

EXHIBIT 3

OCR Case 84064

Adramelech 2024

CP #: 07-25-84064

Local #:

EEOC#:

HUD #:

Area: **Public Accommodation**Basis: **AO - Religion, OR - Retaliation**18 Month Date: **12/10/2026****MORTIMER ADramelech VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES****Complainant: MORTIMER ADramelech**

Address: C/O MATT KEZHAYA

2nd Address: 150 S 5TH ST, SUITE 1850

City/State/Zip: MINNEAPOLIS, MN 55402

Home Phone: 612-276-2216**E-mail: MATT@KEZHAYA.LAW.COM****Legal Counsel: RITA BETTIS AUSTEN****Law Firm: ACLU OF IOWA**

Address: 505 5TH AVE

2nd Address: SUITE 808

City/State/Zip: DES MOINES, IA 50309

Phone: 515-207-0567**E-mail: RITA.BETTIS@ACLU-IA.ORG****Legal Counsel: SHEFALI AURORA****Law Firm: ACLU OF IOWA**

Address: 505 5TH AVE

2nd Address: SUITE 808

City/State/Zip: DES MOINES, IA 50309

Phone: 515-207-0567**E-mail: SHEFALI.AURORA@ACLU-IA.ORG****Legal Counsel: THOMAS STORY****Law Firm: ACLU OF IOWA**

Address: 505 5TH AVE

2nd Address: SUITE 808

City/State/Zip: DES MOINES, IA 50309

Phone: 515-207-0567**E-mail: THOMAS.STORY@ACLU-IA.ORG****Respondent: IOWA DEPARTMENT OF
ADMINISTRATIVE SERVICES**

Address: 1305 E WALNUT ST

2nd Address: 3RD FLOOR

City/State/Zip: DES MOINES, IA 50319

Phone: 515-242-5120**Respondent: ADAM STEEN, DIRECTOR**IOWA DEPARTMENT OF ADMINISTRATIVE
SERVICES

Address: 1305 E WALNUT ST

2nd Address: 3RD FLOOR

City/State/Zip: DES MOINES, IA 50319

Phone: 515-242-5120**Respondent: OFFICE OF THE GOVERNOR OF
THE STATE OF IOWA**

Address: 1007 EAST GRAND AVENUE

2nd Address: #101

City/State/Zip: DES MOINES, IA 50319

Phone: 515-281-5211

Date	Step In Process	Responsible Party
6/10/2025	Complaint Received	ICRC
	Jurisdictional Review	
	Complaint Docketed	
	Notice to Respondent	

	Screening	
	Mediation	
	Investigation	
	ALJ	

Complaint

IOWA OFFICE OF CIVIL RIGHTS COMPLAINT FORM

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

IOCR CP# 07-25-84064 Local Commission# _____ EEOC# _____	(AGENCY USE ONLY) Iowa Office of Civil Rights 6200 Park Ave Ste 100 Des Moines, Iowa 50321-1270
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(PLEASE TYPE OR PRINT LEGIBLY)

[illegible]

-----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: 9/15/1995

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.

- ☐ Employment
 ☒ Public Accommodation
 ☐ Housing
☐ Education
 ☐ Credit
 ☐ Retaliation

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

Employment

- Employment**
- ☐ Demotion
- ☐ Denied Accommodation
- ☐ Denied Benefits
- ☐ Discipline
- ☐ 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,¹ 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,

¹ 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/4djmnbfcr> (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/3kjbthbs>; 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 I).

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 NicholSEN, 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,*^[2] 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,

² 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.

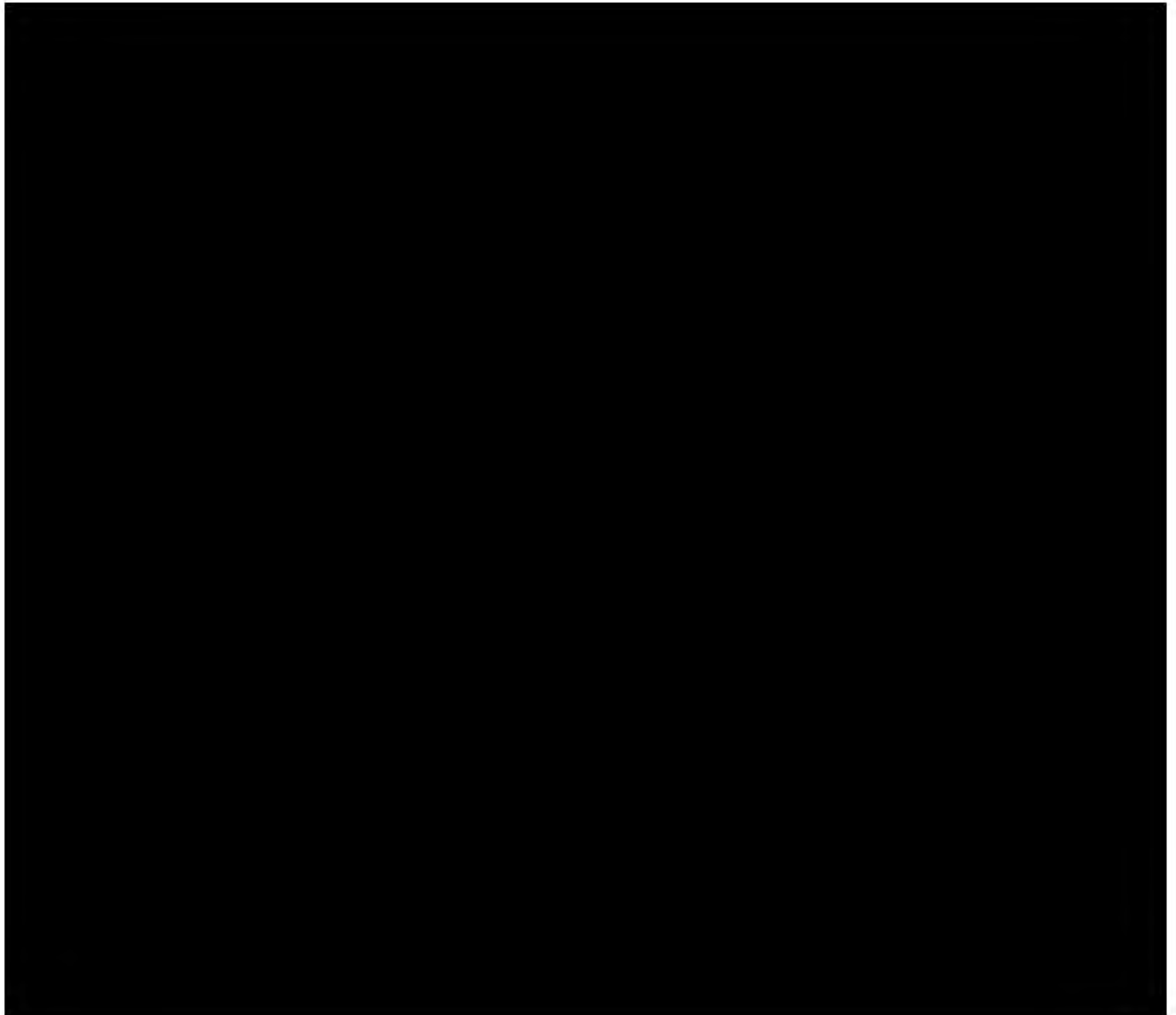
We believe this discrimination on the basis of our actual and perceived religion, and retaliation, violated our rights under the Iowa Civil Rights Act.

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 Mattison Admired 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



Additional Documents from Complainant

Exhibit A- Paradise Lost Marathon Application Email



Mortimer Adramelech <mortimer.adramelech@thesatanictemple.org>

Capitol Building Application - ACB331 - Satanic Temple "Paradise Lost" Reading Marathon - 9/16/2024

1 message

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Fri, Jul 12, 2024 at 10:13 PM

Reply-To: capitol.complex.events@iowa.gov

To: mortimer.adramelech@thesatanictemple.org

Cc: toki.leonard@thesatanictemple.org

Mortimer Adramelech,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB331

Date of Form Submission: 7/12/2024 22:13:32

Form Submission Values:

Representative's Name: Mortimer Adramelech

Address:[REDACTED]

City:[REDACTED]

State: Iowa

Zip Code:[REDACTED]

Email Address: mortimer.adramelech@thesatanictemple.org

Primary Phone: [REDACTED]

Name (Alternate): Toki Leonard

Email Address (Alternate): toki.leonard@thesatanictemple.org

Primary Phone (Alternate):

Sponsor: The Satanic Temple of Iowa

Address (Sponsor):

City (Sponsor):

State (Sponsor): Iowa

Zip Code (Sponsor):

Location: 1st Floor Rotunda - North

Expected Attendance: 25 or less

Catering Equipment and Outdoor Cooking: Neither

Event Title: Satanic Temple "Paradise Lost" Reading Marathon

Web Page With Event Information:

Event Detail: Supplies:

- Various editions of Paradise Lost by John Milton, with illustrations, to be displayed upon bookstands during reading
- Camera for livestream.
- Fold out table.
- Fold out chairs—provided by the Capitol complex
- TST Iowa and TST Flags.
- Bottled water
- Large framed photos of Paradise Lost illustrations from William Blake or Gustave Dore.
- Pamphlets, or small print-outs that have a list of the 7 Tenets and a link to the official TST website, available for curious onlookers.

Setup should take roughly 15 minutes, and then we will read the entirety of the epic poem "Paradise Lost" by John Milton. This event should last between three to four days, depending on the speed of readers and breaks. Takedown should take roughly 15 minutes

Event Date: 9/16/2024

Start Time: 8:30:00 AM

End Time: 4:30:00 PM

Does your event continue across multiple meeting times?: Yes

2nd Event Date: 9/17/2024
2nd Start Time: 8:30:00 AM
2nd End Time: 4:30:00 PM
3rd Event Date: 9/18/2024
3rd Start Time: 8:30:00 AM
3rd End Time: 4:30:00 PM
4th Event Date: 9/19/2024
4th Start Time: 8:30:00 AM
4th End Time: 4:30:00 PM

Exhibit B- Paradise Lost Press Release

This September at the Iowa State Capitol Building Complex:

The Satanic Temple Iowa's "Paradise Lost" Reading Marathon

FOR IMMEDIATE RELEASE



The Satanic Temple of Iowa is excited to share a core Satanic religious text with fellow Iowans!

Join us in the rotunda of the Iowa State Capitol building starting September 16th, 2024 as we read John Milton's "Paradise Lost" (1667) from start to finish.

We would like to thank the Iowa 99 County Bible Reading Marathon as well as our governor Kim Reynolds, and former governor Terry Brandstadt, who have signed annual proclamations encouraging Iowans to read the Bible from start to finish at our state capitol building and all 99 county courthouses in the great state of Iowa.

Paradise Lost is an epic poem that has been pivotal in imbuing the figure of Satan with enlightenment-era values in Romantic literature, the religion of Satanism, and popular culture.

We are hopeful that this event will encourage Iowans to engage in respectful dialog about religious liberty, plurality, and the importance of diverse perspectives.



Mortimer Adramelech
Minister of Satan
The Satanic Temple Iowa

Exhibit C- 9.16.24 Satanic Temple MOU



Department of
Administrative Services

KIM REYNOLDS, GOVERNOR
ADAM GREGG, LT. GOVERNOR

ADAM STEEN, DIRECTOR

**Memorandum of Understanding
Between
The Satanic Temple of Iowa
And
The Iowa Department of Administrative Services
For
Satanic Temple “Paradise Lost” Reading Marathon**

1. **Purpose.** The purpose of this Memorandum of Understanding (“MOU”) is to set forth the terms and conditions of the agreement between the Iowa Department of Administrative Services (“DAS”) and The Satanic Temple of Iowa (“Event Requestor”) for the Satanic Temple “Paradise Lost” Reading Marathon (“Event”). Event Requestor manages, operates, controls, and hosts the Event. Event Requestor will be allowed the non-exclusive use to host the Event in the designated Event Area for the Duration of this MOU subject to the terms and conditions therein.
 - 1.1. **Exemption.** State agencies (as defined in Iowa Code section 669.2(5)) acting in an official capacity and the World Food Prize whose primary location for the annual ceremony is the Capitol Complex (Iowa Code section 15.368) are exempt from time and place restrictions except as otherwise required by law or imposed within the sole discretion of DAS.
2. **Duration.** This MOU exclusively pertains to the Monday, September 16, 2024, Event. Event requests shall be received at least 30 calendar days prior to the event date. Event Requestor is approved for the use of the designated Event Area on Monday, September 16, 2024; beginning at 8:30 a.m. until 4:30 p.m. An Event may not exceed 1 day. An Event Requester, including any affiliate, conduit, designee, partner, or subunit, may not hold more than one event per calendar year.
3. **Event Area.** North section of the 1st Floor Rotunda in the Iowa State Capitol Building on the Capitol Complex in Des Moines, IA. DAS will make the Event Area available in accordance with the terms of this MOU.
 - 3.1. **Site Map.** The Event Area will be restricted to the area identified on Exhibit A (“Site Map”). Site map identifies the perimeter of the Event Area and the location of equipment or displays for the Event. The Event Requestor is responsible for demarcating the Event Area and, if required by DAS, obtain and erect barriers as set forth on the Site Map. Event Requestor shall not conduct the Event at any other location on the Capitol Complex without written approval from DAS.
 - 3.2. **Relocating/Rescheduling of Event.** In the event DAS has to restrict the usage of the Event Area agreed upon in this MOU for any reason, DAS will work in good faith with the Event Requestor to locate an alternative location and/or date on the Capitol Complex. DAS only anticipates this occurring due to unforeseen or extraordinary circumstances.
 - 3.3. **Compliance with Laws.** Event Requestor agrees to comply with all applicable laws in its use of the Event Area including, but not limited to, provisions of the Iowa Code and DAS’s administrative rules governing use of the Capitol Complex.
4. **Charges, Insurance, Indemnification.** Event Requestor is exclusively responsible for financing the Event.
 - 4.1. **Costs to Access.** Event Requestor may conduct the Event within the Event Area without rent or charge.
 - 4.2. **Vendor Services.** Event Requestor will be solely responsible for all expenses and costs charged by vendors. Event Requestor will pay all vendors directly.
 - 4.3. **Liability.** Pursuant to the requirements set forth in Iowa Administrative Code rule 11—100.4(6), Event Requestor acknowledges responsibility and is responsible for any damages occurring during the Event and agrees to reimburse the State of Iowa and the Iowa Department of Administrative Services for such damage to state property, services provided by or through DAS to support the Event, and necessary clean-up after Event Requestor departs the Capitol Complex. Any billing from DAS submitted to Event Requestor shall be paid in full within thirty (30) days of receipt.
 - 4.4. **Indemnification.** Event Requestor agrees to be fully responsible for and/or indemnify and hold harmless the State of Iowa, the Iowa Department of Administrative Services, and all of their agents and employees from any and all claims, liabilities, damages, settlements, judgments, costs, and expenses directly or indirectly caused by, related to, or arising from Event Requestor’s access, parking, and conducting business under this MOU.

Exhibit D- Email re MOU for TST IA Paradise Lost



Mortimer Adramelech <mortimer.adramelech@thesatanictemple.org>

Regarding the MOU for TST IA's Paradise Lost

Capitol Complex, Events <capitol.complex.events@iowa.gov>
To: Mortimer Adramelech <mortimer.adramelech@thesatanictemple.org>
Cc: Toki Leonard <toki.leonard@thesatanictemple.org>

Thu, Aug 22, 2024 at 9:54 AM

The answers to your questions are below.

Q: When was this change added to the memorandum of understanding?

A: The Memorandum of Understanding was revised and published on July 26, 2024.

Q: In January 2024, the 99 County Bible Reading Marathon took place over multiple days. Since that event took place this year, doesn't that set a precedent to allow our event to continue over multiple dates, as we originally requested?

A: No.

Q: How will this change impact plans for holiday displays this coming December? If events are restricted to a single day, would all holiday displays only be allowed to stand for a day?

A: Displays are considered an event.

Q: Are we being asked to choose between the Paradise Lost reading marathon or having a holiday display for 2024? Will there still be holiday displays at the capitol?

A: Event Requestor, including any affiliate, conduit, designee, partner, or subunit, may not hold more than one event per calendar year.

Q: How does the Capitol building complex define a year? Is a year defined as January 1st through December 31st, or are there other metrics factored in?

A: A calendar year begins on January 1 and ends on December 31.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Exhibit E- Statement on Capitol Building Policy Change

The Satanic Temple Iowa's Statement on:

Policy Changes at the Iowa State Capitol Building Complex

FOR IMMEDIATE RELEASE



The Satanic Temple of Iowa is disappointed to learn that the Iowa state government would rather deny homeless veterans access to support than allow us to read a poem at the Iowa State Capitol Building.

The Satanic Temple of Iowa originally had plans to hold a multi-day event at the Iowa State Capitol building starting September 16th, 2024 to engage in a reading marathon of John Milton's epic poem "Paradise Lost" (1667), a historic text of significant importance to the development of Satanism as a religion.

Two weeks after our application to hold a reading marathon event at our beautiful state capitol was submitted, the Capitol Building Complex changed their policies on events. As of July 26th of this year, multi-day events are banned at the Iowa State Capitol, and all organizations are only allowed to hold one event per calendar year.

According to local newsource KCCI, "Organizers of an annual, three-day resource fair aiming to assist people, especially veterans, experiencing homelessness in the Des Moines area may cancel the event after a state policy change denied the group venue access."

Source: <https://tinyurl.com/gov-reynolds-harms-veterans>

The Satanic Temple of Iowa would like to express our support to Iowa's unhoused population who have been unfairly targeted by this policy change, which we believe occurred due to the Iowa state government's unwillingness to respect diverse perspectives and religious freedom.

If you have been looking forward to our "Paradise Lost" Reading Marathon, there is no need to worry—our event is still happening, and we will be announcing a change in venue soon. We are excited to share a core religious text of Satanism with our fellow Iowans, and are happy to continue to encourage our local community to engage in respectful dialog about religious liberty, plurality, and the importance of diverse perspectives.

We are still hopeful that Governor Kim Reynolds will sign the proclamation that we have submitted in support of this event. Iowa State Governor Kim Reynolds annually signs proclamations encouraging all Iowans to read the Bible from start to finish at each of the 99 county courthouses in our state and at our state capitol building—a task that was completed at the rotunda of the Iowa State Capitol building complex in January of this year.



Mortimer Adramelech

Minister of Satan

The Satanic Temple Iowa

mortimer.adramelech@thesatanictemple.org

Exhibit F- Copy of Gmail Chain 1 re 12.14.24 Capitol Building Application



Capitol Building Application - ACB365 - TST Iowa Holiday Display Day - 12/14/2024

15 messages

<donotreplycontactus@iowa.gov>

Mon, Oct 7, 2024 at 1:04 AM

Reply-to: capitol.complex.events@iowa.gov

To: jordannebeach@gmail.com

Cc: mortimer.adramelech@thesatanictemple.org

Jordanne Beach,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB365

Date of Form Submission: 10/7/2024 1:04:26

Form Submission Values:

Representative's Name: Jordanne Beach

Address: 355 31st St Dr SE

City: Cedar Rapids

State: Iowa

Zip Code: 52403

Email Address: jordannebeach@gmail.com

Phone Number: 515-306-4015

Name (On-site): Mortimer Adramelech

Email Address (On-site): mortimer.adramelech@thesatanictemple.org

Phone Number (On-site): 515-718-3228

Event Requestor: The Satanic Temple Iowa

Address (Requestor):

City (Requestor):

State (Requestor): Iowa

Zip Code (Requestor):

Location: 1st Floor Rotunda - East

Expected Attendance: 26 - 100

Catering Equipment and Outdoor Cooking: Neither

Event Title: TST Iowa Holiday Display Day

Web Page With Event Information:

Event Detail: 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 attended to by at least one member of our congregation at all times.

Event Date: 12/14/2024

Start Time: 8:00:00 AM

End Time: 4:00:00 PM

Jordanne Beach <jordannebeach@gmail.com>

Mon, Oct 7, 2024 at 1:20 AM

To: mortimeradramelech@gmail.com, toki.leonard@thesatanictemple.org <toki.leonard@thesatanictemple.org>

[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>

Mon, Oct 7, 2024 at 3:54 PM

To: jordannebeach@gmail.com

Cc: mortimer.adramelech@thesatanictemple.org

Jordan, your request was added to the [Capitol Complex Events Calendar](#). Attached is the Memorandum of Understanding to be completed and emailed back to our office at [capitol.complex.events@iowa.gov](#) along with a photo with the dimensions of the display for approval.

Complete Exhibit A of the MOU with a sketch and / or details of the event set up including the location of equipment such as tables, chairs, banners, displays, podium, crowd, etc. Feel free to add timeline including the set up, event start / stop, and the teardown.

You are welcome to contact our office with any questions regarding this agreement.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Mon, Oct 21, 2024 at 10:55 PM

Good evening, Suzy -

Thank you for adding our event to the Capitol events calendar.

Please find attached the following items:

- Signed MOU
- Holiday Display Mockup
- Event Itinerary

We bring our own table(s) but would like to borrow some chairs if possible. Please let us know if there's anything needed for this.

Please let us know if you have any questions, or if any clarification or details are needed.

Best regards,
Jordanne Beach

[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Mon, Nov 4, 2024 at 11:01 AM

Good morning, Suzy -

Just checking back in about things. Have you had a chance to review the signed MOU, display mockup, and event itinerary sent on 10/21?

Would we be able to borrow chairs from the Capitol? Are there any questions or clarification needed for our event?

Best regards,
Jordanne Beach

[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>
To: Jordanne Beach <jordannebeach@gmail.com>
Cc: mortimer.adramelech@thesatanictemple.org

Wed, Nov 6, 2024 at 1:53 PM

Jordanne, we received your documents and the MOU is with leadership.

Tables and chairs - we do have a ~20 plastic folding tables of various sizes and ~150 padded metal folding chairs on rolling storage racks near the Grand Staircase. Groups set up what they need according to the agreement and return what was used at the conclusion of their event - everyone is self sufficient. However, if you would like, groups are welcome to bring in their own tables or work with vendors of their choice to provide tables and chairs / set up services as long as the services are during the time of the agreement and not disruptive to another group hosting an event.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Wed, Nov 6, 2024 at 2:11 PM

Thank you for your response, Suzy.

Since the MOU is currently with leadership, does that mean it has not been signed by Iowa DAS? What would we be able to expect next?

Best regards,
Jordanne Beach

[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>
To: Jordanne Beach <jordannebeach@gmail.com>
Cc: mortimer.adramelech@thesatanictemple.org

Wed, Nov 6, 2024 at 2:28 PM

Our signor is out of the office and expected to return next week.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
 To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
 Cc: mortimer.adramelech@thesatanictemple.org

Wed, Nov 13, 2024 at 9:59 AM

Good morning, Suzy -

Thank you again for coordinating.
 Has your signor had the chance to review our paperwork for the 12/14 event? Please let us know if there's any additional clarification needed or questions.

Best regards,
 Jordanne Beach

[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>
 To: Jordanne Beach <jordannebeach@gmail.com>
 Cc: mortimer.adramelech@thesatanictemple.org

Tue, Dec 3, 2024 at 2:58 PM

Hello Jordanne, we are requesting The Satanic Temple Iowa to provide additional information specific to the 12/14/2024, TST Iowa Holiday Display Day event.

1. The finalized song list / Satanic Holiday Carols during the event.
2. Images of the make & take ornaments.
3. Images of the coloring pages.
4. Images of the anticipated costumes.
5. Details of the costume contest.
6. Detailed description of the ritual.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
 To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
 Cc: mortimer.adramelech@thesatanictemple.org

Tue, Dec 3, 2024 at 10:35 PM

Thank you, Suzy - we aim to submit the requested info by the end of the week.

I do have some questions about an unrelated event scheduled for the same day. (Please see the attached image)

1 - It advertises that it will take place inside the Iowa State Capitol on Dec 14th. Was an application submitted for the patriotic catholics event?

2 - Re: the second item in the image, specifically "Regularly scheduled rosary every 3rd Sunday of the month". Is this out of compliance with the restriction to one event per calendar year for each organization?

Best regards,

Jordanne
[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>
To: Jordanne Beach <jordannebeach@gmail.com>
Cc: mortimer.adramelech@thesatanictemple.org

Wed, Dec 4, 2024 at 8:59 AM

Response to your questions submitted on 12/3/2024.

- 1 - No.
- 2 - We have not received an application.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Capitol Complex, Events <capitol.complex.events@iowa.gov>
To: Jordanne Beach <jordannebeach@gmail.com>
Cc: mortimer.adramelech@thesatanictemple.org

Fri, Dec 6, 2024 at 2:15 PM

Hello Jordanne, as a reminder, please submit the images and details requested below to determine approval.

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

capitol.complex.events@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Fri, Dec 6, 2024 at 4:06 PM

- 1 - The finalized song list / Satanic Holiday Carols during the event.
- 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

2 - Images of the make & take ornaments.
Please see the attachments.

3 - Images of the coloring pages.
Please see the attachments.

4 - Images of the anticipated costumes.
Please see the attachments.

5 - 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.

6 - 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.

I have also included the finalized itinerary, and a Google Drive link to the images in case the attachments don't work.

Link: <https://drive.google.com/drive/folders/1N5PBfgzeC1st3GrqVIZy7DJOvryQYaMW>

 **TSTIA 2024 Holiday Display Event Itinerary**

Please let us know if you have any additional questions.

Best regards,
Jordanne

[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Capitol Complex, Events <capitol.complex.events@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Mon, Dec 9, 2024 at 9:51 AM

Good morning, Suzy -

Please find attached 2 more images.

If any of the information previously sent isn't viewable please let me know.

Best Regards,
Jordanne

[Quoted text hidden]

Exhibit G- Document 13

Document ID: 0.7.441.5021

From: Steen, Adam <adam.steen@iowa.gov> on
behalf of Steen, Adam <adam.steen@iowa.gov>
<adam.steen@iowa.gov>
To: Nathan Reckman
<nathan.reckman@iowa.gov>
Cc:
Bcc:
Subject: Fwd: Event Documents
Date: Mon Dec 09 2024 16:40:49 CST
Attachments: 2024.12.14 Scheduled and Anticipated Groups in the Rotunda.pdf
2024.12.14 The Satanic Temple Iowa Event Details.pdf

Adam Steen

Director

Iowa Department of Administrative Services

1305 E. Walnut Street, Des Moines, IA 50319

515-720-6176 mobile

adam.steen@iowa.gov<mailto:adam.steen@iowa.gov>

<https://das.iowa.gov><<https://das.iowa.gov/>>

[https://lh7-us.googleusercontent.com/iFGUJjgvqkvbbYFi3ubVwBy8cLI_Gwl5iNqpGY64Un1gkCAje3pz-i-Ke1qmdZJufFMOvQUqf58gFce4wbV5e04gfse2aATpfwtUIH9Okm2-7P6E9BhoFWtE2uh9iHZd0GuSUu4nK_Qf3XlxH-yEI3Q]

----- Forwarded message -----

From: Trotter, Suzy <suzy.trotter@iowa.gov<mailto:suzy.trotter@iowa.gov>>
Date: Mon, Dec 9, 2024 at 11:34AM
Subject: Event Documents
To: Adam Steen <adam.steen@iowa.gov<mailto:adam.steen@iowa.gov>>
Cc: Cross, Charlee <charlee.cross@iowa.gov<mailto:charlee.cross@iowa.gov>>

Suzy Trotter

Capitol Complex Events Coordinator

General Services Enterprise

Iowa Department of Administrative Services

109 S.E. 13th St., Des Moines, IA 50319

515-281-7259 Office

515-631-9247 Mobile

suzy.trotter@iowa.gov<<mailto:suzy.trotter@iowa.gov>>

<https://das.iowa.gov><<https://das.iowa.gov/>>

[https://lh7-us.googleusercontent.com/hgKdGuWyXTx-UM2t_cyQCCRdLx1_Arig6vB2MZKcJjDRzgoCk_9W04bZTFdN93K5KvowySauc6g4pgyqdcXxhZq1iAhoEmiioWdy-4_j086_pdP8oa9iTGelj87PKJ1ruwOKMTddVVzq77kSgZK3yco]

Document ID: 0.7.441.5021-000001

Owner: Steen, Adam <adam.steen@iowa.gov> on behalf of Steen, Adam <adam.steen@iowa.gov> <adam.steen@iowa.gov>

Filename: 2024.12.14 Scheduled and Anticipated Groups in the Rotunda.pdf

Last Modified: Mon Dec 09 16:40:49 CST 2024

Anticipated Groups in the Rotunda on December 14, 2024**Application submitted**

- The Satanic Temple Iowa
8:00a – 4:00p, east section
Display and activities

Applications submitted and denied due to 30-day notice

- Red Oak Mennonite Youth Group
2:00p – 3:00p, all four sections
Acapella Christmas Carols
- Jeff Pierick
12:30p – 2:00p, west section
Christmas Chorale with electronic keyboard possibly a remote microphone
- Iowa Liberty Network
8:30a – 4:00p, west section
St. Michael Display and group prayer
- The Molech Monastery
8:00a – 4:00p, west section
TMM Winter Worship

No application submitted for social media advertised event

- Patriotic Catholics
12:30p – unknown time, simply states the event will be inside the Capitol
Praying and music



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB365 - TST Iowa Holiday Display Day - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Mon, Oct 7, 2024 at 1:04 AM

Reply-To: capitol.complex.events@iowa.gov

To: jordannebeach@gmail.com

Cc: mortimer.adramelech@thesatanictemple.org

Jordanne Beach,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB365

Date of Form Submission: 10/7/2024 1:04:26

Form Submission Values:

Representative's Name: Jordanne Beach

Address: 355 31st St Dr SE

City: Cedar Rapids

State: Iowa

Zip Code: 52403

Email Address: jordannebeach@gmail.com

Phone Number: 515-306-4015

Name (On-site): Mortimer Adramelech

Email Address (On-site): mortimer.adramelech@thesatanictemple.org

Phone Number (On-site): 515-718-3228

Event Requestor: The Satanic Temple Iowa

Address (Requestor):

City (Requestor):

State (Requestor): Iowa

Zip Code (Requestor):

Location: 1st Floor Rotunda - East

Expected Attendance: 26 - 100

Catering Equipment and Outdoor Cooking: Neither

Event Title: TST Iowa Holiday Display Day

Web Page With Event Information:

Event Detail: 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 attended to by at least one member of our congregation at all times.

Event Date: 12/14/2024

Start Time: 8:00:00 AM

End Time: 4:00:00 PM



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB385 - Christmas Carols by Red Oak Mennonite Youth Group - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Thu, Nov 21, 2024 at 11:22 AM

Reply-To: capitol.complex.events@iowa.gov

To: kayleeanneesau@gmail.com

Cc: kayleeanneesau@gmail.com

Kaylee Unruh,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB385

Date of Form Submission: 11/21/2024 11:22:12

Form Submission Values:

Representative's Name: Kaylee Unruh

Address: 8 Shaun Circle

City: Red Oak

State: Iowa

Zip Code: 51566

Email Address: kayleeanneesau@gmail.com

Phone Number: 712-789-9214

Name (On-site): Kaylee Unruh

Email Address (On-site): kayleeanneesau@gmail.com

Phone Number (On-site): 712-789-9214

Event Requestor:

Address (Requestor):

City (Requestor):

State (Requestor):

Zip Code (Requestor):

Location: 1st Floor Rotunda - East, North, West, South

Expected Attendance: 25 or less

Catering Equipment and Outdoor Cooking: Neither

Event Title: Christmas Carols by Red Oak Mennonite Youth Group

Web Page With Event Information:

Event Detail: acapella caroling

Event Date: 12/14/2024

Start Time: 2:00:00 PM

End Time: 3:00:00 PM



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB388 - Christmas Chorale - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Tue, Dec 3, 2024 at 11:59 AM

Reply-To: capitol.complex.events@iowa.gov

To: jeffpierick3115@gmail.com

Cc: jeffpierick3115@gmail.com

Jeff Pierick,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB388

Date of Form Submission: 12/3/2024 11:59:50

Form Submission Values:

Representative's Name: Jeff Pierick

Address: 3115 SW 31st. Place

City: Des Moines

State: Iowa

Zip Code: 50321

Email Address: jeffpierick3115@gmail.com

Phone Number: 515-778-6087

Name (On-site): Jeff Pierick

Email Address (On-site): jeffpierick3115@gmail.com

Phone Number (On-site): 515-778-6087

Event Requestor: Jeff Pierick (not an organization or agency)

Address (Requestor): 3115SW 31st Place

City (Requestor): Des Moines

State (Requestor): Iowa

Zip Code (Requestor): 50321

Location: 1st Floor Rotunda - West

Expected Attendance: 101 - 500

Catering Equipment and Outdoor Cooking: Neither

Event Title: Christmas Chorale

Web Page With Event Information: Paper flyer no web page - word of mouth

Event Detail: Electronic Keyboard possibly a remote microphone

Event Date: 12/14/2024

Start Time: 12:30:00 PM

End Time: 2:00:00 PM



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB391 - Christmas with Iowa Liberty Network - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Wed, Dec 4, 2024 at 5:18 PM

Reply-To: capitol.complex.events@iowa.gov

To: barb@claytoncompany.net

Cc: bgsherm@gmail.com

Barb Clayton,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB391

Date of Form Submission: 12/4/2024 17:18:00

Form Submission Values:

Representative's Name: Barb Clayton

Address: 13265 253rd Ave

City: Spirit Lake

State: Iowa

Zip Code: 51360

Email Address: barb@claytoncompany.net

Phone Number: 712-330-1288

Name (On-site): Brad Sherman

Email Address (On-site): bgsherm@gmail.com

Phone Number (On-site): 319-331-6019

Event Requestor: Iowa Liberty Network

Address (Requestor): P.O. Box 352

City (Requestor): LeMars

State (Requestor): Iowa

Zip Code (Requestor): 51031

Location: 1st Floor Rotunda - West

Expected Attendance: 26 - 100

Catering Equipment and Outdoor Cooking: Neither

Event Title: Christmas with Iowa Liberty Network

Web Page With Event Information: None

Event Detail: We will be putting up a one-day display of St. Michael and praying.

Event Date: 12/14/2024

Start Time: 8:30:00 AM

End Time: 4:00:00 PM



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB394 - TMM Winter Worship - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Thu, Dec 5, 2024 at 7:37 PM

Reply-To: capitol.complex.events@iowa.gov

To: Michaeltpike@msn.com

Cc: Michaeltpike@msn.com

Mike Pike,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB394

Date of Form Submission: 12/5/2024 19:36:56

Form Submission Values:

Representative's Name: Mike Pike

Address: 3922 E 27th Street

City: Des Moines

State: Iowa

Zip Code: 50317

Email Address: Michaeltpike@msn.com

Phone Number: 515-770-3550

Name (On-site): Mike Pike

Email Address (On-site): Michaeltpike@msn.com

Phone Number (On-site): 515-770-3550

Event Requestor: The Molech Monastery

Address (Requestor): 3922 E 27th Street

City (Requestor): Des Moines

State (Requestor): Iowa

Zip Code (Requestor): 50317

Location: 1st Floor Rotunda - West

Expected Attendance: 26 - 100

Catering Equipment and Outdoor Cooking: Neither

Event Title: TMM Winter Worship

Web Page With Event Information: None

Event Detail: Minimalistic display requiring little setup consisting of one single cross approximately 5' tall. Setup 30 minutes prior and tear down immediately following. No other actions.

Event Date: 12/14/2024

Start Time: 8:00:00 AM

End Time: 4:00:00 PM



PATRIOTIC CATHOLICS

IN RESPONSE TO THE SATANIC TEMPLE'S DISPLAY IN
IOWA'S CAPITOL BUILDING ON DECEMBER 14,
LET'S JOIN IN PRAYING THE HOLY PATRIOTIC ROSARY.

Saturday, December 14th at 12:30 pm
inside Iowa State Capitol

Sunday, December 15th at 1:30 pm
outside on West Steps of Capitol
*(Regularly scheduled rosary
every 3rd Sunday of the Month)*

Music provided by Dr. Marion & Rosa Scott
Narrated by Linda Roberts

LET'S UNITE AS WE TURN BACK TO GOD TO
HEAL OUR NATION BOTH SPIRITUALLY AND MORALLY.

Exhibit H- 12.14.2024 Satanic Temple MOU



**Department of
Administrative Services**

KIM REYNOLDS, GOVERNOR

ADAM STEEN, DIRECTOR

**Memorandum of Understanding
Between
The Satanic Temple Iowa
And
The Iowa Department of Administrative Services
For
TST Iowa Holiday Display Day**

- 1. Purpose.** The purpose of this Memorandum of Understanding (“MOU”) is to set forth the terms and conditions of the agreement between the Iowa Department of Administrative Services (“DAS”) and The Satanic Temple Iowa (“Event Requestor”) for the TST Iowa Holiday Display Day (“Event”). Event Requestor manages, operates, controls, and hosts the Event. Event Requestor will be allowed the non-exclusive use to host the Event in the designated Event Area for the Duration of this MOU subject to the terms and conditions therein.
 - 1.1. Exemption.** State agencies (as defined in Iowa Code section 669.2(5)) acting in an official capacity and the World Food Prize whose primary location for the annual ceremony is the Capitol Complex (Iowa Code section 15.368) are exempt from time and place restrictions except as otherwise required by law or imposed within the sole discretion of DAS.
- 2. Duration.** This MOU exclusively pertains to the Saturday, December 14, 2024, Event. Event requests shall be received at least 30 calendar days prior to the event date. Event Requestor is approved for the use of the designated Event Area on Saturday, December 14, 2024; beginning at 8:00 a.m. until 4:00 p.m. An Event may not exceed 1 day. An Event Requestor, including any affiliate, conduit, designee, partner, or subunit, may not hold more than one event per calendar year.
- 3. Event Area.** East section on the 1st Floor Rotunda in the Iowa State Capitol Building on the Capitol Complex in Des Moines, IA. DAS will make the Event Area available in accordance with the terms of this MOU.
 - 3.1. Site Map.** The Event Area will be restricted to the area identified on Exhibit A (“Site Map”). Site map identifies the perimeter of the Event Area and the location of equipment or displays for the Event. The Event Requestor is responsible for demarcating the Event Area and, if required by DAS, obtain and erect barriers as set forth on the Site Map. Event Requestor shall not conduct the Event at any other location on the Capitol Complex without written approval from DAS.
 - 3.2. Relocating/Rescheduling of Event.** In the event DAS has to restrict the usage of the Event Area agreed upon in this MOU for any reason, DAS will work in good faith with the Event Requestor to locate an alternative location and/or date on the Capitol Complex. DAS only anticipates this occurring due to unforeseen or extraordinary circumstances.
 - 3.3. Compliance with Laws.** Event Requestor agrees to comply with all applicable laws in its use of the Event Area including, but not limited to, provisions of the Iowa Code and DAS’s administrative rules governing use of the Capitol Complex.
- 4. Charges, Insurance, Indemnification.** Event Requestor is exclusively responsible for financing the Event.
 - 4.1. Costs to Access.** Event Requestor may conduct the Event within the Event Area without rent or charge.
 - 4.2. Vendor Services.** Event Requestor will be solely responsible for all expenses and costs charged by vendors. Event Requestor will pay all vendors directly.
 - 4.3. Liability.** Pursuant to the requirements set forth in Iowa Administrative Code rule 11—100.4(6), Event Requestor acknowledges responsibility and is responsible for any damages occurring during the Event and agrees to reimburse the State of Iowa and the Iowa Department of Administrative Services for such damage to state property, services provided by or through DAS to support the Event, and necessary clean-up after Event Requestor departs the Capitol Complex. Any billing from DAS submitted to Event Requestor shall be paid in full within thirty (30) days of receipt.
 - 4.4. Indemnification.** Event Requestor agrees to be fully responsible for and/or indemnify and hold harmless the State of Iowa, the Iowa Department of Administrative Services, and all of their agents and employees from any and all claims, liabilities, damages, settlements, judgments, costs, and expenses directly or indirectly caused by, related to, or arising from Event Requestor’s access, parking, and conducting business under this MOU.

Memorandum of Understanding
 The Satanic Temple Iowa
 Page 2 of 7

4.5. Insurance. Event Requestor is not required to obtain liability insurance for the Event; however, this does not relieve Event Requestor of any Charges or Indemnification pursuant to this MOU.

4.6. Billing Address.
 The Satanic Temple Iowa
 355 31st St Dr SE
 Cedar Rapids, IA 52403

5. Standard of Care Obligation. Event Requestor acknowledges that it will be held to a standard of care appropriate given the historical property it has endeavored to use for this Event. Care is to be taken for all areas utilized throughout the Capitol Complex. Event Requestor is exclusively responsible for the Event including set up, tear down, and Event activities.

- 5.1. Equipment and Displays.** Event Requestor will provide all equipment necessary to conduct the Event. The State of Iowa is not responsible for any damages, loss, or theft to equipment or displays provided, owned or used by Event Requestor.
- 5.2. Display Design.** Display design identifying specific size and location must be approved in advance by DAS. All displays must be free standing and may not be affixed or supported by any other surfaces. Display will not restrict traffic flow and will not pose a hazard for persons with disabilities. If required by DAS, the Event Requestor will incorporate a baseboard into the design surrounding the entire display. The Event Requestor will provide signage at the display location containing a disclaimer stating the display is not owned, maintained, promoted, supported by or associated with the State of Iowa. The use of an unattended display is prohibited. Refer to Exhibit C for additional guidelines.
- 5.3. Signage.** Event Requestor will not hang signs on the Capitol Complex including but not limited to buildings, lampposts, traffic signs, trees, sidewalks, existing signs, monuments, etc.
- 5.4. Protective Surface.** Event Requestor will take all reasonable steps to protect surfaces, ground, and buildings from damage from Event Requestor's equipment or display.
- 5.5. Power.** Event Requestor is approved to use the electrical outlets at the Event Area. Event Requestor will hire and/or obtain its own power beyond the electrical outlets provided. Any such generator must be grounded as per code. Event Requestor will secure all cables in a safe manner with a non-adhesive cable cover.
- 5.6. Restrooms.** Restrooms are available in the buildings on Capitol Complex during normal business hours. Event Requestor will provide a sufficient amount of portable restrooms and handicapped restrooms as necessary to support the expected participation for the Event. Such portable restrooms would be allowed during the date and time indicated on this MOU Duration. Portable restrooms would be placed in the Event Area on a concrete surface not impeding pedestrian foot traffic, i.e. sidewalks and cross walks.
- 5.7. Tents, canopies and inflatables (outdoor events only).** Upon approval from DAS, Event Requestor may set tents, canopies and inflatables in the Event Area. Approved tents, canopies and inflatables will be secured with weights.
- 5.8. Street/Sidewalk Closures.** Event Requestor will provide appropriate street/sidewalk closure barricades for the closure of street(s) and/or sidewalk(s) on the Capitol Complex. All street and sidewalk closures must be reviewed and approved by DAS and submitted on the site map provided to DAS. Event Requestor will seek approval from the City of Des Moines for the closure of city streets and/or sidewalks.
- 5.9. Ground Penetration.** Event Requestor will follow the "Digging/Ground Penetration Approval Procedures for the Capitol Complex" before penetrating the soil in any way, with signs, posts, etc. Any holes/penetration, etc., must be repaired immediately following the conclusion of the Event.
- 5.10. Clean-up/Waste Removal.** Event Requestor will provide waste receptacles to collect waste from the Event Area. Event Requestor will remove all waste generated during the Event from the Event Area. Capitol Complex waste receptacles in the Event Area used by the Event will be emptied and replaced by the Event Requestor with clean 45" x 48" bags. Parking lots, streets and sidewalks utilized for the Event will be cleaned by Event Requestor.
- 5.11. Security.** If the Event Requestor requires security for the Event, the Event Requestor shall obtain private security and shall be responsible for all private security costs.
- 5.12. Vehicles.** Event Requestor will not drive any vehicle on any sidewalk, lawn or landscaping except as provided herein. Turf type vehicles, such as golf carts may be driven on sidewalks and lawn. At no time may any vehicle park on the lawn.
- 5.13. Parking.** Capitol Complex non-gated parking lots for visitors as well as the parking structure on the corner of E. Grand Avenue and Pennsylvania Avenue may be available for the Event. Parking designated for state employee and reserved parking is not available for Event parking between 6 a.m. and 6 p.m., Monday-Friday,

Memorandum of Understanding
The Satanic Temple Iowa
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unless otherwise posted and with the exception of state designated holidays. Improper use of any “Persons with Disabilities” parking spaces is subject to a fine and towing at the owner’s expense.

5.14. Not Permitted on Capitol Complex.

- Admission fees;
- Alcohol;
- Use of tobacco;
- Fireworks;
- Horses or other livestock (except on streets);
- Sidewalk chalk/paint;
- Popcorn poppers for use in buildings;
- Open flame (except for outdoor cooking or catering equipment with prior approval from DAS and compliance to requirements in Exhibit B);
- Sale of merchandise (except for the sale of food associated with the Event).
- Helium Balloons are not allowed in the Capitol Building.

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.

6. Event Requestor Coordinator(s):

Jordanne Beach	Mortimer Adramelech
515.306.4015 jordannebeach@gmail.com	515.718.3228 mortimer.adramelech@thesatanictemple.org

7. DAS Event Coordinator.

Suzy Trotter
109 S. E. 13th Street, Des Moines, Iowa 50319
Office: 515.281.7259 Cell: 515.631.9247 Email: capitol.complex.events@iowa.gov

8. MOU Administration.

- 8.1. Amendments.** This MOU may be amended in writing by mutual consent of the parties. All amendments to this MOU must be in writing and fully executed by the parties.
- 8.2. Assignment and Delegation.** This MOU may not be assigned, transferred or conveyed in whole or in part without the prior written consent of the other party.
- 8.3. Integration.** This MOU represents the entire MOU between parties. The parties shall not rely on any representation that may have been made which is not included in this MOU.
- 8.4. Headings or Captions.** The paragraph headings or captions used in this MOU are for identification purposes only and do not limit or construe the contents of the paragraphs.
- 8.5. Supersedes Former MOUs or Agreements.** This MOU supersedes all prior MOUs or Agreements between the parties for the services provided in connection with this MOU.
- 8.6. Governing Law.** This agreement, and any disputes arising from it, shall be construed in accordance with Iowa law. Venue for any lawsuits resulting from it shall be Des Moines, Polk County, Iowa.
- 8.7. Interpretation.** The State and Event Requestor, and their respective attorneys, have been provided an opportunity to review and revise this document prior to signing it. Ambiguities shall be interpreted as if both parties drafted the agreement together.

9. Termination. This MOU automatically terminates at 4:00 p.m. on Saturday, December 14, 2024. Event Requestor’s obligations under this MOU continue beyond its termination.

Memorandum of Understanding
The Satanic Temple Iowa
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10. Signatures. Event Requestor, through the signature of its duly authorized representative identified below, affirmatively represents the signatory possesses all necessary power, authority and legal capacity to (1) act on behalf of Event Requestor; (2) enter into and bind Event Requestor to perform Event Requestor's obligations under this MOU; and (3) accept written notice for Event.

Charlee Cross, Chief Operating Officer
Department of Administrative Services
General Services Enterprise

Date



Oct 20, 2024

Duly Authorized Event Requestor Representative
Jordanne Beach
The Satanic Temple Iowa

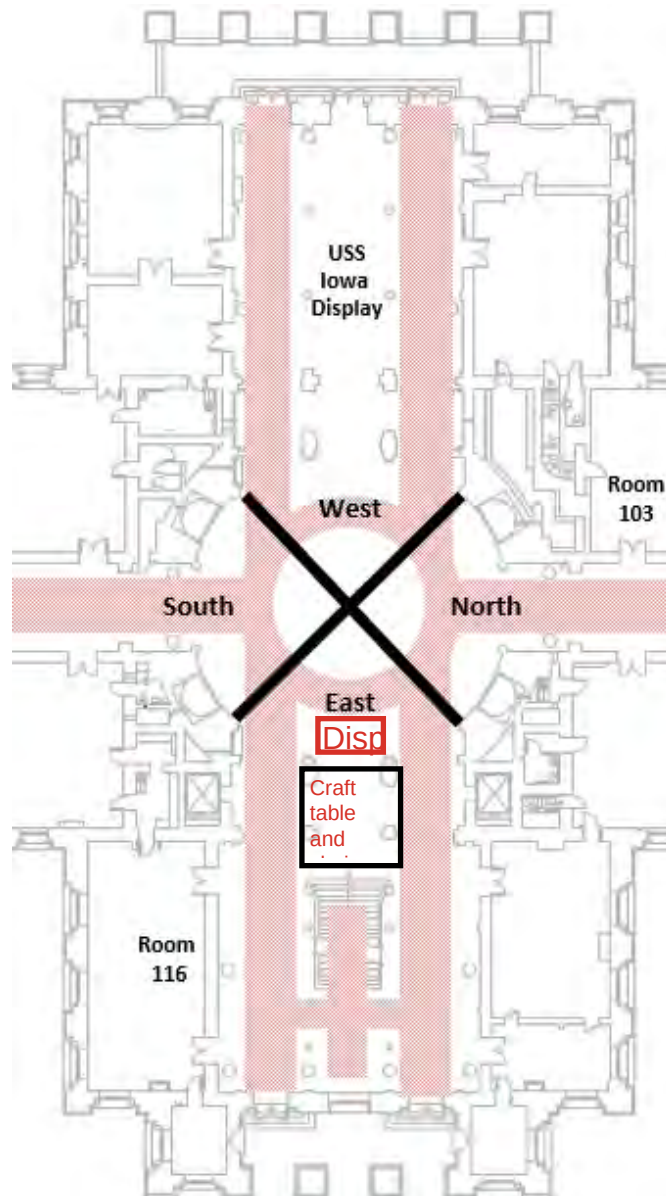
Date

Memorandum of Understanding
The Satanic Temple Iowa
Page 5 of 7

**Exhibit A
Site Map**

Using the map below, sketch and label the event equipment layout in the Event Area(s), including tables, chairs, catering equipment, banners, podium, etc.

The pink shaded area is the egress / ingress and pathway, do not plan to place event equipment in the shaded area.



Revised July 26, 2024

Memorandum of Understanding
The Satanic Temple Iowa
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Exhibit B
Catering Equipment and Outdoor Cooking

Catering Equipment Requirements

- Portable food warming devices that are fueled (i.e. Sterno) shall have non-combustible lids for immediate use for each warming device.
- The warming device shall be on a noncombustible protective material to prevent tipping and damage.
- The devices shall be continuously under the care and control of a competent person.
- A fire extinguisher must be provided by the Event Requestor and located to be readily available for use.

Outdoor Cooking Requirements

- A designated person of the Event Requestor will need to be responsible for lighting, kindling and maintaining the self-supporting outdoor cooking equipment.
- Cooking equipment will be at a minimum of 20 feet of any building.
- Cooking equipment will be at a minimum of 10 feet between other cooking equipment, vehicles, trash containers or other significant quantities of combustible materials.
- If propane tanks are used, all connections are to be soap tested prior to ignition. LP containers and equipment must be in compliance with acceptable NFPA (National Fire Protection Association) Code.
- The fire shall be continuously under the care and control of a competent person until it is extinguished. In addition, a fire extinguisher must be provided by the Event Requestor and located to be readily available for use.
- Outdoor cooking equipment shall be on a noncombustible protective material to prevent damage. Outdoor cooking equipment may be placed on the grass with protective material; however, this does not relieve Event Requestor of any Charges or Indemnification as a result of damage to the grass.
- If outdoor conditions pose a high risk of the fire spreading, such as high winds or extremely dry conditions, the Iowa Department of Administrative Services and/or Iowa State Patrol Post 16 reserves the right to require the Event Requestor to discontinue use of the cooking equipment to protect the public and facilities.

Memorandum of Understanding
The Satanic Temple Iowa
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Exhibit C
Display Guidelines

Capitol Building Displays

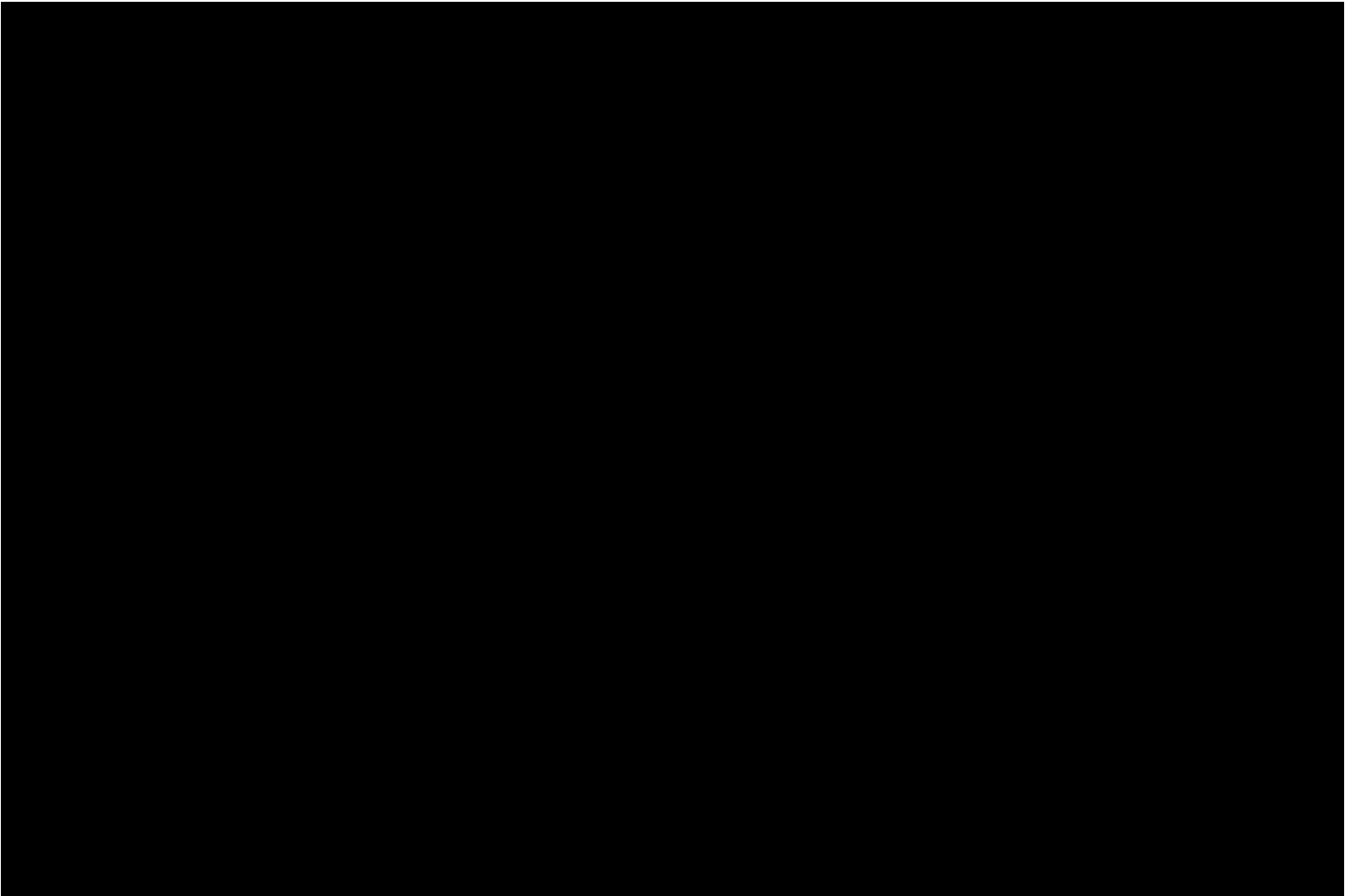
- Displays are considered an 'event' as we are coordinating the use of the space.
- The 1st Floor Rotunda in the Capitol has four defined spaces for groups to reserve.
- All groups must submit a photo with dimensions of the display for approval. Dimensions will not exceed 7 foot wide and 7 foot deep.
- Displays in the building have a height cap of 9 foot, so not to interfere with electronic smoke detectors.
- Displays will not be allowed to impede the egress.
- Displays are required to provide a baseboard so those with visual impairments using a cane can identify obstacles.
- Events / Displays may be refused if it would be disruptive of official state business or to the public health, safety and welfare, or is inconsistent with Iowa Administrative Code.
- The time limit allows for maintenance / cleaning of the area.
- All approved displays will provide signage at the display location containing a disclaimer stating the display is not owned, maintained, promoted, supported by or associated with the State of Iowa.

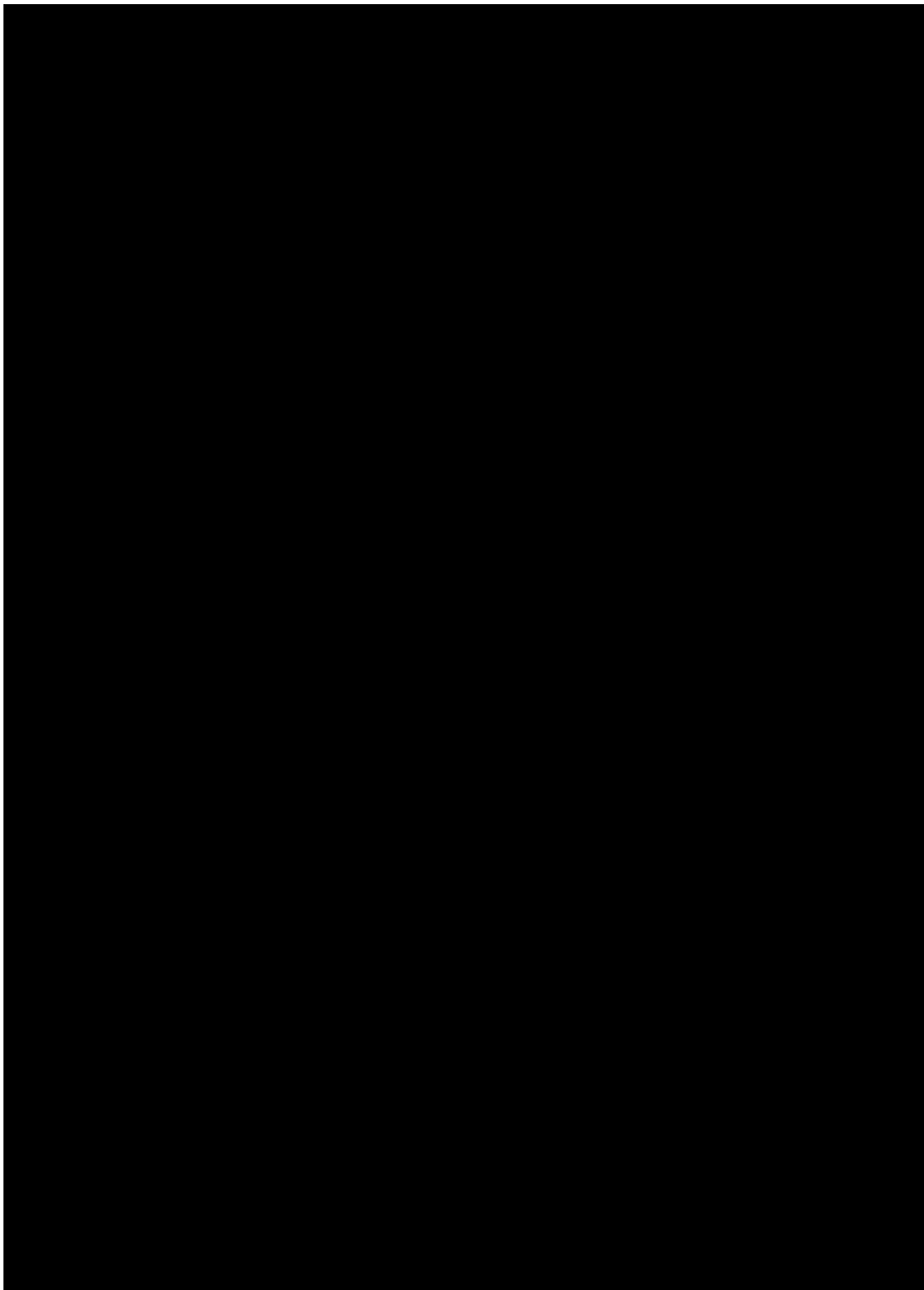
Outdoor Displays

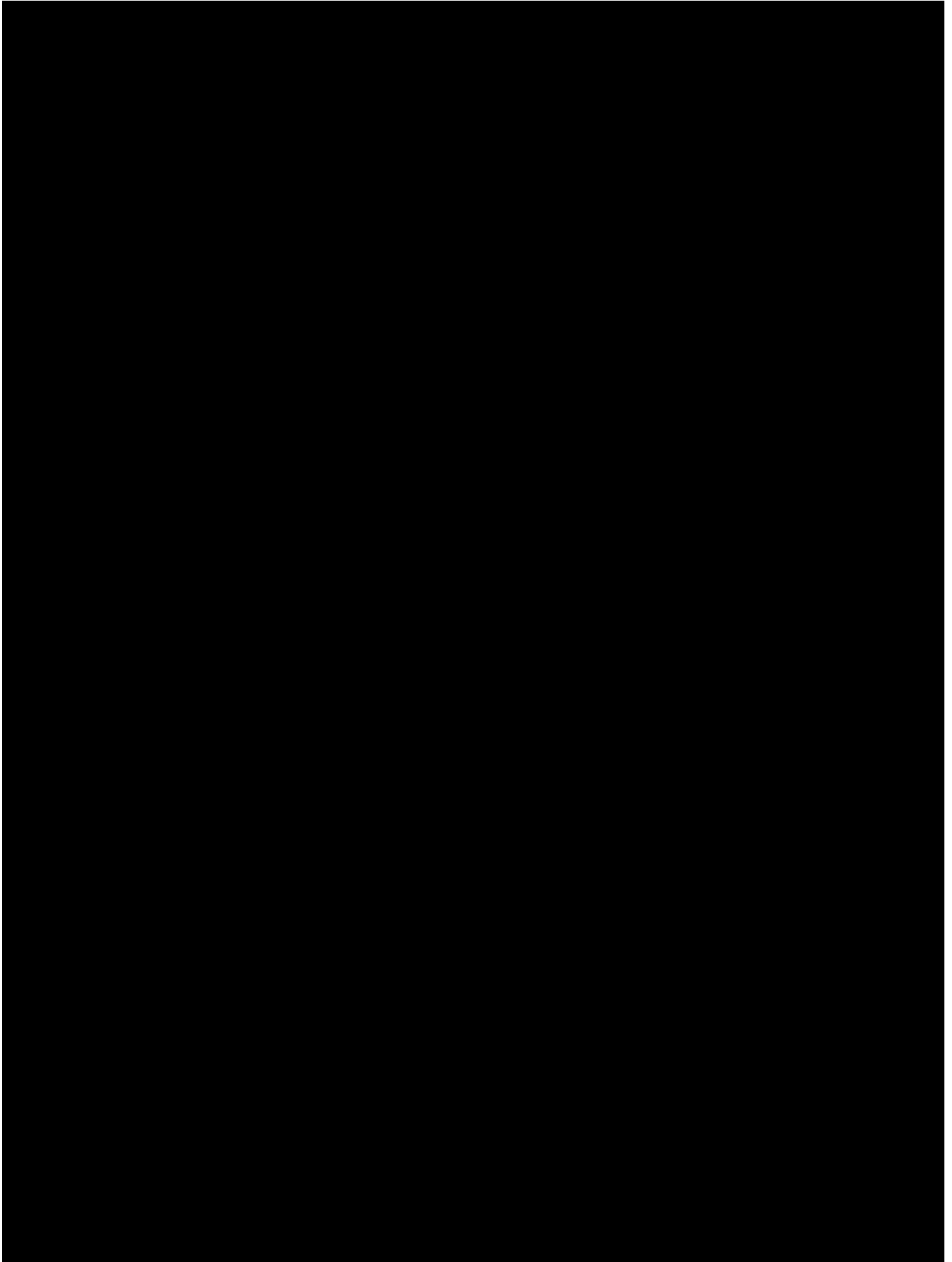
- Outdoor displays are considered temporary site features and must be submitted to the Capitol Planning Commission Site Features Committee for review and approval. (<https://das.iowa.gov/state-employees/general-services/capitol-planning-commission/site-features>)

Exhibit I- IGOV Open Records

From: Stan Thompson
Subject:
To: Thompson, Stan [IGOV]
Sent: November 20, 2024 8:38 AM (UTC-06:00)
Attached: 2024-11-19 Memorandum on Religious Displays Final.pdf







IGOV IFOIA R406-2024-000004

From: Quijano, Trisha
Subject: DAS Department Report - 11/20/2024
To: Frideres, Taryn [IGOV]; Nicholson, Jacob [IGOV]; Paulsen, Kraig
Cc: Steen, Adam [DAS]
Sent: November 20, 2024 1:34 PM (UTC-06:00)
Attached: 11.20.24 DAS Department Report .docx, Relevant Agency Data Metrics.pdf

[REDACTED]

[REDACTED]

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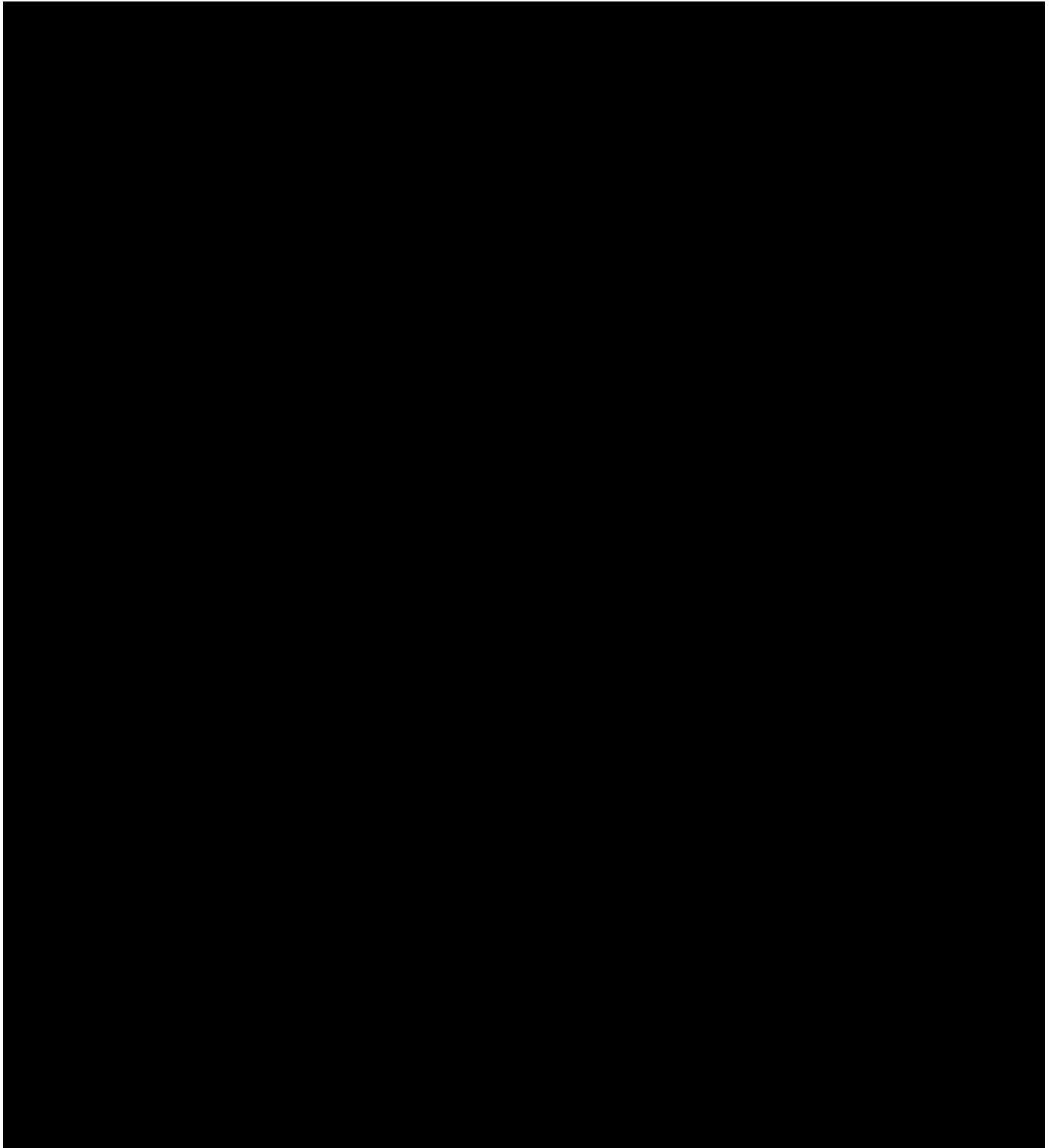
Trisha Quijano
Administrative Assistant
Office of General Counsel
Iowa Department of Administrative Services
Hoover Building, 3rd Floor
1305 E Walnut St, Des Moines, IA 50319
515-725-2817 office
515-281-0753 fax
trisha.quijano@iowa.gov
<https://das.iowa.gov>

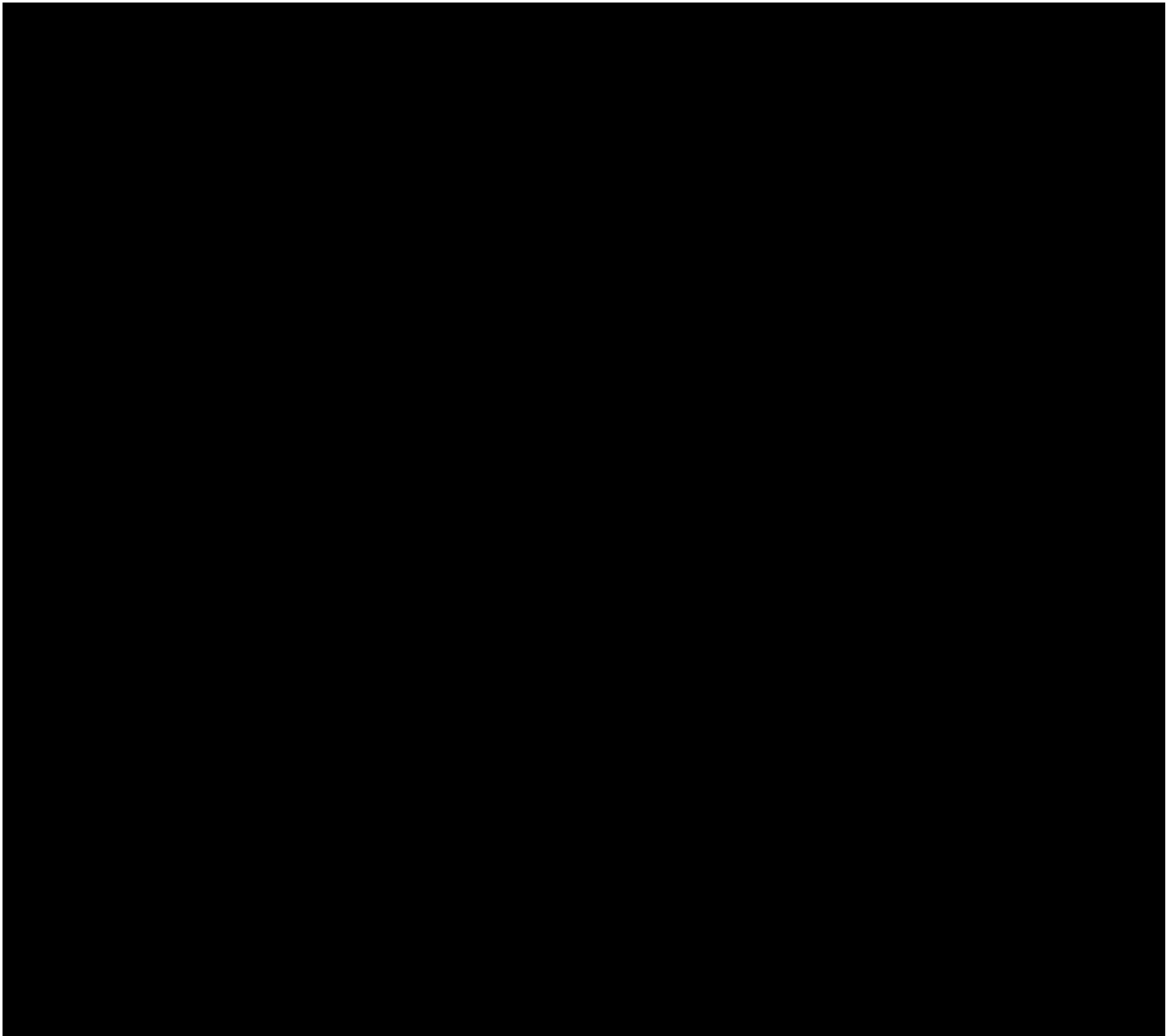


Department Report

Department: Department of Administrative Services

Date: 11/20/2024





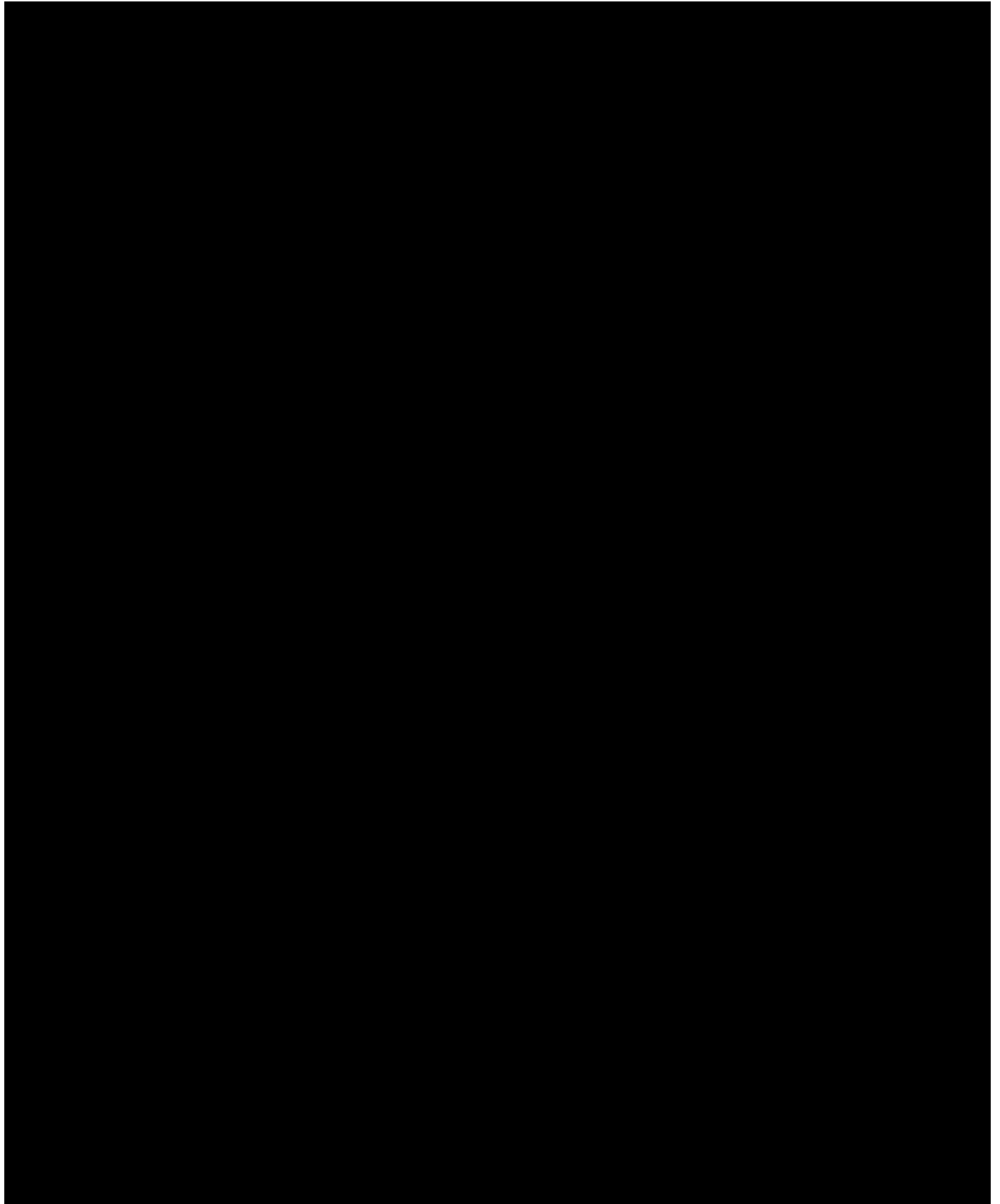


Exhibit J- 2024 TST Holiday Display Event Itinerary

TSTIA 2024 Holiday Display Event Itinerary

8:00am - Setup

9:00am - 10:00am - Satanic Holiday Carols

Proposed Songlist (still under discussion):

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

(A finalized songlist can be submitted at a later date if requested by the Capitol Events Office)

10:00am - 12:00pm - Make & Take Ornaments, and Social Time

Ornaments to be constructed from clear plastic globes and items that can be placed in or on them.

12:00pm - 1:00pm - All Ages Krampus Costume Contest

1st, 2nd, 3rd Place prizes - The winners will be determined by audience votes.

1:30pm - 2:30pm - Ritual

3:00/3:30pm - 4:00pm - Teardown and Cleanup

Exhibit K- Photo Examples Sent to Capitol





YULE COLORING PAGES

✦ INSTANT DOWNLOAD ✦



✦ M A G I C K M O T H M E D I A ✦



MAGICK MOTH MEDIA













Exhibit L- IGOV Open Records

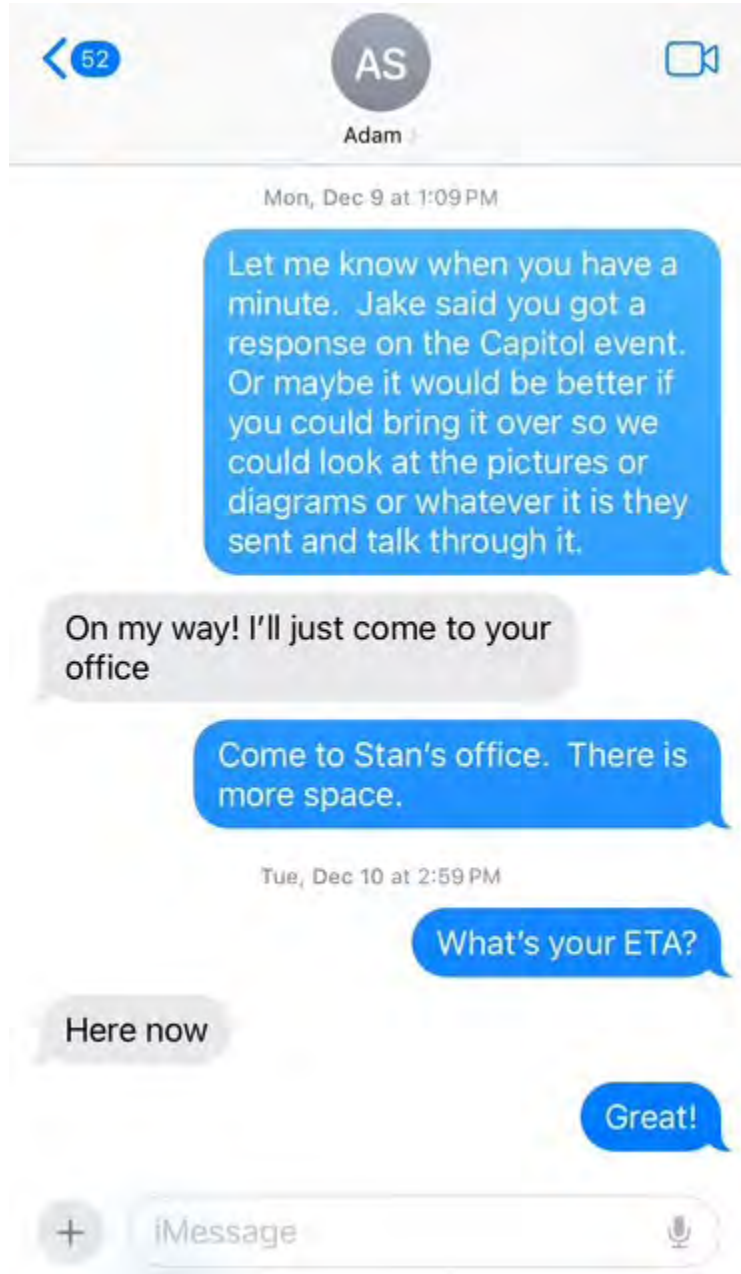


Exhibit M- IGOV Open Records Compilation

IGOV IFOIA R406-2024-000105

From: Mauro, Mason
Subject: Mauro, Mason shared "12.10.2024 Satanic Temple denial statement" with you
To: Bell, Damian [IGOV]
Sent: December 10, 2024 10:04 AM (UTC-06:00)

IGOV IFOIA R406-2024-000106



Mauro, Mason invited you to edit a file

Here's the document that Mauro, Mason shared with you.



12.10.2024 Satanic Temple denial statement



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IGOV IFOIA R406-2024-000107

12.10.2024 Satanic Temple denial statement DRAFT

Legally Appropriate Statement:

Our state government is always going to be concerned about the wellbeing of children. The Iowa State Capitol Complex is a place that is open to the public, where children and families routinely visit. Because of this, the State's event policy takes into consideration conduct that would be harmful to minors. This satanic event, which specifically targets children, is harmful to minors and so it was denied.

IGOV IFOIA R406-2024-000108

From: Mauro, Mason
Subject: Mauro, Mason shared "12.10.2024 Satanic Temple denial statement" with you
To: Blankinship, Steven [IGOV]; Thompson, Stan [IGOV]
Sent: December 10, 2024 11:10 AM (UTC-06:00)

IGOV IFOIA R406-2024-000109



Mauro, Mason invited you to edit a file

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12.10.2024 Satanic Temple denial statement



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IGOV IFOIA R406-2024-000110

12.10.2024 Satanic Temple denial statement DRAFT

Legally Appropriate Statement:

Our state government is always going to be concerned about the wellbeing of children. The Iowa State Capitol Complex is a place that is open to the public, where children and families routinely visit. Because of this, the State's event policy takes into consideration conduct that would be harmful to minors. This satanic event, which specifically targets children, is harmful to minors and so it was denied.

IGOV IFOIA R406-2024-000111

From: Mauro, Mason
Subject: Re: Green, Jen shared "2024.12.6 AP Mass Deportations" with you
To: Green, Jen
Sent: December 10, 2024 1:07 PM (UTC-06:00)

Yes, lawyers approved this statement. Still waiting for them to sign off on the satanic temple statement.

MM

Mason Mauro
Deputy Communications Director
Office of the Governor of Iowa
Governor Kim Reynolds
Iowa State Capitol
1007 East Grand Avenue | Des Moines, IA 50319
515-745-2840 mobile
mason.mauro@governor.iowa.gov
governor.iowa.gov



From: Green, Jen <Jen.Green@governor.iowa.gov>
Sent: Tuesday, December 10, 2024 1:05:25 PM
To: Mauro, Mason <Mason.Mauro@governor.iowa.gov>
Subject: Green, Jen shared "2024.12.6 AP Mass Deportations" with you

IGOV IFOIA R406-2024-000209

From: Blankinship, Steven [IGOV]
Subject: Blankinship, Steven [IGOV] shared "12.10.2024 Satanic Temple denial statement" with you
To: Green, Jen
Sent: December 10, 2024 1:40 PM (UTC-06:00)

IGOV IFOIA R406-2024-000210



Blankinship, Steven [IGOV] invited you to view a file

Here's the document that Blankinship, Steven [IGOV] shared with you.



12.10.2024 Satanic Temple denial statement



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IGOV IFOIA R406-2024-000211

12.10.2024 Satanic Temple denial statement DRAFT

Legally Appropriate Statement:

Our state government is always going to be concerned about the wellbeing of children. The Iowa State Capitol Complex is a place that is open to the public, where children and families routinely visit. Because of this, the State's event policy takes into consideration conduct that would be harmful to minors. This satanic event, which specifically targets children, is harmful to minors and so it was denied.

IGOV IFOIA R406-2024-000212

From: Green, Jen
Subject: Green, Jen shared "12.10.2024 Satanic Temple denial statement" with you
To: Mauro, Mason
Sent: December 11, 2024 4:03 PM (UTC-06:00)

IGOV IFOIA R406-2024-000213



Green, Jen invited you to view a file

Here's the document that Green, Jen shared with you.



12.10.2024 Satanic Temple denial statement



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IGOV IFOIA R406-2024-000214

12.10.2024 Satanic Temple denial statement DRAFT

Legally Appropriate Statement:

Our state government is always going to be concerned about the wellbeing of children. The Iowa State Capitol Complex is a place that is open to the public, where children and families routinely visit. Because of this, the State's event policy takes into consideration conduct that would be harmful to minors. This satanic event, which specifically targets children, is harmful to minors and so it was denied.

Exhibit N- Copy of Gmail Chain 2 Re 12.14.2024 Event Request Denial



12/14 Event Request - Denial

2 messages

Steen, Adam <adam.steen@iowa.gov>
To: Jordannebeach@gmail.com

Tue, Dec 10, 2024 at 6:02 PM

Good Evening,

Thank you for your patience and your responses to questions regarding your event request for December 14th in the Capitol Rotunda.

The request for space in the Capitol Rotunda is not approved per [Administrative Rule 100.4\(5\)](#) & pursuant Department of Administrative Services [Memorandum of Understanding](#), specifically section 5.15, as listed below:

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.

Thank you,

Adam Steen
Director

Iowa Department of Administrative Services
[1305 E. Walnut Street, Des Moines, IA 50319](#)
515-720-6176 mobile
adam.steen@iowa.gov
<https://das.iowa.gov>



Jordanne Beach <jordannebeach@gmail.com>
To: Steen, Adam <adam.steen@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org

Tue, Dec 10, 2024 at 6:30 PM

Good evening, Adam -

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.

Best regards,
Jordanne
[Quoted text hidden]

Exhibit O- Copy of Gmail Chain 3- Time Sensitive re 12.14.2024 Event Request Denial



***Time-sensitive* Re: 12/14 Event Request - Denial**

4 messages

Jordanne Beach <jordannebeach@gmail.com>

Wed, Dec 11, 2024 at 12:48 PM

To: Steen, Adam <adam.steen@iowa.gov>, Capitol Complex, Events <capitol.complex.events@iowa.gov>

Cc: mortimer.adramelech@thesatanictemple.org

Good afternoon, Adam -

I'm reaching back out regarding my questions, and the feedback I requested as this is time-sensitive.

I'd be happy to work with the Capitol Events office and Iowa DAS to review the specific items that were considered in the denial decision, and make changes where applicable.

I have worked with the Capitol Events office in the past to successfully hold an event in compliance with policy, and confident we can do so again.

Please let me know if you would prefer to schedule a call.

Best regards,

Jordanne

- 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?

On Tue, Dec 10, 2024, 6:30 PM Jordanne Beach <jordannebeach@gmail.com> wrote:

Good evening, Adam -

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.

Best regards,
Jordanne

On Tue, Dec 10, 2024, 6:02 PM Steen, Adam <adam.steen@iowa.gov> wrote:

Good Evening,

Thank you for your patience and your responses to questions regarding your event request for December 14th in the Capitol Rotunda.

The request for space in the Capitol Rotunda is not approved per [Administrative Rule 100.4\(5\)](#) & pursuant Department of Administrative Services [Memorandum of Understanding](#), specifically section 5.15, as listed below:

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.

Thank you,

Adam Steen

Director

Iowa Department of Administrative Services

1305 E. Walnut Street, Des Moines, IA 50319

515-720-6176 mobile

adam.steen@iowa.gov

<https://das.iowa.gov>



Steen, Adam <adam.steen@iowa.gov>
To: Jordanne Beach <jordannebeach@gmail.com>

Wed, Dec 11, 2024 at 3:40 PM

Good afternoon Jordanne,

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.

Thank you,

Adam

Adam Steen

Director

Iowa Department of Administrative Services

1305 E. Walnut Street, Des Moines, IA 50319

515-720-6176 mobile

adam.steen@iowa.gov

<https://das.iowa.gov>



[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>
To: Steen, Adam <adam.steen@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org, Capitol Complex, Events <capitol.complex.events@iowa.gov>

Wed, Dec 11, 2024 at 3:56 PM

Thank you for your response, Adam.

Regarding MOU section 5.15, our event does not depict or describe genitals, sex acts, masturbation, excretory functions, or sadomasochistic abuse.

The sticks are a traditional costume component and for appearance only. They were never intended to be used on anyone, and we never stated that they would be.

If that was the only item in question, then the costume contest can be omitted from the itinerary. I respectfully request that we be allowed to resubmit our application as such.

Best regards,

Jordanne
[Quoted text hidden]

Jordanne Beach <jordannebeach@gmail.com>

Thu, Dec 12, 2024 at 7:40 PM

To: Steen, Adam <adam.steen@iowa.gov>
Cc: mortimer.adramelech@thesatanictemple.org, Capitol Complex, Events <capitol.complex.events@iowa.gov>

Good evening, Adam -

I'm writing to follow-up on our proposal to proceed with the event without the Krampus costume contest, since that was the specific item you pointed out.

I would also like to reiterate that none of the items in MOU 5.15 are included in our event. We fully intend for it to be family-friendly, and planned accordingly.

I believe this to be the most mutually beneficial and mutually respectful way forward, and look forward to our future collaboration.

Best regards,

Jordanne
[Quoted text hidden]

Exhibit P- IGOV Open Records



Exhibit Q- 12.16.24 Demand Letter & Preservation Notice

Matt Kezhaya
150 S. Fifth St., Suite 1850
Minneapolis, MN 55402



matt@kezhaya.law
Direct: (479) 431-6112
General: (612) 276-2216

December 16, 2024

Iowa Department of Administrative Services
ATTN: Mr. Adam Steen, Director
By email only to: adam.steen@iowa.gov

Re: *The Satanic Temple, Inc. v. Steen* – demand letter, preservation notice

Dear Mr. Steen:

I serve as general counsel for The Satanic Temple, an international religious movement with a congregation in Iowa. This letter arises from a potential legal dispute in which you prohibited my client's holiday event from equal access to State facilities on equal terms as other religious events.¹ I am hopeful that this letter will persuade you to reconsider your decision and reschedule the event for this upcoming Saturday, or otherwise work with me to facilitate my client's free expression and avoid potential litigation.

The event in question had the following itinerary:

8:00 am – Setup

9:00am - 10:00am – Satanic Holiday Carols (*I'll Be Your Mirror* by The Velvet Underground & Nico; *Waiting for the Night* by Depeche Mode, and *Lucifer's the Light of the World* by King Dude)

10:00am - 12:00pm – Make & Take Ornaments, and Social Time (Ornaments to be constructed from clear plastic globes and items that can be placed in or on them).

12:00pm - 1:00pm – All Ages Krampus Costume Contest (1st, 2nd, 3rd Place prizes - The winners will be determined by audience votes).

1:30pm - 2:30pm – Ritual (Ritual participants will form a procession to the display. One will carry a veiled infinity candle, *i.e.*, a flameless LED candle. The ritual leader will give an invocation celebrating both the light and the night. The infinity candle is unveiled. The ritual is concluded).

3:00/3:30pm - 4:00pm – Teardown and Cleanup

By email dated December 3 (one week before denial), your office requested specification of:

¹ At least one other religious event took place inside the Iowa State Capitol on December 14, 2024.

what particular songs would be sung during the Satanic Holiday Carols segment, images of the ornaments to be created, images of the coloring pages to be colored, images of anticipated costumes, details about the costume contest, and a detailed description of the ritual. This inspection means your determination was “content-based,” which is subject to the strictest judicial scrutiny. *See Reed v. Town of Gilbert, Ariz.*, 576 U.S. 155, 163 (2015) (“Content-based laws—those that target speech based on its communicative content—are presumptively unconstitutional and may be justified only if the government proves that they are narrowly tailored to serve compelling state interests.”)

Additionally, your denial plainly provides that your determination was content-based. Your email dated December 11 states that the denial was grounded in, “the presence of minors, coupled with the anticipation of costumes with sticks used as weapons on children” which prompted you to believe that the event would be “harmful to minors.” There are two problems with your decision.

First, the costume event would not have entailed hitting children. The photograph you referenced is copied below:



No part of any application material suggested that children would be hit. Nor does the photograph you referenced depict children being hit. You simply concocted a false narrative about the contents of my client’s speech and then used your lie as a basis to deny the application. Moreover, my client corrected your misunderstanding by informing you that “The sticks are a traditional costume component and *for appearance only*,” expounding that “They were never intended to be used on anyone, and *we never stated that they would be*.”

(emphasis added). Yet your determination remained unchanged. And your determination remained unchanged, even after my client struck the costume contest as part of the event. Because the denial was based on your own false narrative, a narrative which you refused to depart from even after confronted with contrary evidence, it is my opinion that your stated basis is a transparent pretext to conceal viewpoint discrimination. See *Cuffley v. Mickes*, 208 F.3d 702, 711 (8th Cir. 2000) (“obviously unreasonable and pretextual” grounds to deny an application as viewpoint discrimination).

Second, the “harmful to minors” doctrine only prohibits sexually explicit material and does not allow the State to prohibit dissemination of violent material. No part of the event was sexual, and even if the denial was based on the impliedly violent nature of a Krampus holding a stick that would still violate the First Amendment. *Brown v. Ent. Merchants Ass’n*, 564 U.S. 786, 793 (2011) (“violence is not part of the obscenity that the Constitution permits to be regulated.”)

Based on the foregoing, it is my opinion that your decision to prohibit my client’s event was a direct violation of my client’s well-established First Amendment rights. Although litigation is immediately permissible, it is my strong preference to avoid court action. You can help facilitate that end by either approving the event to take place this Saturday, December 21 or by reaching out to me to figure out an appropriate alternative time for the holiday event.

The foregoing is based on my present understanding of the facts. Should it become necessary in future proceedings, my client reserves the right to assert additional or different facts or law as may become relevant. Nothing in this letter waives any claim for relief which may arise at law or in equity.

Please preserve all documents and communications pertaining to this issue as litigation appears to be on the horizon.

Sincerely,

s/Matt Kezhaya

Exhibit R- Steen Article

EXHIBIT R

RECEIVED BY IOCR 08/22/2025

PART OF STATES NEWSROOM



GOVERNMENT + POLITICS

Former Iowa administrator Adam Steen announces GOP campaign for governor

BY: ROBIN OPSAHL - AUGUST 19, 2025 8:56 PM



Adam Steen, former Iowa director of Administrative Services, was joined by his sons, Maverick and Ryker and his wife Kasey Steen, as announced he was running for governor Aug. 19, 2025 at Berean Church in Pleasant Hill. (Photo by Robin Opsahl/Iowa Capital Dispatch)

Republican Adam Steen, former director of the Iowa Department of Administrative Services, announced his campaign for governor Tuesday, labeling himself as a “faith guy” in the race to succeed Gov. Kim Reynolds.

Steen held a campaign kickoff event Tuesday at Berean Church in Pleasant Hill, starting with a musical performance from Nathan Thomas and the A17 worship band and an introduction from Pastor Gary Pilcher. As he introduced himself, Steen said there had been some speculation online about what type of candidate he would be.

“Let me tell you, from my own lips, who I am: I am the faith guy,” Steen said. “I’m a Jesus guy. I’m a Make America Great Again guy. I’m a common-sense policy, America first, people first guy.”

In addition to being a credentialed minister, Steen said some of his highest profile commitments to faith were as DAS director. The department had canceled a Satanic Temple of Iowa holiday celebration event at the Iowa Capitol in [December 2024](#), with Steen saying the event was denied because it included “elements that are harmful to minors.”

Steen said at the campaign event he was “the guy that stood in front of the Satanists when they blatantly targeted our children, and I’m the guy getting sued by the Satanists for protecting our children.”

He also said there was another event request at the Capitol he denied, for an all-ages, family-friendly drag show. He said this planned event was not as well known, but that he believed it was the right thing to do despite being at risk of getting sued.

Steen, appointed in 2021 to serve as DAS director in Reynolds’ administration, said he led some of the major policies changing state government, like the government agency restructuring [signed into law in 2023](#). Speaking with reporters, Steen said he had discussed running for the seat with Reynolds and came to a “mutual agreement” that he would resign from his position if he ran for the office.

“Today, at 10 a.m., I walked into the governor’s office and I submitted my resignation,” Steen told the crowd. “Today I walked away from a job that I loved. I walked away from a job that I loved, so I could join the fight and defend the state that I love.”

Before leading DAS, Steen [was the director of business development](#) at Syverson Strege, a financial services firm, and had previously owned a management consulting firm called 25 Connections. He also was a minor league baseball relief pitcher in 2002, playing for the Philadelphia Phillies and Batavia Muckdogs.

Steen highlighted his commitment to protecting private property rights, but did not go into detail on his views about the use of eminent domain for carbon capture pipeline projects — the subject of a contentious bill that was [vetoed by Reynolds this session](#).

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"I was working with her at this time, and I support everything that Governor Reynolds is doing," Steen said. When asked about his views on the use of eminent domain in these projects, he said "I'm a pro-property rights, pro-private ownership person."

Steen is the latest Republican to join the field of GOP candidates seeking to take the mantle from Reynolds [after she announced she would not run](#) for reelection in 2026. [U.S. Rep. Randy Feenstra](#) and [state Sen. Mike Boussetor, R-Ankeny](#), currently have "exploratory" committees for governor, while [Rep. Eddie Andrews, R-Johnston](#), and former state legislator Brad Sherman have announced campaigns.

[Iowa Auditor Rob Sand](#) is considered the current frontrunner to become the Democratic gubernatorial candidate. [Former political operative Julie Stauch](#) and [Democrat Paul Dahl](#) are also running to become the party nominee.



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ROBIN OPSAHL  

Robin Opsahl is an Iowa Capital Dispatch reporter covering the state Legislature and politics. They have experience covering government, elections and more at media organizations including Roll Call, the Sacramento Bee and the Wausau Daily Herald.

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BY ROBIN OPSAHL

August 19, 2025



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BY ROBIN OPSAHL

August 15, 2025

COMMUNITY JOURNALISM FOR DEMOCRACY

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Exhibit S- Steen Article 2

EXHIBIT S



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FEATURED

Gubernatorial candidate Adam Steen makes campaign stop in Fort Madison

Brad Vidmar bvidmar@thehawkeye.com
Oct 21, 2025



1 of 4
< >

Republican gubernatorial candidate Adam Steen talks during a campaign stop at Sub Arena Sandwich Shop in Fort Madison on Friday, Oct. 17, 2025.
Brad Vidmar/Mississippi Valley Publishing

Adam Steen wants to be Iowa’s next Republican governor, and he made a stop in Fort Madison to make his case late last week.

Steen made a campaign stop at the Sub Arena Sandwich Shop in Fort Madison on Friday night.

Over a dozen people were in attendance, and Steen took the opportunity to talk about his background and where he stands on some of the more prominent issues impacting Iowans today, and later took the time to answer questions and speak one-on-one with some attendees.

But Steen also used the opportunity to make his case as to why he thinks he is uniquely suited to be the next leader of the State of Iowa.

“I know all the (state) departments, I know all the players, I know where all the efficiencies can be gained, where more efficiencies can be gained,” Steen told the crowd.

“So on Day One, I can operate this state. I’m custom fit to assume that role right out of the gate.”

Steen grew up in Indianola, earned a college baseball scholarship, was drafted by the Philadelphia Phillies, and played a few years in the minor leagues as a relief pitcher before his baseball career came to an end.

Steen eventually launched a turkey decoy company, called The Turkey Fan, with a friend, and later owned the management consulting firm 25 Connections and served as director of business development for the financial service firm Syverson Strege.

But in 2021, Steen was appointed by Governor Kim Reynolds as director of Iowa's Department of Administrative Services (or DAS; which is generally responsible for the state's human resources, general services, central procurement, and state accounting duties) a position Steen held until resigning in August to begin his campaign to replace Reynolds after her term ends in January 2027.

After speaking about his life and background, family, and Christian faith, Steen gave attendees some insight into some of his accomplishments and controversial moves he made while serving in the DAS.

"It's a very challenging job," Steen said. "There are 350 people in my department, and we oversee 20,000 employees organizationally.

"So, the problems of the (State of Iowa), the worst ones all flowed up to my desk. And every morning at about 8 a.m., people would come in (my office), the files would come in, and we had to solve problems on a regular basis to make sure that your tax dollars were stewarded wisely."

Among some of the more controversial decisions Steen made while running the DAS, in December 2024, Steen ordered the cancellation of a holiday celebration by the Satanic Temple of Iowa at the State Capitol, as well as the cancellation of an all-ages, family-friendly drag show that was also supposed to take place.

"I was the guy at the Capitol when the Baphomet Satanic statue was in there," Steen said.

"I had several conversations with several people that led us to, ultimately, not fight the 'free speech' aspect of (that display).

"But I'm also the guy that changed the policy to make sure that we weren't going to lose a 'free speech' argument, and I'm now being sued by the Satanists for that."

Steen later told Mississippi Valley Publishing that he believed the presence of the Satanic statue and the drag show could have been harmful for children to see, and that those determinations persuaded him to cancel both events.

Steen promised to be a champion for skilled trades across the state.

"There are jobs that are open all over the place," Steen said.

"We need to get vocational studies back into 7th and 8th grade and make those (jobs) cool again. Because these kids can get jobs right out of high school and on-the-job training (and could be) making \$55,000-\$65,000 a year.

"The 'American Dream' is achievable if we look at it from that lens. It's not achievable when we force kids into four-year universities and they leave with hundreds of thousands of dollars of student loan debt and then they end up getting their job replaced by (artificial intelligence programs)."

Steen also said he believes community colleges could be used to help provide more training and opportunities for those seeking careers in skilled trades and that a focus on skilled trades could help increase economic growth throughout the state.

Steen, also said he would champion the work of local churches.

"We need local churches to step up and do what local churches are supposed to do," Steen said.

"The government has infiltrated our communities. It's infiltrated our lives.

"The sole purpose of government is two things: it's to punish evil and condone good. It's not to raise our kids. It's not to help the homeless. It's not working with mental health (issues). The government has infiltrated every single area of our life, and we have to remove government and give the power back to the people.

"And that has to come from local churches. We got to get churches to rise up, speak Biblical truth, talk about challenges like real human beings, and not being afraid to say what needs to be said.

"We have sat back for too long and allowed the government to come in and take over for what it is that we are supposed to be doing as people."

Steen later clarified that he believes local churches should step up and work to take care of mental health and homelessness issues across the state by donating to non-profits with experts in those fields as opposed to government agencies Steen believes would be less successful in those missions.

When shifting to policy issues, Steen said having a governor willing and able to work with their legislature is crucial and that he has experience working with both Republicans and Democrats.

Steen said he opposes eminent domain laws and wants to help property owners protect their rights and ability to resist unwanted intrusion and use of their land by entities against their wishes.

Steen said he is also in favor of property tax reform.

“There are some bills that are being introduced this legislative session that we hope moves the needle on property tax reform,” Steen said.

“We need lower property taxes. We need different formulas in there. But I will say this, through and through, for the property tax issue: we need to elect good people onto school boards, in county supervisor seats, and in city council seats.

“Those three areas account for, if not 100% of your property taxes spent, darn near 100% of your property taxes spent. So if you don’t elect the right people in those down-ballot positions, we’re starting from behind.”

Steen also shared his views on education.

“I am very much a pro school choice advocate,” he said. “I believe parents need to be raising their kids; parents need to be working with their kids.

“And I also believe that teachers need to be allowed to teach. Not (teaching) some sort of curriculum coming in and forcing you into a box and forcing teachers not to use their gifts and talents to teach their students how they need to be taught.”

Steen later told Mississippi Valley Publishing that, while he is aware of concerns some in the state have about reforms to the state’s area education agencies (AEAs) and the state’s private school vouchers program, he believes the AEAs could have been spending less of their money on administrative costs and positions and that the free market will likely dissuade private schools from enacting excessive tuition hikes that could leave students with less money from the state to use towards a private school education.

Steen noted that his two sons attend public schools themselves, but said he believes the competition from private schools will lead to better public schools.

Speaking on the topic of water and soil quality, Steen said he has been speaking with a group of individuals he calls “trusted advisers that have a detailed perspective into what’s going on in our soils and what’s leaking into our water system right now.”

“And I’ll tell you right now: I’m not putting that on the backs of our farmers,” Steen said.

“There are toxins in our soils that aren’t from farmers. There’s toxins from a lot of different things. And we need to figure that out, get that solved, and move that forward.”

Steen noted that his father passed away three years ago from kidney cancer, that his illness was not believed to have been passed down from previous generations, and that his mother is a recent breast cancer survivor.

“There is something going on (with cancer rates in Iowa),” Steen said. “We need to solve it for the future of our children.”

Steen said one possible solution to the question of potentially cancerous farm runoff that he has been made aware would be the implementation of 60-80 foot buffer strips between farmland and water sources.

“(Those buffer strips) will filter out 90% of the chemicals that are going into that water,” Steen said.

“That’s oversimplifying a solution to the problem, but buffer strips is a potential solution to that problem right out of the gate. We just need to be having the right conversations to make sure that we’re getting some sort of better result.”

When asked about the state’s law banning abortions six weeks after conception, Steen said the law was the step in the right direction but that he would be in favor of further restrictions.

“I’m a life-at-conception-guy through and through,” Steen said. “The ‘Heartbeat Bill’ /six-week-ban was wonderful, but we’re not going far enough.

"I would be an advocate for pushing that forward so that we could protect life at conception with no exceptions."

Steen also said he was a supporter of President Donald Trump and his agenda on the federal level, and later told Mississippi Valley Publishing that he supports the Trump Administration's continued efforts to deport migrants living in this country without legal citizenship status.

Steen also told Mississippi Valley Publishing that, while he is in favor of medical marijuana in Iowa, he is not in favor of legal recreational marijuana and that he would support efforts to ban cannabis products that are currently being legally sold and consumed in Iowa, including Delta-8.

And when speaking about the legacy of Governor Reynolds as her time leading the state draws closer to its end, Steen said he plans to honor Reynolds' legacy while still carving out his own path if elected as Iowa's next governor.

"I was very open when I announced I was running for governor that I would honor the legacy of Kim Reynolds," Steen told Mississippi Valley Publishing.

"But I am my own person, I've got my own ideas, I've got things that I want to take that she has established and move it forward in a (bigger way).

"So, we'll honor her legacy through and through. I think she has been an unbelievable champion for many conservative issues and conservative values.

"And to honor that, to hold that, and to take that to the next level is my goal."

bvidmar

**Additional Info Received
12.23.2025**

Complainant Email



McCann, Tiffany <tiffany.mccann@iowa.gov>

Fwd: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063

1 message

Smith, Kaitlin <kaitlin.smith@iowa.gov>
To: Tiffany McCann <tiffany.mccann@iowa.gov>

Tue, Dec 23, 2025 at 11:51 AM

Can you have these date-stamped and added to the files?

Thanks!

----- Forwarded message -----

From: **Shefali Aurora** <shefali.aurora@aclu-ia.org>

Date: Tue, Dec 23, 2025 at 11:50 AM

Subject: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063

To: Smith, Kaitlin <kaitlin.smith@iowa.gov>, Ubaldo, Ramona <ramona.ubaldo2@iowa.gov>

Cc: Rita Bettis <rita.bettis@aclu-ia.org>, Matt Kezhaya <matt@kezhaya.law>, Maria Bottino <maria.bottino@aclu-ia.org>

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Good afternoon,

Please see the attached Exhibit T. Based on new developments, we would like to include Exhibit T as an additional exhibit to supplement our Complaint in both Case Number: 07-25-84064 MORTIMER ADRAEMELECH VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL, and Case Number: 07-25-84063 THE SATANIC TEMPLE, INC VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL.

Please let me know if you need anything further.

Thank you!

Shefali Aurora Magner

Staff Attorney

Pronouns: she/her/hers

ACLU of Iowa

505 Fifth Avenue, Ste. 808

Des Moines, IA 50309-2317

www.aclu-ia.org



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Exhibit T- Cases 07-25-84064 and 07-25-84063.pdf
214 KB

[Click to Download](#)

Exhibit T Cases 07-25-84064 and 07-25-84063.mov
33.3 MB

--

Kaitlin Smith, J.D.

Regulatory Compliance & Administrative Process Manager

Iowa Office of Civil Rights

6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270

515-281-0333 office

515-281-4121 main line

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PastedGraphic-1.tiff
37K

Exhibit T Notice of Supplemental Authority

EXHIBIT T

Before the Iowa Office of Civil Rights

Complainants, Mortimer Adramelech and The Satanic Temple, Inc. v. Respondent, Iowa Department of Administrative Services, Adam Steen, and the Office of the Governor of the State of Iowa	CP#s: #07-25-84063 <i>and</i> #07-25-84064 Notice of Supplemental Exhibit
--	---

Complainants (Mortimer Adramalech and The Satanic Temple of Iowa) submit the following, along with the attached video of Adam Steen and linked articles as important additional evidence that speaks directly to the pretextual nature of the claim that their application was denied because the Respondents believed that the costume contest violated the Memorandum of Understanding.

Complainants reiterate that even without this additional evidence, the belief that the costume contest would involve violence to children itself was based on discriminatory stereotypes, which were completely unfounded and untrue. The record shows Complainants made it clear to the Respondents that the costume contest would involve or depict absolutely no harm to children in any way, and nevertheless even offered to remove the costume contest altogether to take the issue off the table. Yet, the Respondents still denied the Complainants' application.

A video recorded of a press conference held at the Iowa Capitol regarding Complainants is also attached. The following is a quotation excerpt from Adam Steen's comments:

"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."

This quote makes clear that Steen's objection was to Complainants' religion itself, as well as Complainants' expression and exercise of that religion through a family-friendly religious ceremony and gathering, involving ornament making, a ritual procession, craft activities, and costume contest. He characterized these religious expressions as "marketing to children", "trying to get them to create Satanic symbols, sing Satanic hymns, partake in Satanic rituals." His comments regarding the costume contest specifically state that his objection was not a fear of actual violence against children, but the mere involvement of children in their family's religious gathering through participation in the costume contest. Finally, Steen's comment that he objected to "defending weapons, used to abuse youth" is clearly referencing his objection to the inclusion of the Krampus figure itself, as a concept, and not any actual belief that the costume contest would involve abuse of children.

Steen's comments were reported by the following outlets:

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?
utm_medium
=email](https://rleonard.substack.com/p/who-is-the-greater-threat-to-children?utm_medium=email)

Respectfully submitted,

/s/ Shefali Aurora
Shefali Aurora, AT00012874

/s/ Rita Bettis Austen
Rita Bettis Austen, AT0011558

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

**Additional Info
Received 5.15.2026**

Complainant Email



McCann, Tiffany <tiffany.mccann@iowa.gov>

Fwd: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063

1 message

Smith, Kaitlin <kaitlin.smith@iowa.gov>
To: Tiffany McCann <tiffany.mccann@iowa.gov>

Fri, May 15, 2026 at 3:03 PM

Can you get these added?

----- Forwarded message -----

From: **Shefali Aurora Magnier** <shefali.aurora@aclu-ia.org>
Date: Fri, May 15, 2026 at 2:42 PM
Subject: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063
To: Smith, Kaitlin <kaitlin.smith@iowa.gov>
Cc: Rita Bettis Austen <rita.bettis@aclu-ia.org>, Matt Kezhaya <matt@kezhaya.law>, Maria Bottino <maria.bottino@aclu-ia.org>

Good afternoon Kaitlin,

Please see the attached Exhibits U and V. Based on new developments, we would like to include Exhibit U and V as an additional exhibit to supplement our Complaint in both Case Number: 07-25-84064 MORTIMER ADRAEMELECH VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL, and Case Number: 07-25-84063 THE SATANIC TEMPLE, INC VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL.

We would also like to cross-file these with our complaint in cases CP 85468 and CP 85526.

Please let me know if you need anything further.

Thank you!



Exhibit U- Steen Good v. Evil Ad.mov



Exhibit V Steen Ad KCCI Article.pdf



TST Supplemental Exhibits.pdf

--

Shefali Aurora

Senior Staff Attorney

Pronouns: she/her/hers
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www.aclu-ia.org

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Kaitlin Smith, J.D.

Regulatory Compliance & Administrative Process Manager

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515-281-4121 main line

kaitlin.smith@iowa.gov | <https://icrc.iowa.gov>



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Exhibits U & V Notice of Supplemental Authority

Before the Iowa Office of Civil Rights

Complainants, Mortimer Adramelech and The Satanic Temple, Inc. v. Respondent, Iowa Department of Administrative Services, Adam Steen, and the Office of the Governor of the State of Iowa	CP#s: #07-25-84063 <i>and</i> #07-25-84064 Notice of Supplemental Authority
--	---

Complainants (Mortimer Adramalech and The Satanic Temple of Iowa) submit the following attached article and video of Adam Steen as important additional evidence that speaks directly to the pretextual nature of the claim that their application was denied.

A recent advertisement (video attached as Exhibit U) by Steen’s campaign specifically targets The Satanic Temple. It is captioned: “The next Governor of Iowa has a duty to protect and preserve the great state of Iowa by focusing on the values the state is rooted in—faith, family, and freedom.”

KCCI reported on Steen’s advertisement (article attached as Exhibit V):

“In the new ad, Steen leans heavily into cultural and religious themes that have been central to his campaign message. “I’m a Christian conservative,” Steen says in the spot. “I’ll defend life. I’ll protect your kids against radical woke ideology. I’ll keep the satanists out of the Capitol because our Iowa values are under attack, and we don’t keep them without a fight.””

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-state-wide-ad-buy-as-primary-nears/71112989>

Respectfully submitted,

/s/ Shefali Aurora

Shefali Aurora, AT00012874

/s/ Rita Bettis Austen

Rita Bettis Austen, AT0011558

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Email: Shefali.Aurora@aclu-ia.org

Email: Rita.Bettis@aclu-ia.org

Exhibit V- Steen Ad KCCI Article

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Advertisement

Iowa governor candidate Adam Steen rolls out statewide ad buy as primary nears

Adam Steen launches \$250,000 ad buy as Iowa GOP governor primary enters final stretch

×

Amanda Rooker  

Chief Political Reporter

Former state administrator Adam Steen is launching a major new advertising push in Iowa's Republican race for governor, becoming the latest candidate to escalate efforts in the final stretch before the June primary.

Video above: Adam Steen pitches business background and conservative views in run for Iowa governor



Steen's campaign announced Thursday it is launching the first phase of a quarter-of-a-million-dollar media buy, with a new ad set to air statewide on local news stations, Fox News and digital platforms.

The move comes at a key moment in the Republican primary. Steen is scheduled to participate in an Iowa PBS debate on April 28 alongside fellow GOP candidates Brad Sherman and Eddie Andrews. The Iowa PBS release about the debate did not list U.S. Rep. Randy Feenstra or businessman Zach Lahn as participants.

With multiple Republicans competing for the nomination, television and digital advertising can be one of the fastest ways for lesser-known candidates to boost name recognition and sharpen contrasts with rivals before voting begins.



Adam Steen pitches business background and conservative views in run for Iowa governor

In the [new ad](#), Steen leans heavily into cultural and religious themes that have been central to his campaign message.

"I'm a Christian conservative," Steen says in the spot. "I'll defend life. I'll protect your kids against radical woke ideology. I'll keep the satanists out of the Capitol because our Iowa values are under attack, and we don't keep them without a fight."

He also calls the campaign "a battle of good versus evil" and says the race is about making sure the next generation lives "safer, freer and more prosperous than a generation before."

Steen has frequently pointed to his time leading Iowa's Department of Administrative Services under Gov. Kim Reynolds, including decisions he made to deny requests by The Satanic Temple ✕

The group sued after state officials denied a request for a one-day winter celebration in 2024. Steen has referenced that dispute on the campaign trail, saying it shows he will fight to protect children and Iowa values.

Steen entered the governor's race in August 2025 after resigning from Reynolds' administration. Since then, he has positioned himself as a socially conservative candidate focused on faith, education and culture war issues.

The Republican field also includes **Feenstra**, **Lahn**, **Sherman** and **Andrews**. Feenstra, a sitting congressman with statewide connections and fundraising strength, is widely viewed as a top contender in the race.

Recent campaign finance moves and advertising buys have intensified competition in the closing weeks of the primary, with several candidates working to break through in a crowded field.

The winner of the June 2 Republican primary will advance to the general election, where Democratic State Auditor Rob Sand is running unopposed for his party's nomination.



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**Additional Info
Received 07.02.2026**

Complainant Email

Subject: Fwd: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063
From: "Smith, Kaitlin" <kaitlin.smith@iowa.gov>
To: ICRC Iowa Civil Rights Commission <icrc@iowa.gov>
Date Sent: Thursday, July 2, 2026 2:09:25 PM GMT-05:00
Date Received: Thursday, July 2, 2026 2:10:07 PM GMT-05:00
Attachments: TST Supplemental Exhibits W and X.pdf, Exhibit X- May 2026 Gazzette Article.pdf

To be filed.

----- Forwarded message -----

From: **Shefali Aurora Magner** <shefali.aurora@aclu-ia.org>
Date: Thu, Jul 2, 2026 at 1:52 PM
Subject: Supplemental Exhibit for Cases 07-25-84064 and 07-25-84063
To: Smith, Kaitlin <Kaitlin.smith@iowa.gov>, Rita Bettis Austen <rita.bettis@aclu-ia.org>, Matt Kezhaya <matt@kezhaya.law>, Maria Bottino <maria.bottino@aclu-ia.org>

Good afternoon Kaitlin,

Please see the attached Exhibits W and X. Based on new developments, we would like to include Exhibits W and X as additional exhibits to supplement our Complaint in both Case Number: 07-25-84064 MORTIMER ADRAMELECH VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL, and Case Number: 07-25-84063 THE SATANIC TEMPLE, INC VS. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES ET AL.

We would also like to cross-file these with our complaint in cases CP 85468, CP 85526, CP 85818, and CP 85819.

Please let me know if you need anything further.

Thank you!

Shefali Aurora Magner

Senior Staff Attorney

Pronouns: she/her/hers
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 Exhibit W.mov

--
Kaitlin Smith, J.D.
Regulatory Compliance & Administrative Process Manager
Iowa Office of Civil Rights
6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270
515-281-0333 office
515-281-4121 main line

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Exhibits W & X Notice of Supplemental Authority

Before the Iowa Office of Civil Rights

Complainants, Mortimer Adramelech and The Satanic Temple, Inc. v. Respondent, Iowa Department of Administrative Services, Adam Steen, and the Office of the Governor of the State of Iowa	CP#s: #07-25-84063 <i>and</i> #07-25-84064 Notice of Supplemental Authority
--	--

Complainants (Mortimer Adramalech and The Satanic Temple of Iowa) submit the following attached article and video of Adam Steen as important additional direct evidence that speaks directly to the motivations and views of Respondents regarding the religion of Complainants, their perceptions of the religion of Complainants, and the pretextual nature of the claim that their application was denied, retaliatory basis for changing the policy governing events and displays, and parties involved in the decision-making.

At a recent campaign event on May 25th, 2026 (video attached as Exhibit W), Steen specifically discussed The Satanic Temple's application. It is captioned: "Adam Steen talks about addressing request for displays at the Iowa Capitol in past role." Steen states in the video:

"You don't even have to stand near...your display. And I'm like, well, that's a very terrible policy. It leaves us exposed to a lot of different things. And sure enough, the Satanic Temple shows up and they reserve space at the capital for the Baphomet statue. It's the...devil goat thing. And I called the attorney general's office. I called the governor's office. I called the leadership of the House and the Senate. We met in a boardroom and I said, 'Here we go.' Because we didn't get that policy change. We're now exposed...And so I said, 'Here's the deal, guys. I am willing to deny this. I'm willing to deny it, but we're going to...lose because we have a terrible policy in place.' I said, 'Or I can grin and bear it and we can let this thing be displayed for two weeks, but we're changing the policy'...We changed the policy. I took policy from Florida. I took policy from Texas. We put it into one. I gave the DAS director, who I was at the

time, discretion to determine if something was harmful to minors or obscene material. I gave myself the ability to do that. We actually had a tight policy. And you know what happened? The next thing that was requested was an all ages family-friendly drag show. I denied that per the policy. Didn't get sued for that. The...Satanic Temple shows up. They requested a 3-day reading of Paradise Lost. I had taken the policy and crammed it down to a one-day display. So, you couldn't display anything for 14 days anymore. It had to be one day. So, they came back— 3-day reading of Paradise Lost. Nope.”

The Gazette, *Adam Steen talks about addressing request for displays at the Iowa Capitol in past role*, Youtube (May 26, 2026),
https://www.youtube.com/watch?v=CH_zjlcF-6A

The Gazette reported on the video from Steen’s event (article attached as Exhibit X).

Erin Murphy, *Steen expects low turnout, targets late-deciding Iowa voters*, The Gazette (May 26, 2026),
https://www.thegazette.com/news/elections/state/steen-expects-low-turnout-targets-late-deciding-iowa-voters/article_996e1b37-271d-4ec9-935b-64c483d5024e.html

Respectfully submitted,

/s/ Shefali Aurora
Shefali Aurora, AT00012874

/s/ Rita Bettis Austen
Rita Bettis Austen, AT0011558

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Email: Rita.Bettis@aclu-ia.org

Exhibit X- Steen Gazette Article

https://www.thegazette.com/news/elections/state/steen-expects-low-turnout-targets-late-deciding-iowa-voters/article_996e1b37-271d-4ec9-935b-64c483d5024e.html

✓ Why you can trust The Gazette

Steen expects low turnout, targets late-deciding Iowa voters

Steen is 1 of 5 Republicans running for Iowa governor in the June 2 primary election

Erin Murphy
Gazette Des Moines Bureau
May 26, 2026

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Adam Steen, a Republican candidate for governor, speaks during a campaign event Monday at Whiskey River in Ankeny.

Erin Murphy/The Gazette

ANKENY — Adam Steen senses apathy in Iowa voters that could lead to low turnout in next Tuesday's primary election.

That makes the scramble for likely but still undecided voters all the more important, Steen, one of five Republican candidates for Iowa governor, said Monday night after a campaign event at an events space here.

"There is a ton of apathy out there, a scary amount of apathy. Now why is that? I don't know," Steen told reporters after Monday night's event. "There's a ton of apathy. I think we'll probably see it in the voter turnout in the primary, and then job No. 1 is to get more enthusiasm and excitement out there in the general (election)."

Steen, a former state agency director from Runnells, addressed roughly 50 people for roughly two hours Monday night as part of his blitz of events leading to Tuesday's primary election. Monday night's was one of 37 events his campaign has scheduled throughout the state over these final two weeks, including Election Day.

Also seeking Iowa Republicans' nomination for governor are U.S. Rep. Randy Feenstra, of Hull; business owner Zach Lahn, of Belle Plaine; pastor Brad Sherman, of Williamsburg; and state legislator Eddie Andrews, of Johnston.

Republican Iowa Gov. Kim Reynolds, who has held the office since 2017, is not seeking re-election. Rob Sand, the Iowa state auditor from Decorah, is the lone Democratic candidate for governor.

While there has been no independent, public polling on Iowa's Republican gubernatorial primary campaign, multiple campaigns have told The Gazette they believe there remains a large percentage of undecided voters just days before the election. Steen said Monday his barnstorming tour and TV ads were designed to capture as many of those undecided voters as possible.

"We assume that Iowa is sort of a late-break voting base, and that's why this last week we're hitting the airwaves with TV ads. Because we've got them all cut; we want to get as many out there as possible," Steen said. "But we did also spend a very large amount of time on the grassroots infrastructure ground game. I mean, you drive around the state, there's Adam Steen signs everywhere. It's the hard work we put in."



Iowa Republican gubernatorial candidate Adam Steen speaks Monday during a campaign event in Ankeny.
Erin Murphy/The Gazette

During his remarks and Q&A with Monday night's crowd, Steen touched on his familiar campaign themes of touting his experience in business and as a state agency leader, and the central role his faith plays in his life. He had pointed criticisms for Feenstra, the perceived front-runner in the Republican primary, and Sand, who will face the GOP primary winner in this fall's general election.

Steen told the gathering that he believed he and his campaign had done everything in their power to be competitive when the votes are tallied next week.

"We've worked incredibly hard over the last nine and a half months. But we've got eight days left, and I can stand here right now, and I can say with absolute confidence that I am at absolute peace with everything that we've done," Steen said. "I can tell you right now that I go home every night and I lay my head down

knowing I've kept my integrity, I didn't bend my morals, I didn't compromise my values, and I'm at absolute peace that we've done everything we've known how to do.

"We got eight days left, and we're leaving it all on the field. That's how I roll."



Iowa Republican gubernatorial candidate Adam Steen talks about how as former Iowa Department of Administrative Services Director he addressed requests for displays at the Iowa Capitol by the Satanic Temple during an event on May 25, 2026 in Ankeny, Iowa.

Erin Murphy
The Gazette

Erin Murphy covers state government and politics for The Gazette. He can be reached at erin.murphy@thegazette.com or (515) 355-1300.

Erin Murphy

Des Moines Bureau Chief

**DAS Response
Received 09.08.2025**

Response on behalf of the Iowa Department of Administrative Services

1 message

Browning, Lindsey <Lindsey.Browning@ag.iowa.gov>
To: "icrc@iowa.gov" <icrc@iowa.gov>

Mon, Sep 8, 2025 at 6:17 PM

Good Evening,

Please find attached a Response on behalf of the Iowa Department of Administrative Services in CP# 07-25-84063 and CP# 07-25-84064. Please also find attached hereto Exhibits 1-9. Should you have any issues accessing the attached, please let me know.

Please confirm receipt at your earliest convenience.

Warm Regards,
Lindsey L. Browning

Lindsey L. Browning

Administrative Law Section Chief

Office of the Attorney General of Iowa



1305 E. Walnut St.

Des Moines, Iowa 50319

Main: (515) 281-5164 | Direct: (515) 281-3441

Email: lindsey.browning@ag.iowa.gov | www.iowaattorneygeneral.gov

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[Book time to meet with me](#)

10 attachments

ICRC Response DAS Final.pdf
257K



DAS EXHIBIT 1.pdf
1148K



DAS EXHIBIT 2.pdf
527K

RECEIVED BY IOCR 09/08/2025

149



DAS EXHIBIT 3.pdf

733K

Case 4:26-cv-00336-SMR-HCA Document 3-4 Filed 08/13/26 Page 151 of 224

RECEIVED BY IOCR 09/08/2025



DAS EXHIBIT 4.pdf

677K



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354K



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DAS EXHIBIT 7.pdf

641K



DAS EXHIBIT 8.pdf

5440K



DAS EXHIBIT 9.pdf

569K

RECEIVED BY IQCR 09/08/2025

BRENNA BIRD
ATTORNEY GENERAL

LINDSEY L. BROWNING
SECTION CHIEF



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www.iowaattorneygeneral.gov

IOWA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

September 8, 2025

BY E-MAIL ONLY (icrc@iowa.gov)

Iowa Office of Civil Rights
6200 Park Ave., Ste. 100
Des Moines, Iowa 50321-1270

RE: CP# 07-25-84063 The Satanic Temple, Inc. v. Iowa Department of Administrative Services; CP #07-25-84064 Adramelech v. Iowa Department of Administrative Services

Dear Staff:

The Iowa Department of Administrative Services (“Department”) has requested my assistance in responding to the civil rights complaint filed by Mortimer Adramelech and the Satanic Temple, Inc. (“Complainants”). The Department denies Complainants’ allegations and affirmatively states no discrimination occurred.

Without waiving any objections, privileges, or consenting to jurisdiction, the Department submits this written response in lieu of responding to the questionnaire, as permitted in accordance with Iowa Administrative Code r. 161—3.26(2)(a). The Department does not, by submission of this information, waive any evidentiary objections they may have with respect to the use of information contained in this letter and the attached exhibits in proceedings before the Commission or any other body. The Department reserves the right to supplement this response. We respectfully request that you administratively close this complaint because, as explained herein, there is no reasonable possibility of a probable cause determination.

I. Statement of the Facts

The Department was created by the Iowa legislature on July 1, 2003, in order to manage and coordinate the major resources of state government. The Department’s mission is to provide high-quality, affordable infrastructure products and services to Iowa state government customers in a manner that empowers them to provide better service to the citizens of Iowa and support the State of Iowa in achieving economic growth. In creating the Department, Iowa’s legislature merged four separate offices which provide services to State

CP# 07-25-84063 and CP #07-25-84064

September 8, 2025

Page 2

employees and members of the general public alike: general services, information technology, personnel, and the accounting division of revenue and finance. Among the general services provided by the Department is the oversight of the application process for use of public spaces at the Capitol Building. In providing these general services, the Department utilizes an MOU agreement with each applicant outlining the expectations for utilization of the Capitol Complex space. See Exhibit 7. The Department has antidiscrimination policies and complies with state and federal antidiscrimination laws.

Complainants allege three incidents of discrimination – the destruction of the Satanic Temple’s holiday display in December 2023; the denial of its application to hold a multi-day event from September 16, 2024, through September 19, 2024; and the denial of its application for a holiday display to take place on December 14, 2024, in the Capitol East Rotunda. Complainants allege two of these three incidents of discrimination were retaliatory,

(o)ur 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.

Complaint at 11.

Complainants first allege that they were victims of a “well-publicized incident of discriminatory vandalism.” Complaint at 14. Complainants offer no evidence that the individual who caused damage to the display, later prosecuted criminally for his acts, was acting as an agent of the Department or the Office of the Governor of Iowa.

Secondly, Plaintiff alleges that the Department was “taking action to limit our [The Satanic Temple’s] access to the State Capitol to celebrate and promote our beliefs on the same terms that other religious organizations do in Iowa every year.” Complaint at 14. In support of this statement, Complainants’ states that “on July 12, 2024, we submitted an application we submitted an application to hold a four-day reading marathon event of *Paradise Lost* by John Milton, a core Satanic religious text.” Complaint at 14. Complainants note that the Department preliminarily put his religious group’s event on the Capitol building calendar.

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The Department changed its events policy which now “prohibits organizations from holding more than one event a year there.” This policy extends to “any affiliate, conduit, designee, partner, or subunit of a requesting organization.” Additionally, events at the Capitol Complex may not be more than one day in length. Among those organizations who have been denied events at the Capitol Complex based upon these changes by the Department are:

- Des Moines Homeless Veterans Stand Down; See Exhibit 1.
- Iowa Vietnam War Veterans; See Exhibit 2.
- Iowa Federation of Labor; See Exhibit 3 *also*, [“Honor the living or the dead? Labor union memorial forced to move from Iowa Capitol”](#) Des Moines Register (April 29, 2025);
- The Des Moines Metro Concert Band. See Exhibit 4 *also*, [“Rule limiting events on Iowa Capitol grounds forces an 80-year-old concert series to relocate”](#) Iowa Public Radio (May 28, 2025).

A group’s application must be no more than one year and no less than thirty days from the time of the proposed events. Many organizations have been denied the ability to hold events at the Capitol Complex based on the timing restrictions imposed in 2024. On December 14, 2024, alone the following groups were denied the ability to hold events in the Capitol because they had not made their requests timely: the Red Oak Mennonite Youth Group singing acapella Christmas carols, a Christmas Chorale sponsored by Jeff Pierick, the Iowa Liberty Network’s St. Michael Display and Group Prayer; and The Molech Monastery’s Winter Worship. See Exhibit 5.

On July 29, 2024, the Department granted The Satanic Temple’s application for its reading of *Paradise Lost*. However, in accordance with its policy, it approved the application for only the date of September 16, 2024. The applicant was put on notice that the Department was now only permitting organizations and their affiliates to hold only one event a year. At that time, Complainants elected to withdraw their application for their September 2024 event in favor of an event to be held around their holiday season.

A. The Complainants’ Holiday Application

On or about the date of October 7, 2024, Jordanne Beach (“Beach”) submitted a request on behalf of the Satanic Temple of Iowa to hold an event in the 1st Rotunda-East within the State of Iowa Capitol Building. See Exhibit 6. The proposed event was to take place on December 14, 2024 (“Proposed Event”). Also on October 7, Ms. Beach was provided with the Department’s memorandum of understanding (“MOU”) which outlines rules for holding

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events at the Capitol. See Exhibit 7. The MOU also requested additional information concerning details of the event.

Per the Department's standard process, the Proposed Event was promptly placed under review and an event placeholder was added to the State's Capitol Complex Event Calendar.

B. The Department's Request for Further Information on the Holiday Event

On or about the date of December 3, 2024, the Department requested several additional pieces of information from Beach via e-mail. This request related to details for the Proposed Event. Beach, on December 6th, provided further additional details regarding the December 14th Event. See Exhibit 8.

Department Director Adam Steen ("Steen") reviewed the information submitted by Beach. Notably, the content submitted by Beach on December 6th included photographs, depictions, and information related to the inclusion of a "Krampus" costume contest at the Proposed Event. See Exhibit 8.

C. The Legacy of Krampus and Violence Against and Kidnapping of Children.

Krampus's origins may be found in the dark ages, but the violence which accompanies him is still a twenty-first century concern. Krampus "runs" and other activities have sparked violence across the globe. See "[*Are Krampus Parades Too Dangerous*](#)" The Local Austria (December 4, 2024); "[*Krampus Demon Attacks Woman at Christmas Market Parade*](#)" The Sunday Times (December 13, 2019); "[*Austria's Krampus Parades Too Violent for Insurance Companies*](#)" China Global Television Network (December 15, 2022); "[*Violence the Other Way Around Too: Attacks on Krampuses 'We need Security!'*](#)" Kronen Zeitung (November 24, 2024); "[*Krampus Parades Turn Violent: Traditional Festivities Spark Debate over Safety and Gendered Violence*](#)" Euro News (March 12, 2024).

D. The Department's Evaluation of the Application and Decision.

The images provided by Beach to the Department providing details for the proposed event showed two images of Krampus in relationship to the proposed costume contest. See Exhibit 8. The first image depicts eleven individuals dressed as Krampus and carrying birch rods – traditionally used by Krampus to strike children. See Exhibit 8. The second image depicts a single individual in Krampus costume who is carrying again what appears to be a depiction of a birch rod. See Exhibit 8.

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After reviewing Beach's materials, Steen determined, consistent with his authority under Iowa Admin. Code r. 11—100.4(5), he would deny the Complainants' request to use this space. The Director denied this application based upon his judgment that the event could potentially result in violence, and be disruptive to public safety due to the event including imagery representing violence against children. See Exhibit 9. Complainants were put on notice that this might occur in the proposed MOU Beach was sent as displays or other actions that are harmful to minors are prohibited in the MOU at section 5.15.

Steen provided Beach the Department's denial in writing on December 10, 2024, via e-mail. In this correspondence the Director indicated the event was denied due to 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."

II. DISCUSSION

A. Requirements to proceed with a Tier 1 Investigation.

Pursuant to Iowa Administrative Code Rule 161—3.26(5) which establishes the Office of Civil Rights ("OCR")'s standard for tier one investigations, a complaint will be administratively closed if further investigation is not warranted. Further, processing is only warranted "when the submitted information indicates a reasonable possibility of a probable cause determination or the legal issues in the complaint need development." For the reasons stated below, there is no reasonable likelihood of a probable cause determination in this matter. Resultantly, the Respondent requests this complaint be administratively closed.

B. Complainants have failed to establish a Prima Facie Case of Discrimination by the Department under Iowa Law.

Public Accommodation. A public accommodation is considered "each and every place, establishment, or facility of whatever kind, nature, or class that caters or offers services, facilities, or goods for a fee or charge." Iowa Code § 216.2(16)(a). Notably, a public accommodation "includes each state and local government unit or tax-supported district of whatever kind, nature, or class that offers services, facilities, benefits, grants or goods to the public, gratuitously or otherwise." Iowa Code § 216.2(16)(b). Under Iowa law, places of public accommodation may not discriminate against an individual on the basis of color, creed, disability, national origin, race, religion, sex, and sexual orientation by refusing or denying the accommodations, advantages, facilities,

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services, or privileges of the public accommodation to that individual. Iowa Code § 216.7(1)(a). In this matter, the Complainants allege their group was denied access to public accommodation (the Capitol Rotunda) on the basis of its religion (Satanism).

Prima Facie Case of Discrimination. In order to demonstrate that they has been discriminated against, the Complainants must show,

(1) [he] is a member of a protected class; (2) [he] sought to enjoy the accommodations, advantages, facilities, services, or privileges of a “public accommodation”; and (3) [he] did not enjoy the accommodations, advantages, facilities, services, or privileges of the “public accommodation” in that (a) [he] was refused or denied the accommodations, advantages, facilities, services, or privileges of the “public accommodation” under circumstances giving rise to an inference of discrimination or (b) [he] was allowed to use the accommodations, advantages, facilities, services, or privileges of the “public accommodation,” but was otherwise discriminated against in the furnishing of those accommodations, advantages, facilities, services, or privileges by being subjected to markedly hostile conduct that a reasonable person would find objectively unreasonable under circumstances giving rise to an inference of discrimination.

Dahlsten v. Lee, 531 F. Supp. 2d 1029, 1046 (N.D. Iowa 2008) (citing *Kirt v. Fahsion Bug #3253, Inc.*, 479 F. Supp. 2d 938, 963 (N.D. Iowa 2007)).

Complainants state they are a member of The Satanic Temple, Inc. and The Satanic Temple, Inc. respectively. Complainants further state that they and his group sought to have a Holiday Event at the Iowa Capitol Complex on December 14, 2024. Both of these prongs of the discrimination test are borne out by the factual information submitted by the Complainants and the Respondent in this matter.

Denial of Public Accommodation not Under Circumstances Giving Rise to Discrimination.

Complainants have failed to demonstrate that they were denied the use of the Iowa Capitol Complex on December 14, 2024, under circumstances giving rise to an inference of discrimination. On October 6, 2024,

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Complainants provided limited information initially regarding the nature of the event he desired to hold at the Capitol Complex. See Exhibit 6 (“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 attended to by at least one member of our congregation at all times.”). On October 21, 2024, the Complainants executed the MOU to use the Capitol Complex space. See Complainants’ Exhibit F. At that time, Complainants agreed to be bound by the “Additional Limitations” outlined in the MOU at paragraph 5.15. See Exhibit 7.

As shown in Complainants Exhibit F, on December 3, 2024, the Department reached out to the Complainants to receive clarification on the nature of the event they were holding, including images of the anticipated costumes. On Friday December 6, after prompting by the Department, Complainants provided additional details regarding its Holiday Display Day event. At that time, Complainants provided photographs of the anticipated costumes. See Exhibit 8. Also at that time, Complainants noted that the event would include a costume contest for all ages – for the first time in its application process. See Exhibit 8, *also* Complainants Exhibit F.

The MOU executed by Beach explicitly states,

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.

Exhibit 7 (emphasis added).

The storied legacy of violence against children associated with Krampus lore coupled with the images submitted by Complainants group which depict birch rods with which to strike children, plainly qualifies as “other actions that are harmful to minors.” Further, Complainants group sought to have not a display depicting Krampus images, but a costume contest where multiple individuals would be in full Krampus costume with birch rods. Given the violence which has historically accompanied Krampus events across the world, such an event could easily escalate to be harmful to minors. Complainants proposed event would further be harmful to minors should the portion of the Krampus legend be related or portrayed where Krampus kidnaps “naughty” children and takes

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them to a different location – ranging from a cave to Hell depending upon one’s preferred version of the legend. Complainants own complaint makes clear the denial was based on safety concerns after information was provided about the costumes at this proposed event. The request to hold this event was processed normally and preliminarily approved, which contradicts any potential inference of religion-based discrimination.

C. Complainants Cannot Establish a Claim of Retaliation.

A prima facie case of retaliation under the ICRA requires Complainants to establish (1) he was engaged in statutorily protected activity, (2) he was subjected to a materially adverse action, and (3) a causal connection between his participation in the protected activity and the adverse...action. *Rheeder v. Gray*, 23 N.W.3d 1, 15 (Iowa 2025) (quoting *Rumsey v. Woodgrain Millwork, Inc.*, 962 N.W.2d 9, 28 (Iowa 2021)); see also *Haskenhoff v. Homeland Energy Sols., LLC*, 897 N.W.2d 553, 582 (Iowa 2017)..

Complainants allege that “(w)e complained of” the December 2023 incident of vandalism “immediately, which was extensively covered in the media.” Complaint at 11. Complainants then allege that “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.” Complainants continues, “The restrictions were intended and designed to prevent us from holding our multi-day event, or a discretionary exception was unlawfully withheld form us because of our religion.” Complaint at 11. Complainants believe “these restrictions were intended to and designed to prevent us from holding our holiday event later in the year. We complained immediately to DAS.” Complaint at 11. Finally, Complainants note that “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.” Complaint at 11.

As a threshold matter, Complainants complaint as it pertains to the change in policy that limited all applicants to one event per year is untimely. The ICRA includes a statute of limitations requiring that “a claim under this chapter shall not be maintained unless a complaint is filed with the [Iowa Civil Rights Commission] within three hundred days after the alleged discriminatory or unfair practice occurred.” Iowa Code § 216.15(13). In this case, Complainants filed their ICRC complaint on June 9, 2025. As a result, Complainants claim must be founded upon the occurrence of a discriminatory or unfair practice on or after August 13, 2024. Complainants allege they were notified about the policy on July 29, 2024, and they elected to withdraw their application for an event in September in order to hold their holiday event in December. The policy

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change and the withdrawal of the application occurred outside the timely period. Without waiving any defense based on the lack of timeliness, this analysis will proceed.

Complainants state “we have since learned this policy [the one day a year 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 a year.” Complaint at 15. Complainants offer no evidence the groups they reference actually obtained a permit. Indeed, the Complainants’ own Exhibit F belies that the Patriotic Catholics had not, in fact, obtained a permit, but had just organized a group of individuals on Facebook to show up to outside the Capitol Building – a public space.

Secondarily, Complainants have failed to demonstrate how the September 2024 event, which was approved in accordance with the one-day limitation, is somehow retaliatory based upon the events of December 2023. Complainants have further failed to create a nexus between how the implementation of rules regarding the duration and timing of events at the Capitol Complex which have impacted community members ranging from war veterans to labor groups to community bands are retaliatory against him specifically.

Finally, Complainants have failed to show how denying his group’s 2024 Holiday Display Day request several months later is retaliatory. In determining the content was harmful to minors based upon a request to hold a costume contest featuring Krampus – who is famed for striking and kidnapping children, the Department exercised the discretion afforded to it under Iowa law.

III. CONCLUSION

For the reasons set forth above, the Iowa Department of Administrative Services respectfully requests the Iowa Office of Civil Rights find that there is no reasonable possibility of a probable cause determination and close this complaint. Should you have any further questions, please feel free to contact me at your convenience.

Sincerely,

/s/ Lindsey L. Browning

Lindsey L. Browning
Section Chief
Administrative Law Section

9/2/25, 3:01 PM

'We're just scrambling': Resource fair to assist homeless, veterans threatened by state policy change

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'We're just scrambling': Resource fair to assist homeless, veterans threatened by state policy change

Updated: 8:57 PM CDT Sep 3, 2024

[Editorial Standards](#) ⓘ**Pepper Purpura** ✉

Reporter/Multimedia Journalist

DES MOINES, Iowa — Organizers of an annual, three-day resource fair aiming to assist people, especially veterans, experiencing homelessness in the Des Moines area may cancel the event after a state policy change denied the group venue access.

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9/2/25, 3:01 PM

'We're just scrambling': Resource fair to assist homeless, veterans threatened by state policy change

On Aug. 8, John Malloy said he filed the required paperwork to host the Des Moines Homeless Veterans Stand Down, an annual 3-day event that connects homeless people and veterans with resources, provides warm meals and allows on-site camping monitored by security. In 2023, around 1,200 people attended.



Advertisement

The group has hosted the event on an empty lot owned by the state at 12th and Des Moines Street previously. See KCCI's coverage of the event last year [here](#). The week prior to this story's publication, the state responded to the request, informing organizers that event plans the state has accommodated in years past are now against policy.

According to email correspondence between the Iowa Department of Administrative Services and event organizers, [a new policy](#) was enacted on July 26th. It bars anyone from hosting an event on state property for longer than one day.

Event organizer Nick Lemmo said set-up alone exceeds the allowed time, and even if the event could be ready, one day is not enough time for visitors to connect with organizations attending without missing other opportunities at the event.

Any venue available to host the event Sept. 12 may contact johnmalloy.hvs@gmail.com.

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Event in Des Moines helps people experiencing homelessness

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TOP PICKS

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9/2/25, 3:03 PM

State of Iowa Mail - Memorials - Capita grounds



Steen, Adam <adam.steen@iowa.gov>

Memorials - Capita grounds

1 message

DANIEL GANNON <gannonobx@aol.com>

Fri, Jan 17, 2025 at 9:22 AM

To: adam.steen@iowa.gov

Cc: Dennis Jones <dfjones559@gmail.com>, Dan Gannon <gannonobx@aol.com>, Suzy Trotter <suzy.trotter@iowa.gov>

Mr. Steen,

My name is Dan Gannon. I am a Vietnam Veteran and do an annual event, " Iowa Vietnam Veterans Recognition Day " in May each year. This year will be our 18th annual event that started in 2008. It is held outdoors at the Vietnam Veterans Memorial Wall on the Capital grounds.

Sometimes we will do other events the same year, recognizing our Veterans, such as Agent Orange Awareness Day, which is done at the Iowa Vietnam Wall, in August.

The Marine Corps League also does events on the Capital grounds at the Veterans War Memorials every year. They have been doing similar events for a number of years, just like I have.

This past year due to a change in the regulations at the Capital grounds, the frequency of their events, Memorial Day & Veterans Day, they were not allowed to do their normal events due to a change as stated in DAS MOU (2.0), where an organization can only do one event per calendar year.

Therefore the MCL could not perform their recognition ceremony, as they have done for years at the Korean War & Vietnam Wall Memorials, on Memorial Day & Veterans Day, which we feel is unacceptable in honoring our Veterans that we both are so dedicated in doing.

In talking with Suzy Trotter, Capital Complex Events Coordinator, regarding this change in the regulations, she stated that I would need to reach out to you, Director of DAS, for further discussion on this matter.

Thanks

Dan Gannon
Email: gannonobx@aol.com
Cell: 515-991-5257

Sent from my iPhone

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9/2/25, 2:57 PM

State of Iowa Mail - Capitol Complex Event Policy



Steen, Adam <adam.steen@iowa.gov>

Capitol Complex Event Policy

1 message

Mon, Mar 24, 2025 at 4:11 PM

Melissa Speed <MSpeed@afscmeiowa.org>

To: "adam.steen@iowa.gov" <adam.steen@iowa.gov>

Cc: "suzy.trotter@iowa.gov" <suzy.trotter@iowa.gov>, "Reckman, Nathan [DAS] (Nathan.Reckman@iowa.gov)" <Nathan.Reckman@iowa.gov>

Good afternoon Director Steen,

On behalf of the Southcentral Iowa Federation of Labor (SCIFL) Community Services Committee, I am, as committee chair, writing to respectfully request an exception be made to the policy limiting organizations to one event per year on the Capitol Complex grounds. While our request to hold our annual Labor Day event on Monday, September 1, 2025, has already been approved, we are also requesting to hold Workers Memorial Day on Monday, April 28, 2025, as we have in years past without issue. These observances have always been conducted with respect, order, and care, reflecting their significance to Iowa's working families and the broader community. We urge DAS to recognize this importance by granting an exception to the one-event-per-year policy in respect to these two events annually.

Workers Memorial Day is a solemn occasion dedicated to honoring Iowa workers who tragically lost their lives while on the job. For grieving families, friends, and colleagues, this day carries profound significance – a time for reflection, mourning, and ensuring that the memory of their loved ones endures. It offers comfort to those who have experienced unimaginable loss. Each year, many individuals from across the Capitol Complex, including elected officials, gather for this observance to pay their respects and recognize the lasting contributions of those who have passed.

Labor Day is a celebration of Iowa's workforce – the individuals who build, maintain, and improve our communities. This event recognizes their dedication and contributions, reminding us that Iowa's workforce is the backbone of our state.

These two events are not interchangeable. Mourning those we have lost should never come at the cost of celebrating those still serving. Both deserve their own dedicated space, time, and respect. Importantly, neither event is held inside the Capitol Building. Both are conducted outdoors on Capitol Complex grounds, ensuring no disruption to legislative business or other Capitol functions.

Given the significance of these observances, we respectfully ask DAS to waive the one-event-per-year policy and allow both events to proceed. Since our Labor Day event has already been approved, please advise if we should submit a separate request for Workers Memorial Day or follow an alternative process.

We are committed to working with your office to ensure these events are well-coordinated, respectful, and fully compliant with Capitol Complex guidelines. Iowa's working families deserve nothing less than the dignity of both honoring the fallen and celebrating the living.

We believe this is a fair and reasonable request, and we strongly encourage DAS to support us in ensuring both events can move forward. Please let us know how we can proceed.

In Solidarity,

Melissa Speed

SCIFL Community Services Committee Chair

 2024 Fatalities to Union for Workers Memorial Day.xlsx

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9/2/25, 3:06 PM

State of Iowa Mail - Music Under the Stars and the Capitol Complex



Steen, Adam <adam.steen@iowa.gov>

Music Under the Stars and the Capitol Complex

1 message

Mon, Dec 23, 2024 at 10:04 AM

Dan Stevenson <danielbstevenson@aol.com>
 Reply-To: Dan Stevenson <danielbstevenson@aol.com>
 To: adam.steen@iowa.gov

Mr. Adam Steen
 Director
 Iowa Department of Administrative Services

Dear Director Steen,

I am writing to you because while we have been informed of the new policy limiting groups to one day a year, we don't believe you intended to push Music Under the Stars out of the West Mall after seventy-eight years of free Sunday night band concerts.

Playing only a single program at the Capitol would present an existential problem for us. There is no other permanent performing space for a summer music event that offers the capacity, shade, and breeze on a hot summer evening that the West Mall does – and certainly not the beautiful and historic setting that brings thousands of people to the Capitol each summer for this series of five to six concerts.

Music Under the Stars has entertained four generations of central Iowans. It is an incredibly successful tradition that enjoys broad corporate and community support. We celebrate our country with patriotic music. This is a wholesome, noncontroversial activity that people of all ages and walks of life enjoy together.

Music Under the Stars is a destination event for families and seniors. Church groups and family reunions meet on the hill, bringing their blankets and picnic baskets to make musical memories together. Visitors to our community from many states and several countries have attended with their local hosts to experience this unique tradition that celebrates the Iowa values of family, community, and excellence in the performing arts on our beautiful Capitol grounds. Toddlers march around or sit in the lap of their parents or grandparents, clapping along together to the strains of a stirring march. These are the types of programs that we need more of in our community.

Director Steen, this is an event that benefits everyone. We appeal to you that based on its history, its cultural contribution to Iowa, its importance to the community, and our record of good stewardship, you would grandfather Music Under the Stars as an exemption from the new DAS scheduling policy.

Sincerely,

Daniel B. Stevenson
 Executive Director
 515.423.2865
www.musicunderthestars.org



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Anticipated Groups in the Rotunda on December 14, 2024

Application submitted

- The Satanic Temple Iowa
8:00a – 4:00p, east section
Display and activities

Applications submitted and denied due to 30-day notice

- Red Oak Mennonite Youth Group
2:00p – 3:00p, all four sections
Acapella Christmas Carols
- Jeff Pierick
12:30p – 2:00p, west section
Christmas Chorale with electronic keyboard possibly a remote microphone
- Iowa Liberty Network
8:30a – 4:00p, west section
St. Michael Display and group prayer
- The Molech Monastery
8:00a – 4:00p, west section
TMM Winter Worship

No application submitted for social media advertised event

- Patriotic Catholics
12:30p – unknown time, simply states the event will be inside the Capitol
Praying and music

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Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB365 - TST Iowa Holiday Display Day - 12/14/2024

donotreplycontactus@iowa.gov <donotreplycontactus@iowa.gov>

Mon, Oct 7, 2024 at 1:04 AM

Reply-To: capitol.complex.events@iowa.gov

To: jordannebeach@gmail.com

Cc: mortimer.adramelech@thesatanictemple.org

Jordanne Beach,

The following request was submitted on the Capitol Building Application Form.

Application Number: ACB365

Date of Form Submission: 10/7/2024 1:04:26

Form Submission Values:

Representative's Name: Jordanne Beach

Address: 355 31st St Dr SE

City: Cedar Rapids

State: Iowa

Zip Code: 52403

Email Address: jordannebeach@gmail.com

Phone Number: 515-306-4015

Name (On-site): Mortimer Adramelech

Email Address (On-site): mortimer.adramelech@thesatanictemple.org

Phone Number (On-site): 515-718-3228

Event Requestor: The Satanic Temple Iowa

Address (Requestor):

City (Requestor):

State (Requestor): Iowa

Zip Code (Requestor):

Location: 1st Floor Rotunda - East

Expected Attendance: 26 - 100

Catering Equipment and Outdoor Cooking: Neither

Event Title: TST Iowa Holiday Display Day

Web Page With Event Information:

Event Detail: 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 attended to by at least one member of our congregation at all times.

Event Date: 12/14/2024

Start Time: 8:00:00 AM

End Time: 4:00:00 PM

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Department of
Administrative Services

KIM REYNOLDS, GOVERNOR

ADAM STEEN, DIRECTOR

Memorandum of Understanding
Between
Event Requestor
And
The Iowa Department of Administrative Services
For
Event

1. **Purpose.** The purpose of this Memorandum of Understanding (“MOU”) is to set forth the terms and conditions of the agreement between the Iowa Department of Administrative Services (“DAS”) and *Event Requestor* (“Event Requestor”) for the *Event* (“Event”). Event Requestor manages, operates, controls, and hosts the Event. Event Requestor will be allowed the non-exclusive use to host the Event in the designated Event Area for the Duration of this MOU subject to the terms and conditions therein.
 - 1.1. **Exemption.** State agencies (as defined in Iowa Code section 669.2(5)) acting in an official capacity and the World Food Prize whose primary location for the annual ceremony is the Capitol Complex (Iowa Code section 15.368) are exempt from time and place restrictions except as otherwise required by law or imposed within the sole discretion of DAS.
2. **Duration.** This MOU exclusively pertains to the *Date*, Event. Event requests shall be received at least 30 calendar days prior to the event date. Event Requestor is approved for the use of the designated Event Area on *Date*; beginning at *Time* until *Time*. An Event may not exceed 1 day. An Event Requestor, including any affiliate, conduit, designee, partner, or subunit, may not hold more than one event per calendar year.
3. **Event Area.** *Location* on the Capitol Complex in Des Moines, IA. DAS will make the Event Area available in accordance with the terms of this MOU.
 - 3.1. **Site Map.** The Event Area will be restricted to the area identified on Exhibit A (“Site Map”). Site map identifies the perimeter of the Event Area and the location of equipment or displays for the Event. The Event Requestor is responsible for demarcating the Event Area and, if required by DAS, obtain and erect barriers as set forth on the Site Map. Event Requestor shall not conduct the Event at any other location on the Capitol Complex without written approval from DAS.
 - 3.2. **Relocating/Rescheduling of Event.** In the event DAS has to restrict the usage of the Event Area agreed upon in this MOU for any reason, DAS will work in good faith with the Event Requestor to locate an alternative location and/or date on the Capitol Complex. DAS only anticipates this occurring due to unforeseen or extraordinary circumstances.
 - 3.3. **Compliance with Laws.** Event Requestor agrees to comply with all applicable laws in its use of the Event Area including, but not limited to, provisions of the Iowa Code and DAS’s administrative rules governing use of the Capitol Complex.
4. **Charges, Insurance, Indemnification.** Event Requestor is exclusively responsible for financing the Event.
 - 4.1. **Costs to Access.** Event Requestor may conduct the Event within the Event Area without rent or charge.
 - 4.2. **Vendor Services.** Event Requestor will be solely responsible for all expenses and costs charged by vendors. Event Requestor will pay all vendors directly.
 - 4.3. **Liability.** Pursuant to the requirements set forth in Iowa Administrative Code rule 11—100.4(6), Event Requestor acknowledges responsibility and is responsible for any damages occurring during the Event and agrees to reimburse the State of Iowa and the Iowa Department of Administrative Services for such damage to state property, services provided by or through DAS to support the Event, and necessary clean-up after Event Requestor departs the Capitol Complex. Any billing from DAS submitted to Event Requestor shall be paid in full within thirty (30) days of receipt.
 - 4.4. **Indemnification.** Event Requestor agrees to be fully responsible for and/or indemnify and hold harmless the State of Iowa, the Iowa Department of Administrative Services, and all of their agents and employees from any and all claims, liabilities, damages, settlements, judgments, costs, and expenses directly or indirectly caused by, related to, or arising from Event Requestor’s access, parking, and conducting business under this MOU.

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4.5. Insurance. Event Requestor is not required to obtain liability insurance for the Event; however, this does not relieve Event Requestor of any Charges or Indemnification pursuant to this MOU.

4.6. Billing Address.

*Event Requestor
 Address
 City, State Zip*

5. Standard of Care Obligation. Event Requestor acknowledges that it will be held to a standard of care appropriate given the historical property it has endeavored to use for this Event. Care is to be taken for all areas utilized throughout the Capitol Complex. Event Requestor is exclusively responsible for the Event including set up, tear down, and Event activities.

- 5.1. Equipment and Displays.** Event Requestor will provide all equipment necessary to conduct the Event. The State of Iowa is not responsible for any damages, loss, or theft to equipment or displays provided, owned or used by Event Requestor.
- 5.2. Display Design.** Display design identifying specific size and location must be approved in advance by DAS. All displays must be free standing and may not be affixed or supported by any other surfaces. Display will not restrict traffic flow and will not pose a hazard for persons with disabilities. If required by DAS, the Event Requestor will incorporate a baseboard into the design surrounding the entire display. The Event Requestor will provide signage at the display location containing a disclaimer stating the display is not owned, maintained, promoted, supported by or associated with the State of Iowa. The use of an unattended display is prohibited. Refer to Exhibit C for additional guidelines.
- 5.3. Signage.** Event Requestor will not hang signs on the Capitol Complex including but not limited to buildings, lampposts, traffic signs, trees, sidewalks, existing signs, monuments, etc.
- 5.4. Protective Surface.** Event Requestor will take all reasonable steps to protect surfaces, ground, and buildings from damage from Event Requestor's equipment or display.
- 5.5. Power.** Event Requestor is approved to use the electrical outlets at the Event Area. Event Requestor will hire and/or obtain its own power beyond the electrical outlets provided. Any such generator must be grounded as per code. Event Requestor will secure all cables in a safe manner with a non-adhesive cable cover.
- 5.6. Restrooms.** Restrooms are available in the buildings on Capitol Complex during normal business hours. Event Requestor will provide a sufficient amount of portable restrooms and handicapped restrooms as necessary to support the expected participation for the Event. Such portable restrooms would be allowed during the date and time indicated on this MOU Duration. Portable restrooms would be placed in the Event Area on a concrete surface not impeding pedestrian foot traffic, i.e. sidewalks and cross walks.
- 5.7. Tents, canopies and inflatables (outdoor events only).** Upon approval from DAS, Event Requestor may set tents, canopies and inflatables in the Event Area. Approved tents, canopies and inflatables will be secured with weights.
- 5.8. Street/Sidewalk Closures.** Event Requestor will provide appropriate street/sidewalk closure barricades for the closure of street(s) and/or sidewalk(s) on the Capitol Complex. All street and sidewalk closures must be reviewed and approved by DAS and submitted on the site map provided to DAS. Event Requestor will seek approval from the City of Des Moines for the closure of city streets and/or sidewalks.
- 5.9. Ground Penetration.** Event Requestor will follow the "Digging/Ground Penetration Approval Procedures for the Capitol Complex" before penetrating the soil in any way, with signs, posts, etc. Any holes/penetration, etc., must be repaired immediately following the conclusion of the Event.
- 5.10. Clean-up/Waste Removal.** Event Requestor will provide waste receptacles to collect waste from the Event Area. Event Requestor will remove all waste generated during the Event from the Event Area. Capitol Complex waste receptacles in the Event Area used by the Event will be emptied and replaced by the Event Requestor with clean 45" x 48" bags. Parking lots, streets and sidewalks utilized for the Event will be cleaned by Event Requestor.
- 5.11. Security.** If the Event Requestor requires security for the Event, the Event Requestor shall obtain private security and shall be responsible for all private security costs.
- 5.12. Vehicles.** Event Requestor will not drive any vehicle on any sidewalk, lawn or landscaping except as provided herein. Turf type vehicles, such as golf carts may be driven on sidewalks and lawn. At no time may any vehicle park on the lawn.
- 5.13. Parking.** Capitol Complex non-gated parking lots for visitors as well as the parking structure on the corner of E. Grand Avenue and Pennsylvania Avenue may be available for the Event. Parking designated for state employee and reserved parking is not available for Event parking between 6 a.m. and 6 p.m., Monday-Friday, unless

otherwise posted and with the exception of state designated holidays. Improper use of any "Persons with Disabilities" parking spaces is subject to a fine and towing at the owner's expense.

5.14. Not Permitted on Capitol Complex.

- Admission fees;
- Alcohol;
- Use of tobacco;
- Fireworks;
- Horses or other livestock (except on streets);
- Sidewalk chalk/paint;
- Popcorn poppers for use in buildings;
- Open flame (except for outdoor cooking or catering equipment with prior approval from DAS and compliance to requirements in Exhibit B);
- Sale of merchandise (except for the sale of food associated with the Event).
- Helium Balloons are not allowed in the Capitol Building.

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.

6. Event Requestor Coordinator(s):

Signor

Phone #

Email Address

Second Contact

Phone #

Email Address

7. DAS Event Coordinator.

Suzy Trotter

109 S. E. 13th Street, Des Moines, Iowa 50319

Office: 515.281.7259 Cell: 515.631.9247 Email: capitol.complex.events@iowa.gov

8. MOU Administration.

8.1. Amendments. This MOU may be amended in writing by mutual consent of the parties. All amendments to this MOU must be in writing and fully executed by the parties.

8.2. Assignment and Delegation. This MOU may not be assigned, transferred or conveyed in whole or in part without the prior written consent of the other party.

8.3. Integration. This MOU represents the entire MOU between parties. The parties shall not rely on any representation that may have been made which is not included in this MOU.

8.4. Headings or Captions. The paragraph headings or captions used in this MOU are for identification purposes only and do not limit or construe the contents of the paragraphs.

8.5. Supersedes Former MOUs or Agreements. This MOU supersedes all prior MOUs or Agreements between the parties for the services provided in connection with this MOU.

8.6. Governing Law. This agreement, and any disputes arising from it, shall be construed in accordance with Iowa law. Venue for any lawsuits resulting from it shall be Des Moines, Polk County, Iowa.

8.7. Interpretation. The State and Event Requestor, and their respective attorneys, have been provided an opportunity to review and revise this document prior to signing it. Ambiguities shall be interpreted as if both parties drafted the agreement together.

9. Termination. This MOU automatically terminates at *Time on Date*. Event Requestor's obligations under this MOU continue beyond its termination.

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Memorandum of Understanding

Event Requestor

Page 4 of 9

- 10. Signatures.** Event Requestor, through the signature of its duly authorized representative identified below, affirmatively represents the signatory possesses all necessary power, authority and legal capacity to (1) act on behalf of Event Requestor; (2) enter into and bind Event Requestor to perform Event Requestor's obligations under this MOU; and (3) accept written notice for Event.

Charlee Cross, Chief Operating Officer
Department of Administrative Services
General Services Enterprise

Date

Duly Authorized Event Requestor Representative
Signor
Event Requestor

Date

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Revised July 26, 2024

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Exhibit A
Site Map

Using the map below sketch and / or details of the event set up including the location of equipment such as portable restrooms, barricades, food trucks, banners, generator, podium, crowd, etc.
Feel free to add timeline including the set up, event start / stop, and the teardown.



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Exhibit A
Site Map

Using the map below sketch and / or details of the event set up including the location of equipment such as portable restrooms, barricades, food trucks, banners, generator, podium, crowd, etc.
Feel free to add timeline including the set up, event start / stop, and the teardown.



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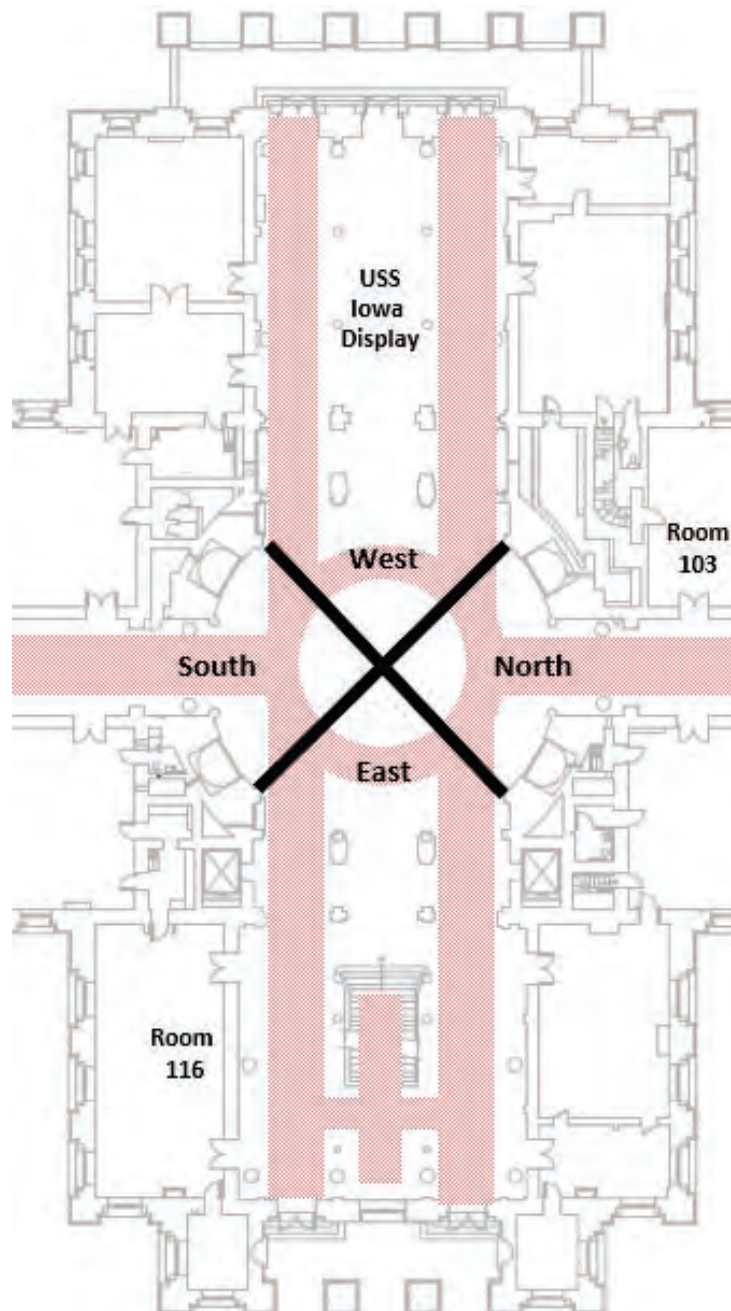
Revised July 26, 2024

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**Exhibit A
Site Map**

Using the map below, sketch and label the event equipment layout in the Event Area(s), including tables, chairs, catering equipment, banners, podium, etc.

The pink shaded area is the egress / ingress and pathway, do not plan to place event equipment in the shaded area.



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Exhibit B
Catering Equipment and Outdoor Cooking

Catering Equipment Requirements

- Portable food warming devices that are fueled (i.e. Sterno) shall have non-combustible lids for immediate use for each warming device.
- The warming device shall be on a noncombustible protective material to prevent tipping and damage.
- The devices shall be continuously under the care and control of a competent person.
- A fire extinguisher must be provided by the Event Requestor and located to be readily available for use.

Outdoor Cooking Requirements

- A designated person of the Event Requestor will need to be responsible for lighting, kindling and maintaining the self-supporting outdoor cooking equipment.
- Cooking equipment will be at a minimum of 20 feet of any building.
- Cooking equipment will be at a minimum of 10 feet between other cooking equipment, vehicles, trash containers or other significant quantities of combustible materials.
- If propane tanks are used, all connections are to be soap tested prior to ignition. LP containers and equipment must be in compliance with acceptable NFPA (National Fire Protection Association) Code.
- The fire shall be continuously under the care and control of a competent person until it is extinguished. In addition, a fire extinguisher must be provided by the Event Requestor and located to be readily available for use.
- Outdoor cooking equipment shall be on a noncombustible protective material to prevent damage. Outdoor cooking equipment may be placed on the grass with protective material; however, this does not relieve Event Requestor of any Charges or Indemnification as a result of damage to the grass.
- If outdoor conditions pose a high risk of the fire spreading, such as high winds or extremely dry conditions, the Iowa Department of Administrative Services and/or Iowa State Patrol Post 16 reserves the right to require the Event Requestor to discontinue use of the cooking equipment to protect the public and facilities.

Memorandum of Understanding

Event Requestor

Page 9 of 9

Exhibit C
Display Guidelines

Capitol Building Displays

- Displays are considered an 'event' as we are coordinating the use of the space.
- The 1st Floor Rotunda in the Capitol has four defined spaces for groups to reserve.
- All groups must submit a photo with dimensions of the display for approval. Dimensions will not exceed 7 foot wide and 7 foot deep.
- Displays in the building have a height cap of 9 foot, so not to interfere with electronic smoke detectors.
- Displays will not be allowed to impede the egress.
- Displays are required to provide a baseboard so those with visual impairments using a cane can identify obstacles.
- Events / Displays may be refused if it would be disruptive of official state business or to the public health, safety and welfare, or is inconsistent with Iowa Administrative Code.
- The time limit allows for maintenance / cleaning of the area.
- All approved displays will provide signage at the display location containing a disclaimer stating the display is not owned, maintained, promoted, supported by or associated with the State of Iowa.

Outdoor Displays

- Outdoor displays are considered temporary site features and must be submitted to the Capitol Planning Commission Site Features Committee for review and approval. (<https://das.iowa.gov/state-employees/general-services/capitol-planning-commission/site-features>)



Capitol Complex, Events <capitol.complex.events@iowa.gov>

Capitol Building Application - ACB365 - TST Iowa Holiday Display Day - 12/14/2024

Jordanne Beach <jordannebeach@gmail.com>

Fri, Dec 6, 2024 at 4:06 PM

To: "Capitol Complex, Events" <capitol.complex.events@iowa.gov>

Cc: mortimer.adramelech@thesatanictemple.org

1 - The finalized song list / Satanic Holiday Carols during the event.
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

2 - Images of the make & take ornaments.
Please see the attachments.

3 - Images of the coloring pages.
Please see the attachments.

4 - Images of the anticipated costumes.
Please see the attachments.

5 - 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.

6 - 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.

I have also included the finalized itinerary, and a Google Drive link to the images in case the attachments don't work.

Link: <https://drive.google.com/drive/folders/1N5PBfgzeC1st3GrqVIZy7DJOVryQYamW>

 **TSTIA 2024 Holiday Display Event Itinerary**

Please let us know if you have any additional questions.

Best regards,
Jordanne

[Quoted text hidden]

9 attachments

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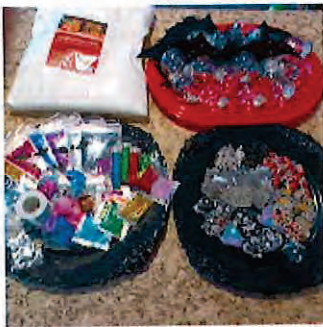
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TSTIA 2024 Holiday Display Event Itinerary

8:00am - Setup

11:00am - Satanic Holiday Carols

Songlist:

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

All day - Make & Take Ornaments, and Social Time

12:00pm - All Ages Krampus Costume Contest

1st, 2nd, 3rd Place prizes - The winners will be determined by audience votes.

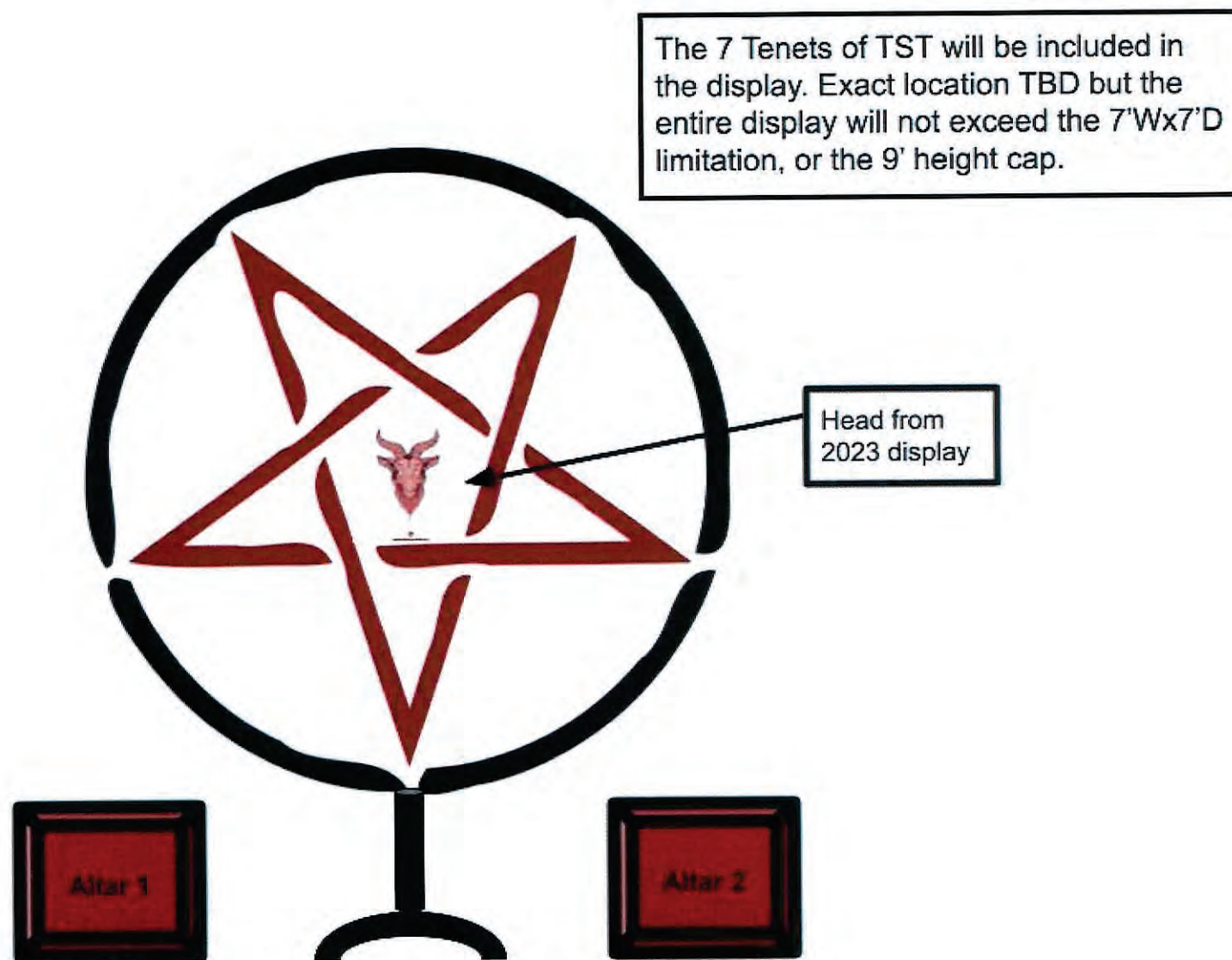
Participants will present their costume for the audience to vote on.

2pm - Ritual

3:00/3:30pm - Teardown and Cleanup

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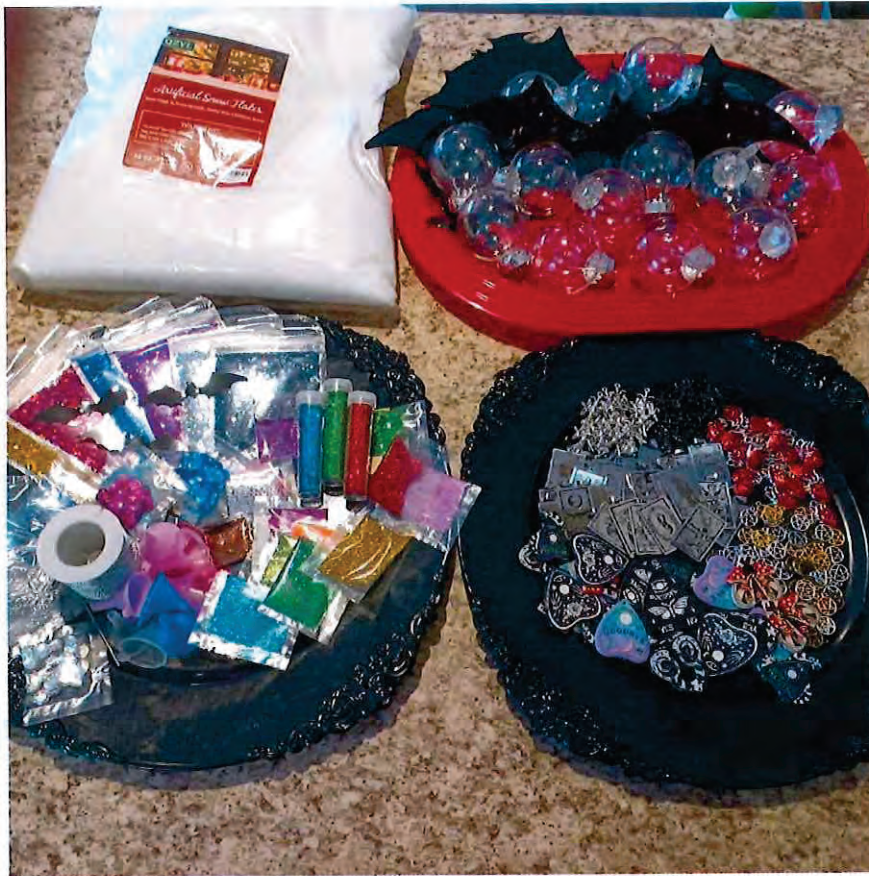
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9/3/25, 3:00 PM

State of Iowa Mail - 12/14 Event Request - Denial



Steen, Adam <adam.steen@iowa.gov>

12/14 Event Request - Denial

Steen, Adam <adam.steen@iowa.gov>
To: Jordannebeach@gmail.com

Tue, Dec 10, 2024 at 6:02 PM

Good Evening,

Thank you for your patience and your responses to questions regarding your event request for December 14th in the Capitol Rotunda.

The request for space in the Capitol Rotunda is not approved per [Administrative Rule 100.4\(5\)](#) & pursuant Department of Administrative Services [Memorandum of Understanding](#), specifically section 5.15, as listed below:

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.

Thank you,

Adam Steen
Director
Iowa Department of Administrative Services
1305 E. Walnut Street, Des Moines, IA 50319
515-720-6176 mobile
adam.steen@iowa.gov
<https://das.iowa.gov>



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**Office of Governor
Response Received
09.08.2025**

Response on behalf of the Office of the Governor of Iowa

1 message

Browning, Lindsey <Lindsey.Browning@ag.iowa.gov>
To: "icrc@iowa.gov" <icrc@iowa.gov>

Mon, Sep 8, 2025 at 6:21 PM

Good Evening,

Please find attached a Response on behalf of the Office of the Governor of Iowa in in CP# 07-25-84063 and CP# 07-25-84064. Should you have any issues accessing the attached, please let me know.

Please confirm receipt at your earliest convenience.

Warm Regards,
Lindsey L. Browning

Lindsey L. Browning

Administrative Law Section Chief

Office of the Attorney General of Iowa

1305 E. Walnut St.

Des Moines, Iowa 50319

Main: (515) 281-5164 | Direct: (515) 281-3441

Email: lindsey.browning@ag.iowa.gov | www.iowaattorneygeneral.gov



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[Book time to meet with me](#)



ICRC Response IGov Final.pdf
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BRENNA BIRD
ATTORNEY GENERAL

LINDSEY L. BROWNING
SECTION CHIEF



1305 E. WALNUT ST.
DES MOINES, IA 50319
Main: 515-281-5164 • Direct: 515-281-3441
Email: lindsey.browning@ag.iowa.gov
www.iowaattorneygeneral.gov

IOWA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

September 8, 2025

BY E-MAIL ONLY (icrc@iowa.gov)

Iowa Office of Civil Rights
6200 Park Ave., Ste. 100
Des Moines, Iowa 50321-1270

RE: CP# 07-25-84063 The Satanic Temple, Inc. v. Iowa Department of Administrative Services; CP #07-25-84064 Adramelech v. Iowa Department of Administrative Services

Dear Staff:

The Office of the Governor of the State of Iowa (“Office of the Governor”) has requested my assistance in responding to the civil rights complaint filed by Mortimer Adramelech and The Satanic Temple Incorporated. (“Complainants”). The Office of the Governor denies Complainants’ allegations and affirmatively states no discrimination has taken place.

Without waiving any objections, privileges, or consenting to jurisdiction, the Office of the Governor submits this written response in lieu of responding to the questionnaire, as permitted in accordance with Iowa Administrative Code r. 161—3.26(2)(a). The Office of the Governor does not, by submission of this information, waive any evidentiary objections they may have with respect to the use of information contained in this letter and the attached exhibits in proceedings before the Commission or any other body. The Office of the Governor reserves the right to supplement this response. We respectfully request that you administratively close this complaint because, as explained herein, there is no reasonable possibility of a probable cause determination.

I. Statement of the Facts

A. Constitutional Authority of the Governor of Iowa.

The Governor of the State of Iowa is an elected office created by the Iowa Constitution. Art. IV, §1. The supreme executive power of this state is vested in the office of the Governor of Iowa. *Id.* The Governor shall transact all executive business with the officers of the government, civil and military, and

CP# 07-25-84063 and 07-25-84064

September 8, 2025

Page 2

may require information in writing from the officers of the executive department upon any subject relating to the duties of their respective offices. Art. IV §9. The Director (“Director”) of the Iowa Department of Administrative Services (“Department”) is such an officer of such an executive Department.

B. Complainants’ Allegations of Discrimination.

The vast majority of Complainants’ complaint asserts that the Iowa Department of Administrative Services denied their application to have a holiday display in the Capitol Building. The only allegations that pertain to the Office of the Governor are that the Office of the Governor “conspired” and “coordinated” with the Department to deny the application based on Complainants’ religion and in retaliation for complaints about a prior incident of criminal vandalism in 2023.

II. DISCUSSION

A. Requirements to proceed with a Tier 1 Investigation.

Pursuant to Iowa Administrative Code Rule 161—3.26(5) which establishes the Office of Civil Rights (“OCR”)’s standard for tier one investigations, a complaint will be administratively closed if further investigation is not warranted. Further, processing is only warranted “when the submitted information indicates a reasonable possibility of a probable cause determination or the legal issues in the complaint need development.” For the reasons stated below, there is no reasonable likelihood of a probable cause determination in this matter. Resultantly, the Respondent requests this complaint be administratively closed or that the Office of the Governor be dismissed as a party.

Public Accommodation.

Complainants allege a denial of service of a public accommodation as the basis for their complaint. As a threshold matter, the Office of the Governor of Iowa is not responsible for the approval or denial of any applicant’s request to utilize space at the Capitol Complex. This is a responsibility that has been delegated to the Department.

Complainants alleged the Office of the Governor “coordinated” and “conspired” with the Department to deny Complainants’ applications. Complainants have not offered any substantive evidence in support of this allegation. Complainants has offered conjecture only regarding meetings which took place between the Office of the Governor and the Department.

CP# 07-25-84063 and 07-25-84064

September 8, 2025

Page 3

Complaint at 11 and 14. In fact, Complainants admit that they do not know the content of the meetings between the Office of the Governor and the Department. The Iowa Constitution expressly grants the Governor the ability to “transact all executive branch business with the officers of the government”. Art. IV §9. It also expressly grants the Governor the discretion to require information in writing from the officers of the executive department upon any subject. *Id.* The Director of the Department is such an officer. *See* Iowa Code § 8A.102 (2025). Complainants’ allegations of “conspiracy” and “coordination” as supported by the limited correspondence they have provided do not indicate more than Iowa’s executive branch functioning in accordance with Iowa’s constitution.

Complainants have not advanced any claim of discrimination in a public accommodation as it pertains to the Office of the Governor. The Office of the Governor should be dismissed as a party to this complaint.

Complainants have not made a prima facie case for Retaliation.

A prima facie case of retaliation under the ICRA requires Complainants to establish (1) [they were] engaged in statutorily protected activity, (2) [they were] subjected to a materially adverse action, and (3) a causal connection between [their] participation in the protected activity and the adverse....action. *Rheeder v. Gray*, 23 N.W.3d 1, 15 (Iowa 2025) (quoting *Rumsey v. Woodgrain Millwork, Inc.*, 962 N.W.2d 9, 28 (Iowa 2021)); *see also Haskenhoff v. Homeland Energy Sols., LLC*, 897 N.W.2d 553, 582 (Iowa 2017).

Significantly, Complainants have failed to provide any evidence that the Office of the Governor denied the application. Complainants have shown that the Department and the Office of the Governor met regarding the Satanic Temple’s application. However, as previously stated, the Office of the Governor of Iowa does not evaluate applications or ultimately approve or deny applications for the use of space at the Capitol Complex.

Complainants have also failed to show how the denial of the Satanic Temple’s application for the Holiday Display Day event was related to the events of December 2023 and complaints made by the Satanic Temple thereafter. The December 2024 event was months later. Without explanation as to how the Office of the Governor took an adverse action against the Complainants and how the Office of the Governor had any motive to retaliate against Complainants, Complainants are simply unable to establish a claim of retaliation.

CP# 07-25-84063 and 07-25-84064

September 8, 2025

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III. CONCLUSION

For the reasons set forth above, the Office of the Governor of the State of Iowa respectfully requests the Iowa Office of Civil Rights dismiss it as a party to this complaint, or alternatively find that there is no reasonable possibility of a probable cause determination and close this complaint. Should you have any further questions, please feel free to contact me at your convenience.

Sincerely,

/s/ Lindsey L. Browning

Lindsey L. Browning
Section Chief
Administrative Law Section

Correspondence with Parties

Mediation Letters



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

11/24/2025

RE: CP# 07-25-84063 & 07-25-84064

THE SATANIC TEMPLE, INC v. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES

Dear THE SATANIC TEMPLE, INC:

The above captioned complaint has been deemed to warrant further investigation. A copy of the Tier 1 Investigative Report is enclosed.

At this time, you may choose to have this dispute mediated. Mediation is a process that affords the parties an opportunity to develop their own mutually acceptable resolution to a dispute. The mediator acts as a neutral facilitator and controls the *process*. The parties maintain control over the *outcome*. Participation in mediation is optional.

Mediation through the Iowa Office of Civil Rights (IOCR) is available at no cost to the parties. If both parties agree to mediate, the IOCR will designate a mediator to conduct a mediation session pursuant to Iowa Code §216.15B. All communications made to the designated mediator are privileged and confidential and are not subject to disclosure in any judicial or administrative proceeding as provided in Iowa Code Chap. 679C, which states that mediation commences at the time of initial contact with the mediator and includes all contacts between the mediator and any party, until such time as the parties reach a resolution or the mediation process concludes.

Parties who elect to mediate are expected to come with settlement authority and a good faith intention to pursue a voluntary resolution. Participants should be prepared to listen to the other party's point of view, to address the issues on the face of the complaint, and to exchange proposals for a reasonable resolution.

If a settlement is reached, the complaint with the Iowa Office of Civil Rights will be closed. If either party chooses not to mediate, or a voluntary settlement does not result from the mediation, the complaint will be assigned for further investigation.

Representation by an attorney is not required; however, you have the right to be represented by legal counsel provided at your own expense. It may be in your interest to consult an attorney prior to the mediation.

Please contact Lindsay Strosche at 515-608-3716 or via e-mail at lindsay.strosche@iowa.gov with any questions and to communicate whether or not you elect to participate in mediation. Failure to respond may affect the timely processing of this complaint.

Sincerely,
Iowa Office of Civil Rights

Enclosures: Tier 1 Investigative Report

CC: File

RITA BETTIS AUSTEN, Complainant's Attorney
AURORA SHEFALI, Complainant's Attorney
THOMAS STORY, Complainant's Attorney
MATT KEZHAYA, Complainant's Attorney



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

11/24/2025

RE: CP# 07-25-84063

THE SATANIC TEMPLE, INC v. IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES

Dear IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES:

The above captioned complaint has been deemed to warrant further investigation. A copy of the Tier 1 Investigative Report and Initial Information Requests are enclosed.

At this time, you may choose to have this dispute mediated. Mediation is a process that affords the parties an opportunity to develop their own mutually acceptable resolution to a dispute. The mediator acts as a neutral facilitator and controls the *process*. The parties maintain control over the *outcome*. Participation in mediation is optional.

Mediation through the Iowa Office of Civil Rights (IOCR) is available at no cost to the parties. If both parties agree to mediate, the IOCR will designate a mediator to conduct a mediation session pursuant to Iowa Code §216.15B. All communications made to the designated mediator are privileged and confidential and are not subject to disclosure in any judicial or administrative proceeding as provided in Iowa Code Chap. 679C, which states that mediation commences at the time of initial contact with the mediator and includes all contacts between the mediator and any party, until such time as the parties reach a resolution or the mediation process concludes.

Parties who elect to mediate are expected to come with settlement authority and a good faith intention to pursue a voluntary resolution. Participants should be prepared to listen to the other party's point of view, to address the issues on the face of the complaint, and to exchange proposals for a reasonable resolution.

If both parties agree to mediate, the deadline for production of relevant documents provided in the enclosed Initial Information Request is stayed until thirty (30) days after the conclusion of the mediation. If a settlement is reached, the complaint with the Iowa Office of Civil Rights will be closed. If either party chooses not to mediate, or a voluntary settlement does not result from the mediation, the complaint will be assigned for further investigation.

Representation by an attorney is not required; however, you have the right to be represented by legal counsel provided at your own expense. It may be in your interest to consult an attorney prior to the mediation.

Please contact Lindsay Strosche at 515-608-3716 or via e-mail at lindsay.strosche@iowa.gov with any questions and to communicate whether or not you elect to participate in mediation. Failure to respond may affect the timely processing of this complaint.

Sincerely,
Iowa Office of Civil Rights

Enclosures: Tier 1 Investigative Report, Initial Information Request

CC: File

LINDSEY L. BROWNING, Respondent's Attorney
ADAM STEEN, DIRECTOR
OFFICE OF THE GOVERNOR OF THE STATE OF IOWA

Docketing Letters



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

7/24/2025

MORTIMER ADramelech
C/O MATT KEZHAYA
150 S 5TH ST, SUITE 1850
MINNEAPOLIS, MN 55402

RE: CP# 07-25-84064
MORTIMER ADramelech v IOWA DEPARTMENT OF
ADMINISTRATIVE SERVICES

MORTIMER ADramelech:

The Iowa Office of Civil Rights (IOCR) has received your completed complaint form. You have stated IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES has violated the Iowa Civil Rights Act by discriminating against you. A date-stamped copy of the complaint and an outline of the complaint process are enclosed. If there is an EEOC # at the top of this letter, we have also filed your complaint with the US Equal Employment Opportunity Commission (EEOC).

The IOCR is an investigative law enforcement agency. Our office does not represent you or the respondents in this case. Our role is to conduct a neutral investigation of any conduct covered by the Iowa Civil Rights Act. We will collect information that could include statements, documents, and witness names and statements to aid us in our investigation.

ACTION NEEDED: You will be provided with a Questionnaire seeking additional information about your claims, which will assist our office in our investigation. Please complete this set of questions and return within thirty (30) days of the date of this letter. It is important that your responses to the questionnaire are clear and contain complete information. Further, please send any supporting evidence you have with the questionnaire response (e.g. statements, documents, witness names and/or statements). **Email submissions to icrc@iowa.gov are preferred.** Please keep a copy of everything you submit to this office. All other submitted documentation should be on "8½" by 11" paper and not include staples. Whenever contacting our office, please provide the CP# cited above.

Once the investigation is complete, an Agency determination will be made based on the information submitted by both you and the Respondent. You and the Respondent will receive written notice of the outcome of the investigation.

If you want to bypass the administrative investigative process, you may request a letter granting you the right to sue in State District Court. Please read the enclosed Information Sheet regarding Right-to-Sue letters.

PLEASE NOTE: You are responsible for keeping us notified of any changes of address or telephone numbers. If you do not, this may be considered as a failure to cooperate with the investigation and may result in our closure of your file and loss of your rights under the law.

Sincerely,
Iowa Office of Civil Rights

Enclosures: Complaint Form, Complainant Questionnaire, RTS Information Sheet, Case Process Information, EEOC Information Sheet (if applicable).

CC: File

RITA BETTIS AUSTEN, Complainant's Attorney
SHEFALI AURORA, Complainant's Attorney
THOMAS STORY, Complainant's Attorney

Iowa Office of Civil Rights, 6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270
515-281-4121 / 1-800-457-4416 / Fax 515-242-5840 / icrc@iowa.gov



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

7/24/2025

IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES
1305 E WALNUT ST, 3RD FLOOR
DES MOINES, IA 50319

RE: CP# 07-25-84064
MORTIMER ADRAMELECH v. IOWA DEPARTMENT
OF ADMINISTRATIVE SERVICES

IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES:

The purpose of this letter is to provide legal service upon you as a Respondent in this case. The complaint cited above has been filed with the Iowa Office of Civil Rights (IOCR) pursuant to Iowa Code Chapter 216. A date-stamped copy of the complaint is enclosed. If there is an EEOC# printed above, then this case has also been cross-filed with the United States Equal Employment Opportunity Commission (EEOC). The IOCR has been designated as an agent of the EEOC, and has authority to serve notice of this charge for the EEOC. This letter is your notice of the EEOC charge.

Under the Iowa Civil Rights Act, the IOCR has a legal responsibility to conduct an impartial fact-driven investigation of the enclosed complaint. Enclosed you will find a Questionnaire. All Respondents who receive a Questionnaire must provide responses. Please submit the Questionnaire within thirty (30) days of the date on this letter with complete and thorough information. Documentation supporting your responses is **REQUIRED**, including all documents and/or affidavits that support your position. **Email submissions to icrc@iowa.gov are preferred.** You may also give a written statement using the questionnaire as a guide. Should you decide to provide a position statement, as opposed to providing responses to the enclosed questionnaires, please provide the identity of the employee/agent/owner of Respondent who is responsible for providing the information contained within the position paper.

PLEASE NOTE: 161 Iowa Administrative Code 3.6(1) provides: "When a complaint has been served on a respondent, the respondent shall preserve all records relevant to the investigation until the complaint is finally adjudicated, including but not limited to:

1. Any books, papers, documents, applications, forms, or records of any form that are relevant to the scope of the investigation;
2. Records relating to the complainant, other employees, applicants or members holding or seeking positions similar to that held or sought by the complainant;
3. Records relating to other applicants for the same position or membership as the complainant.

PLEASE REMEMBER: It is a violation of both state and federal discrimination laws for any person to retaliate against Complainant for having filed a complaint of discrimination.

If you prefer to communicate with our office exclusively via email, please email icrc@iowa.gov and provide the email address(es) you would like us to send all future correspondence to. Whenever contacting our office, please provide the CP# cited above.

Sincerely,
Iowa Office of Civil Rights

Enclosures: Complaint Form, Respondent Questionnaire, Case Process Information, EEOC Information Sheet (if applicable).

CC: File

ADAM STEEN, DIRECTOR
OFFICE OF THE GOVERNOR OF THE STATE OF IOWA

Iowa Office of Civil Rights, 6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270
515-281-4121 / 1-800-457-4416 / Fax 515-242-5840 / icrc@iowa.gov

Right to Sue Letter to Complainant



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

07/07/2026

MORTIMER ADramelech
C/O MATT KEZHAYA 150 S 5TH ST, SUITE 1850
MINNEAPOLIS, MN 55402

RE: CP# 84064

MORTIMER ADramelech v. IOWA DEPARTMENT OF
ADMINISTRATIVE SERVICES

MORTIMER ADramelech:

Enclosed is the requested Right-to-Sue letter. **The Right-to-Sue letter and issuance of a Right-to-Sue is not a finding on the merits of the charge by the Iowa Office of Civil Rights (IOCR).** Under Iowa Code Chapter 216, it is Complainant's right to receive a Right-to-Sue and the IOCR's duty to issue the Right-to-Sue. Therefore, the IOCR has administratively closed the case cited above effective the date of this letter. The IOCR will take no further action on this case.

Any party to a complaint can request a copy of the file when a Right-to-Sue has been issued. **If you or your attorney would like to obtain a copy of the file, please submit your request in writing via regular mail, fax, or email to icrc@iowa.gov (preferred).** You may opt for a paper copy or an electronic copy of the file. The copy and processing fees are as follows:

- Electronic copy of investigative files – No charge
- Photocopy of investigative files - .25¢ per page; copies of digital recordings \$15.00 per electronic storage device (hard copy); actual cost of postage.

If you opt for an electronic copy, you must provide an email address in order to receive the copy.

You have ninety days (90) from the date of this letter to initiate or file a lawsuit against the Respondent in District Court. If you have not retained an attorney, you may wish to contact the Iowa Bar Association's Lawyer Referral Services at www.iabar.net.

Thank you for your cooperation.

Sincerely,
Iowa Office of Civil Rights

Enclosure: Administrative Release (Letter of Right-to-Sue)

CC: File

Complainant Attorney: RITA BETTIS AUSTEN

Iowa Office of Civil Rights, 6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270
515-281-4121 / 1-800-457-4416 / Fax 515-242-5840 / icrc@iowa.gov

Right to Sue Letter to Respondent



STATE OF IOWA

KIM REYNOLDS, GOVERNOR
CHRIS COURNOYER, LT. GOVERNOR

KRISTEN STIFFLER, EXECUTIVE DIRECTOR

07/07/2026

IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES
ATTN: IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES, OFFICE OF THE GOVERNOR OF
THE STATE OF IOWA, ADAM STEEN, DIRECTOR
1305 E WALNUT ST 3RD FLOOR
DES MOINES, IA 50319

RE: CP# 84064

MORTIMER ADRAMELECH v. IOWA DEPARTMENT OF
ADMINISTRATIVE SERVICES

IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES, OFFICE OF THE GOVERNOR OF THE
STATE OF IOWA, ADAM STEEN, DIRECTOR:

The Complainant has requested and received a 'Right-to-Sue' letter. **The Right-to-Sue letter and issuance of a Right-to-Sue is not a finding on the merits of the charge by the Iowa Office of Civil Rights (IOCR).**

Under Chapter 216 of the Code of Iowa, it is Complainant's right to receive a Right-to-Sue and the IOCR's duty to issue the Right-to-Sue. Therefore, the IOCR has administratively closed the case cited above effective the date of this letter. The IOCR will take no further action on this case.

Any party to a complaint to request a copy of the file when a Right-to-Sue has been issued. **If you or your attorney would like to obtain a copy of the file, please submit your request in writing via regular mail, fax, or email to icrc@iowa.gov (preferred).** The copy and processing fees are as follows:

- Electronic copy of investigative files – No charge
- Photocopy of investigative files - .25¢ per page; copies of digital recordings \$15.00 per electronic storage device (hard copy); actual cost of postage.

If you opt for an electronic copy, you must provide an email address in order to receive the copy.

Thank you for your cooperation.

Sincerely,
Iowa Office of Civil Rights

Enclosure: Administrative Release (Letter of Right-to-Sue)

CC: File

Respondents: IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES, OFFICE OF THE GOVERNOR
OF THE STATE OF IOWA, ADAM STEEN, DIRECTOR

Iowa Office of Civil Rights, 6200 Park Avenue, Suite 100, Des Moines, Iowa 50321-1270
515-281-4121 / 1-800-457-4416 / Fax 515-242-5840 / icrc@iowa.gov

Right to Sue Release to Complainant and Respondent

Administrative Release
(Letter of Right-To-Sue)

To: MORTIMER ADramelech C/O MATT KEZHAYA 150 S 5TH ST, SUITE 1850 MINNEAPOLIS, MN	From: Iowa Office of Civil Rights 6200 Park Avenue Suite 100 Des Moines, Iowa 50321-1270
Complaint CP# 84064	

This is your Administrative Release (Right-To-Sue) Letter issued pursuant to Iowa Code § 216.16 and Iowa Administrative Code r. 161-3.43. It is issued pursuant to your request.

The conditions precedent found in Iowa Code § 216.16(2) and Iowa Administrative Code r. 161-3.43(2) have been met.

With this Right-To-Sue Letter, you have the right to commence an action in district court. That action must be commenced within ninety (90) days of the Right-To-Sue Letter issuance date, 07/07/2026.

The Right-To-Sue Letter is not a finding by the IOCR on the merits of the charge. The Iowa Office of Civil Rights will take no further action in this matter.

A copy of the Right-To-Sue Letter has been sent to the Respondent(s) as shown below. Iowa law allows any party to a complaint to request a copy of the file when a Right-to-Sue has been issued. If you or your attorney would like to obtain a copy of the file, please submit your request in writing via regular mail, fax, or email to icrc@iowa.gov. The copy and processing fees are as follows:

- Electronic copy of investigative files – No charge
- Photocopy of investigative files - .25¢ per page; copies of digital recordings \$15.00 per electronic storage device (hard copy); actual cost of postage.

If you opt for an electronic copy, you must provide an email address to receive the copy.

The Iowa Office of Civil Rights

Phone: (515) 281-4121

FAX: (515) 242-5840

Email: icrc@iowa.gov

CC: File

Complainant Attorney: RITA BETTIS AUSTEN

Respondents: IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES, OFFICE OF THE GOVERNOR OF THE STATE OF IOWA, ADAM STEEN, DIRECTOR

Decisions

**84063 and 84064
PCR Final
11.24.25**

TIER 1 INVESTIGATIVE REPORT

CP # 07-25-84063 & 07-25-84064

Areas: Public Accommodation; Retaliation

Bases: Religion; Opposition

Complainants: The Satanic Temple, Inc. (TST) & Mortimer Adramelech¹

Respondents: Iowa Department of Administrative Services (DAS), Office of the Governor of the State of Iowa (IGOV), Adam Steen

Adverse Action 1: Denied Service

Date: December 10, 2024

Adverse Action 2: Retaliation

Date: October 7, 2024–December 10, 2024

COMPLAINANT’S ALLEGATIONS

Relevant Factual Allegations:

The Satanic Temple, Inc. (TST or Complainant) is a religious organization dedicated to the beliefs of Satanism. TST is led by Mortimer Adramelech and provides ministry to a congregation in Iowa, as well as hosting events promoting their beliefs similarly to other religious organizations, often utilizing publicly available space.

In late 2023, Complainant put up a holiday display at the Iowa State Capitol, which was subsequently destroyed by an individual professing “Christian civil disobedience.”² This incident occurred a few days after comments regarding the display by national and state political figures, including Governor Kim Reynolds. Complainants assert these comments indicate hostility toward their beliefs. Complainants allege that they made complaints to the State of Iowa about this incident and their complaints were not addressed by Respondents.

On July 12, 2024, Complainant applied to Respondent Iowa Department of Administrative Services (DAS) to hold a four-day event at the Capital Building that involved a marathon reading of PARADISE LOST by John Milton, which is identified as a core religious text for Complainant. The event was initially added to the Capitol Building calendar for September 16 to 19, 2024. However, on July 26, 2024, Complainant was notified that a change of policy would disrupt the event. DAS’s new policy restricted all events to a single day and organizations could only hold one event per calendar year in the capitol. Complainants decided not to hold the PARADISE LOST event, so that they would be able to have a holiday event later in the year. Complainants also informed Respondent that they felt this

¹ The IOCR separated the complaints of the two complainants for administrative purposes. Because the facts and legal arguments are identical in both cases, they will be considered together for purposes of this Tier 1 Investigative Report. In this Report, Complainant or “TST” will refer to The Satanic Temple, Inc. and Mortimer Adramelech will be referred to as Adramelech. They will be referred to collectively as Complainants.

² All quotes contained herein are verbatim. Any alterations are denoted in brackets.

new policy was discriminatory, because a multi-day marathon reading of the Bible had been allowed earlier in the year. Complainants also requested clarification from DAS about when the policy changed, and DAS confirmed it changed on July 26, 2024. TST put out a press release following their decision to move their PARADISE LOST event, in which it stated the policy was changed, “due to the Iowa state government’s unwillingness to respect diverse perspectives and religious freedom.”

Complainants assert that Respondent continued to apply its policies inconsistently and allowed some Christian organizations to continue to hold multiple events during the year, including a monthly Pray the Rosary event for the Catholic Diocese of Des Moines.

On October 7, 2024, TST submitted an application to hold its holiday display event in the Capitol Rotunda on December 14, 2024. The application stated the display would include a “ritual, Krampus costumes, caroling, and other family-friendly activities such as coloring pages, and make and take ornaments.” Capitol Complex Events Coordinator Suzy Trotter replied to the application, stating the event had been added to the calendar and requesting Complainant complete the MOU and provide “a sketch and/or details of the event.” Complainant submitted the MOU on October 21, 2024.

On November 4, 2024, after not receiving a countersigned copy of the MOU, Complainant emailed Trotter to ask about the status of its application. On November 6, 2024, Trotter responded that the MOU was under review with leadership and it could expect a response a week later. By November 13, 2024, Complainant still had not received a response and it followed up with Trotter once again. However, Respondent did not reply until December 3, 2024. This response did not conclusively approve or deny the application, but asked for further information. On December 6, 2024, Complainant submitted the additional information. This included a song list, images of the ornaments and coloring pages, descriptive images of what the Krampus costumes would look like, details about the costume contest, and a detailed description of the ritual.

Complainants provide open records responses it received from Respondent demonstrating at this time, DAS and Office of the Governor of the State of Iowa (IGOV) senior staff may have been consulting on the review of Complainant’s application. This included meetings between DAS Director Adam Steen, IGOV Chief Operating Officer Jacob Nichol森, and IGOV Senior Legal Counsel Stan Thompson. On December 9, 2024, Nicholson texted Steen asking about the application and requesting he come to IGOV’s offices to discuss the additional information Complainant had submitted. The following day, IGOV’s Deputy Communications Director Mason Mauro sent Thompson a document titled “12.10.2024 Satanic Temple denial statement” for feedback.

Also on December 10, 2024, Steen sent an email to Complainants informing them the application had been rejected and cited Iowa Admin. Code r. 11-100.4(5) and section 5.15 of the MOU.

Iowa Admin. Code r. 11—100.4(4)&(5) provide:

(4) *Event request.* State agencies or the general public may request use of capitol complex facilities, grounds or parking lots for public events by completing an application on the department website (das.iowa.gov). This shall not be interpreted as an infringement on the right of assembly and petition guaranteed by Section 20, Article I, Constitution of Iowa.

- a. The director shall notify the applicant of approval or denial to use the requested areas. Notification of approval may take the form of a letter to the event sponsor(s) or a memorandum of understanding (MOU) signed by the director and the event sponsor(s). The MOU specifies the conditions under which the event will take place.
- b. The director may allow events if appropriate security and supervision are provided and the director determines that granting the approval is consistent with the underlying purpose of these rules and that the public interest so demands.
- c. Approval for the event may contain such terms and conditions as are consistent with the protection, health and safety of occupants of the buildings and visitors to the capitol complex as well as preservation of the buildings, facilities, and grounds. The approval may also contain limitations on equipment used and its location, and the time and area within which the event is allowed.

(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.

Section 5.15 of the MOU provides:

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.

The denial letter did not specify what particular parts of the event were determined to be "obscene material" or "gratuitous violence or gore" or that were otherwise in violation of the rule or MOU. Complainant was confused by this denial, as it had intended this to be a family-friendly event and had emphasized this to Respondent in several email communications. Complainant responded, asking for clarification on how the decision was reached and whether Complainant could appeal the decision or modify the event to comply with Respondent's concerns.

Open records documents show Steen once again met with senior IGOV staff on December 11, 2024. The same day, Steen sent Complainant an email stating:

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.

Complainant was also confused by the reference to “sticks used as weapons on children,” because its application did not describe such an event or action. Complainant understood this to be a reference to the Krampus costume contest, as Krampus is sometimes depicted holding a birch branch. In historical folk tales, Krampus used the birch branch to beat naughty children, as an intentional contrast to St. Nicholas, who brought gifts to good children. Complainants explain that this historical depiction does not represent contemporary understandings of Krampus “as a rejection of the consumerism surrounding the [holiday] season” and a reminder of the other traditions related to the Winter Solstice.³

Complainants assert that no material it submitted could reasonably be understood to include plans to use sticks as weapons on children. Accordingly, Complainant responded to this email, indicating it never intended for the birch branches to be anything other than decorative, would not be used on anyone, and if that was still objectionable, offered to omit the costume contest entirely. Respondent did not respond to this email, despite another follow-up request on December 12, 2024. The event did not take place on December 14, 2024. Complainant asserts at least one other religious event was held in the State Capitol on that day.

On December 16, 2024, Complainants requested the event be rescheduled to December 21, 2024. Respondent did not answer this request.

Complainant asserts that the delays in responses from DAS during the course of its evaluation of the application prevented Complainant from correcting any concerns raised in the process. Complainant submitted its application materials on October 7, 2024, but did not receive the requests for additional information until December 3, 2024, making it impossible for them to submit a new application in compliance with the time requirements of Respondent. Further, Respondent ignored all subsequent requests from Complainant to amend its initial application to remove the offending material in order to comply with the MOU or to reschedule the event.

Complainants also state that comments made by Steen following his tenure as Director of DAS indicate that he had discriminatory and/or retaliatory motive in denying their application. According to the articles provided by Complainant, Steen describes himself as a “faith guy” and a

³ Peter Larson, The Naughty List: Krampus, Other Dark Characters as Holiday Traditions, UCF TODAY, Dec. 5, 2024, <https://www.ucf.edu/news/the-naughty-list-krampus-other-dark-characters-as-holiday-traditions/>. Article provided by Complainant.

“Jesus guy” and states that he “stood in front of the Satanists when they blatantly targeted our children.”⁴ In another interview, Steen said:

“I was the guy at the Capitol when the Baphomet Satanic statue was in there. ... I had several conversations with several people that led to us eventually not fight the ‘free speech’ aspect of (that display). But I’m also the guy that changed the policy to make sure we weren’t going to lose a ‘free speech’ argument, and now I’m being sued by the Satanists for that.”⁵

Relevant Information/Documents:

- IOCR Complaint Form
- News Stories regarding vandalism of Complainant’s 2023 holiday display
- Complainant’s July 12, 2024, application for a marathon reading of Paradise Lost
- Press Release from Complainant advertising the Paradise Lost Event
- Memorandum of Understanding regarding Paradise Lost Event
- Email regarding Complainant’s questions about the MOU and changes to space use policy
- Public Statement from Complainant complaining about the changes to space use policy
- Complainant’s October 7, 2024, application
- Additional Information regarding Holiday Display Event, including itinerary and images
- MOU regarding Holiday Display Event
- Open Records Responses showing correspondence between DAS and IGOV staff
- Email correspondence regarding Respondent’s denial and Complainants’ request to modify
- Demand Letter from Complainants’ counsel

RESPONDENTS’ REASONS

Relevant Factual Allegations:

Respondents provide separate statements on behalf of DAS and IGOV. Each statement will be summarized separately below.

DAS Response

The Iowa Department of Administrative Services is a division of Iowa state government created by the Iowa legislature on July 1, 2003. DAS is responsible for managing state government resources, infrastructure, and services. DAS was created from a merger of four separate offices: general services, information technology, personnel, and the accounting division of revenue and finance. DAS is responsible for oversight of use of public spaces at the Capitol Building. Respondent has

⁴ Robin Opsahl, Former Iowa Administrator Adam Steen Announces GOP Campaign for Governor, IOWA CAPITAL DISPATCH, August 19, 2025, <https://iowacapitaldispatch.com/2025/08/19/former-iowa-administrator-adam-steen-announces-gop-campaign-for-governor>. Article provided by Complainants.

⁵ Brian Vidmar, Gubernatorial Candidate Adam Steen makes campaign stop in Fort Madison, DAILY DEMOCRAT, October 21, 2025, https://www.mississippivalleypublishing.com/daily_gate/gubernatorial-candidate-adam-steen-makes-campaign-stop-in-fort-madison/article_13288ffe-060b-4f37-ad16-038967aaf346.html. Article provided by Complainants.

developed a Memorandum of Understanding (MOU) it uses for all applications in order to outline expectations for use of public space.

As a preliminary matter, DAS questions Complainant's highlighting of the vandalism incident from late 2023. It notes there is no evidence the individual who destroyed the display was in any way linked to Iowa government actors or any part of Respondents. The individual acted on his own and was criminally prosecuted for the vandalism.

DAS further asserts that it acted in accordance with the procedures it applies to all outside entities seeking to use public space at the Capitol. In 2024, DAS changed its events policy, stating organizations could no longer hold multi-day events, nor could they hold more than one event per year. DAS provides evidence of four non-religious events that were denied permission to use Capitol space after the policy change: Des Moines Homeless Veterans Stand Down, Iowa Vietnam War Veterans, Iowa Federation of Labor, and The Des Moines Metro Concert Band. The policy also requires events be submitted more than thirty days in advance of the event. DAS identifies four events also submitted for December 14, 2024, which were all denied for applying with insufficient time to review: Red Oak Mennonite Youth Group, Christmas Chorale, Iowa Liberty Network's St. Michael Display, and The Molech Monastery's Winter Worship.

On July 29, 2024, DAS approved TST's application for a reading of PARADISE LOST. However, due to policy, it only approved the application with regard to the September 16, 2024, event. DAS informed TST of the policy that it would only be able to hold one event per year. TST then chose to withdraw its application in favor of an event during its holiday season.

On October 7, 2024, Jordanne Beach submitted a request from TST for an event in the Capitol Rotunda on December 14, 2024. The same day, DAS provided the MOU with rules for holding events at the Capitol. DAS then put the event under review and added a placeholder event to its State Capitol Complex Event Calendar.

On December 3, 2024, DAS requested additional information about the event.

Beach provided a response on December 6, 2024, including a finalized song list; images of ornaments, coloring pages, and anticipated costumes; descriptions of the costume contest and ritual; and a finalized itinerary. The costume contest description states, "Participants will present their costumes for the audience to vote on. We will have 1st, 2nd, and 3rd place prizes." The ritual description states, "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." Beach provided two photos as examples of Krampus costumes. Those photos are reproduced below.



The information was reviewed by DAS Director Adam Steen. Respondent asserts Steen was concerned primarily about the inclusion of a Krampus costume contest. Respondent notes Krampus folk lore involves a legacy of violence against children. Respondent provides news stories from 2019 through 2024 regarding “Krampus runs” in Germany and Austria that resulted in some violence and concerns that the events were upsetting to children.⁶ Respondent further notes the images provided to DAS demonstrating Krampus costumes included birch rods, which are “traditionally used by Krampus to strike children.”

Based on these images, Steen decided to deny the application on the grounds of the discretionary power granted to him by Iowa Admin. Code r. 11—100.4(5). Iowa Admin. Code r. 11—100.4(4)&(5) provide:

(4) *Event request.* State agencies or the general public may request use of capitol complex facilities, grounds or parking lots for public events by completing an application on the department website (das.iowa.gov). This shall not be interpreted as an infringement on the right of assembly and petition guaranteed by Section 20, Article I, Constitution of Iowa.

- d. The director shall notify the applicant of approval or denial to use the requested areas. Notification of approval may take the form of a letter to the event sponsor(s) or a memorandum of understanding (MOU) signed by the director and the event sponsor(s). The MOU specifies the conditions under which the event will take place.
- e. The director may allow events if appropriate security and supervision are provided and the director determines that granting the approval is consistent with the underlying purpose of these rules and that the public interest so demands.
- f. Approval for the event may contain such terms and conditions as are consistent with the protection, health and safety of occupants of the buildings and visitors to the capitol complex as well as preservation of the buildings, facilities, and grounds. The approval may also contain limitations on equipment used and its location, and the time and area within which the event is allowed.

(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).

⁶ “Are Krampus Parades Too Dangerous”, The Local Austria, December 4, 2024, <https://www.thelocal.at/20241204/are-krampus-parades-in-austria-too-violent-and-dangerous>; “Krampus Demon Attacks Woman at Christmas Market Parade” The Sunday Times, December 13, 2019, <https://www.thetimes.com/world/article/krampus-demon-attacks-woman-at-christmas-market-parade-q7snndc5m>; “Austria’s Krampus Parades Too Violent for Insurance Companies”, China Global Television Network, December 15, 2022, <https://newseu.cgtn.com/news/2022-12-15/Austria-s-Krampus-parades-too-violent-for-insurance-companies-1fLlFlemrhC/index.html>; “Violence the Other Way Around Too: Attacks on Krampuses “We need Security!””, Kronen Zeitung, November 24, 2024, <https://www.krone.at/3603515>; “Krampus Parades Turn Violent: Traditional Festivities Spark Debate over Safety and Gendered Violence”, Euro News, March 12, 2024, <https://www.euronews.com/culture/2024/12/03/krampus-parades-turn-violent-traditional-festivities-spark-debate-over-safety-and-gendered>.

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.

Steen based this decision on his judgment the event could result in violence or be disruptive to public safety, based on the images implying violence against children. Respondent notes the MOU also outlines instances where an event might be declined if they displayed or incorporated actions harmful to minors. Steen communicated the denial to Beach on December 10, 2024.

Respondent denies DAS has misapplied its policies regarding multi-day and one-event-per-year events since implementing them on July 26, 2024. Respondent notes the two events TST complained about—Patriotic Catholics and Pray the Rosary—were not formal events held inside the rotunda in space controlled by DAS, but were held outside the Capitol Building on public space. Respondent denies that it granted applications for those events.

DAS denies it acted discriminatorily or in retaliation against Complainant. It does acknowledge TST's event request was denied, but asserts the denial was done within Steen's discretion as Director, out of a concern for public safety based on the historical legacy of Krampus.

IGOV Response

The Governor of the State of Iowa is an elected office created by Article IV of the Iowa Constitution. IGOV is the office responsible for aiding the Governor of Iowa in dispensing executive duties, including transacting executive business with officers of other departments and agencies. This includes DAS, with Steen acting as DAS's officer in the instances relevant to this complaint.

IGOV denies it was involved in the alleged discrimination against Complainant. It notes Complainant's claims are primarily against DAS and its decision to deny Complainant's request to use Capitol Building space for events. The only allegation against IGOV is that it "conspired" and "coordinated" with DAS in its decision to deny the application. IGOV is not responsible for approving or denying requests to use public space in the Capitol Building, as it has delegated this responsibility to DAS. IGOV asserts Complainant has failed to demonstrate coordination between DAS and IGOV, as there is no record of the matters discussed in the meetings between the agencies referenced in Complainant's complaint. It similarly asserts Complainant has failed to allege IGOV was involved in any allegedly retaliatory conduct.

Relevant Information/Documents:

- Position Statements for DAS & IGOV drafted by Respondents' counsel
- News Stories and Emails documenting denial of non-religious events due to Respondent's July 26, 2024, policy change
- Record of Applications for Events to be held on December 14, 2024
- Complainant's Event Application Email
- Memorandum of Understanding
- Additional Information Request and Complainant's Answer
- Email notifying Complainant the Event Request has been denied, dated December 10, 2024

STANDARD

The Iowa Office of Civil Rights (IOCR) issues Tier One investigation decisions based on the information collected to date. If the information indicates a “reasonable possibility of a probable cause determination or the legal issues in the complaint need development” the IOCR will retain the complaint for further investigation. Iowa Admin. Code r. 161—3.26(5). During the Tier One investigation stage, the IOCR 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 IOCR does not evaluate credibility at this stage, and instead evaluates only whether the stated facts create a “reasonable possibility” for a probable cause finding. The IOCR 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).

ANALYSIS

Relevant Parties

As an initial matter, IGOV asserts Complainant erred in naming IGOV as a party to this matter, as it is not responsible for approval or denial of applications to use space at the capitol. That responsibility is delegated to DAS generally and Steen specifically, as DAS Director. Complainant has alleged IGOV coordinated with DAS in its decision to deny its application. IGOV resists this assertion by claiming Complainant has no evidence this matter was ever discussed in meetings between staff and any document requests were merely the regular course of communication and monitoring between IGOV and an agency officer.

In support of its claim against IGOV, Complainant provided a text message between Steen and IGOV staff. This message specifically includes the request Steen “bring [the materials Complainant submitted to Respondent’s December 3, 2024, request] over so we could look at the pictures or diagrams or whatever it is they sent and talk it through.” These communications support an inference IGOV staff was consulted in the process of DAS’s decision-making.

Iowa Code § 216.11 states that it is an unfair or discriminatory practice to aid another person in a discriminatory practice under Iowa Code Chapter 216. At the Tier 1 investigation stage, the IOCR makes all reasonable inferences in a complainant’s favor. Although DAS is the sole agency of the state responsible for responding to the type of request Complainants made, Complainants may still be able to state a claim against IGOV under the ICRA in these circumstances. Accordingly, this analysis will continue as to all named Respondents at the Tier 1 investigation stage.

Adverse Action 1: Denied Service

Date: December 10, 2024

Timely?

☒ Yes

☐ No

☐ Undetermined

“Except as otherwise provided in section 614.8, a claim under this chapter shall not be maintained unless a complaint is filed with the agency within three hundred days after the alleged discriminatory or unfair practice occurred.” Iowa Code § 216.15(13). Complainants filed this complaint on June 9, 2025. Therefore, all adverse actions occurring on or after August 13, 2024, are timely.

Is there direct evidence? ☐ Yes ☒ No ☐ Undetermined

Complainant can prove unlawful discrimination through direct evidence or indirectly through inference using the pretext analytical model. *Butler v. Crittenden Cty., Ark.*, 708 F.3d 1044, 1050 (8th Cir. 2013) (citing *Young-Losee v. Graphic Packaging Int’l, Inc.*, 631 F.3d 909, 912 (8th Cir. 2011); *Price Waterhouse v. Hopkins*, 490 U.S. 228, 242 109 S. Ct. 1775 (1989)). Complainant must show the adverse action “‘occurred under circumstances giving rise to an inference of discrimination,’” and Complainant’s status as a protected class member was a motivating factor in the decision. *DeBoom v. Raining Rose, Inc.*, 772 N.W.2d 1, 13 (Iowa 2009) (citations omitted).

Prima Facie Case:

A prima facie case of discrimination in public accommodation requires a showing the Complainant (1) is a member of a protected class; (2) they sought to enjoy the accommodations of the public accommodation; and (3) they did not enjoy the accommodations because of discrimination in that (a) the individual was refused or denied the accommodations while similarly situated persons outside the protected class were not deprived of those services, or (b) the individual was allowed to use them but was otherwise subjected to markedly hostile conduct. *Kirt v. Fashion Bug #3253*, 479 F. Supp. 2d 938, 959 (N.D. Iowa 2007).

In a business setting, “markedly hostile” conduct is conduct that “(1) is so profoundly contrary to the manifest financial interests of the merchant and/or [their] employees; (2) so far outside of widely accepted business norms; and (3) so arbitrary on its face, that the conduct supports a rational inference of discrimination.” *Id.* at 966 (quoting *Callwood v. Dave & Buster’s, Inc.*, 98 F. Supp. 2d 694, 708 (D. Md. 2000)). A complainant must prove the conduct was “‘in a manner that a reasonable person would find objectively unreasonable’” for the conduct to be considered markedly hostile. *Id.* at 962 (quoting *Callwood*, 98 F. Supp. 2d at 708). “Any credible evidence” showing a respondent engaged in an adverse action based on a complainant’s protected class “may establish an inference of discrimination.” *Id.*

Element 1: ☒ Yes ☐ No ☐ Undetermined

TST is a religious group.

Adramalech is a Satanist. He is a member of a protected group based on his religion.

Element 2: ☒ Yes ☐ No ☐ Undetermined

On October 7, 2024, TST submitted an application to hold an event in the Iowa Capitol Building on December 14, 2024. Complainants sought to enjoy Respondent’s accommodations.

Element 3: ☒ Yes ☐ No ☐ Undetermined

Complainants' application to hold an event at the Capitol Rotunda on December 14, 2024 was denied. Complainants were denied the use of that public accommodation.

Complainants assert that there are circumstances suggesting that discrimination against Complainants' religion was the motivation for the denial. First, Complainants note that other organizations were allowed to hold events that day and during the month of December. Complainants also assert that Respondent has inconsistently applied its rule about multi-day events, including allowing a monthly event for another religious entity, suggesting a preference for other religions. Complainants also assert that the timing and manner of Respondent's response suggests a possible discriminatory motive. Respondent received Complainants' application on October 7, 2024. Respondent issued the denial of Complainants' application on December 10, 2024 and did not respond to Complainants' requests to amend its application to omit possible offending aspects.

Complainants have made a prima facie case.

Respondent's Nondiscriminatory Reason:

Respondent provided legitimate, nondiscriminatory reason and supported with admissible evidence:

☒ Yes ☐ No

The establishment of a prima facie case creates a rebuttable presumption of discrimination. *McCullough v. Real Foods, Inc.*, 140 F.3d 1123, 1126 (8th Cir. 1998). Once a prima facie case is established, the burden shifts to the Respondent to articulate some legitimate, nondiscriminatory reason for the challenged action. *Valline*, 2003 WL 21361344 at *3 (citing *Bd. of Supervisors of Buchanan Cnty. v. Iowa C.R. Comm'n*, 584 N.W.2d 252, 256 (Iowa 1998)). The reason must be articulated with some specificity and clarity in order to afford Complainant "a full and fair opportunity to demonstrate pretext." *Burdine*, 450 U.S. at 255–56.

This burden involves the production of some admissible evidence giving rise to a genuine issue of fact. *Hamilton v. First Baptist Elderly Hous. Found.*, 436 N.W.2d 336, 338 (Iowa 1989). The supporting evidence does not need to be enough to persuade a court that the proffered reason was the actual motivation. *Id.* Attorney arguments are not considered admissible evidence. *State v. Graves*, 668 N.W.2d 860, 878 (Iowa 2003); 8th Circuit Model Civil Jury Instructions 1.02(1); Iowa Model Jury Instruction 100.4.

First, Respondent states Steen had discretion to deny the event due to the potential for violence or disruption of public safety. This power is granted to Steen under Iowa Admin. Code r. 11—100.4(5) and was stated in the MOU sent to TST. Respondent DAS asserts that it denied Complainants' application due to concerns about violence against children. DAS states that Complainants provided photos of examples of Krampus costumes, which include birch branches. Respondent cites several articles about violence occurring during "Krampus runs" and asserts the birch rods included in the typical Krampus costume are associated with a tradition of hitting children.

Respondent further asserts that it denied four other applications for events to use Capitol space on December 14, 2024 by groups that are not associated with TST or Satanism. Each of those applications was denied because the application was received less than 30 days before the event, so it

is not clear that these are relevant comparators, because the stated reasoning for denying the event is not similar to the reasoning for denying Complainants' event. Those events may be relevant comparators in relation to TST's request to amend its application and reschedule its event.

Respondent has provided a nondiscriminatory reason for its denial of Complainants' application. Therefore, the burden shifts to Complainant to prove that such reason is pretext for discrimination.

Proof of Pretext:

Complainant can prove pretext: ☐ Yes ☐ No ☒ Undetermined

Once Respondent offers a nondiscriminatory reason, the burden then shifts back to Complainant to show that the explanation is a pretext for discrimination. *Yates v. Rexton, Inc.*, 267 F.3d 793, 798 (8th Cir. 2001). Complainant can demonstrate Respondent's reason is pretextual by showing that it is false, through the use of comparisons with similarly situated individuals, or through the use of statistics to show a pattern of discrimination. *See, e.g., Miles v. M.N.C. Corp.*, 750 F.2d 867, 870 (11th Cir. 1985); *Bradford v. Norfolk S. Corp.*, 54 F.3d 1412, 1419 (8th Cir. 1995). Failing to follow its own policies or substantially changing its proffered reasons for its actions might also be evidence of pretext by Respondent. *Ledbetter v. Alltel Corp. Servs., Inc.*, 437 F.3d 717, 722 (8th Cir. 2006) (discussing an employer failing to follow its own policies); *Kobrin v. Univ. of Minn.*, 34 F.3d 698, 703 (8th Cir. 1994), cert. denied, 522 U.S. 1113 (1998) (discussing substantial changes in proffered reason). Complainant can prove pretext by offering "evidence of 'remarks of the employer that reflect a discriminatory attitude,' as well as 'comments which demonstrate discriminatory animus in the decisional process or those uttered by individuals closely involved in employment decisions.'" *Roberts v. Park Nicollet Health Servs.*, 528 F.3d 1123, 1128 (8th Cir. 2008) (quoting *EEOC v. Liberal R-II Sch. Dist.*, 314 F.3d 920, 923 (8th Cir. 2002)). Complainant may also show evidence of prior instances of disparate treatment by Respondent in other contexts. *Phillip v. ANR Freight Sys. Inc.*, 945 F.2d 1054, 1056 (8th Cir. 1991).

Complainant may have shown Respondent's reasoning was pretext for discrimination. Complainant provides evidence that it offered to omit the Krampus costume contest from its event, which would presumably alleviate any concerns about children being hit with birch branches or being frightening by the presence of the branches.

Complainants assert that other religious groups were allowed to hold events on December 14 and other dates. However, it is not clear that there are any other events that included a costume contest or other historic references that could arguably violate the MOU. Therefore, whether there are similarly situated comparators is unable to be determined at this stage.

Complainants do not provide statistics showing a pattern of discrimination. Complainants provide examples of other groups that have held multi-day events since the changing of Respondent's rule prohibiting multi-day events. However, Respondent asserts that those groups have not received permission from DAS for those events. Accordingly, further investigation about the use of capital space without formal approval would be necessary to determine if that is a relevant comparator.

Complainants do not assert that Respondents failed to follow their own explicit policies. However, they do assert that the timing of the denial of the approval of their event suggests a possible discriminatory motive and break from usual protocols, which involve more prompt decisions on

event applications in TST's experience.

Complainant has also provided evidence of statements made by Steen, subsequent to his denial of their application, in which he describes himself as a "faith guy" and a "Jesus guy" and states that he "stood in front of the Satanists when they blatantly targeted our children."⁷ In another interview, Steen said:

"I was the guy at the Capitol when the Baphomet Satanic statue was in there. ... I had several conversations with several people that led to us eventually not fight the 'free speech' aspect of (that display). But I'm also the guy that changed the policy to make sure we weren't going to lose a 'free speech' argument, and now I'm being sued by the Satanists for that."⁸

Complainants assert that these statements indicate a discriminatory motive by Steen. The meaning of these statements is not totally clear in this context, therefore further investigation would be necessary to determine whether they indicate admission of discriminatory motive.

Complainant has provided evidence that may indicate that Respondent's reason for denying their event was pretext for discrimination. In other words, it is possible to draw the inference in Complainant's favor, based on the evidence before the IOCR at this stage of the complaint process, that Respondent was motivated by animus towards Complainant's religion in denying the application to use the space at the capitol. Further investigation is warranted to determine if the denial of Complainants' application for use of the capitol rotunda on December 14, 2024 was a violation of the Iowa Civil Rights Act.

FURTHER INVESTIGATION WARRANTED

☒ Yes ☐ No

Adverse Action 2: Retaliation

Date: December 10, 2024

Timely? ☒ Yes ☐ No ☐ Undetermined

Is there direct evidence? ☐ Yes ☒ No ☐ Undetermined

Prima Facie Case:

To establish a prima facie case of retaliation under the ICRA, an aggrieved individual must show: (1) they engaged in a statutorily protected activity; (2) they suffered an adverse action; and (3) there are circumstances supporting an inference that there is a causal connection between Complainant's

⁷ Robin Opsahl, Former Iowa Administrator Adam Steen Announces GOP Campaign for Governor, IOWA CAPITAL DISPATCH, August 19, 2025, <https://iowacapitaldispatch.com/2025/08/19/former-iowa-administrator-adam-steen-announces-gop-campaign-for-governor>.

⁸ Brian Vidmar, Gubernatorial Candidate Adam Steen makes campaign stop in Fort Madison, DAILY DEMOCRAT, October 21, 2025, https://www.mississippivalleypublishing.com/daily_gate/gubernatorial-candidate-adam-steen-makes-campaign-stop-in-fort-madison/article_13288ffe-060b-4f37-ad16-038967aaf346.html.

protected activity and Respondent's actions. *City of Hampton v. Iowa C.R. Comm'n*, 554 N.W.2d 532, 535–36 (Iowa 1996). The burden of establishing a prima facie case is not onerous. *Tex. Dep't of Cmty. Affs. v. Burdine*, 450 U.S. 248, 253 (1981); *see also Johnson v. Securitas Sec. Serv. USA, Inc.*, 728 F.3d 754, 760 (8th Cir. 2013); *Smidt v. Porter*, 695 N.W.2d 9, 14–15 (Iowa 2005). Under the ICRA, a complainant need only prove that their protected activity was a motivating factor in the challenged employment action. *Haskenboff v. Homeland Energy Sols., LLC*, 897 N.W.2d 553, 634 (Iowa 2017) (Appel, J., concurring in part and dissenting in part); *Id.* at 602 (Cady, C.J., concurring in part and dissenting in part) (agreeing that the correct standard is “motivating factor”); *see also DeBoom v. Raining Rose, Inc.*, 772 N.W.2d 1, 13 (Iowa 2009).

Element 1: ☒ Yes ☐ No ☐ Undetermined

The ICRA prohibits any person from retaliating against another because they have “lawfully opposed any practice forbidden by,” “obeys the provisions of,” or “has filed a complaint, testified, or assisted in any proceeding under” Chapter 216 of the Iowa Code. Iowa Code § 216.11(2). Courts have found protected activities include internal and informal complaints about discrimination. *Gagnon v. Sprint Corp.*, 284 F.3d 839, 854 n.4 (8th Cir. 2002), *abrogated on other grounds by Desert Palace v. Costa*, 539 U.S. 90 (2003). Complainant need not show the conduct they opposed was in fact discriminatory, but must show “a good faith, reasonable belief” the conduct was discriminatory. *Stuart v. Gen. Motors Corp.*, 217 F.3d 621, 634 (8th Cir. 2000).

Complainant identifies two incidents in which TST engaged in statutorily protected activity. First, it complained about an incident of vandalism at its 2023 holiday display, which was destroyed following critical remarks from national and state political figures. Complainant alleges these complaints were ignored. Second, Complainant also complained that Respondent was inconsistently applying its newly implemented policy regarding events at the Capitol to exclude TST. Both of these complaints involved concerns that TST was being treated differently than other religious organizations. Complainant engaged in statutorily protected conduct.

Element 2: ☒ Yes ☐ No ☐ Undetermined

The retaliation must be harmful enough that a reasonable person would find it materially adverse. *Haskenboff*, 897 N.W.2d at 587–88 (adopting *Burlington N. & Santa Fe Ry. Co. v. White*, 548 U.S. 53 (2006)). An action is materially adverse if it “well might have dissuaded a reasonable [person] from making or supporting a charge of discrimination.” *Burlington N.*, 548 U.S. at 68.

Complainants' application was denied. This was a materially adverse action.

Element 3: ☐ Yes ☐ No ☒ Undetermined

The “first opportunity to retaliate” doctrine allows a plaintiff to prove the causation element of a retaliation claim — despite a temporal gap sufficient to prevent a finding that the protected activity and the retaliatory conduct have some causal connection — if the plaintiff can show that the defendant had no earlier opportunity to retaliate and that the evidence shows the events are not completely unrelated. *Templeton v. First Tenn. Bank, N.A.*, 424 Fed. App'x. 249, (4th Cir. 2011) (citing *Price v. Thompson*, 380 F.3d 209, 213 (4th Cir. 2004); *see also Orluske v. Mercy Med. Ctr. N. Iowa*, 455 F. Supp. 2d 900 (N.D. Iowa 2006) (citing *Thompson v. Bi-State Dev. Agency*, 463 F.3d 821, 826 (8th Cir.

2006)).

Complainant's most recent complaint to Respondent about TST's treatment occurred in late July 2024, following the change in policy regarding multi-day events. The alleged retaliation did not begin until October 7, 2024. Normally, there would not be sufficient temporal proximity to support an inference of a causal connection. However, Complainant and Respondent do not regularly interact. Their only interactions are during Complainant's application for events. Complainant's next application for an event at the Capitol was the application at issue in this complaint. It appears this would have been Respondent's first opportunity to retaliate. Complainant's previous complaint also involved Respondent's policies for holding events at the Capitol, indicating the events may have been related. Complainant has alleged sufficient facts to support an inference there may be a causal connection between its complaints and Respondent's conduct.

Respondent's Nondiscriminatory Reason:

Respondent provided legitimate, nondiscriminatory reason and supported with admissible evidence:

☒ Yes ☐ No

This burden involves the production of some admissible evidence giving rise to a genuine issue of fact. *Hamilton v. First Baptist Elderly Hous. Found.*, 436 N.W.2d 336, 338 (Iowa 1989). The supporting evidence does not need to be enough to persuade a court that the proffered reason was the actual motivation. *Id.* Attorney arguments are not considered admissible evidence. *State v. Graves*, 668 N.W.2d 860, 878 (Iowa 2003); 8th Circuit Model Civil Jury Instructions 1.02(1); Iowa Model Jury Instruction 100.4.

See Respondent's Nondiscriminatory Reason in Denied Service Analysis.

Proof of Pretext:

Complainant can prove pretext: ☐ Yes ☐ No ☒ Undetermined

In addition to the traditional methods of demonstrating pretext, claims of retaliation allow for additional methods of proving pretext. An aggrieved individual may prove pretext by showing that Respondent "subjected [Complainant's] work performance to heightened scrutiny after [they] engaged in protected activity." *Winarto v. Toshiba Am. Elec. Components, Inc.*, 274 F.3d 1276, 1286 (9th Cir. 2001) (establishing that heightened scrutiny must be unwarranted based on plaintiff's continued satisfactory performance to support a plaintiff's allegation of pretext). Additionally, Complainant may demonstrate close temporal proximity between the alleged retaliatory conduct and their protected activity to support their claim of retaliation. *Jasper v. H. Nizam, Inc.*, 764 N.W.2d 751, 768 (Iowa 2009); *Jones v. Bernanke*, 557 F.3d 670, 679–80 (D.C. Cir. 2009) (establishing that evidence of close temporal proximity applies to both a prima facie case as well as "the ultimate inquiry"); *Hossaini v. W.M.M.C.*, 97 F.3d 1085, 1088–89 (8th Cir. 1996) (Complainant can show pretext if Respondent launched an investigation into their conduct shortly after he engaged in protected activity). Mere coincidence of timing does not conclusively establish this element, but the timing of the action, combined with all the other circumstances present in this case, may result in a finding of pretext. *Boyle v. Alum-Line, Inc.*, 710 N.W.2d 741 (Iowa 2006); *but see Loudermilk v. Best Pallet Co.*, 636 F.3d 312, 315 (7th Cir. 2011) ("Occasionally, however, an adverse action comes so close on the heels of a protected act that an inference of causation is sensible.").

See Pretext in Denied Service analysis.

Complainant may have shown TST was subjected to heightened scrutiny after engaging in protected activity. When Complainant applied for the marathon reading in July 2024, it was immediately placed on the calendar without issue. However, the October 2024, application was subjected to multiple rounds of inquiries from Respondent before ultimately being denied. It is possible this demonstrates Respondent applied heightened scrutiny after Complainant's previous complaints.

Complainant has demonstrated that there may be evidence the Respondent's reasoning for denying their application was, at least in part, related to retaliation for prior complaints about alleged civil rights infringements. Accordingly, further investigation is warranted.

FURTHER INVESTIGATION WARRANTED

☒ **Yes** ☐ **No**

RECOMMENDATION ☒ Refer for Further Investigation ☐ Administratively Close

The IOCR's administrative rules provide the standard for Tier One Investigations. "The Tier One Investigation process will determine whether further investigation is needed." Iowa Admin. Code r. 161—3.26(5). "If further investigation is not warranted, the complaint will be administratively closed. Further processing is warranted when the submitted information indicates a reasonable possibility of a probable cause determination or the legal issues in the Complaint need development." *Id.* Probable cause exists where there are reasonable grounds to believe discrimination has occurred. *Wilson v. Hayes*, 464 N.W.2d 250, 261–62 (Iowa 1990) (citing 52 Am.Jur.2d *Malicious Prosecution* § 51, at 219).

Amy Heverly

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Legal Manger
Iowa Office of Civil Rights