

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

The Satanic Temple, Inc., and Mortimer
Adramelech,

Plaintiffs,

vs.

Mark Campbell, Director of the Iowa
Department of Administrative Services, *in his
official and individual capacities*, Adam
Steen, former Director of the Iowa
Department of Administrative Services, *in his
individual capacity*, and the Iowa Department
of Administrative Services,

Defendants.

Case No. 4:26-cv-336

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

COME NOW Plaintiffs, The Satanic Temple, Inc. and Mortimer Adramelech¹, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and file this Motion for a Preliminary Injunction to preliminarily enjoin Defendants from violating their rights under the First and Fourteenth Amendments of the Constitution, the Iowa Religious Freedom Restoration Act, and the Iowa Civil Rights Act by denying their applications to hold an event at the Iowa Capitol Rotunda, and to prevent further irreparable injury pending a final adjudication of this action.

1. This Motion is supported by the accompanying Brief in Support of Plaintiffs' Motion for a Preliminary Injunction and the attachments thereto.

¹ Plaintiff Mortimer Adramelech has contemporaneously filed a motion to proceed under pseudonym. Mortimer Adramelech is the religious pseudonym that Plaintiff has adopted to protect his identity. To protect his privacy pending consideration of this Motion, Adramelech has used this pseudonym in this Motion and in all other initial filings.

2. As set forth more fully in the accompanying Brief in Support of Plaintiffs’ Motion for a Preliminary Injunction, Plaintiffs have established the necessary elements under the four *Daptaphase* factors, and are entitled to preliminary injunctive relief. *Daptaphase Sys., Inc. v. CL Sys., Inc.*, 640 F.2d 109 (8th Cir. 1981) (en banc).

3. First, Plaintiffs are likely to succeed on the merits of their claims challenging the denials of their event applications as a violation of their constitutional rights under the First and Fourteenth Amendments, and their statutory rights under the Iowa Religious Freedom Restoration Act and the Iowa Civil Rights Act. Second, Plaintiffs have established that they face the threat of irreparable harm absent preliminary relief, because Defendants continue to deny or unduly delay their event applications. Third, a balancing of the weight of the injuries with the public interest supports a preliminary injunction, because “it is always in the public interest to protect constitutional rights”, and “the balance of the equities generally favors the constitutionally-protected freedom of expression.” *Schmitt v. Rebertus*, 148 F.4th 958, 970 (8th Cir. 2025) (quoting *Rodgers v. Bryant*, 942 F.3d 451, 458 (8th Cir. 2019)).

4. Plaintiffs have filed their application for an event on December 12, 2026. There are currently no other events scheduled for the time and space Plaintiffs have requested. There is a pattern of Defendants delaying, denying, or failing to respond to applications by the Plaintiffs.

5. Plaintiffs’ application has been pending for 159 days. There is no reason to expect this pattern to change, or expect that Defendants will allow the 2026 event to occur absent intervention by this Court.

6. Plaintiffs request that this Court waive the bond requirement under Federal Rule of Civil Procedure 65(c). *Richland/Wilkin Joint Powers Auth. v. U.S. Army Corps of Eng’rs*, 826 F.3d 1030, 1043 (8th Cir. 2016) (whether to require bond is within court’s discretion). Public

interest litigation is a recognized exception to the bond requirement, especially where, as here, requiring a bond would injure the constitutional rights of Plaintiffs, and the relief sought would not impose a hardship on Defendants. *See id.*

Accordingly, for the reasons set forth in this motion, and those more fully expressed in the Brief in Support, Plaintiffs respectfully request that this Court grant them a preliminary injunction ordering Defendants to stop violating their rights under the First and Fourteenth Amendments of the Constitution, the Iowa Religious Freedom Restoration Act, and the Iowa Civil Rights Act, and to approve Plaintiffs' application to hold a holiday event at the Iowa Capitol Rotunda on December 12, 2026. Plaintiffs also request that briefing and any necessary argument be scheduled so as to allow sufficient time for the Court to decide this motion ahead of the planned December 12, 2026 event. Specifically, Plaintiffs respectfully ask that the Court decide this motion on or before November 20, 2026. That will allow Plaintiffs sufficient time to plan, organize, and promote their event at the Rotunda, or find an alternative location.

Respectfully submitted this 13th day of August 2026.

/s/ Shefali Aurora
Shefali Aurora, AT00012874
/s/ Rita Bettis Austen
Rita Bettis Austen, AT0011558
/s/ Thomas Story
Thomas Story, AT0013130

ACLU of Iowa Foundation, Inc.
505 Fifth Ave., Ste. 808
Des Moines, IA 50309-2317
Telephone: (515) 243-3988
Fax: (515) 243-8506
Email: Shefali.Aurora@aclu-ia.org
Email: Rita.Bettis@aclu-ia.org
Email: Thomas.Story@aclu-ia.org

/s/ Emily E. Wilson
Emily E. Wilson AT0013860
/s/ Melissa C. Hasso
Melissa C. Hasso AT0009833

HASSO & WILSON LAW FIRM
111 E. Grand Ave., Suite 212
Des Moines, IA 50309
Telephone: (515) 224-2079
Fax: (515) 224-2321
Email: ewilson@hwlawiowa.com
Email: mhasso@hwlawiowa.com

/s/Matt Kezhaya
Matt Kezhaya
(*Application for admission pro hac vice forthcoming*)

Kezhaya Law PLC
150 S. Fifth St., Suite 1850
Minneapolis, MN 55402
Telephone: (612) 276-2216
Fax: matt@kezhaya.law

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing paper with the Clerk of Court by using the CM/ECF system.

The foregoing paper and attachments will also be served along with the Complaint and Summons to all Defendants.

Date: August 13, 2026

/s/ Shefali Aurora
Shefali Aurora, AT00012874

ACLU of Iowa Foundation, Inc.
505 Fifth Ave., Ste. 808
Des Moines, IA 50309-2317

Telephone: (515)243-3988

Fax: (515) 243-8506

Email: Shefali.Aurora@aclu-ia.org