

CERTIFICATION BY COMPLAINANT

I, Kaylara Lee Hoadley, hereby certify that, to the
Name of Complainant
best of my knowledge the information contained in the attached complaint is true
and correct. I understand that a person who knowingly files a false complaint is
subject to prosecution for and the penalties attached to the crime of perjury.

Subscribed and affirmed to before me this 24 day of
August, 2026.



Stephanie Sarset

NOTARY PUBLIC IN AND FOR THE STATE OF IOWA

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I, _____, do hereby certify that on the
Chief Clerk of the House/Designee
_____ day of _____, 20____, I received and filed the above
certification and attached complaint.

Chief Clerk of the House/ Designee of Chief Clerk

IOWA GENERAL ASSEMBLY

HOUSE OF REPRESENTATIVES ETHICS COMPLAINT FORM

Re: Representative Shannon Lundgren

Name of Respondent (Alleged Violator)

Respondent's Address (if known): Street Address/City/State Zip

918 Heather Drive

Peosta, IA 52068

By: Kaylara Hoadley

Name of Complainant

Complainant's Address: Street Address/City/State/Zip

326 27th St SW

Mason City, IA 50401

I, Kaylara Hoadley, hereby complain that the

Name of the Complainant

Rep. Shannon Lundgren has committed an act or acts that violate the

Name of Respondent

provisions of the Code of Ethics/Rules Governing Lobbyist of the House of Representatives as follows:

That on or about (list date or dates on which conduct or actions took place)

July 13, 2026

Rep. Shannon Lundgren did the following:

Name of Respondent

Please recite facts/actions taken by Respondent that are believed to violate the Code of Ethics or the Rules Governing Lobbyist. Please list the Code provision or Rule that has been violated, if that information is known to you. Please attach additional information to form if insufficient space is provided.

On July 13, 2026, Representative Shannon Lundgren sent a letter to the sentencing judge in the criminal case involving Dave Lehmann, in which she personally vouched for Mr. Lehmann and provided a character reference in connection with his sentencing. Representative Lundgren's letter was written on official Iowa House of Representatives letterhead. The letterhead prominently identifies her as "Shannon Lundgren, STATE REPRESENTATIVE," identifies her as a member of the Iowa House of Representatives, displays the Iowa State Capitol and "House of Representatives, State of Iowa," provides her legislative email address and Statehouse

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Names/addresses of person other than complainant (if any) who are or may be witness to above described activities. If necessary, attach additional sheets to the form.

Other sources of information (if any) that relate to or are proof of the violation. If necessary, attach additional sheets to the form.

Attached is Iowa Code Chapter 48B.2A, and the preamble to the House Code of Ethics.

telephone number, and identifies her legislative committees. Her signature is followed by "Representative Shannon Lundgren." The letter was addressed to "Your Honor" and stated that Representative Lundgren was writing "as a character witness for Dave Lehmann." She described her personal relationship with Mr. Lehmann, stated that she had known him for many years through her private family-owned restaurant, and provided positive statements concerning his character, conduct, and community involvement. She concluded by offering to provide additional information.

Thus, Representative Lundgren used her official legislative identity, official House letterhead, official Statehouse contact information, and the visual insignia and designation of the Iowa House of Representatives in a personal communication to a sentencing judge on behalf of a private individual. I believe these actions warrant review under Iowa Code 68B.2A, particularly the provisions concerning prohibited outside activities and the use of an official's "other evidences of office or employment." I also believe the conduct warrants review under the House Code

of Ethics, including its preamble requiring House members to uphold the integrity and honor of the General Assembly, conduct themselves so as to reflect credit on the General Assembly, and inspire the confidence, respect, and trust of the public. A copy of Representative Lundgren's July 13, 2021 letter is submitted as supporting evidence. _____
Karyn Hoadley 8/24/21

Shannon Lundgren
STATE REPRESENTATIVE
Sixty-Fifth District
Statehouse: (515) 281-3221
E-mail – shannon.lundgren@legis.iowa.gov

HOME ADDRESS
PO Box 186
Peosta, Iowa 52068



House of
Representatives
State of Iowa
Eighty-Seventh General Assembly
STATEHOUSE
Des Moines, Iowa 50319

COMMITTEES
Commerce
State Government
Ways and Means

APPROPRIATIONS
SUBCOMMITTEE
Health and Human Services

Shannon Lundgren
918 Heather Dr.
Peosta, IA 52068

July 13, 2026

Your Honor:

I am writing this letter as a character witness for Dave Lehmann. I have known Dave for many years through our family-owned restaurant, Trakside Bar & Grill in Peosta, Iowa.

Dave has always been a regular and welcome presence at our establishment. From the first time I met him, I found him to be consistently friendly, optimistic, polite, and respectful toward both me and our entire staff. He treats people with kindness and good humor, and I have never observed anything but positive interactions with those around him.

In addition to his personal demeanor, I have witnessed Dave's commitment to our local communities. Over the years, he has generously volunteered his time and efforts to help the Silker family and Silker's General Store in Epworth with various community events and projects that benefit the people of Epworth and the surrounding area. His willingness to step up and support local initiatives speaks to his character as a caring and involved neighbor.

Dave has earned the respect of many in our region through his consistent, positive conduct and community spirit. I am happy to provide this reference based on my direct observations of him over an extended period.

Please feel free to contact me if you would like any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Shanna Lundgren". The signature is fluid and stylized, with a large initial 'S' and a trailing flourish.

Representative Shannon Lundgren

affected financially by the performance or nonperformance of the donee's official duty in a way that is greater than the effect on the public generally or on a substantial class of persons to which the person belongs as a member of a profession, occupation, industry, or region.

c. Is personally, or is the agent of a person who is, the subject of or party to a matter which is pending before a subunit of a regulatory agency and over which the donee has discretionary authority as part of the donee's official duties or employment within the regulatory agency subunit.

d. Is a lobbyist or a client of a lobbyist with respect to matters within the donee's jurisdiction.

25. "State employee" means a person who is not an official and is a paid employee of the state of Iowa and does not include an independent contractor, an employee of the judicial branch who is not an employee of the office of attorney general, an employee of the general assembly, an employee of a political subdivision of the state, or an employee of any agricultural commodity promotional board, if such board is subject to a producer referendum.

26. "Statewide elected official" means the governor, lieutenant governor, secretary of state, auditor of state, treasurer of state, secretary of agriculture, and attorney general of the state of Iowa.

[C71, 73, 75, 77, 79, 81, §68B.2; 82 Acts, ch 1199, §35, 96]

83 Acts, ch 96, §157, 159; 84 Acts, ch 1067, §13; 87 Acts, ch 213, §1; 92 Acts, ch 1228, §1; 93 Acts, ch 163, §1; 94 Acts, ch 1092, §2 - 4; 96 Acts, ch 1186, §23; 98 Acts, ch 1047, §14; 2002 Acts, ch 1073, §10, 11; 2003 Acts, ch 145, §286; 2004 Acts, ch 1091, §4; 2005 Acts, ch 76, §2; 2013 Acts, ch 29, §40; 2015 Acts, ch 54, §13; 2018 Acts, ch 1154, §1, 4; 2023 Acts, ch 19, §41, 1736, 2715; 2024 Acts, ch 1170, §177, 369; 2025 Acts, ch 30, §11; 2025 Acts, ch 123, §30

Referred to in §68B.22

Subsection 13, paragraph b, subparagraph (1) amended

Subsections 17 and 25 amended

SUBCHAPTER II

CONFLICTS OF INTEREST

68B.2A Prohibited outside employment and activities — conflicts of interest.

1. Any person who serves or is employed by the state or a political subdivision of the state shall not engage in any of the following conduct:

a. Outside employment or an activity that involves the use of the state's or the political subdivision's time, facilities, equipment, and supplies or the use of the state or political subdivision badge, uniform, business card, or other evidences of office or employment to give the person or member of the person's immediate family an advantage or pecuniary benefit that is not available to other similarly situated members or classes of members of the general public. This paragraph does not apply to off-duty peace officers who provide private duty security or fire fighters or emergency medical care providers certified under chapter 147A who provide private duty fire safety or emergency medical services while carrying their badge or wearing their official uniform, provided that the person has secured the prior approval of the agency or political subdivision in which the person is regularly employed to engage in the activity. For purposes of this paragraph, a person is not "similarly situated" merely by being or being related to a person who serves or is employed by the state or a political subdivision of the state.

b. Outside employment or an activity that involves the receipt of, promise of, or acceptance of money or other consideration by the person, or a member of the person's immediate family, from anyone other than the state or the political subdivision for the performance of any act that the person would be required or expected to perform as a part of the person's regular duties or during the hours during which the person performs service or work for the state or political subdivision of the state.

c. Outside employment or an activity that is subject to the official control, inspection, review, audit, or enforcement authority of the person, during the performance of the person's duties of office or employment.

House Resolution 4 - Introduced

HOUSE RESOLUTION NO. 4
BY COMMITTEE ON ETHICS
(SUCCESSOR TO HSB 94)

1 A Resolution relating to the code of ethics of the
2 House of Representatives for the Ninety-first
3 General Assembly.

4 BE IT RESOLVED BY THE HOUSE OF REPRESENTATIVES, That
5 the House Code of Ethics shall be as follows:

6 HOUSE CODE OF ETHICS

7 PREAMBLE. Every legislator and legislative employee
8 has a duty to uphold the integrity and honor of the
9 general assembly, to encourage respect for the law
10 and for the general assembly, and to observe the house
11 code of ethics. The members and employees of the house
12 have a responsibility to conduct themselves so as to
13 reflect credit on the general assembly, and to inspire
14 the confidence, respect, and trust of the public. The
15 following rules are adopted pursuant to chapter 68B of
16 the Code, to assist the members and employees in the
17 conduct of their activities:

18 1. DEFINITIONS. The definitions of terms provided
19 in chapter 68B of the Code apply to the use of those
20 terms in these rules.

21 2. ECONOMIC INTEREST OF MEMBER OR EMPLOYEE OF
22 HOUSE.

23 a. *Economic or investment opportunity.* A member
24 or employee of the house shall not solicit or accept
25 economic or investment opportunity under circumstances
26 where the member or employee knows, or should know,
27 that the opportunity is being afforded with the intent