

# IOWA OFFICE OF CIVIL RIGHTS COMPLAINT FORM

515-281-4121 / 800-457-4416 / Fax: 515-242-5840 / <https://icrc.iowa.gov>

(AGENCY USE ONLY)	
IOCR CP# _____	<b>Iowa Office of Civil Rights</b>
Local Commission# _____	<b>6200 Park Ave Ste 100</b>
EEOC# _____	<b>Des Moines, Iowa 50321-1270</b>

**(PLEASE TYPE OR PRINT LEGIBLY)**

-----**SECTION 1 • COMPLAINANT INFORMATION**-----

Your legal name: The Satanic Temple, Inc.

Your preferred name: N/A

Your mailing address: C/O Matt Kezhaya, 150 S. Fifth St., Suite 1850

City: Minneapolis State: MN Zip Code: 55402

Telephone #: 612.276.2216 Email address: matt@kezhaya.law.com

Your date of birth: N/A / \_\_\_\_\_ / \_\_\_\_\_

Have you previously filed this complaint with any other federal, state, or local **anti-discrimination** agency?  Yes  **No**

If yes, what agency? N/A When? N/A

-----**SECTION 1 (CONTINUED) • COMPLAINANT INFORMATION**-----

Your legal name: \_\_\_\_\_

Your preferred name: Mortimer Adramelech

Your mailing address: C/O Matt Kezhaya, 150 S. Fifth St., Suite 1850

City: Minneapolis State: MN Zip Code: 55402

Telephone #: 612.276.2216 Email address: matt@kezhaya.law.com

Your date of birth: ██████████

Have you previously filed this complaint with any other federal, state, or local **anti-discrimination** agency?  Yes  **No**

If yes, what agency? N/A When? N/A

-----**SECTION 2 • DISCRIMINATION INFORMATION**-----

1. Please indicate the **AREA(S)** in which the discrimination occurred.

- |                                     |  |                                      |
|-------------------------------------|--|--------------------------------------|
| <input type="checkbox"/> Employment | <input checked="" type="checkbox"/> Public Accommodation | <input type="checkbox"/> Housing     |
| <input type="checkbox"/> Education  | <input type="checkbox"/> Credit                          | <input type="checkbox"/> Retaliation |

2. Please indicate the **ACTION(S)** that the organization took against you.

- |   |  |
|---|--|
| <b>Employment</b>                             | <input type="checkbox"/> Denied Benefits |
| <input type="checkbox"/> Demotion             | <input type="checkbox"/> Discipline      |
| <input type="checkbox"/> Denied Accommodation | <input type="checkbox"/> Failure to Hire |

- Failure to Promote
- Failure to Recall
- Failure to Train
- Forced to Quit/Retire
- Harassment
- Layoff
- Reduced Hours
- Reduced Pay
- Sexual Harassment
- Suspension
- Termination
- Undesirable Assignment/Transfer
- Unequal Pay

Denied Service

**Housing**

- Denied Accommodation or Modification
- Eviction
- Failure to Rent
- Harassment

**Education**

- Denied Accommodation
- Harassment

**Credit**

- Denied Accommodation
- Denied Financial Services/Credit

**Public Accommodation**

Denied Accommodation

Other: \_\_\_\_\_

3. Please indicate the **BASIS(ES)** or reasons for the discrimination. There must be at least one basis to establish jurisdiction under the Iowa Civil Rights Act.

a. Do you believe you were discriminated against because of your race (circle one)? Yes  No

If yes, what is your race? \_\_\_\_\_

b. Do you believe you were discriminated against because of your skin color? Yes  No

If yes, what is your skin color? \_\_\_\_\_

c. Do you believe you were discriminated against because of your national origin? Yes  No

If yes, what is your national origin? \_\_\_\_\_

d. Do you believe you were discriminated against because of your sex? Yes  No

If yes, what is your sex? \_\_\_\_\_

e. Do you believe you were discriminated against because of your sexual orientation? Yes  No

If yes, what is your sexual orientation? \_\_\_\_\_

f. Do you believe you were discriminated against because of your gender identity? Yes  No

If yes, what gender do you identify as? \_\_\_\_\_

g. Do you believe you were discriminated against because of a disability? Yes  No

If yes, what is your real or perceived disability? \_\_\_\_\_

h. Do you believe you were discriminated against because of your religion or creed?  Yes  No

If yes, what is your religion or creed? Satanism (The Satanic Temple) \_\_\_\_\_

i. Do you believe you were discriminated against because of your pregnancy or pregnancy - related condition? Yes  No

j. If your complaint involves employment or credit, do you believe you were discriminated against because of your age? Yes  No

If yes, do you believe you were discriminated because you are older or because you are younger? \_\_\_\_\_

k. If your complaint involves housing or credit, do you believe you were discriminated against based on your familial status? Yes  No

If yes, how many children live with you? \_\_\_\_\_

l. If your complaint involves credit, do you believe you were discriminated against based on your marital status? Yes  No

If yes, what is your marital status? \_\_\_\_\_

m. Do you believe you were retaliated against because you reported discrimination related to a protected basis (see list above) to someone within the organization, filed a complaint with the IOCR, or participated as a witness in an anti-discrimination (see list above) agency proceeding?

Yes  No

If yes, what did you report or complain about, and to whom?

First, in 2023, we were the victim of criminal vandalism on the basis of our religion and/or perception of our religion in that an individual destroyed a symbol of our religious faith in the Iowa State Capitol Building. We complained of this incident immediately, which was extensively covered in the media and discussed in more detail below.

Second, on July 12, 2024, we applied to hold a multi-day Reading Marathon of *Paradise Lost*, to be held from September 16 through September 19, 2024. On July 26, IDAS changed its events policy to preclude (a) multi-day events, and (b) limit particular groups to one-event-per-year. Several other groups, both religious and secular, have been provided exceptions to these restrictions. The restrictions were intended and designed to prevent us from holding our multi-day event, or a discretionary exception was unlawfully withheld from us because of our religion. Further, these restrictions were intended to and designed to prevent us from holding our holiday event later in the year. We complained immediately to IDAS.

Finally, we complained of the most recent incident of discrimination on the basis of our religion and/or perception of our religion, that being the denial of our application for a 2024 holiday display described below, directly to Director Steen at IDAS.

**State what happened to you as a result of your report or complaint.**

Our complaints relating to the destruction of our 2023 holiday display were a basis for the denial of our 2024 application, along with Respondents' prejudiced views about our religion. Specifically, due to our complaints, Respondents conspired to prohibit us from accessing the State Capitol on equal terms to other faiths and secular groups, and during the 2024 holiday season.

Regarding IDAS's change in policy to infringe upon our equal access to the State Capitol Building by prohibiting multi-day events and multiple events by particular groups per year, IDAS did not revert its policy in response to our complaint. Accordingly, and in reliance on this new policy, we cancelled our Reading Marathon event—which IDAS had proposed to approve only for a single day of the requested four—so that we would be able to hold our holiday event later in the year. We have since learned this policy, in addition to being targeted towards us, has not been applied evenly. For example, the Diocese of Des Moines is permitted to hold “pray the rosary” events at the Capitol Building monthly, on every third Sunday, despite the policy limiting each group to one event per year. An archived version of its events calendar is available here: <https://tinyurl.com/yjew88kc>. And a Protestant group prays in the rotunda every Tuesday at noon. The World Food Prize event and an insurance-related group have also been allowed multi-day events or multiple events within one year. We believe other groups are being allowed multi-day or multiple events per year without restriction by IDAS or its one-day-per event, one-event-per-year policy.

Finally, following our complaint of the denial of our 2024 application, despite our attempts to resolve the stated basis for the denial and despite time remaining to accommodate our request to hold an event, Respondents did not provide us any timely response. Having knowledge that their denial of our initial application was baseless and blatant discrimination on the basis of our religion and/or their perception of our religion, Respondents continued to prohibit us from accessing the State Capitol on equal terms to other faiths and beliefs during the 2024 holiday season.

4. What was the date (month/day/year) of the MOST RECENT discriminatory incident?  
(REQUIRED): December 14, 2024

5. If Employment is the Area, what is your hire date or application date? N/A

6. Are you still employed by the organization that discriminated against you?  Yes  No

If no, when did your employment end? \_\_\_\_\_ (month, day, year)

If no, how did your employment end?

Terminated

Voluntary Quit

Forced to Quit/Retire

-----SECTION 3 • RESPONDENT INFORMATION-----

7. What is the full legal name of the organization that discriminated against you?

[This organization will be charged with discrimination and given a copy of your complaint.]

Iowa Department of Administrative Services

Address: 1305 E. Walnut St. 3rd Floor

City: Des Moines County: Polk State: Iowa

Zip Code: 50319 Telephone #: (515) 242 - 5120

8. If the organization listed in #7 has a parent organization or corporate office, list it here.

[This organization will also be charged with discrimination and given a copy of your complaint.]

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Zip Code: \_\_\_\_\_ Telephone #: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

If more than two respondents, please list additional organization or individual respondents, including name, job title, and address, on an attached piece of paper. The additional organizations/individual respondents will also receive a copy of the complaint.

**Please see attached.**

**9.** Provide the address of the location where the discrimination occurred (**REQUIRED**):

Iowa State Capitol, 1007 E. Grand Ave., Des Moines, IA 50319

**10.** Were you placed by a temporary firm agency at the organization that discriminated against you? [If the answer is yes and you wish to file a complaint against the temporary staffing firm, you will need to file a separate complaint form naming that firm.]

Yes  No

**11.** If Employment is the Area, indicate approximate number of ALL employees (full-time and part-time) at ALL employer locations nationwide (**REQUIRED**):

4-14  15-19  20-100  101-200  201-500  500+

-----**SECTION 3 • RESPONDENT INFORMATION (CONTINUED)**-----

In addition to the Iowa Department of Administrative Services, the organization, Complainant was discriminated against by the following respondents, who should receive a copy of the complaint:

Adam Steen  
Director, Iowa Department of Administrative Services  
1305 E. Walnut St. 3rd Floor  
Des Moines, IA 50319  
515.242.5120

Office of the Governor of the State of Iowa  
1007 East Grand Avenue #101  
Des Moines, IA 50319  
515.281.5211

-----SECTION 4 • BRIEF SUMMARY OF ALLEGATIONS-----

**Please describe what happened to you. State how you were discriminated against. What happened? When did it happen? Be sure to address each Action you checked on page one and each Basis you addressed on page two. (REQUIRED)**

In coordination with the Office of the Governor of the State of Iowa (“IGOV”), the Iowa Department of Administrative Services (“IDAS”), through its Director, Adam Steen, denied our application to hold a holiday display and event in the Iowa Capitol Building Rotunda—both (1) on the basis of our religion and/or their perception of our religion and (2) in retaliation for our prior reports of discrimination. I, Mortimer Adramelech, on my own behalf and as a minister of the Iowa congregation of The Satanic Temple, Inc. (“TST”) bring this action due to the discrimination we and our impacted Iowa congregation have experienced.

One year prior to the most recent discriminatory incident, TST’s Iowa branch was the victim of a well-publicized incident of discriminatory vandalism. In short, our 2023 holiday display at the Iowa State Capitol was destroyed by an individual who unabashedly admitted he did so because of our religion, referring to his actions as “Christian civil disobedience.” This man did so after presidential candidate Ron DeSantis, members of the Iowa legislature, and the Iowa Governor publicly criticized the display. Their statements, reported in the media,<sup>1</sup> demonstrate the anti-Satanic Temple motivation or state of mind of the Respondents. TST and its members were vocal in condemning this incident of discrimination, which drew national attention.

Nevertheless, we refused to be forced into silence or hide our religious convictions because of this incident. We began preparing for the 2024 holiday season and a new event at the State Capitol to celebrate and promote our beliefs on the same terms that other religious organizations in Iowa do every year.

In the meantime, IDAS had already begun taking action to limit our access to the State Capitol. For example, on July 12, 2024, we submitted an application to hold a four-day reading marathon event of *Paradise Lost* by John Milton, a core Satanic religious text. (Exhibit A, pp. 1-2); (Exhibit B, p. 1). While IDAS initially, and preliminarily, added the event to the Capitol Building calendar, on July 26, 2024,

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<sup>1</sup> Victoria Reyna-Rodriguez and Noelle Alviz-Gransee, *Iowa lawmaker calls for Gov. Kim Reynolds to remove Satanic Temple’s display from Capitol*, Des Moines Register, Dec. 11, 2023, <https://tinyurl.com/4djmbbfr> (Iowa State Representative Brad Sherman: “[It is] a tortured and twisted interpretation of law that affords Satan . . . religious expression equal to God . . .”); Stephen Gruber-Miller, *Kim Reynolds Calls Iowa Capitol satanic display ‘objectionable,’ encourages Iowans to pray*, Des Moines Register, Dec. 12, 2023, <https://tinyurl.com/mr2v9kh4> (Iowa Governor Kim Reynolds: “I find the Satanic Temple’s display in the Capitol absolutely objectionable.”); Biong M. Biong, *DeSantis lays blame on Trump administration for Satanic Temple display in Iowa Capitol*, Des Moines Register, Dec. 13, 2023, <https://tinyurl.com/45vujm93> (Ron DeSantis: “My view would be that [Satanism is] not a religion that the founding fathers were trying to create.”); Kim Norvell, *Former congressional candidate charged with vandalizing Satanic Temple display at Iowa Capitol*, Des Moines Register, Dec. 15, 2023, <https://tinyurl.com/4u5rh8kh>; Phil Helsel, *Man who destroyed Satanic Temple altar in Iowa charged under hate crime law*, NBC News, Jan. 31, 2024, <https://tinyurl.com/3kjbtbhs>; and AP, *Mississippi man who destroyed statue of a pagan idol at Iowa Capitol takes plea deal*, KCCI Des Moines, May 28, 2024, <https://tinyurl.com/33f4ucuk>.

IDAS changed its events policy in two key respects, effective immediately: first, multi-day events were now prohibited, and second, organizations are permitted only one event per calendar year. On July 29, 2024, we received a Memorandum of Understanding for the *Paradise Lost* event, which reflected the new policy and would have approved only the first day of the applied-for four. (Exhibit C, p. 1, § 2). We did not agree to this Memorandum of Understanding, and requested clarification on the impact of the policy change. (Exhibit D, p. 1). We noted that another religious group had already in the 2024 calendar year held a multi-day reading event of a religious text (the “99 County Bible Reading Marathon”), and we asked whether we were being asked to choose between our Reading Marathon and having a holiday display in 2024. (*Id.*). IDAS refused to permit our multi-day event despite having done so for a Christian organization and it confirmed that if we held the (now one-day) event we would be prohibited from an event or display during the holiday season. (*Id.*). We spoke out publicly against this policy change. (Exhibit E, pp. 1-2). Due to the policy that had minimized the event we intended and would have prohibited us from further access to the Capitol Building, we decided to withdraw the application in favor of holding a holiday event.

As noted above, we have since learned this policy has not been enforced evenly and, in particular, has been disregarded to allow Christian religious groups regular access to the Capitol Building multiple times per year.

On October 7, 2024, we properly submitted a Capitol Building Application to hold an event in the 1st Floor Rotunda–East entitled TST Iowa Holiday Display Day (the “Event”) on December 14, 2024. In our application, the Event was described as follows:

TST Iowa’s holiday display will include an itinerary for the day with ritual, Krampus costumes, caroling, and other family-friendly activities such as coloring pages, and make and take ornaments. *Everything will be family-friendly*, and our display will be always attended to by at least one member of our congregation.

(Exhibit F, p. 1). Other non-Satanic, religiously affiliated applications for access to the Capitol Building Rotunda that day included “Christmas Carols by Red Oak Mennonite Youth Group,” “Christmas Chorale” by Jeff Pierick, “Christmas with Iowa Liberty Network,” and “The Molech Monastery Winter Worship.” (Exhibit G, p. 4).

The same day we submitted our application, Suzy Trotter, the Capitol Complex Events Coordinator for IDAS, informed us the Event was added to the Capitol Complex Events Calendar and requested us to complete and submit a Memorandum of Understanding (“MOU”) “with a sketch and / or details of the event.” (Exhibit F, p. 1). We did so and submitted the requested MOU and information on October 21, 2024. (Exhibit F, p. 2); Exhibit H]

On November 4, 2024, not having received a countersigned MOU, we sent an email follow up to Ms. Trotter to inquire as to status and ask a question about chairs for the event. Two days later, Ms. Trotter responded that “the MOU is with leadership.” (Exhibit F, p. 2). We asked for clarification as to whether this meant the agreement had not been signed by IDAS, and were told to expect a response a week later. (Exhibit F, p. 3).

A week passed with no response. On November 13, 2024, we again contacted Ms. Trotter and inquired as to status. (Exhibit F, p. 4).

By this time, those reviewing the application included not only IDAS and its Director, Adam Steen, but also officials at IGOV, who had together already begun coordinating to deny TST Iowa's application. (Exhibit D).

It was not until December 3, 2024, nearly two months after we had submitted our application, that IDAS responded and requested additional information about the event. (Exhibit F, p. 4).

On December 6, 2024, we submitted the requested information, including a finalized song list (*I'll Be Your Mirror* by The Velvet Underground and Nico, *Waiting for the Night* by Depeche Mode, *Lucifer's the Light* by King Dude, and *Saturnalia* by Cauda Pavonis), images of the make-and-take ornaments, coloring pages, and anticipated costumes, further details of the costume contest, and a detailed description of the ritual to be performed (a procession to the display, carrying a veiled, flameless candle, an invocation celebrating the light and the night, the unveiling of the flameless candle, and the conclusion of the ritual). Representative images are included below and in full in the attachments.





(Exhibit F, pp. 5-6); (Exhibit J, p. 1); (Exhibit K, pp. 1-9).

On December 9, Jacob Nichol森, Chief Operating Officer at IGOV, texted Director Steen and asked whether IDAS had received the additional information “from the group requesting the event on the 14th,” i.e., us. Upon learning that it had, IGOV had Director Steen come to IGOV’s offices “so we could look at the pictures or diagrams or whatever it is they sent and talk through it.” (Exhibit L, p. 1). The next day, Director Steen did so. (Id.). We do not know what exactly was said at this meeting, but we do know that shortly after it (the same morning), IGOV and IDAS began coordinating and drafting a “Legally Appropriate Statement” to share in response to anticipated media requests, called, “Satanic Temple denial statement.” (Exhibit M, pp. 1-10).

That night, Director Steen emailed TST Iowa and stated, “The request for space in the Capitol Rotunda is not approved,” citing the following section of the MOU:

5.15. Additional Limitation. Because the Capitol Complex is often a destination for children (persons under the age of eighteen) learning about their State government, visual displays, sounds, and other actions that are harmful to minors including, but not limited to, obscene materials (as defined in Iowa Code section 728.1(5)), and gratuitous violence or gore are not permitted at the Capitol Complex. “Obscene material” is any material depicting or describing the genitals, sex acts, masturbation, excretory functions or sadomasochistic abuse which the average person, taking the material as a whole and applying contemporary community standards with respect to what is suitable material for minors, would find appeals to the prurient interest and is patently offensive; and the material, taken as a whole, lacks serious literary, scientific, political or artistic value. “Gratuitous violence or gore” means any depiction of severe bodily injury or blood, organs, or other bodily fluids, which the average person, taking the material as a whole and applying contemporary community standards with respect to what is suitable material for minors, would find appeals to the prurient interest and is

patently offensive; and the material, taken as a whole, lacks serious literary, scientific, political or artistic value.

(Exhibit N, p. 1) Director Steen did not explain whether or what in the song list, make-and-take ornaments, coloring pages, costume contest, or ritual was determined to be “obscene material” or “gratuitous violence or gore.” We had endeavored at the outset to make clear that this was family friendly event and that there was no obscenity, gratuitous violence, or gore.

We asked Director Steen to explain how the application was evaluated, and whether there was an appeal process or option to modify the Event to resolve IDAS’s concerns. (Exhibit N, pp. 1-2). Director Steen did not respond and we were forced to follow up again. (Exhibit O, p. 1).

On December 11, 2024, Director Steen and IGOV met again for an in-person discussion. (Exhibit P, p. 1). Following this, Director Steen responded to TST Iowa as follows:

The event request is denied as submitted. The *cumulative circumstances* that occur within the State Capitol building, including the presence of minors, *coupled with the anticipation of costumes with sticks used as weapons on children,*<sup>[2]</sup> positions the event to be harmful to minors contrary to MOU section 5.15. The evaluation and denial decision rests within my authority as the DAS Director per Administrative Rule 100.4(5).

This constitutes a final agency action.

(Exhibit O, p. 2 (emphases added)). The phrase, “cumulative circumstances,” intentionally obscures any specific rationale for IDAS’s decision. Moreover, and quite obviously, at no time had anybody at TST Iowa proposed to permit or encourage participants in the costume contest to use sticks “as weapons on children.”

We responded as much, stating that any sticks at the Event would be “a traditional costume component and for appearance only,” and were “never intended to be used on anyone.” Still, in an attempt to save the Event, we offered to omit the costume contest entirely and resubmit the application. (Exhibit O, p. 3)]. IDAS simply did not respond to this proposal—despite still another attempt by us, on December 12, to follow up. (*Id.*).

The scheduled day of the Event came and passed. At least one other religious event took place inside the State Capitol on that day.

Through counsel, we made a final attempt to resolve the issue and allow for the Event without litigation. (Exhibit Q, p. 1). TST’s counsel informed Director Steen and IDAS that their actions were in violation of our constitutional rights and requested that the Event be rescheduled to Saturday,

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<sup>2</sup> This shocking assertion is one Director Steen appears to have determined based on his own research of unknown external sources on the central European legend of Krampus, who, in contrast to St. Nicholas (who “rewards nice children by leaving presents”), “beats those who are naughty with branches and sticks.” Britannica, *Krampus*, <https://www.britannica.com/topic/Krampus> (last updated Feb. 4, 2025). Yet, Krampus, which also represents duality, has newfound popularity “as a rejection of the consumerism surrounding the season,” and celebrates the historical supernatural elements to the solstice season, allowing us to “give some thought to the traditions of the past and what they mean to us today.” Peter Larson, *The Naughty List: Krampus, Other Dark Characters as Holiday Traditions*, University of Central Florida, Dec. 5, 2024, <https://tinyurl.com/3u73p5nz>.

December 21, or an appropriate alternative date. (*Id.*, pp. 2-3). There was no response, which itself is a continued denial notwithstanding our outstanding offer to omit the costume contest and thus resolve the stated basis for the denial.

Director Steen, IDAS, and IGOV's decision to deny the application was based on our religious beliefs and/or their perception of our religious beliefs. The Event as-planned was not, by any objective measure, "harmful to minors" under IDAS's own definition in section 5.15 of the MOU. IDAS used this provision—justifying it with the absurd, unfounded concern of hitting children with sticks and falling back on a "cumulative circumstances" catch-all—as a pretext for discrimination against our religion. The simple truth is the State of Iowa does not want to allow Satanists to enjoy the same access to the Iowa State Capitol as other "mainstream" religions, in particular Christianity, and in particular during the Christmas holiday season.

This is evidenced by the justification on which they relied, which was incorrect and which we fully clarified and disavowed. It is further evidenced by the Respondents' delays in processing the Event application and communicating with us. To summarize, TST Iowa submitted its application on October 7, months in advance. We completed all requested forms and provided supplementary information and materials on October 21. With no response, we followed up to check on the status of our application on November 4 and again on November 12. It was not until December 3, mere weeks prior to the planned Event-date, that IDAS requested still more information about the Event, which we provided immediately, and then not until December 10, days prior to the planned Event-date, that IDAS issued its summary denial. All our attempts to resolve the purported concerns were ignored. And all during this time, Respondents were working together—not to find a way to accommodate our request to access the State Capitol on equal terms—but to prepare media statements about the denial. This timeline indicates that Respondents never intended to consider our application seriously or fairly, but instead always intended to deny it.

The timeline also indicates that Respondents intentionally delayed in communicating their decision to us, in contrast to a more typical timeline to process other event applications for individuals and groups associated with, or perceived to be associated with, non-Satanic religions. They did so because it left us scrambling to try and appease their concerns by modifying the Event at the last minute and excused them the embarrassment of drawn-out publicity concerning their unwarranted cancellation and their ongoing refusal to engage with us on the Event. By delaying, they were able to ignore us and refuse to entertain our offers to, for example, omit the costume contest and reschedule. In part through this delay, Respondents were able to prevent the Event entirely and deprive us of equal access to the Capitol during the 2024 holiday season.

In addition to the discriminatory beliefs they hold about us, we believe Respondents would never have accepted an application in any form from us in retaliation for our just criticism of their actions last year. In the 2023 holiday season, they failed to defend our constitutional rights and respond forcefully against calls for the removal of our religious display; to the contrary, they instead shared their personal views opposing our religion. This failure then emboldened an individual to destroy our symbol of faith. They did not stop this from happening and they did not speak out against it after it occurred. We objected, and in response, they determined they would not allow us to access the State Capitol on equal terms again.

We believe this discrimination on the basis of our actual and perceived religion, and retaliation, violated our rights under the Iowa Civil Rights Act.

I certify under penalty of perjury and pursuant to the laws of the State of Iowa and the laws of the United States of America that the preceding charge is true and correct.

X Mortimer Adramelech \_\_\_\_\_ 6/9/2025  
Signature of Complainant (REQUIRED) Date

It is not necessary that you provide any additional documentation at this time. Be aware that any additional documentation provided with your complaint form will be sent out to all named parties along with this form. An opportunity to provide additional documentation will be given at a later time if/when the complaint is accepted by the IOCR. Any submitted additional documentation/narration of more than five pages may result in a delay in the processing of your complaint.

## IOWA OFFICE OF CIVIL RIGHTS

# Contact Information

Note: This information will NOT be given out to anybody.  
It is for IOCR use only.

Your Name: Mortimer Adramelech

### Contact Person

Please provide the name and telephone number of a relative or friend who will always know where you can be reached. Your "Contact Person" should be someone who does not live with you.

Name: ACLU of Iowa, ATTN: Rita Bettis Austen, Shefali Aurora, and Thomas Story, counsel

Mailing Address: 505 Fifth Ave., Ste. 808

City: Des Moines

State: IA

Zip Code: 50309

Telephone #: (home) \_\_\_\_\_

(work) (515) 207-0567

(cell) \_\_\_\_\_

E-mail: [rita.bettis@aclu-ia.org](mailto:rita.bettis@aclu-ia.org); [Shefali.aurora@aclu-ia.org](mailto:Shefali.aurora@aclu-ia.org); [Thomas.story@aclu-ia.org](mailto:Thomas.story@aclu-ia.org)

Please check box if the above listed Contact Person is Complainant's attorney and is representing the Complainant before the IOCR. Please be sure to include firm name if applicable.

## IOWA OFFICE OF CIVIL RIGHTS

# Authorization Release Form

I hereby authorize anyone possessing medical, education, personnel, income, credit, or any other information necessary for a full and complete investigation, mediation, or conciliation of my complaint to furnish such information to the Iowa Office of Civil Rights and any other anti-discrimination agency.

I hereby release anyone so authorized, the Iowa Office of Civil Rights, and any other anti-discrimination agency from all liability for any damages whatsoever in furnishing and obtaining such information.

Name: Mortimer Adramelech

Signature: Mortimer Adramelech Date: 6/9/2025