

EXHIBIT 1

Adramelech Declaration

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

**DECLARATION OF
MORTIMER ADRAMELECH
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

COMES NOW Mortimer Adramelech, who states as follows under penalty of perjury

1. *Identity.* I am Mortimer Adramelech, a plaintiff in the above-styled cause.
2. *Purpose.* I make this declaration in support of Plaintiffs' Motion for Preliminary Injunction.
3. *Foundation.* I am an adult of sound mind. I make these statements based on my own personal knowledge and under penalty of perjury. Since August 2019, I have continuously served as a leadership Council Member and Media Liaison for the Iowa congregation of The Satanic Temple. In that role, I lead the media, legislative, and legal activities of the congregation. Since November 2023, I have also continuously been a Minister of Satan, which required me to undergo specialized training in the religious ideas propounded by The Satanic Temple. Pursuant to my roles in the organization, and of importance to this case, I have personal familiarity with the religious ideas and symbolism of The Satanic Temple and all activities of The Satanic Temple in Iowa from 2023 to the present, particularly the events and circumstances described below. Additionally, I was the artist who created the 2023 Holiday Display, which is further

described below. I am authorized to make statements on behalf of The Satanic Temple, Inc. about this case. As Minister of Satan, I am qualified to explain doctrinal matters about TST's religious ideas.

4. *Religiosity of The Satanic Temple.* The Satanic Temple ("TST") is an atheistic sect of Satanism. TST venerates (but does not worship) the biblical adversary as a promethean icon against tyranny. TST takes inspiration from John Milton's *Paradise Lost* and like works in which Satan is portrayed as a revolutionary antihero who stood up against impossible odds to seek justice and egalitarianism for himself and others. TST propounds the Seven Tenets:

- I. One should strive to act with compassion and empathy toward all creatures in accordance with reason.
- II. The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions.
- III. One's body is inviolable, subject to one's own will alone.
- IV. The freedoms of others should be respected, including the freedom to offend. To willfully and unjustly encroach upon the freedoms of another is to forgo one's own.
- V. Beliefs should conform to one's best scientific understanding of the world. One should take care never to distort scientific facts to fit one's beliefs.
- VI. People are fallible. If one makes a mistake, one should do one's best to rectify it and resolve any harm that might have been caused.
- VII. Every tenet is a guiding principle designed to inspire nobility in action and thought. The spirit of compassion, wisdom, and justice should always prevail over the written or spoken word.

5. As a member and minister of TST, I sincerely hold the beliefs and practices espoused by

The Satanic Temple.

6. *TST's Iconography*. TST has various symbols and holidays of religious significance. Of importance to this action:

- (a) *Baphomet*. Baphomet is an occultic figure which represents the reconciliation of opposites: simultaneously male and female, human and beast, angel and demon. The concept of Baphomet comes from the now-infamous inquisition against the Knights Templar, who were all tortured to death on trumped-up charges that they worshipped Baphomet. To TST, Baphomet represents both harmonic balance and serves as a memorial to the victims of demonization. A true and correct photograph of TST's Baphomet With Children monument follows.



Figure 1: TST's Baphomet with Children monument (depicting Baphomet)

- (b) *Inverted pentagram*. The inverted pentagram is an occultic symbol which features an

upside-down five-pointed star within a circle. To TST, the symbol represents the supremacy of the physical realm over the spiritual realm. A photograph of the Iowa Congregation's 2024 Holiday Wreath is depicted below:



Figure 2: TST-Iowa's 2024 Holiday Wreath (inverted pentagram)

- (c) *Saturnalia*. Among other holidays, TST observes Saturnalia, a winter solstice holiday of ancient Roman tradition which symbolically celebrated liberty, role reversal, and a reprieve from rigid power structures.

7. *Recognition of TST's Religiosity*. TST has established itself as a bona fide religion in various contexts:

- (a) *"Church" public charity status*. In February 2019, TST was recognized by the IRS as a "church" within the meaning of 26 USC § 170(b)(1)(A)(i).

- (b) *First Amendment status.* TST has established its status as a sincere religion, entitled to the full suite of First Amendment protections, before the District of Arizona and the Eastern District of Arkansas. *See Satanic Temple v. City of Scottsdale*, No. CV18-00621-PHX-DGC, 2020 WL 587882 (D. Ariz. Feb. 6, 2020); *Cave v. Jester*, 829 F. Supp. 3d 582, 669-671 (E.D. Ark. 2026); *Satanic Temple, Inc. v. Saucon Valley Sch. Dist.*, 671 F. Supp. 3d 555, 559 (E.D. Pa. 2023).
- (c) *Academia.* TST is recognized as a bona fide religion entitled to equal treatment under the law in academic literature. Dr. Joseph Laycock, a religious studies professor at Texas State University, issued a book-length study analyzing TST's religiosity. Joseph Laycock, *Speak of the Devil: How The Satanic Temple is Changing the Way We Talk about Religion* (Oxford University Press, 2020). TST has also been a frequent subject of discussion in law review articles. *E.g.*, Angela R. Pruitt, *Maybe Today, Satan: A Christian Supreme Court, Unbalanced Religious Clauses, and the Rise of the Satanic Temple*, 26 J. Gender Race & Just. 271 (2023); *Pandora's Box of Religious Exemptions*, 136 Harv. L. Rev. 1178 (2023); Allen Rostron, *Saints, Satanists, and Religious Public Charter Schools*, 59 Tulsa L. Rev. 451 (2024); Lillian Kwok, *Religious Abortion*, 48 U. Haw. L. Rev. 189 (2025).
- (d) *Pop culture.* TST is a recognized religion in popular culture. TST was the subject of a critically acclaimed documentary film. Penny Lane, *Hail Satan?* (Magnolia Films, 2019). And TST was featured in a layperson's guide to modern Satanism. La Carmina, *The Little Book of Satanism: A Guide to Satanic History, Culture, and Wisdom* (Ulysses Press, 2022).
- (e) *Book Club.* The Iowa congregation of The Satanic Temple has a book club. Both

Speak of the Devil and *The Little Book of Satanism* have been included in the reading materials. We also hosted an author Q&A with La Carmina (who wrote *The Little Book of Satanism*).

- (f) *Membership*. TST maintains an internet registry of its membership. Members are not required to register to identify as a TST member, are not required to participate in their local congregation, and are not required to input geographic information. As of July 17, 2026, TST's registered membership exceeds 600,000 and can be found in every State, including Iowa. Our Iowa registered membership exceeds 5,000.

8. *Iowa Capitol Complex Public Forum*. For a period of time long predating 2023, the duration being outside my personal knowledge, the Iowa Capitol Complex, including the Capitol Building Rotunda ("Rotunda") has been made available to the public for various events. The process by which a member of the public secures the space for a particular event is managed by the Iowa Department of Administrative Services ("IDAS"). TST's membership regularly participates in public forums of this kind to spread awareness of TST's ideology to new potential members and to express our unique viewpoint.

9. *Baphomet Holiday Display*. In early December 2023, TST's Iowa Congregation participated in a two-week holiday display forum in which various groups (both religious and secular) were allotted space on a first-come, first-served basis without regard to viewpoint. Other participants included various other religions which displayed their own winter holiday displays. Another participant in the forum was the Freedom From Religion Foundation (a state/church separation public advocacy group), which displayed Benjamin Franklin, Thomas Jefferson, George Washington, and the Statue of Liberty gazing in adoration at a manger with a leaflet representing the Bill of Rights. Two true and correct photographs of TST's 2023 holiday display

follow:



Figure 3: TST's 2023 Holiday Display (close-up)



Figure 4: TST's 2023 Holiday Display (wide angle)

10. *2023 Holiday Display Controversy.* News of TST's equal participation in the public forum resulted in a public controversy.

- (a) In a press release dated December 12, 2023, Iowa Governor Kim Reynolds publicly called the display "absolutely objectionable," although she acknowledged TST's

equal right to participate in the public forum. (PI Ex. 11).

- (b) State Rep. Brad Sherman asserted in a December 8, 2023 public pamphlet, entitled *Honoring God at the Capitol*, that Iowa depends upon the “One Supreme God” for its continued blessings, argued that Satanism should not be afforded equal expression in government spaces, and called for legislation prohibiting Satanic displays on state property while simultaneously calling for legislation requiring the Ten Commandments, a Christian display, in all State-owned buildings and public schools. (PI Ex. 12).
- (c) State Rep. Dunwell made a public comment via Twitter on December 8, 2023, which described TST’s display as “evil,” urged Christians to oppose its message because it “glorifies the evil influence” they oppose, declared that “Iowa needs Jesus,” and suggested reassessing Capitol-display policies; although he also acknowledged TST’s equal right to participate in the open public forum. (PI Ex. 13).

Collectively, I interpret these comments from State officials, broadcast from their official channels, to be an official disapproval of my religious identity and a precursor to subsequent efforts to exclude my congregation from public participation on equal terms as Christians.

11. *2023 vandalism.* Spurred on by the public controversy, failed congressional candidate and Mississippi resident Michael Cassidy traveled to Iowa for the purpose of destroying TST’s Holiday Display in broad daylight. He subsequently made repeated public statements that he performed this act as a “Christian protest.” He was later charged with third-degree criminal mischief and raised more than \$134,000 in aid of his legal defense. Five months later, he entered a negotiated plea of guilty in return for a recommended sentence of probation, a civil penalty, and restitution to TST’s Iowa Congregation in compensation for the destroyed display.

12. *Iowa attempted to bar all public Satanic displays.* In February 2024, State Sen. Sandy Salmon introduced SF 2210, entitled *A bill for an act relating to Satanic displays or Satanic worship on property of the state and its political subdivisions*. (PI Ex. 14). The bill called for: (1) a prohibition against any Iowa political subdivision or Iowa itself from recognizing any Satanic organization; (2) a prohibition on Satanic displays, symbols, or practice of Satanism from being allowed on public property, public schools, or any property owned by either; (3) prohibited any act of Satanic practice involving the ending of a life or shedding of blood, whether human or animal; and (4) established criminal repercussions for items (2) and (3) above. See *id.* WHO 13, a news organization which covers the Des Moines area, linked the submission of SF 2210 to the 2023 Holiday controversy. See Jannay Towne, WHO 13, *Satanic Temple of Iowa calls bill banning satanic displays on state property unconstitutional* (available at: <https://who13.com/news/satanic-temple-of-iowa-calls-bill-banning-satanic-displays-on-state-property-unconstitutional/>) (last visited July 14, 2026). The purpose of this bill was to further State Rep. Sherman's call for a prohibition against Satanism enjoying equal protection under the laws as Christianity. I interpret this bill as an express effort by Iowa's lawmaking body to exclude my congregation and me from equal participation in public life because of our religious identity.

13. *Non-violence.* TST does not propagate any rituals involving violence. TST is a pacifistic religion.

14. *July 12, 2024 Paradise Lost application.* On July 12, 2024, TST's Iowa Congregation applied to hold a four-day public reading marathon of John Milton's *Paradise Lost* at the Iowa State Capitol. As mentioned in ¶ 4, *Paradise Lost* is a core text for TST because it depicts Satan as a defiant rebel against divine authority and refuses to submit to injustice despite overwhelming odds. Upon submitting the application through the IDAS's official web

application, I received an email with a true and correct printout of our application data.(PI Ex. 2 at 18-19; PI Ex. 3 at 18-19). Our Paradise Lost reading marathon was inspired by a multi-day event in which the entirety of the Bible (a text of religious significance to Christians) was read at the Iowa Capitol Complex in January 2024. The Bible reading marathon has been supported annually by the Office of the Iowa Governor for the past ten years (formerly under Terry Brandstadt, currently Kim Reynolds).

15. *July 26, 2024: change in policy.* Exactly two weeks after our application, the IDAS purportedly changed its rules to restrict the public's access to the Iowa Capitol Complex and Rotunda. Before the change in policy (i.e., at the time of the Paradise Lost application), organizations could host multi-day events and could host multiple events per year. Pursuant to the purported change in policy, organizations were limited to one event per year, up to one day per event. The IDAS then retroactively applied those restrictions to our Paradise Lost application. We were notified of the retroactive applicability of the new restrictions by Memorandum of Understanding, which we received on July 29, 2024. (PI Ex. 2 at 23; PI Ex. 3 at 23). As noted in ¶ 2: "An Event may not exceed 1 day." *Id.* Upon my inquiry, Suzy Trotter (our contact person at the IDAS), responded that the change was made on July 26, 2024; that the policy change did not affect the multi-day Bible reading marathon which took place in January 2024, but that the policy change meant TST would have to choose between having only a single day Paradise Lost marathon (As opposed to the four day event), or having a Holiday Display in the 2024 season. (PI Ex. 2 at 25; PI Ex. 3 at 25). The purpose of this policy change was to further State Rep. Dunwell's comments (PI Ex. 13), which called for a limitation on organizations' ability to emplace displays during the Holiday season. I interpret this change in policy as another effort by State officials to exclude my congregation and me from equal participation in public

life because of our religious identity.

16. *Unequal discretionary exclusions from the policy.* The IDAS did not equally apply its purported policy of limiting organizations to one event per year, up to one day per event. From August 2024 through at least April 2025, on every third Sunday of each month, the Diocese of Des Moines (a Catholic organization) held their “Monthly Rosary at the Iowa Capitol.” I maintained a practice of regularly checking and screenshotting their events page (available at <https://www.dmdiocese.org/events/calendar>). An archive of their events page as of April 25, 2025 is available at <https://tinyurl.com/yjew88kc> (last visited July 14, 2026). The same organization also issues a public Google Calendar link, which is accessible by the URL footnoted below to preserve formatting.¹ A compilation of true and correct copies of selected screenshots from their events page (off-white screenshots) and public Google Calendar (black screenshots) is attached. (PI Ex. 15). Further, I have personally observed a Protestant group which prays in the rotunda every Tuesday at noon; the World Food Prize event took place over multiple days in October 2024, and on December 3, 2025.

17. *Proof of IDAS awareness.* IDAS is aware of the uses of its facility because its application process (available at: <https://das.iowa.gov/capitol-complex-information/capitol-complex-event-coordination>) (last visited July 14, 2026) requires all non-state agency events to enter into the Memorandum of Understanding. (PI Ex. 16). Further, pursuant to public records from IDAS and notes groups expected in the Rotunda on December 14, 2024; one group fell under the category “No application submitted for social media advertised event.” (PI Ex. 2 at 36-46; PI Ex. 3 at 36-46). I interpret this document to mean that IDAS maintains a business practice of monitoring the

¹<https://calendar.google.com/calendar/u/0/r?cid=8564774ec86b143e2a35ea185705d25292f285dacd59bb358991311d7c6b0058@group.calendar.google.com> (last visited July 14, 2026)

internet for groups that use the Capitol Complex and Rotunda without submitting to the application process described in PI Ex. 9.

18. *Abandonment of Paradise Lost event.* In reliance on Suzy Trotter’s statement that we had to choose between the Paradise Lost event and a Holiday display (PI Ex. 2 at 25; PI Ex. 3 at 25), we abandoned the Paradise Lost event at the Rotunda so we could have a Holiday display.

19. *2024 Holiday Display Application.* On October 7, 2024, we applied for the use of the Rotunda on December 14, 2024, to host a public ritual, Krampus costume contest, caroling, and other family-friendly activities to include coloring pages and make-and-take ornaments. We emphasized: “Everything will be family-friendly and our display will be attended to by at least one member of our congregation at all times.” (PI Ex. 1 ¶ 19; PI Ex. 2 at 41; PI Ex. 3 at 41). We received a Memorandum of Understanding (“MOU”) for the event, and on October 20, 2024, we signed it. (PI Ex. 2 at 30, 48-54; PI Ex. 3 at 30, 48-54).

20. *IDAS was reviewing our application.* By November 4, 2024, we had not received a countersigned Memorandum of Understanding from IDAS. On that date, we reached out to Suzy Trotter with an inquiry as to the status. On November 6, 2024, Ms. Trotter responded that the “MOU is with leadership.” (PI Ex. 2 at 32; PI Ex. 3 at 32). Upon our further inquiry, we were told to expect a response one week later. *Id.* at 33. One week passed with no response, so on November 13, 2024, we again followed up as to the MOU status. *Id.*

21. *IGOV was also reviewing our application.* Pursuant to a subsequent public records request, I received a copy of documents, true and correct copies of which are attached hereto as (PI Ex. 2 at 55-62; PI Ex. 3 at 55-62). Although the body text of these documents is redacted entirely, the senders and receivers indicate that those reviewing our application included not only IDAS and its then-director (Adam Steen) but also officials at the Office of the Iowa Governor

(“**IGOV**”). *See id.* Further (as contextualized by subsequent events detailed below), the subject “2024-11-19 Memorandum on Religious Displays” indicates that the two official State agencies were coordinating on how to go about rejecting our application. *See id.*

22. *IDAS scrutinized the content of our event.* On December 3, 2024, nearly two months after we issued our application, and just 11 days before the scheduled event, IDAS demanded further information about our event. (PI Ex. 2 at 33; PI Ex. 3 at 33). More particularly, IDAS sought answers to the following contents of our event:

- (a) The finalized song list / Satanic Holiday Carols during the event.
- (b) Images of the make & take ornaments:
- (c) Images of the coloring pages.
- (d) Images of the anticipated costumes.
- (e) Details of the costume contest.
- (f) Detailed description of the ritual.

Three days later, on December 6, 2024, Ms. Trotter informed us that a decision on our event application would be based on our responses. *Id.* (“as a reminder, please submit the image and details requested below to determine approval.”) I interpret this comment to mean that our ability to access the Rotunda for the event we applied for was contingent upon official approval of the contents of our proposed event.

23. *Response to IDAS review.* On December 6, 2024, we responded by email with the following answers and attachments, both of which are truly and accurately reproduced below:

- (a) (song list):

I'll Be Your Mirror-The Velvet Underground and Nico;

Waiting for the Night-Depeche Mode

Lucifer's the Light-King Dude

Saturnalia-Cauda Pavonis

(b) Images of make & take ornaments:



Figure 5: Example make-and-take ornaments



Figure 6: Example make-and-take ornaments



Figure 7: Example make-and-take ornaments



Figure 8: Example make-and-take ornaments

(c) Images of the coloring pages:



Figure 9: Example coloring book pages



Figure 10: Example coloring book pages



Images of the anticipated costumes:



Figure 12: Example anticipated Krampus costume



Figure 13: Example anticipated Krampus costumes

(d) Details of the costume contest:

Participants will present their costumes for the audience to vote on. We will have 1st, 2nd, and 3rd place prizes.

(e) Detailed description of the ritual:

Ritual participants will form a procession to the display.

One will carry a veiled infinity candle (this is a flameless LED candle).

The ritual leader will give the invocation, celebrating both the light and the night.

The infinity candle is unveiled.

The ritual is concluded.

(See PI Ex. 2, at 34-35; PI Ex. 3 at 34-35). In good faith, we also provided an itinerary of the event, a true and correct copy of which is attached hereto as (PI Ex. 2 at 63-64; PI Ex. 3 at 63-64).

24. *IDAS and IGOV coordinated on the decision.* Pursuant to a subsequent public records request, I received, on December 10, 2024, the Chief Operating Officer “**IGOV**” (Jacob NicholSEN) texted the Director of the IDAS (Adam Steen) to coordinate the two offices’ efforts to “look at the pictures or diagrams or whatever it is they [TST] sent and talk through it.” (PI Ex. 2 at 76; PI Ex. 3 at 76). While I can’t know what was discussed at that meeting without the benefit of discovery, we do know that on December 10, 2024—the same morning that IGOV and IDAS reviewed the contents of TST’s event—the two offices coordinated the drafting of two statements: (1) a “Satanic Temple denial statement;” and (2) a “Legally Appropriate Statement” about that denial. (PI Ex. 2 at 80; PI Ex. 3 at 80).

25. *Notice of denial.* On the evening of December 10, 2024, then-Director of IDAS, Adam Steen, emailed us with notice that our application to use the Rotunda was denied. While he did not specifically provide an explanation, he generically cited Admin. Rule 100.4(5) and block-quoted § 5.15 of the Memorandum of Understanding.

(a) The text of Admin. Rule 100.4(5) is restated in full as:

100.4(5) Refusal of usage. The director may refuse to allow use of the facilities that, in the director’s judgment, would be disruptive of official state business or of the public health, safety and welfare, or is inconsistent with subrule 100.4(4). The director may consider such factors as recommendations of the department of public safety, previous experience with the requesting group or other events similar to that requested.

(b) the text of the Memorandum of Understanding § 5.15, is:

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.

(PI Ex. 2 at 93; PI Ex. 3 at 93).

26. *Response with inquiries.* We responded to Steen’s denial email with the following inquiries:

Thank you for taking the time to review our event application. I do have some questions:

- 1 - Could you tell us which specific items were not in compliance?
- 2 - How was the application evaluated? Was it by an individual or a committee?
- 3 - Is there an appeals process or the option to resubmit with changes?

I’m optimistic we can come to an understanding. Looking forward to your feedback.

(PI Ex. 2 at 95-96; PI Ex. 3 at 95-96).

27. *Reply to our inquiries.* We followed up the next day. After which, Steen responded:

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, 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.

(PI Ex. 2 at 96; PI Ex. 3 at 96). Because of the use of the vague phrase “cumulative circumstances”, it is not possible to identify any specific stated rationale for IDAS’s decision in this correspondence. Moreover, 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.” Given the prior public efforts to exclude us from the public square because of our religious identity, I immediately suspected the proffered rationale to be pretextual.

28. *We corrected IDAS’s false characterization.* In order to rule out the possibility that IDAS was simply mistaken about our “family friendly event” being intended to engage in obscene behavior or otherwise physically abuse children, we patiently explained to Steen that no part of the event would “depict or describe genitals, sex acts, masturbation, excretory functions, or sadomasochistic abuse;” and that sticks, which were anticipated as part of Krampus costumes, “are a traditional costume component and for appearance only” which “were never intended to be used on anyone, and we never stated that they would be.” (PI Ex. 2 at 97; PI Ex. 3 at 97). We also offered to omit the costume contest in order to allow the event to proceed as scheduled. *Id.* Steen never replied to us. *See id.* I interpret his refusal to accept our offer as further evidence that the real issue was not the costumes or any part thereof, but our religious viewpoint itself.

29. *Sticks are not prohibited on the Capitol Complex.* The 2024 Memorandum of Understanding (PI Ex. 2 at 48-55; PI Ex. 3 at 48-55) specifies a list of items which are not allowed on the Capitol Complex. *See* PI Ex. 2 at 50 § 5.14; PI Ex. 3 at 50 § 5.14. The list does not prohibit sticks or costume sticks.

30. *No beating children.* Doctrinally, TST is opposed to beating children. Generally, the

prohibition falls within TST's pacifistic nature. See Tenets I, III. Through TST's Protect Children Project, we advocate for our children members to have a religious exemption from corporal punishment in public schools. *See, generally*, <https://thesatanictemple.com/pages/protect-children-project> (last visited July 17, 2026).

31. *TST's demand letter and preservation notice.* On December 16, 2024, Matt Kezhaya (TST's general counsel) issued a demand letter and preservation notice to Steen on our behalf. I received a copy of that demand letter and preservation notice. (PI Ex. 2 at 101-03; PI Ex. 3 at 101-03). Our attorney explained to Steen that the denial was a "transparent pretext to conceal viewpoint discrimination" "[b]ecause the denial was based on your own false narrative, a narrative which you refused to depart from even after confronted with contrary evidence." (PI Ex. 2 at 101-03; PI Ex. 3 at 101-03) (citing *Cuffley v. Mickes*, 208 F.3d 702, 711 (8th Cir. 2000)). Our attorney further explained to Steen that the "harmful to minors" doctrine "only prohibits sexually explicit material and does not allow the State to prohibit dissemination of violent material." (PI Ex. 2 at 101-03; PI Ex. 3 at 101-03) (citing *Brown v. Ent. Merchants Ass'n*, 564 U.S. 786, 793 (2011)). Our attorney therefore demanded that Steen approve an event to take place on December 21, 2024, or otherwise coordinate on an appropriate alternative time for the holiday event.

32. *Steen and IDAS ignored our demand.* Steen ignored our attorney's demand. As a result: TST was deprived of equal access to the Rotunda in connection with our Paradise Lost reading marathon on equal terms as was given to the 99 County Bible reading marathon, the Diocese of Des Moines' monthly prayer meeting, and the Protestant weekly prayer meeting; and TST was deprived of equal access to the Rotunda for our 2024 Holiday event on equal terms as all other religions that participated during the 2024 Holiday season.

33. *Admin. Complaint on 2024 Holiday Event denial.* In June 2025, TST and I (in my personal capacity) filed joint administrative complaints to the Iowa Office of Civil Rights, which was subsequently administratively severed into two separate cases. TST and I each alleged that we were denied access to a public accommodation because of our religion and in retaliation against our prior participation in the Holiday 2023 Display forum; or alternatively, in retaliation against our complaint for IDAS's inaction in the face of the 2023 vandalism.

34. *Steen comments.* In August 2025, Steen announced his candidacy for Iowa's gubernatorial race. In connection with his campaign, he made various public statements that I interpret as admissions of an intent to suppress TST's and my equal access to this public accommodation by changing the rules and by denying our 2024 Holiday Event. More particularly, on or about the below dates, Steen publicly stated:

- (a) On August 19, 2025, in connection with his announcement of candidacy, he publicly stated that he is the "faith guy" and more particularly the "Jesus guy," and one of his highest profile commitments to faith, as IDAS director, was canceling TST's 2024 Holiday Event. (PI Ex. 2 at 105-08; PI Ex. 3 at 105-08).
- (b) On October 17, 2025, in connection with his campaign, Steen publicly explained that he was the driving force behind both changing the policy for the purpose of excluding TST and canceling TST's 2024 Holiday Event. He more particularly explained his reasoning behind canceling TST's Holiday Event as: the presence of our Satanic statue "could have been harmful for children to see." (PI Ex. 2 at 110-14; PI Ex. 3 at 110-14).

I interpret this comment as a direct expression, by Steen, of an opinion that the expression of our religious views, itself, is harmful to minors. This further tends to

prove that the real issue was our viewpoint, not sticks.

- (c) On or about November 24, 2025, Steen made videotaped comments during a campaign event in which he stated in pertinent part:

One of the most divisive issues in the state over the last couple years and the attempts of the so-called Satanic church has been denied again. No more marketing to children. No more trying to get them to create Satanic symbols, sing Satanic hymns, partake in Satanic rituals. No more having youth involved in costume contests and defending weapons, used to abuse youth."

A true and correct depiction of his video recorded public comments is available via YouTube at <https://youtu.be/jDrGaZk4gtw> (last visited July 14, 2026). An archived exhibit will be provided to the Clerk's office as (PI Ex. 2 at 119-122; PI Ex. 3 at 119-122).

Further reporting on his November 24, 2025 comments was published by:

- O. Kay Henderson, *Iowa officials say no to Satanic Temple's event in Capitol*, Radio Iowa, (Nov. 24, 2025), <https://www.radioiowa.com/2025/11/24/iowa-officials-say-no-to-satanic-temples-event-in-capitol/>
- Robert Leonard, *Who is the Greater Threat to Children, the Satanic Temple of Iowa, or MAGA Legislators?*, Deep Midwest: Politics and Culture, (Nov. 24, 2025), <https://youtu.be/jDrGaZk4gtw>
- Robert Leonard, *Who is the Greater Threat to Children, the Satanic Temple of Iowa, or MAGA Legislators?*, Deep Midwest: Politics and Culture, (Dec. 13, 2025) <https://rleonard.substack.com/p/who-is-the-greater-threat-to-children>

I interpret this comment as a direct expression, by Steen, that his purpose in canceling our 2024 Holiday event was to limit our ability to express our viewpoint in the presence of children and that the real issue was not violence against children but merely exposure of children to ideas he found personally offensive.

- (d) On or about April 23, 2026, Steen's campaign issued a video advertisement in which he promises to "keep the Satanists out of the Capitol because our Iowa values are under attack, and we don't keep them without a fight." A true and correct copy of the

advertisement is attached hereto as (PI Ex. 2 at 127-29; PI Ex. 3 at 127-29).

Further reporting on the advertisement was done by KCCI, which notes that “Steen has frequently pointed to his time leading Iowa’s Department of Administrative Services ... including decisions he made to deny requests by The Satanic Temple.”

See Amanda Rooker, *Iowa governor candidate Adam Steen rolls out statewide ad buy as primary nears*, KCCI (Apr. 23, 2026),

<https://www.kcci.com/article/iowa-governor-candidate-adam-steen-rolls-out-statewide-ad-buy-as-primary-nears/71112989>; (PI Ex. 2 at 130-34; PI Ex. 3 at 120-34).

35. *2025 Holiday Event application.* As Steen was campaigning on the suppression of our First Amendment rights, TST was applying for a holiday event in 2025. On September 29, 2025, I filed the application. (PI Ex. 4 at 10-12; PI Ex. 5 at 10-12). On October 29, 2025, Suzy Trotter, the Capitol Complex Events Coordinator for IDAS, informed us that the 2025 Event was added to the Capitol Complex Events Calendar and requested us to complete and submit a MOU “with a sketch and/or details of the event.” (PI Ex. 4 at 13; PI Ex. 5 at 13). I submitted the MOU on November 4, 2025. (PI Ex. 4 at 17- 27; PI Ex. 5 at 17-27)

36. *IDAS demand for details on 2025 Event.* On November 6, 2025, Suzy Trotter requested additional information about the event. (PI Ex. 4 at 29; PI Ex. 5 at 29).

37. *Details of 2025 event.* On November 11, 2025, I provided the requested information. (PI Ex. 4 at 32- 43; PI Ex. 5 at 32-43).

38. *Probable cause finding.* On November 24, 2025, the Iowa Office of Civil Rights returned a “Tier 1 Investigative Report” finding that TST and I had presented probable cause to believe IDAS and IGOV discriminated against us, and that further investigation by the Office was merited. (PI Ex. 2 at 203-04; 219-34; PI Ex. 3 at 203-04; 219-34).

39. *2025 Holiday Event denial.* Also on November 24, 2025, Suzy Trotter informed us that our 2025 Holiday Event application was denied without further explanation. (PI Ex. 4 at 46; PI Ex. 5 at 46). Given all the foregoing, I did not need an explanation. On May 19, 2026, TST and I filed an administrative complaint for the effective denial of our access to the Rotunda for the 2025 event. (PI Ex. 4 at 1-6; PI Ex. 5 at 1-6).

40. *2025 Holiday Event in private space.* Because the IDAS denied our 2025 Holiday Event, we had to secure alternative accommodations at a privately held public accommodation for which we incurred expenses. We took photographs at the event, which photographs truly and accurately depict the circumstances of the event as it would have happened at the Rotunda. (PI Ex. 17). No children were beaten at the event, nor would we have beaten any children at the Rotunda.

41. *2026 Holiday Event application.* On March 7, 2026, I filed an application for a 2026 Holiday event. As before, I received an automated email populated with the application data. (PI Ex. 1 ¶ 41; PI Ex. 6 at 12; PI Ex. 7 at 12).

42. *Admin. complaint for 2026 Holiday Event denial.* On May 19, 2026, not having heard from the IDAS in response to our 2026 Holiday Event application, TST and I filed an administrative complaint for the effective denial of our access to the Rotunda. (PI Ex. 6 at 1-9; PI Ex. 7 at 1-9).

43. *Right-to-Sue letters.* On July 6, 2026, through counsel, TST and I requested Right-to-Sue letters so that we could present the issues to this Court. By letters dated July 7, 2026, TST and I received copies of Right-to-Sue letters for each of the 2024 and 2025 administrative complaints. (PI Ex. 2 at 206-13; PI Ex. 3 at 206-13; PI Ex. 4 at 231-35; PI Ex. 5 at 231-35). By a letter dated July 21, 2026, TST and I received copies of Right-to-Sue letters for each of the 2026

administrative complaint. (PI Ex. 5 at 514-18; PI Ex. 5 at 514-18).

44. On July 15, 2026, Defendants responded to the application with the MOU and added the 2026 event to the Capitol Rotunda Calendar. (PI Ex. 8).

45. *2026 Memorandum of Understanding*. On July 15, 2026 (130 days after the application), IDAS sent a Memorandum of Understanding for the event. (PI Ex. 8). I signed and returned the MOU on July 21, 2026. (PI. Exs. 9,10) We have not heard anything further.

46. *IDAS treatment of other groups*. Pursuant to public records requests, I have received information about how IDAS treats other groups who have applied for use of the Capitol Complex. True and correct copies of a selection of the documents I received is attached hereto as (PI Ex. 18). Of importance to this motion:

(a) There were 37 other applicants from November 2025 through February 2026.

(b) On average, each of these groups received a response on their application within one business day of the application. One outlier had to wait two weeks.

(c) Only one group was denied, and that denial was paired with both a content-neutral explanation (the entire Rotunda had been previously reserved) and an invitation for another application with a link to non-reserved dates. (PI Ex. 18 at 118).

(d) None of these groups had to undergo official scrutiny into the contents of their events.

47. *Suspect class*. TST lacks the political capital to sway elections. Our only hope of equal protection under the laws lies in this Court's hands.

Further your affiant sayeth not.

Acknowledgment

I declare under penalty of perjury that everything I have stated in this document is true and correct to the best of my own personal knowledge.

s/Mortimer Adramelech

Signed in Polk County, Iowa on August 13, 2026