

DECLARATION OF MELISSA SCHILLING

I, Melissa Schilling, declare as follows:

1. I am an attorney with the law firm Dickinson, Bradshaw, Fowler & Hagen, P.C.
2. On July 30, 2025, I was retained to represent Madison County before the Iowa Office of Civil Rights regarding the civil rights complaint filed by Michele Brant. I have continued to represent Madison County regarding Ms. Brant's initial complaint as well as a second civil rights complaint.
3. County Attorney Stephen Swanson was my initial point of contact for Madison County for this case.
4. Since July 30, 2025, I have had several communications protected by the attorney-client privilege with Mr. Swanson regarding the case. More specifically, we communicated by phone and email on August 7, 2025; by email on August 18, 2025; by email on November 19, 2025; by email on November 20, 2025; and by email on May 21, 2026. I also included Mr. Swanson on at least four emails with the County's IT vendor in August 2025.
5. My communications with Mr. Swanson contain privileged information about the County's defense of Ms. Brant's civil rights complaints and reveal case strategy to Mr. Swanson that he would not be entitled to but for his role as the Madison County Attorney. The information learned by Mr. Swanson, and that he may continue to learn as the County Attorney and a point of contact in this case, could be used to the County's disadvantage in Ms. Brant's case.
6. Madison County has never removed Mr. Swanson as a point of contact in this case. Mr. Swanson has continued to insist that I communicate directly with him regarding the case, as the Madison County Attorney, as recently as one week before filing the lawsuit *Brant v. Stancil and Hobbs*, Madison County Case No. CVCV036143.
7. The relevant communications are available for the Court's *in camera* review, should the Court find it necessary.

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

Melissa Schilling

Melissa Schilling (Aug 5, 2026 14:15:36 CDT)

Melissa Schilling

Aug 5, 2026

Date