

IN THE IOWA DISTRICT COURT FOR JOHNSON COUNTY

<p>SADIE McDOWELL, Plaintiff, vs. CITY OF IOWA CITY, IOWA, Defendant.</p>	<p>Case No. _____</p> <p style="text-align: center;">PETITION and JURY DEMAND</p>
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COMES NOW Plaintiff Sadie McDowell, and for her cause of action states the following:

INTRODUCTION

1. This is an action under the Iowa Civil Rights Act seeking damages and equitable relief for Defendant's discrimination and harassment based on Plaintiff's sex and sexual orientation, as well as retaliation.

2. Sadie McDowell is a resident of Johnson County, Iowa.

3. Defendant City of Iowa City is a political subdivision of the State of Iowa, located in Johnson County.

4. The acts of which Plaintiff complains occurred in Johnson County, Iowa.

PROCEDURAL REQUIREMENTS

5. On approximately September 13, 2021, within 300 days of the acts of which she complains, Plaintiff filed charges of employment discrimination against Defendant with the Iowa Civil Rights Commission.

6. On approximately December 7, 2021, the Iowa Civil Rights Commission issued an administrative release with respect to Plaintiff's charges.

7. The parties entered a valid and enforceable tolling agreement, moving the deadline to file this lawsuit to August 4, 2022.

FACTUAL BACKGROUND

8. On June 6, 2011, Defendant hired Sadie McDowell as a firefighter. She was one of only four women in a department of 65 firefighters.

9. Sadie has been an extraordinarily exceptional firefighter and employee.

10. Sadie is lesbian.

11. A fire officer told Sadie that some guys were uncomfortable working with her “because they don’t want to make a joke or say something that would get them fired.”

12. Members of command staff told Sadie she was a “good *woman* firefighter.” Their praise of male firefighters did not mention gender.

13. Male firefighters criticized the performance of female firefighters and fire officers. They warned Sadie to keep her distance and not to listen to those females.

14. Male firefighters and fire officers told Sadie that “the only good woman who ever served on the Iowa City Fire Department was run out of the Department.”

15. Male firefighters referred to a female Captain as “Mom.”

16. During her first year of employment, someone entered the women’s bathroom while Sadie was showering and absconded with her pants.

17. Male firefighters entered and used bathrooms designated for women.

18. After a female medic complained about men using the women’s bathroom, a male Lieutenant called her a “bitch.”

19. Despite the overwhelming statistical evidence to the contrary, one male firefighter insisted that it was much easier for women to become firefighters than White Irish men like him.

20. After the Department made a minor change to the entrance exam for hiring, one Captain (now a Battalion Chief) complained that change “lowered standards” for the sake of “diversity.”

21. After Sadie suffered a work-related knee injury, she was required to work light duty at Station 1. Similarly situated men were expected to work significantly fewer hours or none at all.

22. Sadie experienced medical complications and a delay in healing because of the increased physical activity.

23. Many male firefighters groused about pregnant employees being allowed to go on light duty, insisting they were getting “special treatment.”

24. Sadie is the only person in the history of the Iowa City Fire Department to receive two Meritorious Awards.

25. Sadie was chosen by committee to receive the Meritorious Life Saver Award for saving the life of a man she found unconscious in the snow when she was off duty in 2016.

26. Sadie also received the Community Service Award for assuming responsibility for the Department’s struggling youth academy, expanding it, and making it a tremendous success.

27. The Iowa City Fire Department literally forgot to give Sadie the actual awards. Only after they were reminded by Sadie’s wife *two years later* did the Defendant arrange a ceremony to bestow the awards.

28. Such a ceremony was normally held at a public civil service meeting with media attention, but the Department was embarrassed about the lengthy delay. Defendant held Sadie’s ceremony at a local restaurant and permitted her one guest.

29. Deputy Chief Eric Nurnberg brought with him the certificate for only one of the awards, saying he must have left the second one on his desk.

30. To this day, Sadie has never received the second Meritorious Certificate, even though she was the first person in the Iowa City Fire Department to earn this award in *149 years*.

31. Throughout her ten-plus years of employment, Sadie heard male firefighters and fire officers make sexually inappropriate comments nearly every single day.

32. The men would encourage each other to look at the “boobs” or “butt” of various women. They would point out women they called “sluts,” who were doing the “walk of shame.” They would comment on the way women’s rear ends looked in yoga pants or short denim shorts. They pointed out revealing clothing, saying, “I would never let my daughter wear that, but thank God that girl is.”

33. Male firefighters often discussed and critiqued the sexual and dating history of their female coworkers.

34. For instance, male firefighters warned Sadie not to be like one of their female colleagues, who they said “slept her way through the fire and police departments.”

35. On another occasion, an Iowa City police officer joined firefighters at Sadie’s stationhouse for dinner. They discussed a female dispatcher they claimed had engaged in affairs with several married officers.

36. The men referred to the dispatcher as a “slut,” but did not make derogatory comments about the married male officers with whom she was supposedly sleeping with.

37. Although the comments were made in front of senior firefighters, a Lieutenant, a Captain, and a Battalion Chief; none of them spoke up or stopped the discussion.

38. In fact, at the end of dinner, the Lieutenant stood up and announced he was on his way to dispatch to look at a report—implying he was going to get sexual favors from the female dispatcher they were disparaging. The room erupted in laughter.

39. Male firefighters characterized female firefighters and fire officers as being unstable, too emotional, or weak leaders.

40. The Captain to whom Sadie initially reported referred to her as “Sadie, my girl.”

41. If a call for service concluded during a time when University students were out partying, that same Captain often directed Sadie to drive through the downtown loop so he and other male firefighters could ogle young women and comment on their bodies and/or clothing.

42. They referred to the loop as “the Lust Lap.”

43. Male firefighters would use directional coordinates or times on a clock to surreptitiously communicate to each other where to look for a particularly attractive or unattractive women to objectify.

44. One male firefighter claimed a young woman was “dressed like she wants it.”

45. When firefighters were called to provide medical treatment to young female University students who were injured or intoxicated, the men would often make inappropriate and offensive remarks about the patients’ cleavage, breasts, or other body parts.

46. One male firefighter indicated that a young female patient who was suicidal “just wanted attention.”

47. After male firefighters gave tours of the fire station to preschoolers, they would discuss the attractiveness, physical attributes, and perceived sexual orientation of the moms in the group.

48. One male firefighter performed as a clown as part of the Department’s public education efforts.

49. Throughout Sadie’s employment, this firefighter would joke (in the character of the clown), making comments such as: “Hey kids, your mom/teacher is fucking hot! Can you give me her number?”

50. On one occasion, a small child in a car waved at Sadie in the fire truck. Meanwhile, male firefighters on the truck discussed the sexual desirability of the child’s mother.

51. Male firefighters told Sadie that she had “the hottest wife in the Department.”

52. Male firefighters indicated that one of their colleagues was “hung like a horse,” referring to his purportedly large penis.

53. A male member of the command staff referred to his penis as a “can of corn.”

54. Male firefighters often discussed personal sexual activity they had experienced with their wives, girlfriends, or acquaintances. They would also discuss any lack of personal sexual activity.

55. Male firefighters would joke about how often one of their colleagues would masturbate at work.

56. Male firefighters shared their fantasies about having sex with a particular television meteorologist, particularly while she was pregnant.

57. A male firefighter told Sadie his wife was not sexually satisfied. He asked Sadie how he could get better at “going down on” his wife and for her to explain how she “pleased [her] wife orally.”

58. Jokes about date rape were common. In 2014 or 2015, firefighters received mandatory training about patient care for victims of sexual assault. One senior firefighter joked that he was changing the name of his golf team for an upcoming charitable event to the name of a particular date rape drug.

59. Also in 2014 or 2015, the City required employees to undergo diversity training. Male firefighters and fire officers complained and made rude and offensive comments before, during, and after the training. One Captain (now a Battalion Chief) characterized diversity training as an “attack on white men.”

60. One firefighter insisted that the word “privilege” needed to be replaced by a different word because he found it offensive.

61. Male firefighters and mangers repeatedly played the game “Fuck Marry Kill,” in which participants had to chose whether they would prefer to “fuck,” “marry,” or “kill” particular women.

62. One male firefighter insisted that female servicemembers should not be allowed to work on combat lines because their presence would distract the male soldiers.

63. At a breakfast for retirees, discussion focused on how male firefighters used to call the girl across the street from a pay phone right after she took a shower, so that they could watch her come to the phone naked.

64. In the summer of 2017, a male firefighter subjected Sadie to unwanted and non-consensual kissing and sexual groping. He slapped her rear end. He propositioned her and suggested they participate in a “threesome” with his girlfriend.

65. A week or so later, Sadie confronted the man about his actions and expressed how violated she felt. The man responded that the incident was Sadie’s fault, explaining, “I couldn’t help myself because your body is just too sexy.”

66. Sadie buried the memory of this assault until 2021, when the man began using the bed next to hers in their shared sleeping quarters. She was scared to sleep and repeatedly imagined him attacking her again.

67. When Kamala Harris debated Mike Pence during the 2020 presidential campaign, male fire officers indicated Pence “kicked Kamala’s ass,” adding that “it sure is a large enough ass to kick.”

68. Many sexist and sexually charged comments were made at a 2020 golf tournament sponsored by the Iowa Association of Professional Firefighters. Two male firefighters who were pretending to be physically affectionate were told by a female firefighter from Sioux City to “stop being fags.”

69. Sadie directed a youth academy for at-risk high school students to provide mentorship and introduce them to the Iowa City Fire Department. After the academy was over, one transgender student continued to job shadow Sadie for a time.

70. A senior male firefighter refused to participate in a training proposed by Sadie and the student, insisting that it was his workplace and he couldn't risk the chance that he would "say something to get [him] fired."

71. Male firefighters and managers mocked transgender people and objected to calling the young person by his chosen name and pronouns.

72. Male firefighters used the word "gay" as an insult, saying things like, "My friend is so fucking gay!"

73. Male firefighters made derogatory remarks about LGBTQ celebrities, as well as about Pride month and the Pride parade.

74. Male firefighters and fire officers expressed the view that teenagers were coming out as gay or transgender simply to try and be "cool" or "to get attention."

75. The Iowa City Fire Department has only one Black firefighter.

76. Firefighters made racist remarks such as, "Black people are coming in from Chicago to ruin our city."

77. Firefighters said that Black people in need of an ambulance were looking for "a free taxi ride."

78. Firefighters said, "Black women need to stop having babies they can't afford to raise."

79. Firefighters claimed it was part of "Black culture" to get pregnant in order to get welfare benefits.

80. Firefighters complained that Black people needed “handouts to buy food,” but somehow could still buy big screen TVs.

81. One Lieutenant stated, “I wish I was a Black woman in the 80s when I was trying to become a firefighter. I could have had any job I wanted.”

82. Sadie heard one firefighter comment that a Black homeless man “was not worth the skin on his bones.”

83. The Iowa City Fire Department exhibited racial bias in its responses to calls for service from members of the public.

84. When a call for service originated from a less affluent area with more people of color, firefighters would often complain and respond more slowly than they did in response to calls for service originating from wealthier neighborhoods that housed predominately White people.

85. In June 2020, people in Iowa City and around the world took to the streets to protest the murder of George Floyd and to insist that Black Lives Matter.

86. Many members of the Iowa City Fire Department, including officers, voiced opposition to the protesters and referred to them as “rioters,” “criminals,” and “blacks from Chicago coming to loot our stores.”

87. During the morning debriefing, Deputy Chief Eric Nurnberg stated that the protesters “were successful at disrupting the rush hour commute of *regular folks*.”

88. As a Black man drove by the station on a moped with music playing loudly, one Lieutenant stated, “I’d normally yell out a racially insensitive comment right now but given the current environment”

89. White firefighters advocated for the police to use force against the protesters and “arrest them all.”

90. The Iowa City Fire Department responded to the protesters as if they posed a military threat to its very existence.

91. At some point, Station One personnel were ordered to leave “for their personal safety” and to improve strategic response. One Captain became extremely upset, angrily exclaiming with tears in his eyes that he wasn’t raised to abandon his home and that he wanted to stay to protect his “Alamo.” He expressed fear that “the rioters” would break into the fire station and “steal or destroy everything.”

92. In the summer of 2019, the Iowa City Fire Department obtained ballistic vests and helmets for use in an active shooter situation. The gear had never been used.

93. Suddenly, the day after the Black Lives Matter protests began, the Department adopted a policy placing the ballistic vests and helmets in service.

94. The Department’s single Black firefighter expressed concern about the new policy and the racial bias implicit in the timing of its implementation. In response, one Captain lost his temper, ranted about the Black firefighter and vowed that “no one was going to call him a country cowboy.”

95. In 2020, after encouragement from her Captain and Lieutenant, Sadie decided to participate in the promotion process for Lieutenant.

96. Male firefighters speculated that Sadie was “using” her gender and sexual orientation to get a promotion.

97. Sadie was the only woman who vied for the promotion, and all of the interviewers were men.

98. Sadie received negative feedback from her interview that she was “too excitable,” spoke too much about “big concepts,” and that she talked with her hands.

99. With Sadie's seniority, contributions, and experience; she should have ranked among the top three candidates for promotion. Instead, she was ranked sixth.

100. Defendant did not promote Sadie to Lieutenant.

101. Firefighters and fire officers expressed shock at Defendant's decision not to promote her.

102. As time went on, Sadie began to object more bluntly and strenuously to incidents of sexual and racial bias within the Department. Many of her colleagues responded with anger and defensiveness.

103. For example, one Captain confronted Sadie and said she was "a problem on the shift."

104. Sadie's mental and emotional health deteriorated, as the incidents of bias and retaliation took a toll on her.

105. On June 16, 2020, Sadie sent a five-and-a-half-page letter to Fire Chief John Grier about the department's response to the Black Lives Matter protests and racial/gender bias generally.

106. Chief Grier forwarded Sadie's letter to the rest of the command staff without telling her.

107. Deputy Chief Nurnberg told Sadie that for 72 hours after reading her letter, he was so upset that he had to apologize to his wife and kids.

108. When male firefighters became aware that a complaint had been made, they commented, "Whoever is complaining needs to realize how good they have it."

109. One male Lieutenant said, "We have a spy in the Department."

110. Chief Grier asked Sadie to create action steps the department could take to help remedy the problems she identified.

111. Chief Grier allowed Sadie to create in-house training sessions on racial bias for firefighters; however, it became clear that command staff was not committed to or invested in the endeavor to make the work environment more equitable.

112. For example, one Battalion Chief introduced the training as “Sadie’s thing,” and it became a joke.

113. Another Battalion Chief told Sadie that Chief Grier “just told us to be more careful about what we say when you’re around.”

114. In mid-2020, Sadie applied to be a part of the Iowa City Diversity, Equity, and Inclusion Committee, but she was not selected.

115. Assistant City Manager Rachel Kilburg notified Sadie that a White male was chosen over her because his gender would give him “more influence” over others.

116. The Diversity, Equity, and Inclusion Committee required all Fire Department staff to watch the film “13th,” which vividly documents the United States’ long history of atrocities in furtherance of White supremacy and racial oppression.

117. Incredibly, some firefighters responded to the film by criticizing Black Americans and objecting to the very existence of the film. One firefighter remarked, “We have a real epidemic of victimization mindset in this country.”

118. In January 2021, Deputy Chief Nurnberg asked Sadie and firefighter Maria Koeppel to create an apprenticeship program for at-risk youth.

119. While Sadie and Maria were initially excited, Deputy Chief Nurnberg explained that even though they would be doing all the work, they could not have their names attached to the project. Instead, Nurnberg explained that his intent was to claim credit and use the project to boost his application to become Fire Chief after Chief Grier retired.

120. Koeppel resigned from the Diversity, Equity, and Inclusion Committee because of Deputy Chief Nurnberg's personal agenda. She refused to continue to represent the Iowa City Fire Department because it did not exhibit values consistent with diversity, equity, and inclusion.

121. A few days later, Koeppel was confronted by a Battalion Chief and Captain, who accused her of going outside the chain of command to resign from the Committee and asked her to reconsider.

122. After Koeppel declined to reconsider, the Battalion Chief indicated this demonstrated her lack of commitment to the Fire Department.

123. On February 3, 2021, Deputy Chief Nurnberg asked Sadie about her complaints to Chief Grier and Captain Henry. Nurnberg said the apprenticeship program he proposed was a "test" to see if he could trust her. Nurnberg left the impression that he was trying to manipulate or intimidate Sadie into recanting her complaints.

124. On March 9, 2021, Sadie met with Chief Grier and complained about discrimination, harassment, and retaliation. She shared that she no longer felt safe at work and worried that her coworkers might not have her back in a dangerous situation.

125. On March 26, Sadie met with Assistant City Manager Rachel Kilburg¹ and reiterated her concerns about discrimination, harassment, retaliation and safety. Kilburg responded, "What are we going to have to do—fire all of them?"

126. On March 27, Sadie questioned the Fire Department's 2021 Strategic Plan because the goals regarding equity, diversity, and inclusion were vague and lacked measurable action steps.

127. Battalion Chief Greg Tinnes yelled at and chastised Sadie for hours, claiming that her feedback regarding the Strategic Plan was "disrespectful." His voice was shaking as he described his

¹ Sadie had first requested the meeting with Kilburg on December 2, 2020. There was radio silence until March 12, 2021, when Kilburg apologized for the three-month delay in responding. The meeting was finally held on March 26, 2021.

anger and frustration with her. Tinnes called Sadie “spiteful.” He said he no longer trusted that he could “be [him]self” around her. He said, “We’re not sure what happened to you. You seem to just be focused on the negative now.” Sadie left the meeting in tears.

128. On March 31, Sadie once again complained about discrimination, harassment, and retaliation to Rachel Kilburg and Director of Human Resources Karen Jennings.

129. Jennings promised Sadie there would be an internal investigation, but indicated it could take “awhile.”

130. In the meantime, Jennings recommended that Sadie take sick leave. She reminded Sadie that HR would need a doctor’s note for sick leave that exceeded 48 hours.

131. Sadie was confused because she wasn’t sick, but Jennings suggested that Sadie’s doctor connect the request to feeling unsafe at work.

132. Sadie’s doctor provided a letter indicating she would need leave for the next four weeks and explained the reason was Sadie feeling unsafe at work.

133. Defendant denied Sadie’s request for sick leave and required her to submit a doctor’s certification for Family Medical Leave.

134. On April 29, Sadie called Human Resource Representative Tracy Robinson and discussed her unresolved complaints regarding discrimination, harassment, and retaliation. Sadie informed Robinson that she did not feel comfortable returning to work until the City could provide assurance that the fears for her safety were unfounded.

135. Later that day, Jennings placed Sadie on administrative leave and asked Sadie to provide a written statement explaining why she felt threatened.

136. On May 4, Sadie provided Jennings with a seven-page written statement and also included her June 16, 2020, letter to Chief Grier.

137. Sadie questioned why the City was suddenly willing to place her on paid administrative leave and noted that nothing she had communicated to Robinson on April 29 was any different than her complaints of March 9, March 26, or March 31.

138. Sadie outlined many of the inappropriate sexist, sexual, and racist comments; her attempts to implement changes into the culture of the Fire Department, and the hostile responses she received from coworkers and fire officers.

139. On May 14, Defendant retained Michele Brott, an outside attorney, to begin an investigation of Sadie's complaints.²

140. On June 3, Sadie met with Brott for over six hours.

141. On Friday, July 27, Jennings notified Sadie by email that Brott had finished her investigation and Sadie was expected to return to work on Monday, August 2.

142. Neither Jennings nor anyone else told Sadie anything about the content of the investigation, Brott's report or conclusions, the results of the investigation, what remedial action had been taken, or anything that had been done to alleviate Sadie's concerns about retaliation and safety.

143. Sadie's coworkers were told that she would be returning to work on Monday and that there was to be no further discussion about her complaints.

144. Sadie emailed Jennings with questions about the investigation and explained that she did not feel comfortable returning to work without more information. Sadie informed Jennings that she was going to use an appropriate time accrual to excuse her absence on Monday.

145. Jennings responded and again refused to provide any information about the investigation, its finding or Sadie's safety. Jennings did state that the City had delivered messages against retaliatory behavior, but did not indicate who had delivered or received those messages.

² It took 44 days from the time the City told Sadie the investigation would take "awhile" until it got around even to hiring an investigator. *See* paragraph 129.

146. Jennings denied Sadie's request for additional leave and directed her to "report on Monday as scheduled."

147. On Sunday, August 1, Sadie called Battalion Chief Zach Hickman to request sick leave for Monday. He laughed and said, "You have been directed by HR to report to work tomorrow and told that you can't use sick leave."

148. Sadie was represented by Iowa City Fire Fighters IAFF Local 610. The collective bargaining agreement between City and the union permitted firefighters to use up to 48 hours of sick leave without a doctor's note.

149. Sadie referenced the Union contact and repeated her request to Battalion Chief Hickman. He replied, "Well then, I am denying your request for use of sick leave."

150. Male firefighters were never denied sick leave of 48 hours or less.

151. Firefighters who had not engaged in protected activity were never denied sick leave of 48 hours or less.

152. Only after her lawyer intervened was Sadie finally permitted to take leave.

153. In November 2021, a White male Lieutenant was discussing the City's decision to extend the deadline for candidates to apply for the Fire Chief position. He said "Some of the guys joked that the only reason for the extension is to make sure a Black woman is hired."

154. This ordeal has caused Sadie to develop a myriad of debilitating symptoms and mental health conditions including Major Depressive Disorder and Other Trauma and Stressor Related Disorder.³

155. Although Sadie is still technically employed by Defendant, she is not being paid and cannot return to work.

³ Sadie's Stressor Related Disorder means that she has all the symptoms of Posttraumatic Stress Disorder, even though she did not experience Criterion A, the single traumatic event required for a PTSD diagnosis.

**COUNT I
VIOLATION OF THE IOWA CIVIL RIGHTS ACT
DISCRIMINATION**

156. Plaintiff repleads paragraphs 1 through 155 as if fully set forth herein.

157. Defendant discriminated against Plaintiff.

158. Plaintiff's sex and/or sexual orientation were motivating factors in the discrimination.

159. As a result of Defendant's illegal acts and omissions, Plaintiff has in the past and will in the future suffer injuries and damages, including but not limited to mental and emotional distress, lost enjoyment of life, medical expenses, lost wages, and employment benefits.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount which will fully and fairly compensate her for her injuries and damages, for appropriate equitable and injunctive relief, for prejudgment and postjudgment interest, for attorney fees and litigation expenses, for the costs of this action, and for such other relief as may be just in the circumstances and consistent with the purpose of the Iowa Civil Rights Act.

**COUNT II
VIOLATIONS OF THE IOWA CIVIL RIGHTS ACT
HARASSMENT**

160. Plaintiffs replead paragraphs 1 through 159 as if fully set forth herein.

161. Plaintiffs suffered workplace harassment that was severe and/or pervasive.

162. Plaintiffs' sex and/or sexual orientation were motivating factors in the harassment.

163. As a result of Defendant's acts and omissions, Plaintiff has in the past and will in the future suffer injuries and damages as set forth above.

WHEREFORE, Plaintiffs demand judgment against Defendant in an amount which will fully and fairly compensate her for their injuries and damages, for appropriate equitable relief, for prejudgment and postjudgment interest, for attorney fees and litigation expenses, for the costs of

this action, and for such other relief as may be just in the circumstances and consistent with the purpose of the Iowa Civil Rights Act.

**COUNT III
VIOLATION OF THE IOWA CIVIL RIGHTS ACT
RETALIATION**

164. Plaintiff repleads paragraphs 1 through 163 as if fully set forth herein.

165. Plaintiff engaged in protected activity by opposing and making internal complaints about conduct she reasonably believed was illegal discrimination, harassment, and retaliation; for suggesting and spearheading measures to combat the discrimination, harassment, and retaliation; for cooperating in an investigation; and for filing a civil rights complaint against Defendant with the Iowa Civil Rights Commission.

166. Defendant retaliated against Plaintiff because of her protected activity.

167. As a result of Defendant's illegal acts and omissions, Plaintiff has in the past and will in the future suffer injuries and damages as set forth above.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount which will fully and fairly compensate her for her injuries and damages, for appropriate equitable and injunctive relief, for prejudgment and postjudgment interest, for attorney fees and litigation expenses, for the costs of this action, and for such other relief as may be just in the circumstances and consistent with the purpose of the Iowa Civil Rights Act.

JURY DEMAND

COMES NOW the Plaintiff and requests a trial by jury.

/s/ Paige Fiedler
FIEDLER LAW FIRM, P.L.C.
Paige Fiedler AT0002496
paige@employmentlawiowa.com
Amy Beck AT0013022
amy@employmentlawiowa.com
8831 Windsor Parkway
Johnston, IA 50131
Telephone: 515-254-1999
Facsimile: 515-254-9923
ATTORNEYS FOR PLAINTIFF