to a narrative suggesting that matters "did not work out" and that Plaintiff was unable to let the issue go—characterizations that continue to place Plaintiff's credibility and character in question.

154. Because Plaintiff's academic, advocacy, and public-facing work depends upon credibility and good standing, the unresolved question of whether Plaintiff stalked or harassed a woman in Ames, Iowa continues to inflict harm extending beyond personal distress. These allegations undermine Plaintiff's professional and civic credibility and impair her ability to function effectively in academic, organizational, and leadership roles.

155. Plaintiff is a declared candidate for statewide public office in Iowa. The continued presence of unadjudicated allegations in administrative and judicial records foreseeably and presently implicates Plaintiff's reputation, campaign activities, and associated organizational efforts. Plaintiff alleges that these unresolved allegations create an ongoing chilling effect on public engagement and may continue to adversely affect participation in campaign-related events and initiatives, particularly within her home community.

156. The publication and institutionalization of these allegations cause and continue to cause Plaintiff severe emotional distress, anxiety, and humiliation, particularly given the absence of contemporaneous notice, specificity, or opportunity to respond before the allegations were accepted and relied upon by a government agency.

Plaintiff continues to experience a chilling effect on community participation, knowing that conduct previously authorized and encouraged remains retroactively reframed as misconduct in official forums.

157. Plaintiff did not obtain access to the underlying statements and documentary submissions relied upon by the Iowa Civil Rights Commission until October 2023. That delayed disclosure continues to compound the reputational harm by prolonging Plaintiff's inability to fully rebut the allegations, correct the record, or mitigate downstream consequences.

158. The harm to Plaintiff is ongoing and compounding. The challenged allegations remain embedded in institutional records and continue to be repeated, adopted, and relied upon in judicial proceedings, continuously impairing Plaintiff's reputation, credibility, opportunities, and well-being, including her advocacy work, organizational development, and campaign for public office.

B. Emotional Distress and Cognitive Burden Resulting from Institutionalized Allegations

159. In addition to reputational and professional harm, Plaintiff experiences and continues to experience severe and sustained emotional distress, stress, and anxiety as a foreseeable result of Defendants' conduct. This distress does not arise from ordinary litigation pressures, but from the ongoing institutionalization of stigmatizing allegations without notice, specificity, or opportunity to respond, followed by prolonged procedural escalation and uncertainty.

160. The cumulative effect of Defendants' conduct impairs and continues to impair Plaintiff's ability to concentrate, process information, and perform academically and professionally. Plaintiff is forced to expend substantial emotional and cognitive resources responding to reputational threats, procedural attacks, and ongoing damage-control efforts rather than engaging fully in her studies, work, and daily life.

C. Escalation After Counsel Involvement and Procedural Repetition of the Narrative

161. After Plaintiff engaged in protected activity and Defendants retained counsel, the narrative first advanced during the ICRC proceedings was and continues to be repeated, expanded, and amplified through judicial filings associated with this action.

162. Defendants, through counsel, file and continue to rely upon multiple procedural motions and filings that characterize Plaintiff as harassing, vexatious, or abusive, despite the absence of any adjudicated finding of misconduct. The repetition of this narrative across administrative and judicial forums functions cumulatively to normalize the allegations, reinforce stigma through institutional channels, delay adjudication on the merits, impede discovery, and entrench reputational harm through procedural repetition.

D. Interference with Academic, Professional, and Institutional Obligations

163. As a direct and foreseeable consequence of Defendants' conduct, Plaintiff has been and continues to be compelled to divert substantial time, energy, and resources away from academic, contractual, and institutional obligations in order to respond to and mitigate the effects of Defendants' actions.

Defendants knew or reasonably should have known that escalating procedural burden and reputational harm would and does foreseeably interfere with Plaintiff's ability to meet academic and institutional commitments, particularly where Plaintiff disclosed those constraints to the Court.

164. As a result, Plaintiff has incurred and continues to incur academic disruption, including dropped coursework, incompletes, and diminished academic performance, as well as interference with contracts and commitments involving academic institutions, faculty mentors, scholarship programs, honor societies, and universities.

E. Loss of Time, Labor, and Life Opportunities as Compensable Harm

165. Over multiple years, Plaintiff has been and remains compelled to expend extraordinary time and personal labor responding to administrative proceedings, litigation compliance, record reconstruction, and damage-control efforts necessitated solely by Defendants' conduct.

166. This labor constitutes and continues to constitute compensable economic harm, including lost productive capacity, delayed academic progress, and foregone professional opportunities. Defendants knew or reasonably should have known that imposing sustained procedural conflict on a self-represented litigant would externalize professional labor onto Plaintiff herself.

167. As a further consequence of Defendants' conduct, Plaintiff's compelled diversion of time and labor has materially impaired her ability to work, earn income, develop her political campaign and affiliated organizations, and engage in ordinary personal life activities. Time that would otherwise have been devoted to campaign

development for *Sondra Wilson for Iowa Governor*, to organizational work with Wild Willpower PAC, to paid labor, and to personal relationships and recreation has instead been consumed by defensive litigation and damage control necessitated by Defendants' actions. This loss of time, autonomy, and ordinary life enjoyment constitutes compensable harm, including impairment of Plaintiff's ability to pursue livelihood, civic engagement, and personal well-being.

F. Prospective Harm and Public-Facing Consequences

168. The continued existence of unadjudicated allegations in institutional records poses an ongoing and foreseeable risk to Plaintiff's reputation, credibility, and future opportunities. The persistence of these allegations creates continuing reputational leverage and threatens irreparable harm, independent of any single proceeding.

169. Absent corrective relief, Defendants' conduct will continue to inflict prospective damages by allowing false and misleading allegations to remain embedded in official records in a manner foreseeably damaging to Plaintiff's public standing, academic advancement, professional prospects, organizational development, and campaign activities.

170. Plaintiff seeks corrective relief in part to prevent these prospective harms and to expunge or rebut the false institutional allegations currently embedded in the record.

G. Continuing and Cumulative Nature of Harm

171. The harm alleged herein does not arise from a single completed act, but from the cumulative and compounding effect of Defendants' conduct across administrative and

judicial forums. Defendants use and continue to use formal processes not to resolve disputes on the merits, but to impose pressure, shift narrative blame, exhaust Plaintiff procedurally, and entrench reputational injury through institutional repetition.

H. Incorporation of Exhibits

172. The foregoing facts are supported by contemporaneous communications, administrative records, and procedural history attached as Exhibits A through G, which Plaintiff incorporates by reference.

X. CAUSES OF ACTION:

173. Plaintiff pleads certain claims in the alternative as permitted under Iowa Rule of Civil Procedure 1.402(5), recognizing that the precise legal characterization of Defendants' conduct may be clarified through discovery. Plaintiff does not concede the absence of any element of any claim pleaded herein. Plaintiff pleads the following causes of action based on overlapping and alternative theories of liability. While certain factual allegations support multiple counts, Plaintiff does not seek duplicative recovery and will elect remedies as required by law. Counts are pled in the alternative where appropriate and should be read as independent and non-exclusive.

174. Each Count is pleaded as a separate and independent cause of action and may incorporate overlapping factual allegations without waiving alternative theories of liability.

COUNT I – PROMISSORY ESTOPPEL

(Induced Authorization and Reliance — Garden Project)

(Against Defendants Reliable Street Inc., Lockwood Café, Lyndsay Nissen, and Sharon Stewart)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Lyndsay Nissen, and Sharon Stewart (collectively, the "Garden Promisor Defendants").

B. Clear and Definite Promise

The Garden Promisor Defendants made clear, definite, and actionable promises to Plaintiff concerning her authority, role, and continued involvement in the community garden project located on Defendants' premises.

Those promises included, but were not limited to:

1. Authorizing Plaintiff to manage, rehabilitate, and oversee the community garden;
2. Representing that Plaintiff and a designated collaborator were "in charge" of the garden project for the growing season and "taking the lead" for the year;
3. Delegating operational authority over planning, layout, coordination of volunteers, and site decisions;
4. Encouraging Plaintiff to solicit participation, materials, and labor in furtherance of the garden project; and
5. Providing tangible recognition and benefits, including a standing discount at Lockwood Café, in acknowledgment of Plaintiff's role and contributions.

These promises were communicated directly by Defendants Nissen and Stewart, acting individually and as agents of the entity Defendants, and were reinforced through repeated words and course of conduct over several months.

Defendants represented that Plaintiff was "taking the lead on the community garden this upcoming season" and was "in charge of the garden this year," thereby authorizing Plaintiff's leadership and continued involvement for the duration of the growing season and associated project lifecycle, not on an at-will or day-to-day basis.

C. Foreseeable and Reasonable Reliance

The Garden Promisor Defendants intended, or reasonably should have expected, that Plaintiff would rely upon these promises.

Plaintiff's reliance was foreseeable and reasonable because:

- Plaintiff was expressly told she was "in charge" of the garden project;
- Plaintiff was granted authority to make operational decisions affecting Defendants' premises;
- Plaintiff's work was integrated into Defendants' ongoing operations and physical property;
- Plaintiff was encouraged to devote sustained time, labor, and coordination to the project; and
- Defendants repeatedly accepted, encouraged, and relied upon Plaintiff's continued performance.

D. Actual Reliance and Detriment

Plaintiff did, in fact, reasonably rely on Defendants' promises by:

- Performing substantial unpaid labor over an extended period;
- Coordinating volunteers, planning infrastructure, and performing physical work on the garden;
- Incurring out-of-pocket expenses for materials and supplies;
- Devoting significant time, energy, and personal resources to the project; and
- Associating her reputation and standing with Defendants' premises and programming.

Plaintiff's reliance resulted in concrete detriment when Defendants abruptly revoked authorization, excluded Plaintiff from the premises, and repudiated the role and authority they had induced Plaintiff to undertake—while retaining the benefits of her labor and improvements.

E. Injustice Absent Enforcement

Injustice can be avoided only by enforcement of Defendants' promises.

Defendants accepted and retained the benefits of Plaintiff's labor, planning, coordination, and expenditures related to the garden project, including permanent improvements to their property. Defendants' repudiation occurred only after the substantial performance they encouraged was completed or underway.

Permitting Defendants to retain those benefits while denying the authority and role they expressly granted would sanction inequitable conduct and reward inducement followed by repudiation.

Plaintiff does not seek enforcement of a contract. Plaintiff seeks equitable relief necessary to prevent injustice arising from Defendants' promises and Plaintiff's reasonable reliance.

The injustice arises not merely from uncompensated labor, but from Defendants' inducement of Plaintiff's reliance followed by repudiation after Defendants obtained the benefits of that reliance.

F. Damages and Equitable Relief

As a direct and proximate result of Defendants' conduct, Plaintiff suffered damages including:

- Uncompensated labor and unreimbursed expenses;
- Loss of expected benefits induced by Defendants' promises;
- Reputational and professional harm arising from the abrupt repudiation of Plaintiff's role; and
- Consequential damages to be proven at trial.

Plaintiff seeks equitable relief appropriate under Iowa law, including reliance damages and such other relief as necessary to avoid injustice, without duplicating recovery sought under unjust enrichment or other equitable theories. Plaintiff will elect equitable remedies as required by law.

G. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

COUNT II – PROMISSORY ESTOPPEL

(Induced Authorization and Reliance — Prairie Project)

(Against Defendants Reliable Street Inc., Lockwood Café, Lyndsay Nissen, and Sharon Stewart)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Lyndsay Nissen, and Sharon Stewart (collectively, the "Prairie Promisor Defendants").

B. Clear and Definite Promise

The Prairie Promisor Defendants made a separate and distinct set of promises to Plaintiff concerning the planning, installation, and coordination of a native prairie project on Defendants' property.

Those promises included:

1. Reviewing and approving Plaintiff's written Prairie Proposal;
2. Authorizing Plaintiff to plan, design, and coordinate installation of a native prairie buffer;
3. Encouraging Plaintiff to devote labor, planning, and coordination to the prairie project;
4. Representing that the prairie project was welcomed and aligned with Defendants' use of the property; and

5. Holding out Plaintiff's work as approved and beneficial to Defendants' premises.

These promises were communicated after the garden authorization and concerned a distinct project with a different scope, design, and purpose.

C. Foreseeable and Reasonable Reliance

The Prairie Promisor Defendants intended, or reasonably should have expected, that Plaintiff would rely upon their approval and authorization.

Plaintiff's reliance was foreseeable and reasonable because:

- Defendants reviewed and approved a detailed proposal;
- Plaintiff was authorized to proceed with planning and coordination;
- The prairie project required advance design, sourcing, and labor; and
- Defendants permitted Plaintiff to undertake work that permanently improved their property.

D. Actual Reliance and Detriment

Plaintiff relied on Defendants' promises by:

- Preparing and submitting a detailed prairie proposal;
- Planning and coordinating prairie installation;
- Performing physical labor and project coordination;
- Incurring expenses and devoting substantial time and effort; and

- Integrating prairie planning with the broader property improvements Defendants authorized.

Although some labor supported both the garden and prairie projects, Plaintiff’s reliance on the prairie promises was independently induced and resulted in distinct ecological, aesthetic, and functional benefits to Defendants’ property.

Defendants later repudiated Plaintiff’s role while retaining the benefits of her prairie-related labor and planning.

E. Injustice Absent Enforcement

Injustice can be avoided only by enforcement of Defendants’ promises.

Defendants accepted and retained the benefits of Plaintiff’s prairie-related planning, labor, and expertise, including permanent ecological improvements to their property. Allowing Defendants to retain these benefits while denying the authorization they granted would result in injustice arising from Plaintiff’s reasonable reliance.

Plaintiff seeks equitable relief to prevent injustice, not enforcement of a contract.

The injustice arises not merely from uncompensated labor, but from Defendants’ inducement of Plaintiff’s reliance followed by repudiation after Defendants obtained the benefits of that reliance.

F. Damages and Equitable Relief

Plaintiff suffered damages including:

- Uncompensated labor and planning specific to the prairie project;

- Loss of expected benefits induced by Defendants' promises;
- Reputational and professional harm associated with repudiation; and
- Consequential damages to be proven at trial.

Plaintiff seeks reliance-based equitable relief appropriate under Iowa law, aligned to avoid duplicative recovery with unjust enrichment or other equitable claims.

Plaintiff does not seek duplicative recovery and will elect equitable remedies as required by law.

G. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

COUNT III — DEFAMATION (LIBEL AND SLANDER)

(Per Se and, in the Alternative, Per Quod / Implied Defamation)

(Extrajudicial and Institutional Publication of False Misconduct Allegations)

(Against All Defendants)

Overview and Theory of Liability

This Count arises from Defendants' fabrication, institutionalization, and extrajudicial dissemination of false misconduct allegations concerning Plaintiff. Defendants' liability is based not only on discrete false statements, but on the republication, reliance, and implied communication of defamatory meaning through conduct, exclusion, and narrative repetition, resulting in reputational harm within Plaintiff's community. Plaintiff pleads defamation per se where Defendants expressly communicated false allegations outside any privileged proceeding, and defamation per quod where Defendants' conduct and omissions conveyed an implied assertion of serious wrongdoing reasonably understood by third parties, as further detailed below and in Section IX.

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Love Club LLC, Lyndsay Nissen, Sharon Stewart, Willa Colville, Denise Martinez, and Charlie Esker (collectively, "Defendants").

B. False Statements of Fact

Defendants made, published, republished, and caused to be published false statements of fact concerning Plaintiff, including but not limited to assertions that Plaintiff:

1. Engaged in harassment or stalking of Defendants or their employees;
2. Violated personal boundaries or engaged in threatening or inappropriate conduct;
3. Performed unauthorized, improper, or intrusive work on Defendants' property;
4. Acted obsessively, intrusively, or in a manner warranting exclusion from Defendants' premises; and
5. Made racist, discriminatory, or anti-LGBTQ+ statements toward Defendants or others.

Defendants further asserted and conveyed as fact that Plaintiff violated a woman's personal space over an extended period and failed to respect personal boundaries, presenting such assertions as established misconduct rather than opinion, conjecture, or subjective perception.

Each of these statements was presented as factual, not rhetorical or opinion-based, was capable of being proven true or false, and was false.

Plaintiff expressly and unequivocally denies each and every allegation described above. Plaintiff did not engage in harassment or stalking; did not violate personal boundaries; did not engage in threatening, intrusive, or inappropriate conduct; did not perform unauthorized labor; and did not make racist, discriminatory, or anti-LGBTQ+ statements. As set forth elsewhere in this Petition, these allegations were categorically false and directly contradicted by Defendants' own contemporaneous communications, authorizations, and established course of conduct.

C. Knowledge of Falsity and Reckless Disregard

At the time Defendants made and repeated the defamatory statements, Defendants knew the statements were false or acted with reckless disregard for their truth.

Immediately prior to the March 31, 2022 meeting at which Plaintiff was first accused of misconduct, Defendants had expressly authorized Plaintiff's participation, welcomed her work, relied upon her labor, and engaged in friendly, cooperative, and affirming communications with her. Defendants possessed contemporaneous written communications and personal knowledge demonstrating that Plaintiff had not engaged in harassment, stalking, boundary violations, or improper conduct.

Despite this knowledge, Defendants deliberately reversed their narrative and attributed fabricated misconduct to Plaintiff without investigation, specificity, corroboration, or notice, and without providing Plaintiff any opportunity to respond.

In particular, Defendant Colville's statements were made notwithstanding her own contemporaneous communications expressing warmth, appreciation, affection, and voluntary engagement with Plaintiff, and in the complete absence of any prior boundary-setting, complaint, or objection. These circumstances demonstrate knowledge of falsity or reckless disregard for the truth.

With respect to Defendant Esker, defamatory statements were made with knowledge of falsity or reckless disregard for the truth. Defendant Esker represented to the Iowa Civil Rights Commission that he personally witnessed repeated instances of harassment, racism, and boundary violations by Plaintiff. Contemporaneous communications attached as Exhibit F demonstrate that Defendant Esker expressly disclaimed involvement, lacked personal knowledge of the alleged conduct, and could not plausibly have witnessed the events he later described. These contradictions establish knowing falsity or reckless disregard.

D. Publication to Third Parties

Defendants published and republished the defamatory statements to third parties, including but not limited to:

1. The Iowa Civil Rights Commission, through written submissions and documentary materials entered into an administrative record;

2. Counsel, agents, and representatives acting on Defendants' behalf;

3. This Court, through pleadings, motions, and other judicial filings repeating and relying upon the same factual accusations; and

4. Individuals and entities outside any formal administrative or judicial proceeding, including community members and participants in Defendants' affiliated activities.

Publication was intentional and foreseeable, with Defendants understanding that the statements would be relied upon by governmental bodies, judicial officers, and third parties.

Plaintiff does not allege defamation based solely on the act of submitting statements to the Iowa Civil Rights Commission. Rather, Plaintiff alleges that Defendants knowingly falsified, manipulated, and selectively presented information and thereafter republished, relied upon, and disseminated those false allegations outside any privileged proceeding, causing reputational harm independent of any investigative or adjudicative context.

Defendants' assertions that they "assiduously" avoided discussing the allegations are false or materially misleading. Following Plaintiff's exclusion, Defendants' narrative regarding Plaintiff's alleged misconduct was communicated to individuals outside formal administrative and judicial proceedings.

Plaintiff personally spoke with more than one individual who indicated they had "heard the other side," were uncertain what to believe, and elected to disengage from Plaintiff as a result. These individuals included both a participant in Reliable Street–affiliated events and a longtime personal acquaintance. This disassociation demonstrates extrajudicial publication and that the allegations were understood by third parties as factual assertions of misconduct.

As further detailed in Section IX, Defendants' allegations have produced observable reputational effects within Plaintiff's community, including altered behavior by third parties, social and professional disengagement, and exclusion from public-facing spaces, confirming extrajudicial dissemination and defamatory meaning.

E. Privilege, Reservation of Challenge, and Alternative Pleading

To the extent Defendants contend that certain statements are protected by a qualified or absolute privilege by virtue of having been made in an administrative or judicial context, Plaintiff pleads in the alternative.

Plaintiff alleges that Defendants exceeded any legitimate investigatory, advocacy, or defensive purpose by knowingly injecting false factual allegations into proceedings for retaliatory, coercive, and non-adjudicative purposes, and by republishing and relying upon those allegations outside the scope of any privileged function.

The applicability and scope of any asserted privilege present mixed questions of law and fact that cannot be resolved at the pleading stage, including the nature and function of the forum, the purpose of the statements, and whether subsequent dissemination fell outside any protected context.

As alleged in Section IX, Defendants' continued reliance upon and repetition of false allegations has produced ongoing reputational harm independent of any single proceeding, demonstrating republication, institutional endorsement, and use of defamatory material beyond any adjudicative purpose.

Plaintiff pleads statements made within administrative or judicial filings not as the sole or independent basis for defamation liability where privilege applies, but as evidence of knowing falsity, malice, retaliatory motive, coordinated narrative fabrication, and abuse of process, and as predicate conduct supporting Plaintiff's related claims.

F. Defamation Per Se and, in the Alternative, Defamation Per Quod (Implied Defamation)

Defendants' **extrajudicial republication** of false misconduct allegations constitutes defamation per se under Iowa law because it falsely imputed to Plaintiff:

1. Criminal or quasi-criminal conduct, including harassment and stalking;
2. Conduct incompatible with Plaintiff's academic, professional, advocacy, and community roles; and
3. Moral and social misconduct tending to injure Plaintiff in her reputation and standing within the community.

Because the extrajudicial statements constitute defamation per se, damages are presumed.

In the alternative, Defendants' conduct constitutes defamation per quod. Through Defendants' visible exclusion of Plaintiff from a prominent community space, their maintenance and reliance upon unadjudicated allegations in institutional records, and their repeated invocation of a misconduct narrative without clarification or adjudication, Defendants conveyed an implied assertion of serious wrongdoing. As alleged herein and further detailed in Section IX, a reasonable member of the community would understand Defendants' conduct and omissions to communicate that Plaintiff engaged in harassment, stalking, or other predatory behavior, resulting in reputational harm and special damages.

G. Actual and Proximate Damages

As a direct and proximate result of Defendants' defamatory statements and their dissemination, Plaintiff has suffered and continues to suffer:

- Damage to her personal, professional, academic, and civic reputation;
- Exclusion from community spaces, leadership opportunities, and professional engagement;
- Emotional distress, humiliation, anxiety, and mental anguish;
- Financial loss and loss of prospective opportunities; and
- Ongoing harm resulting from continued reliance upon and repetition of defamatory allegations.

As a direct and proximate result of Defendants' conduct, Plaintiff experienced social and professional disassociation from individuals who had previously interacted with her regularly. Multiple individuals with prior familiarity with Plaintiff ceased contact after exposure to Defendants' narrative, notwithstanding the absence of any adjudicated finding of misconduct. This loss of association and trust constitutes concrete reputational injury corroborating the real-world impact of Defendants' false statements.

H. Vicarious and Joint Liability

Defendant entities Reliable Street Inc., Lockwood Café, and Love Club LLC are liable for the defamatory acts of their officers, employees, and agents, including Defendants Nissen, Stewart, Colville, and Martinez, under principles of agency and respondeat superior.

Defendants acted in concert and pursuant to a shared narrative strategy and are jointly and severally liable for the harm caused.

I. Punitive Damages

Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's rights, entitling Plaintiff to an award of punitive damages sufficient to punish Defendants and deter similar misconduct.

J. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

COUNT IV — VIOLATION OF THE EQUALITY CLAUSE OF THE IOWA CONSTITUTION

(Arbitrary Exclusion and Unequal Procedural Treatment)

(Iowa Const. art. I, § 6)

1. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

2. Article I, section 6 of the Iowa Constitution guarantees equality before the law and prohibits arbitrary or unequal treatment that is not grounded in neutral, reasonable, and consistently applied standards.

3. Iowa courts have long recognized that the Equality Clause operates as an independent constitutional limitation on arbitrary exclusion and unequal treatment, even where specific conduct is not expressly regulated by statute. *See* **Clark v. Bd. of Sch. Dirs.**, 24 Iowa 266, 277 (1868).

4. In *Clark*, decided nearly a century before enactment of the Iowa Civil Rights Act, the Iowa Supreme Court held that exclusion from participation based on arbitrary characteristics violated the Equality Clause notwithstanding the absence of statutory prohibition. The Court explained that access could not be denied "because of nationality, religion, color, clothing or the like," thereby recognizing equality protections extending beyond legislatively enumerated categories. *Id.*

5. *Clark* establishes that the Equality Clause functions as a constitutional backstop against arbitrary and unequal treatment where access, participation, or exclusion is conditioned on non-neutral criteria or impermissible assumptions.

6. Plaintiff does not allege that every adverse decision or exclusion constitutes a constitutional violation. Rather, Plaintiff alleges that Defendants subjected her to materially different, more punitive, and procedurally deficient treatment through the use of exclusionary processes that departed from neutral and consistently applied standards.

7. As alleged herein, Defendants expressly authorized Plaintiff's participation, delegated responsibilities to her, relied upon her labor, and permitted her continued involvement pursuant to agreements and an established course of conduct.

8. In or about March 2022, Defendants received complaints from cisgender women employed by or affiliated with Lockwood Café.

9. Upon receipt of those complaints, Defendants excluded Plaintiff from Defendants' premises and affiliated activities without providing notice of the specific conduct alleged, the dates or circumstances of the alleged conduct, or any opportunity to respond, rebut, or modify her conduct.

10. Defendants' actions departed from ordinary and reasonable procedural practices by presuming the complaints to be dispositive and imposing immediate and permanent exclusion without investigation, neutral evaluation, or proportional response.

11. Plaintiff alleges that Defendants' treatment of her differed from how accusations of comparable seriousness are ordinarily addressed and reflected a presumption of guilt applied to Plaintiff based on impermissible assumptions concerning her status as a transgender woman.

12. Defendants' exclusion of Plaintiff was based on unparticularized allegations and post hoc rationalizations advanced only after Plaintiff's exclusion and after Plaintiff engaged in protected activity.

13. By denying Plaintiff notice, specificity, and any opportunity to be heard following authorized participation, Defendants subjected Plaintiff to arbitrary exclusion and unequal procedural treatment inconsistent with the equality guarantees of Article I, section 6 of the Iowa Constitution.

14. Plaintiff invokes the Equality Clause as a constitutional limitation on arbitrary exclusion and unequal procedural treatment and as an interpretive constraint on the lawful use of exclusionary processes, not as a substitute for statutory civil-rights protections and not to impose uniform outcomes.

15. Plaintiff's claim arises from Defendants' use of exclusionary processes in a manner that was non-neutral, procedurally deficient, and grounded in impermissible assumptions, and does not depend on the existence of any legislatively enumerated protected class.

16. Plaintiff does not seek monetary damages under this Count. Plaintiff seeks declaratory and equitable relief to remedy and prevent continued reliance upon or enforcement of Defendants' arbitrary and unequal exclusionary actions and to clarify the constitutional limits governing such conduct.

17. Plaintiff seeks declaratory and equitable relief under this Count and pleads the Equality Clause violation as a constitutional limitation informing the Court's equitable powers, not as an independent claim for damages.

COUNT V – UNJUST ENRICHMENT

(Against Defendants Reliable Street Inc., Lockwood Café, Love Club LLC, Lyndsay Nissen, and Sharon Stewart)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Love Club LLC, Lyndsay Nissen, and Sharon Stewart (collectively, the "Unjust Enrichment Defendants").

B. Benefits Conferred by Plaintiff

Plaintiff conferred substantial and measurable benefits upon the Unjust Enrichment Defendants, including but not limited to:

1. Extensive unpaid labor over a period of approximately six months, averaging approximately twenty hours per week;
2. Planning, coordination, and execution of physical improvements to Defendants' premises, including restoration of a community garden and installation of a native prairie buffer;
3. Project design, logistical coordination, and volunteer management;
4. Out-of-pocket expenditures for supplies, materials, and project needs;
5. Enhancements to the aesthetic, ecological, and commercial value of the premises; and
6. Association of Plaintiff's labor, time, and reputation with Defendants' property and community programming.

These benefits were tangible, non-incidental, and permanently improved the property used in Defendants' operations. The value of Plaintiff's labor and improvements is readily measurable by market rates for comparable services and materials.

C. Knowledge, Acceptance, and Retention of Benefits

The Unjust Enrichment Defendants knew of, accepted, and retained the benefits conferred by Plaintiff.

Defendants Nissen and Stewart expressly authorized and encouraged Plaintiff's work, exercised oversight, and accepted the fruits of Plaintiff's labor without objection during the period of performance.

Defendant Love Club LLC, although not disclosed to Plaintiff at the time of performance, owned the property upon which Plaintiff's labor was performed and directly benefited from the permanent physical improvements to that property. Plaintiff was not informed that the premises were owned by a separate for-profit entity, and Defendants held out the property and projects as associated with Reliable Street Inc. and Lockwood Café. Had Plaintiff known the property was owned by a separate for-profit entity rather than a nonprofit community space, she would have reconsidered or conditioned her labor and expenditures.

At all relevant times, Defendants acted in a manner that concealed or obscured Love Club LLC's ownership of the property, instead presenting Defendant Nissen as the controlling authority. Plaintiff performed labor and provided materials without knowledge that the property was owned by a for-profit entity, and without any opportunity to negotiate compensation from the true beneficiary. This concealment further renders Defendants' retention of the benefits unjust.

The Unjust Enrichment Defendants retained the benefits of Plaintiff's labor after revoking authorization, excluding Plaintiff from the premises, and repudiating her role.

D. Absence of Compensation or Justification

Plaintiff was not compensated for the substantial labor, planning, coordination, and improvements she provided.

Any limited reimbursement provided to Plaintiff constituted partial reimbursement for materials only and did not compensate Plaintiff for the value of her labor, time, expertise, or the permanent benefits conferred.

Plaintiff did not confer these benefits gratuitously. Plaintiff performed the work in reasonable reliance on Defendants' representations, authorizations, and course of conduct, and under circumstances where Defendants knew or reasonably should have known that Plaintiff expected recognition, continued involvement, or equitable treatment—not uncompensated appropriation followed by exclusion.

E. Inequity of Retention Without Payment

It would be inequitable and unjust for Defendants to retain the benefits of Plaintiff's labor and improvements without compensating Plaintiff or providing equitable relief.

Defendants accepted the benefits of Plaintiff's work while later denying the authority, role, and inducements that caused Plaintiff to perform. Allowing Defendants—including Love Club LLC, as the undisclosed property owner—to retain these benefits without consequence would sanction inequitable conduct and unjustly enrich Defendants at Plaintiff's expense.

F. Alternative and Equitable Nature of the Claim

This Count is pleaded in the alternative to Plaintiff's promissory estoppel claims.

Plaintiff does not allege the existence of an enforceable contract governing compensation. Rather, Plaintiff seeks restitution or other equitable relief necessary to prevent unjust enrichment where Defendants have retained benefits under circumstances that make it inequitable to do so.

G. Relief

Plaintiff seeks equitable relief including, but not limited to:

- Restitution measured by the reasonable value of Plaintiff's labor, services, and contributions;
- Disgorgement of benefits unjustly retained by Defendants;
- Equitable relief as necessary to prevent injustice; and
- Such other and further relief as the Court deems just and proper.

H. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

COUNT VI — RETALIATION (ICRA)

(Retaliatory Use of Administrative Process and Record Creation)

(Iowa Civil Rights Act, Iowa Code ch. 216)

(Against All Defendants)

1. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

A. Protected Activity

2. Plaintiff engaged in protected activity under the Iowa Civil Rights Act ("ICRA"), Iowa Code chapter 216, including:

   a. opposing conduct she reasonably believed constituted discrimination and retaliation;

   b. filing a civil rights complaint with the Iowa Civil Rights Commission ("ICRC") in April 2022; and

   c. participating in the ICRC's administrative process.

3. At the time Plaintiff engaged in this protected activity, the conduct she opposed and reported was protected under Iowa Code chapter 216 as then in effect.

4. Defendants knew of Plaintiff's protected activity.

B. Materially Adverse Actions

5. After Plaintiff engaged in protected activity, Defendants took materially adverse actions against her, including but not limited to:

a. submitting false or materially misleading statements to the ICRC, including statements that contradicted Defendants' prior authorizations, course of conduct, and contemporaneous communications with Plaintiff, accusing Plaintiff of harassment, stalking, racism, and other misconduct;

b. formalizing and escalating allegations that had not been communicated to Plaintiff prior to her protected activity;

c. using the ICRC administrative process to memorialize and legitimize allegations adverse to Plaintiff in an official administrative record;

d. republishing the same allegations in subsequent judicial filings and litigation conduct; and

e. maintaining an official administrative and judicial record that stigmatized Plaintiff and reasonably foreseeably impaired her professional, academic, civic, and public-facing opportunities.

f. imposing substantial procedural burden, reputational risk, and compelled defensive effort through the creation and maintenance of a retaliatory administrative and judicial record, thereby forcing Plaintiff to divert extraordinary time, labor, and personal capacity to rebut false allegations and protect her standing.

6. These actions constituted materially adverse actions and would dissuade a reasonable person from engaging in protected activity under the ICRA. Material adversity under the ICRA is not limited to termination or denial of services, but includes conduct that foreseeably chills, punishes, or burdens protected activity through reputational harm, procedural escalation, or record-based stigma.

C. Causal Connection

7. A direct causal connection exists between Plaintiff's protected activity and Defendants' adverse actions.

8. Defendants' retaliatory conduct began immediately after Plaintiff filed her ICRC complaint and escalated during and after the administrative process.

9. Allegations that had not previously been raised, documented, or substantiated were asserted only after Plaintiff sought administrative relief.

10. Defendants' post-complaint submissions contradicted their prior authorizations, prior course of conduct, and contemporaneous communications with Plaintiff, supporting a reasonable inference that the allegations were pretextual and retaliatory rather than the product of good-faith concern.

D. Retaliatory Use of the Administrative Process

11. Defendants did not invoke the ICRC process in good faith to resolve a civil rights dispute.

12. Instead, Defendants used the administrative process in a manner intended to punish Plaintiff for engaging in protected activity, including by:

a. undermining Plaintiff's credibility;

b. justifying her exclusion from Defendants' premises and affiliated activities;

c. shifting focus from Defendants' conduct to alleged misconduct by Plaintiff;

d. creating and preserving an official record capable of being leveraged against Plaintiff in subsequent proceedings; and

e. subjecting Plaintiff to prolonged uncertainty, reputational threat, and compelled defensive labor as a foreseeable consequence of record-based retaliation.

13. Such conduct constitutes retaliation in violation of the Iowa Civil Rights Act.

E. Statutory Amendments Do Not Bar Liability

14. Plaintiff's retaliation claim is based on protected activity undertaken in April 2022, when Iowa Code chapter 216 provided the protections under which Plaintiff filed her complaint.

15. Subsequent legislative amendments do not extinguish or immunize retaliatory conduct taken in response to activity protected at the time it occurred.

16. Retaliation liability under the ICRA does not depend on the ultimate success of the underlying discrimination claim.

F. Harm

17. As a direct and proximate result of Defendants' retaliatory conduct, Plaintiff suffered and continues to suffer:

- reputational harm and stigma arising from the institutionalization of false allegations;
- emotional distress, anxiety, and mental anguish;
- interference with academic, professional, organizational, and civic pursuits;

- substantial diversion of time, labor, and personal capacity into defensive administrative and judicial response;
- impairment of Plaintiff's ability to work, earn income, develop her political campaign and affiliated organizations, and engage in ordinary personal life activities; and
- ongoing harm from the continued existence and reliance upon the retaliatory administrative and judicial record.

G. Vicarious and Joint Liability

18. Defendant entities are liable for the retaliatory acts of their officers, employees, and agents under principles of agency and respondeat superior.

19. Defendants acted individually and in concert in furtherance of a shared retaliatory objective and are jointly and severally liable for Plaintiff's damages.

H. Relief

20. Plaintiff seeks all relief available under the Iowa Civil Rights Act, including compensatory damages, equitable and injunctive relief, costs, reasonable attorney's fees as permitted by statute, and such other and further relief as the Court deems just and proper.

COUNT VII — FRAUDULENT MISREPRESENTATIONS TO A GOVERNMENT AGENCY

(Extrinsic Fraud on the Iowa Civil Rights Commission)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Willa Colville, Denise Martinez, Charlie Esker, Lyndsay Nissen, and Sharon Stewart (collectively, the “ICRC Fraud Defendants”).

B. The Iowa Civil Rights Commission as a Decision-Making Body

The Iowa Civil Rights Commission (“ICRC”) is a state administrative agency charged with investigating, evaluating, and resolving complaints of discrimination and retaliation. In performing its statutory duties, the ICRC relies on written submissions from respondents and witnesses—including sworn and unsworn statements, documentary exhibits, and compiled communications—in determining credibility, framing factual narratives, assessing procedural posture, and deciding whether to proceed with investigation, mediation, enforcement, or closure.

Written submissions to the ICRC constitute material representations intended to influence governmental decision-making. Respondents and witnesses submitting materials to the ICRC know or reasonably should know that those materials will be relied upon by the agency in exercising its adjudicative and investigative functions.

C. False and Materially Misleading Instruments Submitted to the ICRC

Between approximately May and July 2022, Defendants Colville, Martinez, Esker, Stewart, and Nissen submitted, or caused to be submitted, written statements and documentary materials to the Iowa Civil Rights Commission that contained false representations of material fact and materially misleading documentary evidence concerning Plaintiff.

Defendants' submissions did not merely reflect disputed interpretations or subjective impressions. Instead, certain materials consisted of altered, selectively presented, or contextually distorted documentary evidence that misrepresented the substance, timing, and tone of contemporaneous communications. These submissions conveyed a narrative of prolonged discomfort, boundary violations, harassment, racism, and misconduct that is directly contradicted by the complete underlying record preserved in the administrative file.

In particular:

a. **Defendant Colville** submitted, or caused to be submitted, a document on behalf of Lockwood Café and Reliable Street purporting to reflect contemporaneous communications with Plaintiff. That document was materially altered or presented in a misleading form when compared against the unaltered messages preserved in the administrative record. The submitted version falsely conveyed prolonged discomfort and boundary violations that did not occur, as demonstrated by contemporaneous messages expressing warmth, appreciation, collaboration, and voluntary engagement. *(See Exhibit D; compare Exhibit A.)*

b. **Defendant Martinez** submitted, or caused to be submitted, documentary materials consisting of selectively excerpted communications stripped of surrounding context and timing. These excerpts omitted contemporaneous messages inconsistent with allegations of harassment, racism, or misconduct, and presented isolated statements in a manner designed to bolster a false narrative rather than to convey an accurate account of events. *(See Exhibit E; compare Exhibit A.)*

c. **Defendant Esker** submitted, or caused to be submitted, a written statement claiming firsthand knowledge of repeated harassment, racism, and boundary violations by Plaintiff. That statement was inconsistent with Esker's contemporaneous communications demonstrating friendly interactions, absence of concern, and express statements of noninvolvement. Esker's submission closely tracked the themes and allegations advanced by other Defendants, evidencing coordination and corroboration rather than independent personal observation. *(See Exhibit F; compare Exhibit A.)*

Each of these submissions was presented as factual, based on purported personal knowledge or documentary accuracy, and intended to be relied upon by the ICRC in evaluating Plaintiff's civil rights complaint.

D. Knowledge of Falsity and Intent to Deceive

At the time the foregoing statements and materials were made and submitted, the ICRC Fraud Defendants **knew or recklessly disregarded** that the representations were false.

The falsity of the submissions is demonstrated by, among other things:

- contemporaneous text messages, emails, and interactions showing amicable, cooperative, and affirming relationships during the same period the alleged misconduct supposedly occurred;
- the absence of any contemporaneous complaints, reports, warnings, or corrective actions prior to Plaintiff's protected activity;
- internal inconsistencies, implausibilities, and narrative shifts within the submissions themselves; and

- in the case of Defendant Esker, the physical impossibility of having personally witnessed the alleged conduct.

The falsity of these submissions is established not merely by dispute, but by **direct contradiction** with complete contemporaneous records preserved in the administrative file. The altered and selectively presented materials were **not inadvertent errors, misunderstandings, or good-faith omissions**. They were structured to convey a narrative inconsistent with the underlying communications, demonstrating knowledge of falsity and intent to mislead the ICRC's fact-evaluation process.

Defendants made material representations concerning the ownership, authorization, and nature of the property and Plaintiff's role therein, which were false or misleading at the time they were made. Defendants knew or recklessly disregarded the falsity of these representations and intended that the Iowa Civil Rights Commission rely upon them. Plaintiff reasonably relied on Defendants' representations by engaging in and sustaining protected activity and responding to the administrative process, resulting in direct and proximate injury when Defendants' false submissions were credited, Plaintiff's complaint was closed, and Defendants thereafter repurposed the resulting record to justify exclusion, retaliation, and further harm.

The ICRC Fraud Defendants submitted or caused these statements and materials to be submitted **with the intent that the ICRC rely upon them** in evaluating Plaintiff's complaint and determining whether Plaintiff's allegations had merit. These actions constituted **extrinsic fraud**, in that they prevented the ICRC from evaluating Plaintiff's complaint on a truthful and complete factual record.

E. Coordinated Submission and Reliance by Co-Defendants

Defendants **Nissen and Stewart** acted as coordinators, transmitters, and beneficiaries of the false submissions.

Defendant Stewart relied upon the false statements attributed to Defendants Colville and Martinez as factual and incorporated those allegations into the narrative presented to the ICRC, despite possessing or having access to contemporaneous information contradicting those claims.

Defendant Nissen knowingly submitted, adopted, and amplified the false narrative in formal communications with the ICRC, using those statements as justification for Plaintiff's exclusion and as a defense to Plaintiff's civil rights complaint.

In communications to the ICRC, Defendants further misrepresented the nature of Plaintiff's work by **omitting the existence and role of Love Club LLC**, despite the fact that the property improved by Plaintiff's labor was owned by that entity and used in connection with Defendants' for-profit operations. This omission materially distorted the ICRC's understanding of who benefitted from Plaintiff's labor and whether Plaintiff's work was authorized or exploited.

The coordinated nature of these submissions demonstrates a concerted effort to **construct a false administrative record**, rather than to provide truthful information to a government agency.

F. Materiality and Agency Reliance

The false submissions were **material** to the ICRC's evaluation of Plaintiff's complaint.

The ICRC relied on the narrative constructed by Defendants' submissions in assessing credibility, framing the dispute, determining procedural posture, and ultimately closing Plaintiff's administrative case without a factual determination in Plaintiff's favor.

The fraudulent submissions impaired the integrity of the administrative process and deprived Plaintiff of a fair and truthful evaluation of her complaint. Reliance occurred regardless of whether the ICRC issued formal findings, as the fraudulent submissions shaped the agency's credibility assessment, investigative trajectory, and ultimate closure of the complaint.

These misrepresentations prevented Plaintiff from meaningfully responding to the allegations during the administrative process and deprived the agency of a fair adversarial presentation.

G. Causation and Resulting Harm

As a direct and proximate result of Defendants' fraudulent misrepresentations to the ICRC:

- Plaintiff was forced to expend substantial time, energy, and resources attempting to rebut a false administrative record;
- Plaintiff's credibility and reputation were damaged by the existence of official records accusing her of harassment, racism, and misconduct;
- The false administrative record became a foundation for subsequent defamatory statements, retaliation, and litigation conduct; and
- Plaintiff suffered ongoing reputational, emotional, academic, and professional harm.

These harms were the **foreseeable and intended consequences** of Defendants' conduct.

H. Relationship to Other Claims

The fraudulent submissions to the ICRC constitute **independently actionable misconduct** and also support Plaintiff's claims for defamation, abuse of process, retaliation, and tortious interference by establishing **intent, malice, knowledge of falsity, and improper purpose**.

This Count is asserted in addition to Plaintiff's other claims and addresses distinct misconduct arising from Defendants' **fraudulent interference with a governmental decision-making process**, not merely reputational injury alone.

I. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

COUNT VIII — ABUSE OF PROCESS

(Coordinated Retaliatory Misuse of Administrative and Judicial Proceedings)

(Against All Defendants)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Love Club LLC, Lyndsay Nissen, Sharon Stewart, Willa Colville, Denise Martinez, and Charlie Esker (collectively, "Defendants").

B. Legal Process Employed

Defendants intentionally invoked and employed formal legal and administrative processes against Plaintiff, including but not limited to:

1. Submitting written statements, documentary materials, and narrative allegations to the Iowa Civil Rights Commission ("ICRC");
2. Filing motions, pleadings, and other papers in this Court that repeated and relied upon the same factual accusations;
3. Seeking venue transfer, dismissal, fee shifting, recasting, and other procedural relief; and
4. Using the resulting administrative and judicial records to portray Plaintiff as a harasser, aggressor, or improper litigant.

These actions constitute the use of legal process within the meaning of the tort of abuse of process.

Plaintiff does not challenge Defendants' general right to defend themselves or to access administrative or judicial processes. Rather, Plaintiff challenges Defendants' willful misuse of those processes through acts not proper in their regular conduct, as alleged below.

C. Improper and Ulterior Purpose

Defendants did not use these processes for their intended purposes.

Rather than employing administrative and judicial mechanisms to resolve legitimate disputes or to defend against Plaintiff's claims in good faith, Defendants used process for improper and ulterior purposes, including:

1. Retaliating against Plaintiff for asserting civil-rights protections and filing an administrative complaint;
2. Justifying Plaintiff's exclusion from Defendants' premises and community spaces;
3. Damaging Plaintiff's credibility and reputation through the creation of an official paper trail of unadjudicated accusations;
4. Imposing emotional, financial, and procedural burden unrelated to any legitimate adjudicative objective; and
5. Deterring Plaintiff from pursuing legal redress or continuing participation in academic, professional, civic, and public-facing life.

These purposes were collateral to—and independent of—the legitimate objects of the processes employed.

Defendants' improper purposes further included using administrative and judicial process as leverage to impose foreseeable collateral consequences on Plaintiff beyond the proceedings themselves, including interference with Plaintiff's academic, professional, organizational, and civic obligations.

Defendants also used process with the ulterior purpose of forcing Plaintiff to divert extraordinary amounts of time, labor, and personal capacity into defensive litigation, record correction, and procedural compliance—thereby impairing her ability to work, earn income, develop her political campaign and affiliated organizations, and engage in ordinary personal life activities.

Defendants acted outside the scope of any legitimate organizational purpose and, in several instances, pursued personal, reputational, and retaliatory objectives distinct from and adverse to the lawful interests of any single entity.

Plaintiff does not allege that the filing of motions alone constitutes abuse of process, but that Defendants' coordinated, sequential, and leverage-based use of process for collateral purposes constitutes misuse.

Plaintiff does not seek, in this action, to relitigate the correctness of any judicial ruling or to assert claims against the Court. Plaintiff alleges that Defendants intentionally structured, sequenced, and leveraged procedural mechanisms in a manner designed to impose collateral harm and procedural exhaustion, regardless of how individual motions were resolved.

D. Willful Acts Not Proper in the Regular Conduct of Proceedings (Phase-Based)

In furtherance of the improper and ulterior purposes alleged above, Defendants committed willful acts in the use of administrative and judicial process that were not proper in the regular conduct of such proceedings, including the following:

Phase I — Coordinated Procedural Compression, Tactical Repositioning, and Fee-Leverage

1. **Coordinating a pre-answer "motion barrage"** by filing multiple pre-answer motions simultaneously on the same day at the outset of litigation, thereby forcing a pro se litigant to respond to numerous overlapping filings within compressed response deadlines, before discovery and without any opportunity for evidentiary development;

2. **Using service and threshold objections tactically**—including seeking to quash or defeat service notwithstanding actual notice, then reversing position and accepting service after obtaining a changed procedural posture—followed by promptly using that altered posture to pursue cost-shifting and attorney-fee exposure against Plaintiff;

3. **Advancing venue challenges premised on misapplication of venue law**, despite Plaintiff's statutorily authorized filing in Polk County, and using venue posture as leverage for collateral pressure rather than to resolve a genuine threshold dispute. In doing so, Defendants' procedural filings repeatedly asserted that all conduct occurred exclusively in Story County, that Plaintiff's claims were "unsubstantiated," and that Defendants lacked knowledge of wrongdoing, notwithstanding Defendants' own prior submissions and documentary materials reflecting contrary facts, further supporting an inference of improper purpose and retaliatory misuse of process; Defendants' venue challenges were advanced notwithstanding Defendants' own knowledge that the alleged injury arose in Polk County through submissions to the Iowa Civil Rights Commission, evidencing use of venue procedure as leverage rather than to resolve a legitimate threshold issue.

4. **Seeking fee shifting and sanction-oriented relief** as an instrument of intimidation and deterrence, designed to frame Plaintiff as vexatious and to increase financial risk for pursuing adjudication on the merits, rather than as relief tethered to any proper procedural objective.

Phase II — Induced Tolling and Deadline Manipulation to Constrain Merits Review

5. **Initiating or encouraging settlement discussions** after a dispositive ruling while Plaintiff still had procedural rights to seek reconsideration or amendment, then using the resulting continuances, extensions, or joint scheduling arrangements in a manner that constrained Plaintiff's ability to exercise those rights meaningfully;

6. **Opposing or undermining Plaintiff's efforts to amend, seek reconsideration, or attach supporting authority and materials**, not on the merits, but through procedural positioning intended to prevent Plaintiff from presenting evidence and legal authority capable of correcting errors or omissions in the record.

Phase III — Procedural Exhaustion and Foreclosure of Reconsideration

7. **Leveraging Plaintiff's disclosed academic obligations and time-limited constraints** by opposing reasonable continuances, narrowing time windows, and pressing accelerated schedules at critical junctures—thereby increasing the likelihood of missed deadlines and limiting Plaintiff's opportunity to present her claims in an orderly manner;

8. **Reframing Plaintiff's good-faith compliance efforts as further wrongdoing**, including characterizing motions for continuance, leave, or reconsideration as

harassment or abuse, in order to prejudice the Court against Plaintiff and to justify denial of procedural relief necessary for merits consideration;

9. **Maintaining and reasserting defamatory and stigmatizing allegations** across filings and forums—despite possession of contemporaneous records contradicting those allegations—so as to preserve a coercive "paper trail" and to continue imposing reputational and procedural pressure independent of any legitimate adjudicative goal.

Administrative-Record Manipulation Used as Judicial Leverage

10. **Submitting, compiling, or transmitting altered, selectively excerpted, or context-stripped materials** to the ICRC and then invoking the resulting administrative record as support in judicial proceedings, thereby converting disputed interactions into official "findings" by repetition, rather than by proof;

11. **Withholding, omitting, or distorting known authorizations and contemporaneous context** while advancing a narrative of harassment, stalking, racism, or impropriety only after Plaintiff engaged in protected activity, and then carrying that narrative forward as a justification for exclusion and procedural defenses.

These acts transformed otherwise lawful procedures into instruments of coercion, intimidation, and adjudicative foreclosure. Defendants' use of process was thus directed toward collateral consequences—reputational harm, financial pressure, procedural exhaustion, forced diversion of Plaintiff's time and labor, and deterrence—rather than toward the regular purposes of administrative fact-finding or judicial resolution on the merits.

E. Pattern of Conduct

Defendants' misuse of process was not isolated or accidental. It followed a consistent pattern:

1. Authorization and encouragement of Plaintiff's participation;
2. Abrupt reversal and exclusion without explanation;
3. Formalization of false accusations through administrative filings;
4. Repurposing of those accusations in judicial proceedings; and
5. Strategic use of procedural mechanisms to escalate pressure, reputational harm, and compelled defensive labor.

This pattern evidences intentional misuse of process rather than mere overzealous advocacy.

F. Continuing and Coercive Nature of the Abuse

Defendants' abuse of process has had, and continues to have, a coercive effect independent of any single filing or ruling.

By embedding false allegations into durable administrative and judicial records, Defendants created an ongoing power imbalance whereby Plaintiff remains burdened with refuting the allegations while Defendants retain the ability to reassert or rely upon them in future proceedings or contexts.

Defendants have failed to take reasonable steps to correct, retract, or mitigate the false narrative they created, despite knowledge of its falsity and ongoing impact. The continued existence and reliance upon these records constitutes a continuing misuse of process.

This continuing misuse of process was designed to, and foreseeably does, exert pressure on Plaintiff's external academic, professional, organizational, and civic obligations, including by depriving Plaintiff of the time, stability, and capacity necessary to pursue livelihood, campaign development, organizational leadership, personal relationships, and ordinary life enjoyment.

G. Damages Independent of Outcome

Plaintiff suffered and continues to suffer damages as a direct and proximate result of Defendants' abuse of process, regardless of the outcome of any administrative or judicial proceeding, including:

- Emotional distress and mental anguish;
- Reputational harm arising from the institutionalization of false allegations;
- Financial loss and opportunity costs resulting from increased litigation burden;
- Loss of productive time and uncompensated labor compelled by defensive litigation and record correction;

- Impairment of Plaintiff's ability to work, earn income, and develop her political campaign and affiliated organizations;
- Loss of access to academic, professional, and civic opportunities; and
- Ongoing harm from the continued reliance upon the tainted record.

These damages arise from the misuse of process itself and are not duplicative of damages sought for defamation, retaliation, or discrimination.

H. Joint and Vicarious Liability

Defendants acted individually and in concert in furtherance of a shared strategy to misuse administrative and judicial processes for improper purposes. Defendant entities are liable for the acts of their officers, employees, and agents under principles of agency and respondeat superior. All Defendants are jointly and severally liable.

I. Punitive and Equitable Relief

Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's rights, entitling Plaintiff to punitive damages.

Because the misuse of process is continuing in nature, Plaintiff further seeks appropriate equitable relief to prevent continued reliance upon, dissemination of, or coercive use of the false administrative and judicial narrative created by Defendants.

J. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

Exhibit G, comprising over 90 pages of filings and correspondence, documents the procedural evolution of this litigation across three phases. Phase I reflects the improper initiation of legal process under fabricated pretenses. Phase II illustrates how Defendants sought to foreclose factual adjudication by resisting evidentiary hearings and framing Plaintiff's resistance as delay. Phase III captures post-dismissal escalation, as Defendants used the pendency of unadjudicated allegations to apply reputational and procedural pressure. The structure and sequence of these filings fulfill each element of abuse of process under Iowa law.

COUNT IX — CIVIL CONSPIRACY

(Conspiracy to Commit Defamation, Fraud on a Government Agency, Retaliation, and Abuse of Process)
(Against All Defendants)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against Defendants Reliable Street Inc., Lockwood Café, Love Club LLC, Lyndsay Nissen, Sharon Stewart, Willa Colville, Denise Martinez, and Charlie Esker (collectively, "Defendants").

B. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

C. Existence of an Agreement or Understanding

At all relevant times, Defendants entered into and participated in a common plan, agreement, or understanding to advance and maintain a shared factual narrative portraying Plaintiff as engaging in harassment, stalking, racism, or other misconduct, despite Defendants' possession of contemporaneous records contradicting that narrative.

The agreement need not have been formal or explicit. It is evidenced by Defendants' concerted actions, coordinated submissions, adoption of one another's assertions, and mutual reliance on the same altered or selectively presented materials across administrative and judicial forums.

D. Unlawful Purpose or Lawful Purpose by Unlawful Means

Defendants' agreement was directed toward accomplishing unlawful purposes and lawful purposes by unlawful means, including:

1. committing defamation and defamation per se through the publication and repetition of false factual allegations;
2. committing extrinsic fraud on a government agency by submitting materially false or misleading documentary evidence to the Iowa Civil Rights Commission;
3. retaliating against Plaintiff for engaging in protected activity under the Iowa Civil Rights Act; and
4. abusing administrative and judicial process to impose reputational harm, procedural exhaustion, and coercive pressure unrelated to adjudication on the merits.

E. Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, Defendants committed overt acts, including but not limited to:

1. submitting or transmitting altered, selectively excerpted, or contextually distorted communications to the ICRC;
2. adopting, corroborating, and amplifying one another's false allegations despite possession of contradictory contemporaneous records;
3. omitting known authorizations, approvals, and course-of-conduct evidence from administrative submissions;
4. repurposing the resulting administrative narrative in judicial pleadings and motion practice;
5. invoking that narrative to justify exclusion, procedural defenses, venue transfer, fee exposure, and dismissal efforts; and
6. maintaining and relying upon the resulting administrative and judicial record to impose ongoing reputational and procedural harm.

Each Defendant knowingly participated in at least one overt act and benefitted from the acts of co-conspirators.

F. Intent and Knowledge

Defendants knew or reasonably should have known that the acts undertaken in furtherance of the conspiracy were false, misleading, or improper, and that their coordinated conduct would foreseeably harm Plaintiff's reputation, procedural rights, academic standing, and professional opportunities.

Defendants acted with the intent to advance the shared objective of justifying Plaintiff's exclusion, deterring her from pursuing legal redress, and insulating Defendants from accountability through institutional narrative control.

G. Resulting Damages

As a direct and proximate result of Defendants' conspiracy, Plaintiff suffered damages including, but not limited to:

- reputational harm arising from the institutionalization of false allegations;
- emotional distress and mental anguish;
- increased litigation burden and procedural exhaustion;
- interference with academic, professional, and civic obligations; and
- ongoing harm resulting from the continued reliance upon the tainted administrative and judicial record.

Each Defendant is jointly and severally liable for the damages caused by acts taken in furtherance of the conspiracy.

H. No Challenge to Lawful Advocacy

Plaintiff does not allege that consultation with counsel, coordinated legal defense strategy, or lawful advocacy constitutes civil conspiracy.

The conspiracy alleged herein arises from coordinated extra-judicial and administrative conduct, including the creation, transmission, and institutional reuse of false factual materials and misleading documentary submissions, and from the misuse of process for collateral purposes unrelated to lawful adjudication.

I. Relationship to Other Counts

This Count is derivative of and dependent upon the underlying torts alleged in Counts III (Defamation), VI (Retaliation), VII (Fraudulent Misrepresentations to a Government Agency), and VIII (Abuse of Process).

Liability under this Count does not require proof of an independent injury beyond those alleged in the underlying counts, but establishes joint responsibility for coordinated misconduct.

COUNT X – TORTIOUS INTERFERENCE WITH CONTRACTUAL AND PROSPECTIVE RELATIONS

(Interference Through Retaliatory Record Creation and Procedural Burden)

(Against All Defendants)

A. Parties Against Whom This Count Is Asserted

Plaintiff brings this Count against **all Defendants**.

B. Existing Contractual and Quasi-Contractual Relationships

At all relevant times, Plaintiff was party to valid and enforceable contractual and quasi-contractual relationships, including but not limited to:

1. An Honors Contract with Des Moines Area Community College ("DMACC") for the Fall 2022 semester, supervised by Professor Charles Irwin;
2. An Honors Contract associated with Plaintiff's participation in the DMACC London Abroad Program during the Spring 2024 semester, supervised by Dr. Jeff Schroeder;
3. Scholarship, programmatic, and compliance obligations associated with Plaintiff's participation in the London Abroad Program, including required academic, service, and reporting components;
4. Academic enrollment and coursework obligations at Iowa State University during the Spring 2025 and Fall 2025 semesters; and
5. Additional contractual and/or quasi-contractual relationships arising from Plaintiff's required participation in academic, administrative, and institutional compliance and remediation processes concurrent with her academic programs, which required timely performance, documentation, coordination, and sustained attention.

These relationships required sustained academic performance, timely completion of projects, compliance with institutional deadlines, and the ability to devote reasonable time, cognitive capacity, and attention to Plaintiff's contractual and institutional obligations.

C. Defendants' Knowledge

Defendants had **actual notice** that Plaintiff was a student with time-limited academic and contractual obligations through Plaintiff's motions, continuance requests, disclosures to the Court, and participation in administrative proceedings.

Defendants were not required to know the precise identity or terms of each contractual or quasi-contractual obligation to foresee that escalating procedural burden, reputational harm, and prolonged defensive litigation would interfere with Plaintiff's ability to perform those obligations.

Defendants knew or reasonably should have known that Plaintiff's academic, professional, and organizational pursuits depended upon **credibility, reputation, and freedom from stigmatizing allegations embedded in official records**.

Plaintiff does not allege that Defendants knew the specific details of every disrupted obligation. Plaintiff alleges that Defendants **knew or reasonably should have known** that their conduct would foreseeably interfere with Plaintiff's ability to meet ongoing academic and institutional commitments.

D. Intentional and Improper Interference

Defendants intentionally and improperly interfered with Plaintiff's contractual and prospective relationships through **independently wrongful means**, including but not limited to:

- retaliation in violation of the Iowa Civil Rights Act;
- fraudulent misrepresentations to a government agency;
- defamation and defamation per se; and

- abuse of administrative and judicial process;

as alleged in **Counts IV, V, VI, and VII**, all of which are incorporated herein solely for purposes of establishing wrongful means, intent, foreseeability, and causation.

Defendants' wrongful conduct included, but was not limited to:

- making and publishing false allegations of harassment, stalking, racism, and improper conduct, knowing such allegations would foreseeably impair Plaintiff's academic and professional standing;
- injecting those allegations into official administrative records through the Iowa Civil Rights Commission, thereby creating a durable and stigmatizing paper trail;
- repeating and amplifying the same allegations through judicial filings and litigation conduct;
- using administrative and judicial processes in a manner designed to burden, distract, and destabilize Plaintiff rather than to resolve disputes on the merits; and
- maintaining and leveraging the existence of defamatory administrative records as an ongoing threat to Plaintiff's reputation, credibility, and future opportunities.

Defendants' conduct was **intentional, independently wrongful, improper, and not justified by any legitimate interest**.

E. Causation and Resulting Disruption

As a direct and proximate result of Defendants' conduct:

- Plaintiff was forced to divert substantial time, energy, and cognitive resources away from her academic and contractual obligations in order to respond to, rebut, and mitigate the effects of Defendants' false and retaliatory administrative and judicial record;

- Plaintiff's diversion of time and resources was **not voluntary**, but compelled by the need to prevent foreseeable academic, professional, and reputational consequences arising from Defendants' conduct;
- Plaintiff was required to engage in sustained damage-control activities, including administrative responses, record-correction efforts, litigation compliance, and institutional communications, which directly conflicted with her ability to perform existing contractual and quasi-contractual obligations;
- Defendants knew or reasonably should have known that forcing Plaintiff into prolonged defensive administrative and judicial processes would foreseeably interfere with Plaintiff's ability to satisfy time-sensitive academic and contractual commitments, particularly where Plaintiff disclosed her academic obligations to the Court; and
- Plaintiff was materially impeded in completing required academic work, honors projects, institutional obligations, and contractual performance within agreed or expected timeframes.

Defendants' conduct was a **substantial factor** in causing the disruption, impairment, and interference with Plaintiff's contractual and prospective relationships. Defendants' conduct need not be the sole cause of disruption under Iowa law.

Plaintiff possesses documentary evidence substantiating tuition loss, academic withdrawal, and delayed degree progress resulting from this interference, which will be produced in discovery.

F. Interference with Prospective Professional, Organizational, and Public-Facing Relations

In addition to existing contracts, Plaintiff has reasonable and identifiable expectations of continued academic advancement, professional development, leadership opportunities, organizational growth, and public-facing engagement dependent upon her reputation, credibility, time, and availability.

These prospective relations include, but are not limited to, Plaintiff's development of her gubernatorial campaign for statewide office in Iowa, her leadership and organizational work associated with Wild Willpower PAC and affiliated advocacy initiatives, her ability to pursue compensated and uncompensated professional work, and her participation in public, academic, and civic life.

Defendants knew or reasonably should have known that embedding false allegations into administrative and judicial records—and imposing sustained procedural and reputational burden—would foreseeably impair Plaintiff's ability to pursue academic opportunities, leadership roles, political organizing, public advocacy, income-generating work, and organizational development.

Defendants' conduct intentionally created an ongoing reputational, procedural, and cognitive burden that chilled Plaintiff's participation in academic, professional, political, and civic activities and interfered with her reasonable prospective relations and economic expectancies.

G. Damages

As a result of Defendants' tortious interference, Plaintiff has suffered damages including, but not limited to:

- academic disruption and delayed or impaired performance;
- loss of educational, scholarship, and program-related opportunities;
- increased stress, emotional distress, and cognitive burden affecting performance;
- diminished professional, organizational, political, and academic prospects;
- loss of time, labor, and capacity that would otherwise have been devoted to campaign development, organizational leadership, income-generating work, and personal life pursuits; and
- consequential damages to be proven at trial.

H. Incorporation

Plaintiff incorporates by reference all preceding paragraphs of this Petition as though fully set forth herein.

XI. DAMAGES:

175. As a direct and proximate result of Defendants' acts and omissions, Plaintiff has suffered and continues to suffer compensable damages under Iowa law, including but not limited to the following:

a. **Economic damages**, including uncompensated labor, out-of-pocket expenditures, lost productive capacity, delayed academic progress, and interference with existing and prospective contractual, quasi-contractual, and institutional obligations;

b. **Non-economic damages**, including emotional distress, mental anguish, humiliation, anxiety, stress-related impairment, and loss of enjoyment of life;

c. **Reputational damages** arising from the publication, repetition, and institutionalization of false and stigmatizing allegations in administrative and judicial records, impairing Plaintiff's professional standing, civic participation, public credibility, and ability to engage in leadership and advocacy roles;

d. **Consequential damages** resulting from prolonged procedural burden, forced defensive litigation, administrative proceedings, motion practice, and disruption of Plaintiff's academic, professional, political, organizational, and civic pursuits, including interference with campaign development and affiliated organizational work; and

e. **Prospective and continuing damages** arising from the ongoing existence, discoverability, and foreseeable reuse of unadjudicated allegations embedded in administrative and judicial records, which continue to impair Plaintiff's opportunities, credibility, and well-being.

176. Plaintiff seeks recovery of all damages to the fullest extent authorized by Iowa law and equity. Plaintiff further seeks **punitive damages where authorized by law** in connection with Defendants' willful, wanton, malicious, or reckless conduct, as pleaded in the applicable causes of action.

177. Plaintiff brings this Petition in good faith based on the information reasonably available to her at this stage of the proceedings. To the extent any factual detail requires clarification or correction through discovery or amendment, Plaintiff seeks

leave to conform the pleadings to the evidence as justice requires. This reservation is procedural and does not reflect uncertainty as to the falsity or wrongful nature of Defendants' conduct as alleged herein.

XII. JURY DEMAND

178. Plaintiff hereby demands trial by jury on all issues so triable as a matter of right pursuant to Article I, Section 9 of the Iowa Constitution and Iowa Rule of Civil Procedure 1.903.

XIII. PRAYER FOR RELIEF:

WHEREFORE, Plaintiff Alexandra "Sondra" Wilson respectfully requests that the Court enter judgment in her favor and against Defendants, and grant the following relief:

1. **Compensatory damages** in an amount to be determined at trial for economic loss, emotional distress, reputational harm, loss of enjoyment of life, and other injuries caused by Defendants' conduct;

2. **Statutory damages and relief** authorized under the Iowa Civil Rights Act, Iowa Code chapter 216, including all remedies available thereunder;

3. **Declaratory relief** declaring that Defendants' actions and practices violated Plaintiff's rights under Iowa law;

4. **Equitable and injunctive relief** as appropriate to remedy ongoing and future harm resulting from Defendants' conduct, including equitable relief directing the correction, limitation, or non-reliance upon false or misleading administrative

records created through Defendants' misconduct, and relief necessary to prevent continued reliance upon or dissemination of false and retaliatory records;

5. **An award of punitive damages**, where authorized by law, in an amount sufficient to punish Defendants and deter willful, malicious, or reckless misconduct;

6. **Costs of suit**, and where authorized by statute, reasonable attorney's fees;

7. **Pre-judgment and post-judgment interest** as allowed by law; and

8. **Such other and further relief** as the Court deems just and equitable.

VERIFICATION

I, Alexandra "Sondra" Wilson, declare under penalty of perjury that the foregoing Petition and its factual allegations are true and correct to the best of my knowledge, information, and belief.

Executed on this 6th day of January, 2026.

/s/ Alexandra "Sondra" Wilson
Alexandra "Sondra" Wilson
Pro Se Plaintiff
PO Box 205
Ames, IA 50014
Phone: (515) 357-9725
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CERTIFICATE OF SERVICE

I certify that on January 6, 2026, a true and correct copy of this document was served upon all counsel of record via the Iowa Judicial Branch Electronic Document Management System (EDMS/eFile Iowa).

/s/ Alexandra "Sondra" Wilson
Alexandra "Sondra" Wilson

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