

WILSON V. RELIABLE STREET INC., ET AL.

PROLOGUE

IOWA'S CIVIL-RIGHTS TRAP

How the Reynolds administration **facilitated retaliation** against me, withheld the evidence needed to **secure representation**, and consumed all but **55 days** of my two-year limitations period.

ARTICLE SERIES: **IOWA'S BROKEN JUDICIARY** | **WILDWILLPOWER.ORG**

This article explains the central events that led me to file *Wilson v. Reliable Street Inc., et al.* and why I concluded that litigation had become the only remaining way to obtain the evidence, challenge the disputed record, and clear my name.

It explains:

1. How mistreatment during a community collaboration led me to file a complaint with the Iowa Civil Rights Commission;
2. How respondents submitted serious accusations and materials that I allege were false, materially misleading, altered, or presented outside their original context;
3. How the Commission closed the complaint without investigation and initially withheld the underlying submissions from me;
4. How the process placed damaging allegations into a government record while denying me a meaningful opportunity to examine and answer the complete evidence; and
5. How administrative failure, lack of counsel, and overlapping limitations periods left me only fifty-five days to review the file, identify possible claims, and commence litigation without an attorney.

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A Note About the Scope of This Prologue

This prologue explains the central chain of events that forced *Wilson v. Reliable Street Inc., et al.* into court: the community relationship that preceded the dispute, the accusations and materials submitted during the Iowa Civil Rights Commission process, the Commission's closure of the complaint without investigation, the withholding of the complete agency file, the unsuccessful effort to obtain representation or administrative assistance, and the fifty-five-day period in which I ultimately had to review the record and file suit without an attorney.

I also sought assistance from other state and federal offices after concluding that false or materially misleading information may have been knowingly placed into government records. That broader record involves additional correspondence, legal theories, agency limitations, and questions concerning governmental responsibility that cannot be responsibly compressed into this prologue.

Rather than delay publication of the central record, I am presenting here the evidence necessary to explain why litigation became unavoidable. Additional documents concerning those later requests for government assistance will be added in a separately identified documentary supplement. Where the facts or intent of particular people remain disputed, I identify that uncertainty rather than claiming that the record has already resolved it.

It also shows how finding legal representation for such matters can feel hopeless, especially when upholding civil rights for transgender individuals has become politically unpopular. Regardless of your stance on this topic, however, I hope that by reading this article, you will agree that we need to do much better as a state, morally, ethically, administratively, and within our overly-complex courts, whose processes can exacerbate and amplify harm to Iowans earnestly seeking redress in good faith.

But do not take my word for this alone. I have collected and organized the evidence throughout this article so you can see for yourself, because no Iowan should ever have to go through what I have been through.

This article is not only about what happened to me. It is about what my case reveals about Iowa's civil-rights system itself — a system that failed at every stage, amplified harm, obscured evidence, and ultimately forced me into litigation simply to correct the record. What began as a community collaboration became a civil-rights complaint, then an administrative failure, then a procedural trap, and finally a lawsuit. This exposé follows that chain step by step so readers can see how the system actually works — and why it is failing the very people it was designed to protect.

I. The Community Relationship and Sudden Rupture

The Reliable Street and Lockwood Café case did not begin with conflict. It began with months of friendship, trust, collaborative work, and project arrangements that were openly discussed, approved, and carried out with the knowledge of people responsible for the property.

It ended abruptly on March 31, 2022, when those relationships and arrangements were terminated based upon accusations that were not meaningfully explained to me. Those accusations later expanded, entered an Iowa civil-rights record, and became the foundation of litigation that remains unresolved.

The case involves Reliable Street Inc., Lockwood Café, the property owner Love Club LLC, and several people connected to those organizations. One of the central figures is Lyndsay Nissen, who served as president of Reliable Street Inc. and was a co-owner of Love Club LLC. She communicated with me directly, requested or approved work, represented my role to others, and later submitted a statement to the Iowa Civil Rights Commission that portrayed much of that same conduct as unwanted or unauthorized.

I understand that some readers may be uncomfortable seeing local businesses and individuals named publicly, especially businesses associated with progressive, artistic, or community-oriented values. I did not want this relationship to end in litigation or public accusation. But the parties are named because the administrative record names them, the court case names them, and the contradiction between the contemporaneous communications and the later allegations cannot be understood without identifying who said and did what.

This is not about whether readers personally like or dislike these businesses. It is about whether months of approved collaboration can later be rewritten as intrusive misconduct, whether that rewritten account can enter a government record without meaningful investigation, and whether procedural doctrines can then prevent the underlying truth from being examined through discovery and trial.

A Collaboration Documented in Real Time

I was not an outsider forcing myself into someone else's organization. I lived only a few blocks away and regularly visited Lockwood Café with my boyfriend. We knew the staff by name, and they knew us. During slower afternoons, we often had long, friendly conversations with the people working there. Staff members sometimes wrote kind messages on our takeout packaging, which I saved because they reflected the warmth of the relationship.

I also performed as a singer-songwriter at Reliable Street's open mic events. At one of the first events I attended, Lyndsay asked whether anyone could help set up and tear down future open mics. I volunteered, and she gave me her telephone number so we could coordinate.

For approximately six months, I regularly arrived early to help prepare the space and stayed afterward to help restore it. When Lyndsay could not attend, she sometimes asked other volunteers and me to help run the event in her absence.

By February 2022, this had progressed beyond informal assistance. Lyndsay expressly entrusted Willa and me with responsibility for the open mic when she could not attend and thanked us for "always being so amazing and helpful!!!" Afterward, when I offered suggestions for improving future events, she responded positively and expressed gratitude rather than indicating that my involvement was intrusive or unwanted.

The tone remained warm through the final days of the relationship. On March 22, I apologized because I had not had time to help clean up after the open mic. Lyndsay responded with three heart emojis—nine days before she barred me from the property.

The communications preserved in the court exhibits are not merely polite exchanges between strangers. They contain gratitude, encouragement, heart symbols, approvals, requests for assistance, and messages that reasonably conveyed friendship and trust.

When attendance at the open mic was low, I offered to create a promotional flier. Lyndsay responded, “Awesome!” and discussed teaching me how to operate the event when she was unavailable. I sent her the first draft, requested feedback, and made the specific correction she requested—changing the event identification from Lockwood Café to Reliable Street. Reliable Street then published the flier through its official Facebook page. Lyndsay later requested pull tabs, approved the revised version by stating, “It looks great,” and responded “Awesome!” when I told her that I had distributed copies around Ames.

She also thanked me for “continuously affirming that we’re gonna make this amazing,” adding that it was “so nice to have another person who believes.”

That history matters because Lyndsay later portrayed the flier to the Commission as an unsolicited responsibility I had taken upon myself without asking whether it was wanted. The contemporaneous messages tell a very different story: the proposal was welcomed, the design was reviewed, corrections were requested, the final product was approved, and Reliable Street used it.

The Garden and Prairie Agreements

The collaboration extended beyond the open mic.

The property contained a neglected community garden and an outdoor area surrounded by very tall weeds. People connected to the businesses knew that I had experience with gardening, ethnobotany, native plants, and land stewardship.

After I offered to help, Sharon Stewart approached me and explained that she had spoken with Lyndsay. I was asked to assist with restoring and managing the community garden alongside Students Helping to End Poverty and Hunger, or SHEPH. Lyndsay subsequently confirmed the arrangement.

Her later communications confirmed not merely that I was permitted to help, but that I had been assigned a leadership role. On January 20, 2022, Lyndsay told another participant that I was “taking the lead on the community garden this upcoming season.” On February 18, she stated that the SHEPH president and I were “in charge of the garden this year.”

I also attempted to ensure that my communications remained welcome. When I sent Lyndsay a progress update, I expressly offered to stop sending updates if she did not want them. She did not ask me to stop. She responded positively and thanked me.

A second project involved restoring native tallgrass prairie around the garden. I discussed the idea with staff members and other people involved with the property. Willa Colville expressed enthusiasm and offered to help research and review the proposal. After reviewing it, she responded that it looked good.

The prairie project also involved shared financial commitment. On March 17—only two weeks before I was barred—Willa and I each sent Lyndsay \$100 toward the prairie seed purchase. Willa responded to the accompanying exchange with “Love you <3.” The project was therefore not

merely an idea I was independently pursuing. It had been reviewed, approved, measured, collaboratively funded, and actively coordinated with people connected to the property.

Sharon also requested that I prepare signage for the shared garden project and approved the result with "Perfect!!" Austin Stewart communicated with me concerning the discount promised under the garden arrangement and thanked me for the work I was performing. These communications came from multiple people connected to the organizations—not only from me and not only from one isolated conversation.

I then submitted the proposal to Lyndsay. On October 27, 2021, she gave me permission to proceed and sent older project plans so measurements could be taken. Willa and I measured the area together.

The work that followed was visible, organized, and collaborative. I contacted the Ames Fire Department and prairie-restoration specialists regarding safety and maintenance. I coordinated volunteers, documented progress in a shared project record, created an online task system, helped arrange materials, and assisted with hauling and installing approximately six truckloads of mulch. Other volunteers participated, including people connected to SHEPH and members of the Reliable Street and Lockwood community.

The amended petition describes two oral arrangements: one concerning the garden and another concerning the prairie. Both were expected to continue through the 2022 growing season, with the possibility that the relationship could continue beyond that period.

These were not isolated favors performed without anyone's knowledge. They involved proposals, approval, planning, measurements, volunteer coordination, physical labor, continuing communication, and visible improvements to the property.

The businesses and community accepted the benefit of that work.

Public Values and Private Process

Reliable Street presented itself as an arts and community-improvement organization. The combined space hosted musicians, artists, open mics, gallery events, and community gatherings. It publicly cultivated an atmosphere associated with creativity, cooperation, LGBT+ inclusion, and social justice.

That public identity shaped my expectations. I believed I was participating in a space where concerns would be discussed openly, where misunderstandings could be addressed fairly, and where people who presented themselves as committed to inclusion would not impose punishment based upon undisclosed accusations.

The projects I joined were not foreign to that environment. A community garden, native prairie restoration, local music, public art, volunteerism, and educational collaboration fit the identity the space presented to the public.

For months, my participation was not merely tolerated. It was encouraged, relied upon, and incorporated into the organizations' activities.

And then, without warning, everything changed.

March 31, 2022

On March 31, 2022, after approximately six months of volunteer labor and project coordination, Lyndsay and Sharon informed me that I was no longer permitted on the property.

I was not presented with a written complaint. I was not told the specific conduct being alleged. I was not given an opportunity to speak with the person who had complained, explain what had happened, correct any misunderstanding, or respond before the decision was imposed.

I was told only that I had “violated a woman’s space.”

That phrase carried a meaning far more serious than ordinary interpersonal discomfort. As a transgender woman, I understood it against a political and cultural background in which transgender women are routinely portrayed as men intruding upon women or threatening women’s safety. The phrase suggested sexual or predatory misconduct while providing me no concrete act to answer.

I told Lyndsay and Sharon that I did not understand what they were referring to and that the decision was unfair. My perspective did not alter the outcome. The garden and prairie arrangements were terminated, my volunteer role ended, and I was barred from the property based upon accusations that remained largely unspecified. The amended petition alleges that both project arrangements were terminated that day despite having been expected to continue through the growing season.

The punitive action came first. Explanation, investigation, and meaningful dialogue never followed.

The Social and Reputational Harm Began Immediately

That fear was not abstract. After learning that I had been barred, SHEPH president Emily Poag expressed surprise. Her messages reflected that the student leaders had appreciated my expertise, and she asked whether the decision meant I could not even return to help with spring planting.

Her response is important because SHEPH was not controlled by me. It was an independent student organization involved in the garden. Its president’s surprise is inconsistent with the later suggestion that my participation had been broadly experienced as unwanted, uncooperative, or disruptive.

For months, I had publicly helped with events, the garden, and the prairie project. People knew I was involved. An abrupt disappearance therefore raised an obvious question: What happened?

Friends and acquaintances stopped communicating with me. I feared that people were being told I had been removed for serious misconduct. I also feared that the accusations would destroy my ability to obtain future work involving community leadership, gardening, prairie restoration, education, music, or public service.

That fear was not abstract. When I contacted people connected to the project, one SHEPH participant expressed surprise and wrote that the student leaders had appreciated my expertise. She asked whether being barred meant I could not even return to help with spring planting.

Her response contradicted the suggestion that my participation had been universally unwelcome or disruptive. It reflected what I had experienced during the months before the rupture: I had been treated as someone helping lead the work, not as an intruder imposing herself upon it.

The Contemporaneous Messages Did Not Show a Growing Conflict

The friendship I believed I had with Willa was not based solely upon my own inference. On November 22, 2021, she expressly wrote, “I consider us friends.” She invited me to Friendsgiving at Lockwood Café, later asked to purchase my artwork, voluntarily participated in extended personal conversations, and continued initiating or warmly engaging in communication through March 2022.

On February 16, she asked me to continue sending messages and ended the exchange with “Super appreciate you.” On February 22, she wrote, “I appreciate you so much.” On March 8, she asked me to record my performance at Reliable Street Inc.'s open-mic. On March 16, she wrote, “I appreciate you a lot.” On March 17—fourteen days before I was barred—she responded, “Love you <3,” during our coordination of the shared prairie-seed purchase.

That does not necessarily prove that she never experienced discomfort. People can conceal feelings or struggle to communicate boundaries. But it does establish the central contradiction: I was given no contemporaneous warning that my conduct was being experienced as stalking, harassment, or a months-long violation of someone's space.

Had anyone told me directly that I was causing discomfort, I would have stopped and attempted to address the concern respectfully.

Instead, I continued receiving warm messages and participating in approved projects until the relationship was suddenly terminated through executive action.

From Unexplained Removal to an Unresolved Record

At the time I was barred, I did not know the complete allegations or who had made them. I knew only that serious claims had been communicated to people with authority over the space and that those claims had been accepted without first hearing from me.

The later civil-rights record would greatly expand the narrative. Conduct that had been approved and appreciated would be portrayed as unsolicited. Volunteer leadership would be reframed as intrusion. Friendship and frequent communication would be recast as stalking or harassment. Private conversations would later be presented as evidence of racism, anti-LGBT+ hostility, and other misconduct fundamentally inconsistent with my values and my recollection of events.

But none of that was meaningfully explained to me on March 31.

I was punished first and left to discover the accusations later.

I Asked for Mediation Before Turning to Government

I did not initially seek litigation—or even government intervention.

On April 12, 2022, I sent Reliable Street and Lockwood Café a detailed written request for mediation. The letter described the work I had performed, the abrupt decision to bar me, the complaint Willa had identified as the cause, the communications that appeared inconsistent with that complaint, and the reputational harm already unfolding.

I did not merely ask the businesses to reverse their decision. I proposed that a neutral third party help us determine what had happened. I also asked them to adopt a fair process for addressing future complaints so that another person would not be punished through undisclosed allegations without an opportunity to respond.

They did not answer.

On April 18, I sent a final follow-up message to Lyndsay. That message also received no response.

This chronology matters. Before filing with the Iowa Civil Rights Commission, I attempted to resolve the dispute privately, requested neutral mediation, explained the evidence I believed contradicted the accusations, and proposed a constructive policy change. I turned to the Commission only after the people with authority to address the situation declined to engage.

When I later learned that ICRC complaints frequently lead to mediation, that seemed like the least adversarial remaining path. I was still seeking the conversation I had requested from the beginning.

What happened instead transformed an unexplained private exclusion into a permanent government-record crisis.

II. When Undisclosed Accusations Entered a Government Record

Why I Filed With the Iowa Civil Rights Commission

The more I reflected on what had happened, the clearer it became that this was not a harmless misunderstanding. I had been abruptly removed from a community in which I had spent months working, performing, organizing, and building relationships. The decision damaged my reputation, cost me friendships and community connections, and caused severe mental anguish.

The phrase used to justify that decision—that I had “violated a woman’s space”—carried an especially dangerous meaning for me as a transgender woman. Transgender women are routinely portrayed in political and cultural rhetoric as men intruding upon women’s spaces or threatening women’s safety. An accusation framed in those terms could easily imply sexual, predatory, or boundary-violating conduct even when no specific act had been explained to me.

I initially viewed what happened as profoundly unfair, but I did not immediately understand it as unlawful discrimination. I contacted attorneys regarding the reputational harm, and more than one suggested that I file a complaint with the Iowa Civil Rights Commission, an agency I had not previously known how to navigate.

The discrimination question became difficult to ignore. A non-transgender woman had complained about a transgender woman allegedly violating her space. The transgender woman was then treated as guilty, barred from the property, and denied any meaningful opportunity to learn the specific accusation or respond before punishment was imposed.

When I contacted the ICRC, I understood that civil-rights complaints could lead to mediation. That was precisely what I had already requested directly from Reliable Street and Lockwood Café.

I wanted a neutral conversation. I wanted to learn whether I had unknowingly caused discomfort. I wanted the accusations identified, the contemporaneous communications examined, and the record corrected where it was false. I also sought compensation for labor I would not have performed had I known that the project arrangements and relationships would be terminated in this manner.

I did not file the complaint to punish anyone. I filed because my private request for mediation had gone unanswered and I believed the Commission offered a fair process through which the parties could finally communicate.

The Complaint I Filed

My April 22, 2022 complaint largely carried forward the concerns I had already raised in my unanswered mediation request. I described the months of labor and collaboration, the sudden decision to bar me, the absence of a meaningful explanation, the reputational consequences, and my concern that transgender bias had affected how the complaint against me was received and acted upon.

At that time, I did not possess the respondents' later statements to the Commission. I did not know the full narrative they would present, which individuals would contribute to it, or what documents would be offered as support.

I believed I was asking a civil-rights agency to help investigate an unresolved factual conflict.

Instead, the respondents were permitted to answer my complaint through submissions I would not be allowed to examine before the Commission decided whether the case should proceed.

The Preliminary Case Review

On August 3, 2022, the ICRC issued a [Notice of Administrative Closure](#) and a [Preliminary Case Review](#). The notice informed me that the complaint had been closed and that the Commission would take no further action unless I successfully requested reconsideration within thirty days.

The Preliminary Case Review was far more devastating than the closure itself.

For the first time, I learned that the respondents had presented a broad narrative portraying my months of participation at Reliable Street and Lockwood Café as intrusive, unauthorized, obsessive, and harmful.

Work I remembered as openly discussed and approved was described as though I had simply imposed myself upon the organizations. The open-mic flier that had been reviewed, revised, approved, and publicly posted was summarized as an example of my assuming unwanted responsibility. My involvement in the garden and prairie projects was presented as excessive, controlling, or insufficiently coordinated.

The narrative then escalated far beyond disagreement over volunteer work or communication style.

The review referred to allegations that I had stalked and harassed a woman, ignored boundaries, overwhelmed employees, made racist comments, made inappropriate statements concerning sexual identity, and engaged in other behavior fundamentally inconsistent with my values and recollection of events. The record shows that the review referenced statements, text messages, employee accounts, and patron accounts that had been submitted to the Commission, but I had not been given those underlying materials.

I Could See the Accusations—but Not Their Sources

The Preliminary Case Review gave me enough information to understand that extremely damaging allegations had been submitted against me. But it did not give me enough information to determine exactly who had said what.

Some statements appeared to be attributed directly to respondents. Others appeared to relay what employees, patrons, or unnamed individuals had allegedly reported. The agency's summary moved

between speakers and layers of retelling without providing the original submissions necessary to distinguish:

- firsthand testimony from hearsay;
- a respondent's own allegation from something repeated by an employee;
- an employee's original words from management's interpretation;
- or a complete communication from an excerpt selected to support a particular narrative.

At that point, I could identify several accusations as false because they concerned conduct I knew I had not performed. I could also recognize that the agency's summary conflicted sharply with the contemporaneous messages, approvals, and project records already in my possession.

But without the respondents' underlying submissions, I could not yet determine how the narrative had been assembled or who was responsible for each part of it.

I did not know whether particular screenshots had been submitted in full or in excerpts. I did not know whether dates, sequence, or context had been preserved. I did not know who had prepared the supporting materials or whether every person whose alleged experiences appeared in the summary had actually described them in the way the review suggested.

Those questions would remain unanswered for more than a year.

The Layering Problem

The structure of the Preliminary Case Review created a serious fairness problem.

A government agency had summarized severe accusations about me while denying me the underlying statements and documents necessary to test them. The agency then relied upon that layered account to close the complaint without investigation.

The review therefore operated in two directions at once.

It treated the respondents' narrative as sufficiently credible to justify closure, while telling me so little about the actual submissions that I could not meaningfully rebut them. It transformed disputed accusations into an official agency summary without determining whether the accusations were true.

Because the case was closed at screening, there was no investigation through which witnesses could be questioned, contradictions examined, or original communications compared against the respondents' descriptions.

The conflict was not resolved.

It was preserved in a government record.

The Thirty-Day Appeal Began Before I Could See the Evidence

The closure notice gave me thirty days to request reconsideration. But the Commission had not provided the materials upon which its decision relied.

I was therefore expected to appeal an agency decision while unable to see the respondents' actual statements, the submitted screenshots, or the supporting documents referenced in the review.

Exhibit A describes the practical disadvantage this created. Before filing my appeal, I requested access to the underlying statements and documentary evidence. The Commission denied that request under its policy of withholding the complete file until a right-to-sue letter had issued. My appeal was consequently limited to challenging the hearsay and summaries contained in the agency's review rather than directly answering the evidence itself.

I was being asked to defend my name against evidence I was not allowed to examine.

What I Knew—and What I Did Not Yet Know

By August 2022, I knew several things.

I knew that serious accusations had been submitted to the Iowa Civil Rights Commission. I knew that the allegations contradicted my experience and the contemporaneous communications in my possession. I knew that approved participation was being reframed as unwanted intrusion. I knew that accusations of stalking, harassment, racism, and anti-LGBT+ conduct had entered the agency's analysis. And I knew that the Commission had closed the case without investigating those factual disputes.

But I did not yet possess the respondents' actual statements.

I had not yet seen the complete screenshots or supporting documents.

I could not yet determine the precise role played by Lyndsay Nissen, Sharon Stewart, Willa Colville, Denise Martinez, Charlie Esker, or any unnamed participants in constructing the narrative summarized by the agency.

I also could not yet know whether the original communications had been presented accurately, selectively, out of sequence, or without their surrounding context.

The Preliminary Case Review showed me **the accusations**.

It did not show me **how they had been built**.

That distinction is essential to understanding what followed.

The Broader Political Meaning I Perceived

The Preliminary Case Review appeared beneath the authority of an executive branch led by Governor Kim Reynolds.

Seeing her name prominently associated with the agency document intensified my concern that this failure was not occurring in a politically neutral environment.

By that time, transgender Iowans had already experienced widespread defamatory attacks against our reputations, civil rights violations covered up in news articles under euphemisms such as "rollbacks" or "amendments" to existing law, and Medicaid rights violations. Here in Iowa, Kim Reynolds has remained a central figure in using defamatory language to turn public sentiment against transgender and gender nonconforming people.

Against that background, an agency's decision to close a transgender woman's complaint without investigation—while preserving severe accusations made against her—felt like part of a larger failure of protection.

I could not prove from the closure document alone that Governor Reynolds or any political appointee had influenced the handling of my individual complaint. I do not claim that the document established such direct involvement.

What it did establish for me was the institutional context: serious accusations against a transgender complainant had been accepted into an executive-branch record, the discrimination complaint had been closed without investigation, and the person accused had not been given the underlying materials needed to answer them.

That was the moment the matter became larger than an exclusion from one local community space.

A damaging narrative now existed within a government record. It had not been tested, resolved, or corrected. And I had no way of knowing where that record might later travel, who might obtain it, or how it might be used against my reputation, work, publications, or future political activity.

The Record I Was Not Yet Allowed to See

At that stage, I could only compare the agency's summary against the communications already in my possession.

Those communications documented approvals, delegated responsibilities, shared expenditures, project coordination, affectionate messages, and continuing collaboration in the weeks immediately preceding March 31. They gave me strong reason to dispute the narrative appearing in the Preliminary Case Review.

But the central evidence remained hidden.

I would not receive the complete ICRC file until October 11, 2023. Only then would I be able to read the respondents' statements in their own words and compare the documents they submitted with the original records in my possession.

The Preliminary Case Review showed me the outline of what had happened.

The complete file would later show me how it had been done.

III. The Administrative Trap

Trying to Appeal Without the Underlying Case File

When the Iowa Civil Rights Commission closed my complaint, I knew I needed to challenge the decision. But I still did not possess the evidence upon which that decision had been based.

All I had was the Commission's Preliminary Case Review—a condensed, secondhand account of what respondents, employees, patrons, and other people had allegedly said. I did not have the respondents' complete statements. I did not have the screenshots and documents submitted

alongside them. I could not determine precisely who had made each accusation, whether the agency had accurately characterized it, or whether the supporting communications had been presented with their full context and chronology.

The communications already in my possession sharply contradicted important parts of the agency's summary. They documented invitations, approvals, delegated responsibilities, shared project expenses, affectionate messages, and continuing collaboration shortly before I was barred.

But those records could answer only what I already knew.

They could not tell me exactly what had been submitted behind the scenes.

The Preliminary Case Review therefore placed me in an extraordinary position: I could see that severe accusations had entered an official agency analysis, but I could not see the underlying materials necessary to determine how the narrative had been assembled or who was responsible for each part of it.

The Right-to-Sue Catch-22

I contacted the Commission and asked for the complete case file—the respondents' actual statements, screenshots, and supporting documents that had been used during screening.

I was told that I was not entitled to receive the complete file unless I requested a letter of right-to-sue. Yet the Commission also warned me that I "absolutely" should not request that letter before consulting an attorney.

The Commission's written instructions explained why that warning mattered. Once the letter issued:

- I would have only ninety days to file a civil action;
- I would have to obtain my own attorney or other representative;
- the Commission would take no further action;
- the administrative case would be closed;
- and there would be no opportunity to reopen it.

That created a circular procedural trap:

I needed the complete file to show an attorney what had happened and whether the case was viable.

I was warned to consult an attorney before requesting the right-to-sue letter. But the complete file would not be released until I requested that letter—ending the agency process and beginning the ninety-day lawsuit deadline.

An attorney deciding whether to accept a complicated civil-rights, defamation, or fraud-related case would understandably want to inspect the actual statements and documents. But those were the very materials I could not obtain without first starting the litigation clock.

The process therefore assumed access to legal representation while withholding information that could be essential to obtaining it.

The problem was even more severe because the Commission had already closed my complaint at the screening stage. Its own public explanation of that process stated that a case would be screened in for further investigation when the information showed a “reasonable possibility” of probable cause or when the legal issues required development. It also stated that the Commission would draw rational and reasonable inferences in the complainant’s favor and would not evaluate credibility during screening.

icrc.iowa.gov/file-complaint/outline-complaint-process

Screening The Complaint

After the ICRC receives all responses, or when 30 days have passed, the collected information is reviewed by a screener. If the collected information indicates a reasonable possibility of a probable cause determination, the complaint will be “screened in.” The ICRC uses the following standard when screening cases:

- If the information indicates a “reasonable possibility of a probable cause determination or the legal issues in the complaint need development” the Commission will “screen in” a case for further investigation. Iowa Admin. Code r. 161—3.12(1)(f).
- During the screening stage, the Commission draws all “rational, reasonable, and otherwise permissible” inferences in Complainant’s favor. *See Phillips v. Covenant Clinic*, 625 N.W.2d 714, 718 (Iowa 2001) (quoting *Butler v. Hoover Nature Trail, Inc.*, 530 N.W.2d 85, 88 (Iowa Ct. App. 1994)).
- Importantly, the Commission does not evaluate credibility at the screening stage and instead evaluates only whether the stated facts create a “reasonable possibility” for a probable cause finding. The Commission relies in part on its own experience and expertise with the Iowa Civil Rights Act (ICRA), while remaining mindful that many cases turn on circumstantial—rather than direct—evidence of discrimination. *Ritz v. Wapello Cty. Bd. of Supervisors*, 595 N.W.2d 786, 791 (Iowa 1999).

The ICRC screening standard displayed on the Commission’s public website at the time. It stated that cases could be screened in when there was a reasonable possibility of probable cause or when the legal issues required development; that reasonable inferences would be drawn in the complainant’s favor; and that credibility would not be evaluated at screening.

My case presented precisely the kinds of unresolved conflicts that appeared to require further investigation: contemporaneous messages contradicted the respondents' narrative; authorized work was being portrayed as unwanted; serious accusations depended upon statements and documents I had not been allowed to see; and the agency's summary did not clearly identify who had firsthand knowledge of what.

The Commission did not need to decide at screening that I was right and the respondents were wrong. Under its publicly stated standard, it needed only to determine whether the conflicts, documentation, and undeveloped factual issues created a reasonable possibility that further investigation was warranted.

Instead, the Commission closed the complaint, preserved the respondents' accusations in its records, and withheld the underlying submissions from me.

I was then left with two unacceptable choices:

Appeal the closure without access to the evidence used against me; or terminate the administrative process, start a ninety-day court deadline, and attempt to obtain counsel while simultaneously preparing for litigation.

That was not simply a short deadline. It was a process that placed access to the evidence behind the very procedural step that made immediate legal representation most urgent.

The failure to investigate did not resolve the factual conflict.

It converted an unresolved civil-rights complaint into a race toward court.

Appealing a Summary Instead of the Evidence

The Commission gave me thirty days to request reconsideration and reopening.

That deadline began while the respondents' underlying submissions remained unavailable to me. I was expected to challenge the closure using the agency's summary of the evidence rather than the evidence itself.

I therefore appealed with what I had.

I disputed allegations that I had imposed myself upon the projects, acted without authorization, cornered or harassed people, ignored boundaries, solicited money improperly, or made racist or anti-LGBT+ comments. I explained that the open mic, flier, garden, and prairie work had been discussed and approved; that I had coordinated with management, employees, volunteers, and SHEPH; and that the contemporaneous communications did not resemble the hostile narrative summarized in the review.

But I could not directly answer statements I had not seen.

I could not compare submitted screenshots with the originals. I could not identify omitted messages. I could not determine whether communications had been presented in the correct order. I could not distinguish an employee's actual words from management's interpretation of them. And I could not know whether every person referenced in the agency summary had described events in the way the Commission suggested.

My appeal was therefore not merely written without counsel. It was written without access to the evidentiary record I was being asked to rebut.

That is not a meaningful opportunity to challenge an administrative decision. It is a person being asked to defend her name while the evidence used against her remains hidden.

What the Ombudsman Revealed

After the Commission denied reopening, I sought review from the Iowa Office of Ombudsman.

On November 15, 2022, **I filed a complaint with the Office of the Ombudsman**, asking them to examine whether the ICRC had closed my complaint prematurely despite substantial factual contradictions. I explained that I had supplied evidence contradicting at least some of the statements summarized by the Commission. I asked the Ombudsman to review whether further investigation should have occurred and whether the allegedly false or tortious statements submitted during the process could be examined.

The Ombudsman did not determine whether the allegations against me were true.

In **its January 18, 2023 response**, the office explained that it was not part of the formal ICRC appeal process and lacked authority or specialized expertise to decide whether discrimination had occurred, whether the respondents' statements were truthful, or whether the Commission had assigned appropriate weight to the evidence. Its review was largely confined to whether the Commission had followed the procedures the law allowed it to use.

The Ombudsman ultimately concluded that the ICRC had followed its administrative procedures and that my complaint against the agency could not be substantiated.

But the legal authorities cited in that response revealed something far more consequential than an ordinary procedural limitation.

What the Commission Broadcast to the Public

At the time, the Commission publicly described its screening process in concrete and reassuring terms.

Its website stated that a complaint would be screened in for further investigation if the collected information indicated a "reasonable possibility" of a probable-cause determination or if the legal issues required development.

It further stated that, during screening, the Commission would draw all rational, reasonable, and otherwise permissible inferences in the complainant's favor.

Most importantly, it stated that the Commission did not evaluate credibility at the screening stage. Instead, it supposedly asked only whether the stated facts created a reasonable possibility of probable cause.

That description communicated an understandable promise to complainants and taxpayers:

When material facts conflict, when credibility must be assessed, when the evidence is incomplete, or when the legal issues require development, the

case will proceed to investigation rather than being resolved against the complainant at screening.

My complaint presented exactly those circumstances.

The parties' accounts sharply conflicted. Contemporaneous communications contradicted the respondents' narrative. The Commission's review depended upon layered statements and documents I had not been permitted to examine. Determining which account was accurate necessarily involved questions of credibility, context, authorship, and intent.

Yet the case was closed without investigation.

What *Estabrook* Said the Commission Was Actually Required to Do

The Ombudsman cited *Estabrook v. Iowa Civil Rights Commission*, 283 N.W.2d 306 (Iowa 1979).

In *Estabrook*, the Iowa Supreme Court held that the legislature did not intend to require the Commission to process every complaint that generated even a minimal prima facie case of discrimination. The Court said the Commission was intended to be selective in deciding which cases to process through the agency. It further held that a complainant had no property right to have a claim pursued through the Commission and therefore was not entitled to a due-process evidentiary hearing before a no-probable-cause decision. *Estabrook*, 283 N.W.2d at 310–11.

A **prima facie case** is not merely a vague suspicion. It generally means that the complainant has presented facts which, if accepted as true, are sufficient to establish the basic elements of a claim unless rebutted.

The distinction was therefore profound.

The Commission's website appeared to tell the public that a case presenting a reasonable possibility of probable cause—or factual and legal issues needing development—would be screened in for investigation.

But *Estabrook* said the Commission was not legally required to process every complaint even when it presented a minimal prima facie case.

The public standard sounded like an evidentiary threshold.

The case law described broad administrative discretion.

Those are not the same thing.

***Estabrook* Also Described the Exact Disclosure Problem I Faced**

The majority in *Estabrook* rejected a constitutional right to a full evidentiary hearing at the probable-cause stage. But the special concurrence identified the danger created when the complainant is not told what the opposing party submitted.

The concurring justices observed that the complainant in that case had not been informed of the employer's version of events or the contents of the investigative file. They explained that a person

in that position proceeds blindly because the person does not know what contentions must be rebutted. They suggested that even a simpler disclosure process—informing each party of the other's version and allowing a response—could reduce the risk of error without requiring a full trial-like hearing.

That was almost exactly my situation.

The Commission summarized severe accusations against me, referenced statements and supporting communications, and then closed the case. But it did not provide the respondents' actual submissions, identify clearly who was responsible for each statement, or allow me to compare the submitted materials with the originals before the screening decision was made.

I was expected to respond to an adverse narrative while being denied the record from which that narrative had been built.

The very risk recognized in the *Estabrook* concurrence had become the operating structure of my case.

What *Eilders* Added

The Ombudsman also cited *Sun O. Eilders v. Iowa Civil Rights Commission and Dayco Products, Inc.*, No. 00-1277 (Iowa Ct. App. Apr. 10, 2002).

That case reinforced the distinction between the Commission's preliminary process and a contested judicial proceeding. The Commission's determination process was not treated as a full evidentiary trial in which witnesses are examined, credibility is formally resolved, and each side receives the complete procedural protections associated with court.

The practical effect was that the process presented to complainants as a civil-rights remedy did not necessarily provide the procedural mechanisms needed to determine whether serious accusations were true.

The fuller protections existed only after leaving the agency, obtaining a right-to-sue letter, securing counsel if possible, and commencing litigation.

But obtaining that right-to-sue letter simultaneously:

- ended the Commission's involvement;
- permanently closed the administrative case;
- triggered a ninety-day court deadline;
- and was the prerequisite for obtaining the complete agency file.

The administrative remedy therefore pointed directly toward a court system that many complainants cannot afford to enter.

The Contradiction the Ombudsman Exposed

The Ombudsman's response revealed that the Commission's public description and its legally enforceable obligations were materially different.

The public-facing message was:

We screen in cases when there is a reasonable possibility of probable cause, when legal issues require development, and without deciding credibility against the complainant.

The legal framework described by the Ombudsman was:

The Commission may remain selective even when a complaint presents a prima facie case; the complainant has no property right to have the case processed through the agency; no full evidentiary hearing is required; and the unresolved claim may instead be carried into court.

That was not merely disappointing.

It fundamentally changed my understanding of what the State had represented the civil-rights process to be.

A reasonable complainant reading the Commission's website could believe that serious factual disputes, contradictory evidence, and credibility questions would lead to investigation. A reasonable taxpayer could believe that the agency was funded and operated to examine potentially meritorious discrimination complaints under the standards it publicly announced.

But the authorities supplied by the Ombudsman showed that the Commission could close a case despite a prima facie showing and without providing the complainant a trial-like opportunity to confront the opposing evidence.

The website described a threshold for investigation.

The case law preserved discretion not to investigate.

Why I Alleged Fraudulent Misrepresentation

That discrepancy became the foundation of the fraudulent-misrepresentation theory I later pleaded in *Wilson v. State of Iowa and Kim Reynolds for Iowa*.

My position was not merely that the Commission reached the wrong conclusion in my individual case.

My position was that the State publicly represented the ICRC as a meaningful, evidence-sensitive civil-rights remedy while the governing legal framework allowed the Commission to:

- decline to process a complaint even when it presented a prima facie case;
- resolve screening without a full evidentiary hearing;
- withhold the respondents' underlying submissions from the complainant;
- deny reconsideration before the complainant could inspect the evidence;
- and direct the complainant toward private litigation as the place where fuller procedural protections supposedly existed.

For an unrepresented, low-income complainant, that difference is not academic.

It changes whether filing with the Commission offers a genuine opportunity for investigation or merely consumes time before the person is forced into court.

In the State petition, I alleged that presenting the screening process publicly in one manner while relying upon a materially different legal reality misled both discrimination complainants and Iowa taxpayers. I argued that if the Commission was not obligated to screen in even a prima facie case, that limitation should have been disclosed plainly on the same public page that described the “reasonable possibility” standard.

The court did not adjudicate whether that theory was correct. The State case was dismissed on procedural grounds, and the merits of the fraudulent-misrepresentation allegation were never resolved.

But the contradiction that produced the claim remains:

**The Commission told the public that unresolved evidence and undeveloped legal issues could warrant investigation.
The Ombudsman showed me case law saying the Commission could decline to process even a prima facie case.
The Commission then withheld the evidence, closed my complaint, and directed me toward litigation I could not afford.**

The Ombudsman did not correct the administrative record.

It revealed why the administrative process might never correct it at all.

That was the deeper discovery: what had appeared to be an accidental failure in my individual case was supported by a legal structure that permitted the Commission to promise investigation publicly while retaining broad discretion not to provide it.

Why the Thirty-Day Appeal Was Not Meaningfully Accessible

The thirty-day reconsideration period was especially difficult because I was attempting to respond to severe and reputation-damaging accusations while experiencing significant emotional distress.

Every attempt to work through the appeal required me to revisit allegations that I believed were false, organize months of communications, reconstruct multiple projects and relationships, and answer a layered narrative without access to the submissions from which it had been created.

At times I could write only a sentence or two before becoming physically ill and needing to stop.

A short appeal period may look reasonable when viewed as a date on a form. It looks very different when the complainant is traumatized, unrepresented, denied the underlying file, and expected to reconstruct months of evidence while attempting to identify statements whose authors and context remain unclear.

That experience is why my proposed reforms call for:

- extending the reconsideration period to sixty days;
- providing complainants timely access to the materials used in screening;
- clearly identifying who made each material allegation;
- and adopting trauma-informed procedures for people attempting to challenge an administrative closure.

An appeal is not meaningful merely because a deadline and mailing address are provided. It must offer a realistic opportunity to understand and answer the grounds upon which the decision was made.

IV. Every Remaining Door Pointed Somewhere Else

Why Litigation Became the Only Remaining Option

After the Commission closed my complaint and denied reopening, I did not immediately file suit.

I spent more than a year attempting to find some other institution, attorney, agency, or official willing and able to examine what had happened.

I was not trying to manufacture litigation. I was trying to avoid it.

I wanted someone with legal authority or professional expertise to compare the allegations with the contemporaneous record, determine whether false or misleading information had been used to defeat a civil-rights complaint, and identify a lawful way to correct the resulting government record.

Instead, every path led to another referral, another jurisdictional limitation, or another deadline.

Directed to Private Counsel I Could Not Afford

The Commission repeatedly advised me to locate a private attorney.

I contacted more than fifty attorneys and law firms concerning discrimination, civil rights, defamation, fraud, and related claims. Some did not practice in the relevant areas. Some were unavailable. Some believed the matter would be too complicated or expensive. Others required fees far beyond anything I could pay.

The least expensive concrete quote I documented was \$5,000 in advance and \$275 per hour.

For a person still recovering from years of poverty and housing instability, that was not meaningful access to representation. It was a price of admission I could not pay.

The advice to “find a private attorney” also ignored the evidence problem the Commission itself had created. Attorneys assessing a difficult case generally need the underlying record. But I still could not obtain that record without requesting a right-to-sue letter and beginning the ninety-day litigation deadline.

I was being directed toward professional help while denied the file needed to meaningfully seek it.

Referred to Legal Aid That could Not Take the Case

When I informed the Commission that private representation was unaffordable, an intake specialist provided a list of legal-aid organizations serving low-income Iowans.

I contacted the organizations.

The recurring response was that they did not accept “fee-generating cases” of this kind. Many legal-aid programs concentrate their limited resources on matters such as housing, custody, divorce, public benefits, or other designated areas. That work is essential, but it did not provide representation for the complex civil-rights, reputational, fraud-related, and business claims I was attempting to present.

One university clinic was not accepting new cases because of a staffing transition. Other organizations could not take the matter because of subject-matter or funding limitations.

The referral therefore led to another circle:

The civil-rights agency told a low-income complainant to seek private representation she could not afford.

When she explained that she could not afford it, the agency referred her to organizations that generally could not handle the type of case the agency was telling her to pursue.

The State petition described this as a situation in which “the left hand doesn’t know what the right hand is doing.” Whether caused by institutional fragmentation or a lack of suitable resources, the result was the same: the referral system did not produce legal assistance.

[This PDF](#) documents, in part, my extensive attempt to find legal assistance. The only reason I documented all of this so thoroughly is because I have been through the ringer more than once, and been sent on this sort of runaround. As a transgender woman, I have faced my share of shitty adverse situations, and *this time* I wanted to show the public what it looks like from “down here”—near the bottom of the human rights barrel.

Iowa had civil-rights agencies, law schools, courts, legal-aid organizations, prosecutors, and private attorneys—but no accessible route through which I could obtain the record, secure representation, and have the underlying accusations examined. It felt like “water, water, everywhere, and not a drop to drink.”

Law Enforcement Pointed Across Jurisdictional Lines

I also contacted law enforcement because I believed Iowa Code section 714.8(4), concerning knowingly making a false entry in public records or certain organizational records, might be relevant to the information submitted during the Commission process.

I was not asking officers to accept my legal conclusion without investigation. I was asking where a complaint involving allegedly false information submitted into a state-agency record should be

made and whether the matter could be examined.

Ames Police communicated with the Story County Attorney's Office and told me that the matter was viewed as belonging outside Ames or Story County because the submissions had been made to the Commission in Polk County.

When I contacted Des Moines Police, the officer, whose name I am not disclosing at this time, told me that I should begin with Ames Police and that the matter could be transferred if jurisdiction lay elsewhere.

I returned to Ames Police with that information. I was then told that there was nowhere further to direct me. I also understood that the Story County Attorney's Office had advised both that the matter was outside local jurisdiction and that it would not be prosecuted even if jurisdiction existed.

The result was not a determination that the underlying materials were accurate.

It was a jurisdictional loop in which no office undertook the factual review I was seeking.

This distinction matters. A decision not to investigate or prosecute does not establish that the disputed statements were true. It means only that the law-enforcement path did not produce a forum for resolving them.

The EEOC Did Not Resolve the Facts

The ICRC informed me that my complaint was dual-filed with the federal Equal Employment Opportunity Commission.

But the federal process did not provide an independent factual remedy. As I understood the notices I received, the EEOC deferred while the Iowa proceedings remained active. Any request for federal review was subject to a short deadline, and additional evidence could not simply be added during that review process.

The EEOC later adopted the result of the state proceedings and issued a right-to-sue notice. The notice stated that the federal agency would not proceed further, made no determination that the law had or had not been violated, and warned that any federal lawsuit had to be filed within ninety days.

Once again, the allegations remained unresolved.

The state agency had closed the matter without investigation. The federal agency did not independently decide the disputed facts. The practical remedy offered was another invitation to commence litigation.

The State Tort-Claim Process Did Not Produce a Timely Answer

My efforts eventually extended beyond the underlying Reliable Street dispute to what I believed were broader failures by Iowa institutions.

On July 6, 2023, I filed a claim through the Iowa State Appeal Board under the Iowa Tort Claims Act. The Board informed me that the claim would be referred to the Attorney General's Office for investigation and that I would be notified of the final disposition.

According to the later State petition, I did not receive a substantive investigation request or final determination before filing the related lawsuit. I also did not understand that, if no final disposition

was made within six months, a separate written withdrawal step was required before beginning suit under the Iowa Tort Claims Act. The State later relied upon that omitted procedural step in seeking dismissal.

That experience reinforced the same pattern: even when I attempted to use a formal administrative remedy in good faith, an unrecognized procedural requirement could prevent the underlying substance from being heard.

The State case combined numerous claims and theories far broader than the ICRC issue. Its dismissal did not adjudicate whether the Commission's process was fair, whether the respondents' submissions were truthful, or whether the institutional reforms I proposed were warranted.

One door after another pointed somewhere else: ask the Commission, ask an attorney, ask legal aid, ask the Ombudsman, ask the EEOC, ask law enforcement, or go to court. None of those paths examined and corrected the underlying record.

I did not need help merely coping with the accusations. I needed a meaningful opportunity to clear my name.

Eventually, I understood that I had only two choices: attempt to represent myself or leave the allegations unresolved in government records where they could be used against me later.

Why I Finally Requested the Right-to-Sue Letter

By September 2023, I had spent more than a year attempting to obtain counsel and assistance.

The Commission had directed me toward private attorneys. Private counsel remained unaffordable or unavailable. Legal-aid organizations could not take the case. The Ombudsman could examine procedure but not decide the disputed facts. Law enforcement did not undertake the requested investigation. The EEOC did not independently resolve the allegations. Other government contacts did not correct the record.

I eventually faced a choice:

Continue searching indefinitely while the underlying file remained hidden, or request the right-to-sue letter, begin the ninety-day deadline, and finally obtain the documents necessary to understand what had been submitted.

On September 8, 2023, I requested the right-to-sue letter and immediately requested the complete case file.

The petition records that sequence as the step I took only after contacting more than fifty attorneys, legal-aid organizations, law-enforcement offices, the Attorney General's Office, the Ombudsman, and the EEOC.

Fifty-Five Days to Examine the File and File Suit

The events that initially gave rise to my claims occurred on March 31, 2022.

Iowa Code 614.1(2) generally allows two years to bring actions involving injury to a person or reputation. Based upon that provision, the outside deadline for claims governed by that limitations

period appeared to be March 31, 2024.

On paper, two years may sound like ample time.

But I did not possess the respondents' underlying submissions for most of that period.

The Commission had closed my complaint in August 2022, yet it would not provide the complete case file unless I first requested a right-to-sue letter. That step ended the Commission's involvement and imposed a separate ninety-day deadline for commencing the civil-rights action.

I delayed taking that step because the Commission itself had warned me to consult an attorney first. I spent the intervening period attempting to obtain representation, appeal the closure, seek review from the Ombudsman, contact legal-aid organizations, pursue the EEOC process, and determine whether any government office or law-enforcement agency could examine the allegedly false information.

None of those efforts gave me access to the complete record or produced representation.

Eventually, I had to choose between continuing to search for help without seeing the evidence or requesting the right-to-sue letter, ending the administrative process, and beginning the ninety-day litigation deadline.

I requested the letter in September 2023 and immediately sought the complete file.

The Commission did not provide **the complete case file** until October 11, 2023.

By then, the right-to-sue deadline required me to commence the civil action by December 5, 2023.

Although approximately eighteen months had passed since March 31, 2022, I had possessed the underlying evidence for none of that time.

Once the file finally arrived, only fifty-five days remained before I had to sue.

For the first time, I could read the respondents' submissions in their own words and compare the supporting materials with the original communications in my possession.

I allege that the file revealed:

- mutually reinforcing narratives from multiple people;
- approved work later characterized as unauthorized or intrusive;
- excerpts presented without their complete surrounding context;
- communications involving Willa Colville presented in a manner that distorted their chronology;
- private messages involving Denise Martinez used to support allegations of racism and anti-LGBT+ hostility;
- and statements from Charlie Esker describing conduct Esker claimed to have personally witnessed despite earlier communications suggesting limited involvement.

Readers can examine the respondents' submissions alongside the original communications in **Part Four, *Dangerous Precedent***, which presents the principal court exhibits and explains the alterations, omissions, chronology disputes, and contradictory accounts I later sought to plead in greater detail.

Those factual allegations were never adjudicated on their merits.

Important questions of responsibility also remained unresolved. The file did not conclusively establish whether Sharon Stewart knowingly transmitted a misleading account or relied upon information supplied by others. Nor did it establish whether Willa Colville altered the disputed message presentation before providing it to Stewart, whether Stewart altered it afterward, or whether both understood how the materials had been presented. Those were among the questions I expected discovery to help answer.

But receiving the file fundamentally changed what I knew.

The Preliminary Case Review had shown me the accusations.

The complete file showed me the underlying submissions and allowed me, for the first time, to examine how those accusations had been constructed and supported.

But receiving the file did not mean that the evidence was suddenly organized, fully understood, or ready to plead.

The case involved seven defendants, communications across multiple platforms, several organizations, competing versions of documents, disputed chronology, questions of authorship and alteration, two judicial venues, and eventually three judges. The complete evidentiary record would grow to include more than seventy exhibits, each of which had to be located, preserved, compared with the respondents' submissions, placed into chronological order, and explained in relation to an increasingly complex set of claims.

That work could not be completed within fifty-five days. In reality, reconstructing the record would take years.

During those years, I was not working on the evidence under stable conditions. I was completing demanding academic obligations while responding to continuing litigation pressure, managing overlapping cases, researching unfamiliar procedural rules, and attempting to meet limitations periods affecting both *Wilson v. Reliable Street Inc., et al.* and *Wilson v. State of Iowa and Kim Reynolds for Iowa*. Later, I was also developing and conducting a statewide gubernatorial campaign.

At the same time, I was living through the consequences of continuing state-level civil-rights and Medicaid disputes affecting transgender Iowans, including interruptions to medically necessary care. The emotional pain associated with those losses existed within a broader national and political climate in which transgender people were repeatedly portrayed as threats by public figures and media personalities. That rhetoric did not remain abstract. It contributed to public harassment and to the continuing fear that ordinary activities—including entering a restroom—could lead to confrontation or arrest.

The result was a pressure cooker. I was expected to reconstruct a concealed and disputed record, identify viable claims, litigate without counsel, remain academically functional, protect my medical and civil rights, and prepare for public office—while mandatory deadlines continued to run.

I therefore could not wait until every exhibit had been fully assembled, every contradiction mapped, every question of authorship resolved, and every legal theory developed. Limitations periods required me to preserve the claims first and continue building the record afterward.

The Iowa Civil Rights Commission had consumed most of the broader two-year period while withholding the materials necessary to understand the case. Then, once I took the procedural step required to obtain those materials, the right-to-sue process imposed its own ninety-day deadline.

By the time the evidence was actually delivered, I had fifty-five days.

During those fifty-five days, I had to:

- review and organize hundreds of messages and records involving seven defendants;
- compare the original communications with the statements and documents submitted to the Commission;
- determine who may have authored, altered, transmitted, or relied upon particular materials;
- identify potentially applicable claims involving discrimination, retaliation, defamation, fraud, breached agreements, and related conduct;
- teach myself how to draft and file a civil petition;
- prepare original notices;
- understand the rules governing service upon seven defendants;
- and preserve the case before the right-to-sue deadline expired.

I had no attorney.

I therefore filed a two-page petition on December 5, 2023, to preserve the action before the right-to-sue deadline expired—even though the evidentiary reconstruction had only just begun.

Iowa Rule of Civil Procedure 1.403(1) requires a petition to contain a “short and plain statement” showing that the plaintiff is entitled to relief. It does not require the opening petition to prove every allegation or include every supporting exhibit.

It was not intended to contain every exhibit, resolve every question of authorship, or prove the entire case. It was a good-faith attempt to preserve the action before the deadline expired under Iowa’s notice-pleading system.

Filing the petition did not create the time needed to complete the evidentiary reconstruction. Almost immediately, the case shifted into disputes over service, venue, pleading sufficiency, recasting, dismissal, and other procedural issues. The time I needed to finish organizing the exhibits and develop the petition was repeatedly redirected toward preventing the case from being dismissed before discovery.

That cycle continued for years. I was never given a quiet period in which I could simply sit down with the complete record, follow every evidentiary thread, and draft the fullest possible petition with access to all necessary information. The case remained under procedural pressure while key evidence concerning authorship, transmission, intent, and coordination remained within the defendants’ control.

That history is part of why the Revised Second Amended Petition I sought leave to file in 2026 includes an abuse-of-process claim. The coming installments explain how the complexity grew, why discovery became essential, and how procedural demands repeatedly displaced the work needed to reach the merits.

The practical effect of the administrative process was extraordinary.

A limitations period that appeared to provide two years for claims involving injury to my person or reputation did not give me two years with the evidence. The Commission retained the underlying submissions while I appealed, sought counsel, and exhausted other possible avenues. When it

finally provided the materials, only fifty-five days remained before the litigation deadline the right-to-sue process had triggered.

That is the civil-rights trap described in the title of this article.

The process did not merely fail to resolve my complaint.

It consumed nearly the entire period in which I could prepare to litigate what the process itself had allowed into the record.

That is how litigation became unavoidable.

Not because I rushed toward court.

Because the evidence required to understand and plead the case was withheld until the final fifty-five days.

The administrative process withheld the evidence needed to secure representation and consumed all but fifty-five days of the period available to prepare and file suit.

V. Before the Judicial Phase Begins

Why Correcting the Record Mattered

The underlying case is not merely about hurt feelings or a private disagreement.

The materials I eventually obtained from the Iowa Civil Rights Commission revealed a broad portrayal of me as harassing, stalking, racist, discriminatory, obsessive, invasive, and dishonest—a portrayal I allege was false and supported through misleading or distorted submissions.

No court has adjudicated the truth or falsity of that overall portrayal. The district court later granted summary judgment under an absolute-privilege theory rather than deciding the truth, falsity, context, or presentation of the challenged submissions.

An unresolved narrative of that kind can affect employment, education, relationships, advocacy, publishing, public service, political participation, personal safety, and a person's long-term reputation.

That was why I could not simply walk away.

I was not seeking years of litigation. I was seeking a forum in which the underlying communications, chronology, authorship, and context could finally be examined.

How the Unresolved Record Later Collided With Ballot Access

The danger did not end when I filed suit. The case continued for years while I attempted to compile the evidence, meet mandatory court deadlines, complete my education, manage related litigation, and run for Governor without counsel or institutional support.

The unresolved record eventually became inseparable from my campaign. I could not responsibly seek statewide office while serious accusations remained in official records without adjudication. Yet the litigation required to challenge those accusations consumed the same period Iowa law gave me to gather signatures for ballot access.

That collision became the basis of [Wilson v. Pate](#).

Click the image below to read how the civil-rights litigation burden interfered with ballot access and why I am asking the Iowa Supreme Court for relief.



From Administrative Failure to Reform

The difficulty I faced—appealing without the underlying file, navigating a thirty-day reconsideration period while traumatized and unrepresented, searching unsuccessfully for counsel, and finally receiving the evidence only fifty-five days before suit had to be filed—is why I now advocate for structural reform of Iowa’s civil-rights process.

My statewide plan includes:

- extending the reconsideration period from thirty to sixty days;
- providing complainants timely access to the statements and materials used during screening;
- clearly identifying the source of each material allegation;
- adopting trauma-informed procedures;
- improving referrals for low-income complainants;

- and ensuring that serious factual conflicts are not resolved through undisclosed evidence and layered summaries.

These reforms are not abstract proposals developed from a distance. They arise directly from the documented process described in this article.

[Read my plan to repair the Iowa civil-rights process.](#)

What Happened Next

The administrative process did not correct the record.

It forced me into court.

On December 5, 2023, I filed a two-page petition in *Wilson v. Reliable Street Inc., et al.* I expected that Iowa's notice-pleading system would allow the factual record to be developed through amendment and discovery.

Instead, before discovery began, seven defendants responded with coordinated challenges to service, venue, pleading form, and every claim I had attempted to preserve.

From that point forward, much of the time I needed to finish compiling the evidence was redirected into surviving procedural disputes, researching unfamiliar legal rules, responding to motions, meeting court deadlines, and attempting to prevent dismissal before discovery could reveal the remaining facts.

Those events form part of why the Revised Second Amended Petition I sought leave to file in 2026 includes an abuse-of-process claim. They are documented in the installments that follow.

That is where the civil-rights trap became a judicial one.

Continue to [Part One: Procedural Bombardment](#)

A dramatic photograph of the Polk County Courthouse in Iowa, featuring a large clock tower and classical architectural details. The sky is dark and stormy, with heavy clouds. The text is overlaid on the left side of the image.

Wilson v. Reliable Street Inc., et al.

PROCEDURAL BOMBARDMENT

SIX MISLEADING ATTACKS.

**A JUDGE REQUIRED TO RECUSE—
WHO RULED ANYWAY.**

AN UNDUE FINANCIAL BURDEN.

A BURIED RECORD.

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A Note About the Published Record

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