

IN THE SUPREME COURT OF IOWA

Suzette Rasmussen,

Plaintiff/Appellee,

v.

Governor Kim Reynolds, Michael Boal, and Office of the Governor of the State of Iowa,

Defendants/Appellants.

Supreme Court No. 21-2008

**Unresisted Motion
of 22 Past and Present
Iowa Journalists and
Journalism Educators
for Leave to File
a Brief of *Amici Curiae*
in Support
of Plaintiff/Appellee**

Pursuant to Iowa R. App. P. 6.18, the 22 individuals listed below move through their undersigned counsel for leave to file a Brief of *Amici Curiae* in this interlocutory appeal. The proposed amicus brief would support affirming the District Court’s Order denying the motion to dismiss of Defendants Governor Kim Reynolds, Michael Boal, and Office of the Governor of the State of Iowa (collectively, the “*Office of the Governor*”) in the Iowa Code Chapter 22 public records enforcement action initiated by Plaintiff Suzette Rasmussen (“*Rasmussen*”).

The 22 past and present Iowa journalists and journalism educators seeking this leave are:

John Bachman
Cliff Brockman
Doug Burns
Dave Busiek
Brian Cooper
Art Cullen
John Cullen
Michael Gartner
Diane Graham
Mark Hamilton
Dan Hayes
David Johnson
Alan Mores
Steve Mores
Lyle Muller
Nancy Newhoff
Chuck Offenburger
Kathleen Richardson
Ron Steele
Herb Strentz
Bill Tubbs
Mark Witherspoon

This motion refers to the movants collectively as the “22 *Past and Present Iowa Journalists and Journalism Educators.*”

Further, as permitted by Iowa R. App. P. 6.18(1), the 22 Past and Present Iowa Journalists and Journalism Educators conditionally file their accompanying Brief of *Amici Curiae* and serve it together with this Motion on counsel for the parties through the Court’s electronic filing system.

In support of their motion for leave to file a Brief of *Amici Curiae*, the 22 Past and Present Iowa Journalists and Journalism Educators state:

1. Individually and collectively the 22 Past and Present Iowa Journalists and Journalism Educators have real and cognizable interests in the pending appeal and its outcome.
2. The proposed *Amici Curiae* possess a unique perspective such that they believe they can assist the Court in analyzing the arguments of the parties and in assessing the ramifications of any decision rendered in this interlocutory appeal.
3. Those interests and perspective arise in part from their past, present, and future work as journalists, commentators, writers, authors, reporters, editors, media owners, and journalism educators.
4. Further, as persons who seek and disseminate news, commentary, and information and who train others to do so, the 22 Past and Present Iowa Journalists and Journalism Educators have a stake in preserving access to records and information held by all branches of Iowa government that concern the work of elected and appointed officers and public employees in state, county, and local government.
5. The 22 Past and Present Iowa Journalists and Journalism Educators bring decades of experience in accessing government records and information and analyzing and disseminating it in print, broadcast, electronic, and social media to Iowans so they may become and remain an

informed citizenry, understand the decision-making of their government, and hold their elected and appointed public officials and government workers accountable in their performance and in how they spend taxpayer monies.

6. The 22 Past and Present Iowa Journalists and Journalism

Educators have paid taxes to the State of Iowa and those who reside in the state now continue to do so.

7. The following professional biographies of the 22 Past and

Present Iowa Journalists and Journalism Educators establish their knowledge and experience in accessing public records and disseminating the information they contain, demonstrate their continuing interest in obtaining public records from the Office of the Governor, and reinforce why they can provide helpful voices regarding the uniform and widespread enforcement of Iowa Code Chapter 22 against each lawful custodian who fails to comply with its inspection and copying mandates:

- a. *John Bachman*: A graduate of Waverly-Shell Rock High School, John Bachman returned to Iowa after studying at Oxford University to work in television journalism. He began his career in 1972 at WMT-TV in Cedar Rapids, serving as anchor of the 6 and 10 p.m. newscasts. He then anchored television newscasts in Chicago and Minneapolis. John returned to Iowa in 1987 to serve as lead news anchor of WHO-TV in Des Moines. He continued in that position until 2012, when he retired after covering the presidential election. In 2006, the National Television Academy inducted John into its Silver Circle. John is also a recipient of the Jack Shelley

Award, which is the highest award a broadcast journalist can receive in Iowa.

- b. *Cliff Brockman*: Cliff Brockman retired in 2018 after more than 45 years as a journalist and journalism educator. He served in various capacities in radio and television newsrooms, including in news director positions at KAYL Radio in Storm Lake, KCAU-TV in Sioux City, and WHBF-TV in Rock Island. Cliff concluded his journalism career as a radio producer for the Stanley Foundation based in Muscatine. From there, he moved to the classroom, teaching Wartburg College students as a professor in the Journalism and Communication department from 2006 until his retirement in 2018. Cliff also served as a media coordinator under the Iowa Supreme Court's cameras-in-the courtroom program from 1988-2001. Cliff is also a recipient of the Jack Shelley Award.
- c. *Doug Burns*: A third-generation Iowa reporter and editor, Doug Burns is the vice president for news and co-owner of Carroll Newspapers, the parent company of the Carroll Times Herald and the Jefferson Herald. Prior to returning to his family's newspapers in 1997, Doug worked as a reporter for the Ames Tribune, Palm Beach Post in Florida and Inside Washington Publishers in Washington, D.C. Doug received the Iowa Newspaper Association's master editor and publisher award in 2018. In 2018, Doug, his mother Ann Wilson, and reporter Jared Strong were co-recipients of the Iowa Freedom of Information Council's Friend of the First Amendment award.
- d. *Dave Busiek*: An Iowa transplant, Dave Busiek moved to Des Moines after college to work in the WHO Radio newsroom. He then was a reporter and news anchor at KCCI-TV and was one of the few journalists to report from inside the state penitentiary during the 1982 riots in Fort Madison. KCCI-TV promoted Dave to news director in 1990, a position he held until his retirement in 2018. Dave served as the president of the Radio and Television News Director Association at the time of the September

11 attacks, was a longtime proponent of electronic coverage of the state and federal courts, and received multiple awards and recognition, including Broadcasting and Cable's award as News Director of the Year, a Midwest Television Academy of Arts and Sciences Silver Circle Award, induction into the Iowa Broadcasters Hall of Fame and the Jack Shelley Award of the Iowa Broadcast News Association. Dave served one term as president of the Iowa Freedom of Information Council and received its Skip Weber Friend of the First Amendment Award in 2018.

- e. *Brian Cooper*: For 30 years (1986-2016), Brian Cooper was executive editor of the Telegraph Herald, Dubuque, where he continued as editorial page editor until his retirement in late 2019. He was previously editor of The Ottumwa Courier (1982-1986). For more than 15 years, Brian has written non-fiction books—sports biographies and corporate histories—on a freelance basis. Brian received the Iowa Newspaper Association's two most prestigious honors, the Master Editor-Publisher and Distinguished Service awards; the Stephen Berry Free Press Champion Award from the Iowa Center for Public Affairs Journalism; and the Skip Weber Friend of the First Amendment Award from the Iowa Freedom of Information Council, of which he twice served as board president.
- f. *Art Cullen*: According to a Random House Penguin note for the book *Storm Lake: A Chronicle of Change, Resilience, and Hope from a Heartland Newspaper* (published in January 2020), Art Cullen is “half the ownership and 25 percent of the news staff of The Storm Lake Times (now the Times-Pilot).” During his 40 years in journalism, Art has worked as a reporter and editor at newspapers in Storm Lake, Algona, Ames, and Mason City. In 2017, Columbia University awarded Art the Pulitzer Prize for Editorial Writing for “editorials fueled by tenacious reporting, impressive expertise and engaging writing that successfully challenged powerful

corporate agricultural interests in Iowa.” Art received the Iowa Newspaper Association’s master editor and publisher award in 2006, and the Iowa Freedom of Information Council’s Friend of the First Amendment award in 2018.

- g. *John Cullen*: John Cullen is Art Cullen’s patient brother. He is the founder of The Storm Lake Times and its longtime publisher. The Times was the subject of the PBS documentary “Storm Lake” that premiered on November 15, 2021. John worked for the Algona newspaper and in public relations at Buena Vista University before starting the Times, which published its first edition on June 29, 1990. On April 1, 2022, The Times purchased the competing Pilot-Tribune, making the Times Pilot a community newspaper with a 152-year legacy and Buena Vista County’s oldest business. John received the Iowa Newspaper Association’s master editor and publisher award in 2006.
- h. *Michael Gartner*: Michael Gartner served as the page one editor of the Wall Street Journal before returning to Iowa to work as editor of The Des Moines Register. Michael then held several high-ranking positions nationally, including president of NBC News, editor of the Louisville Courier Journal, and general news executive of USA Today. Simultaneously, he was co-owner of the Ames Tribune and was its lead editorial writer. Columbia University recognized Michael when, in 1997, it awarded him the Pulitzer Prize for editorial writing at the Ames Tribune. Michael served as chair of the Vision Iowa statewide community betterment board and then as president of the Iowa Board of Regents. He was one of the two donors who created the Iowa Journalism Institute scholarship fund at the Iowa Newspaper Association, an organization that awarded him its master editor and publisher award in 1998.
- i. *Diane Graham*: Diane Graham is known for her principled stands and the ground-breaking upward movement she made through the male-dominated

newsroom ranks of 50 years ago. Early in her career, as recited in *Winegard v. Oxberger*, 258 N.W. 2d 847, 848 (Iowa 1977), Diane was “a Des Moines Register and Tribune Company reporter assigned to examine the records in Des Moines courts.” In ruling on her case, the Iowa Supreme Court established that a constitutionally-based qualified reporter’s privilege protected her and all Iowa journalists from compelled testimony. In her three-decade career at the Register, she held top assignments, including a statehouse and legislative reporter, and became the managing editor in 1995. Diane is currently a writer for AARP’s Iowa chapter. She has served in numerous industry leadership positions, including a Pulitzer Prize juror and president of the Iowa Freedom of Information Council.

- j. *Mark Hamilton*: Mark Hamilton owns Times-Citizen Communications in Iowa Falls. In his 39 years of ownership, Mark has expanded the company into one that includes the Times Citizen and the Ackley World Journal; KIFG radio in Iowa Falls; The Link, an electronic news delivery service; Media Marketing, which sells farm publication advertising; and a commercial printing operation. Mark serves on the Community Vitality Center (advisory) Board, the Citizens Advisory Council for Iowa State University Extension, and was instrumental in organizing the Hardin County Community Foundation. Mark received the Iowa Newspaper Association’s master editor and publisher award in 1994. He is also a past president of the Iowa Freedom of Information Council.
- k. *Dan Hayes*: First as an editor of The Quad City Times and then as the corporate news executive for Lee Enterprises, Dan Hayes shaped what Iowans read and learn about their state and neighbors for more than 40 years. Dan began his career in 1966 at the Galesburg Register-Mail in Illinois. Later, he led the Quad City Times as editor for 12 years, after serving as managing editor and executive editor for the previous 12 years. Dan

joined the Lee Enterprises corporate team in 1998. In 2005, Dan became Lee's vice president for communications and oversaw communications for the public company until retiring in 2015. During his extensive career, Dan served as a member of the Mid-American Press Institute board of directors and on the professional advisory board for the School of Journalism at the University of Iowa.

- l. *David Johnson*: Senator David Johnson represented Northwest Iowa for two terms in the Iowa House of Representatives and four terms in the Iowa Senate until his retirement in 2019. The State of Iowa's Official Register lists David's experience as including "dairy herdsman; third generation engaged in family agribusiness; owner of award-winning newspaper, editor, reporter, and photojournalist; [and] camp manager of three scientific research expeditions to Antarctica and the Arctic." David is a recipient of the Hoover Uncommon Public Service Award. David received the Iowa Newspaper Association's Distinguished Service Award, which recognizes long-time journalists for their contributions to the newspaper profession and to their communities, in 1995.
- m. *Alan Mores*: Alan Mores joined Harlan Newspapers in 1984 and co-owned it with his brother Steve until 2020. The Harlan Newspapers accumulated some 300 state and national awards under the Mores family leadership. Alan received the Iowa Newspaper Association's master editor and publisher award in 2000, 11 years after his brother Steve and 36 years after his father Leo received the same recognition. Alan was one of the first regional media coordinators when the Iowa Supreme Court adopted its electronic media coverage rules. He also served in many Iowa Newspaper Association, Iowa Newspaper Foundation, and other industry leadership roles.
- n. *Steve Mores*: Steve Mores joined the Harlan Tribune in 1968, and he and brother Alan became co-publishers in 1984. Together they built the business by creating

HarlanOnline.com and a local news and weather cable television channel. Harlan Newspapers earned many business awards, including recognition as the Shelby County business of the year in 2017. The Mores family funds, through the Iowa Newspaper Association, the Leo Mores Newspaper Leadership Institute, which is designed to enhance the leadership, organization and performance skills of emerging leaders in Iowa journalism. Steve and his family also fund two Iowa State University scholarships in community journalism, as well as the ISU “Leo Mores Sigma Delta Chi Society of Professional Journalism” club. Steve received the Iowa Newspaper Association’s master editor and publisher award in 1989.

- o. *Lyle Muller*: Lyle Muller began his journalism career in radio news at stations in Waverley, Ft. Dodge, and Cedar Rapids before working as a television reporter and anchor at the ABC affiliate serving the Mason City area and several northern Iowa counties. He then worked as news director at KXIC Radio in Iowa City for a couple of years and as a staff reporter at the Iowa City Press Citizen. In 1987 he joined the Cedar Rapids Gazette, where he rose from a bureau chief to editor in a career spanning more than 25 years. Lyle joined the Iowa Center for Public Affairs Journalism in 2012, serving as the first full-time executive director of the nonprofit, nonpartisan training organization and its related IowaWatch.org investigative reporting arm. He continued in that position until 2019. Today, Lyle remains an editor and educator, working as the Iowa editor for PoliFact and by serving as the professional advisor to Grinnell College’s newspaper, The Scarlet & Black, and as the ethics and politics initiative coach for The Daily Iowan at the University of Iowa.
- p. *Nancy Newhoff*: Nancy Newhoff served the readers of the Cedar Valley area for more than 40 years through her work as a reporter and managing editor, eventually becoming the first female editor of the Waterloo Courier.

As the Courier's police and courts reporter, one of Nancy's key assignments was the 1981 slaying of two Waterloo police officers and the subsequent manhunt for James Michael "T-Bone" Taylor. His trial was one of the first to receive television coverage under the Iowa Supreme Court's expanded media coverage rules. Nancy retired from the Courier in 2020. Among her many awards, Nancy received an Iowa Associated Press Managing Editors award for column writing, was named master columnist by the Iowa Newspaper Association and was named the co-winner of the 2003 Iowa Associated Press First Amendment award. She also served as a member of the professional advisory board of the University of Iowa School of Journalism and Mass Communications.

- q. *Chuck Offenburger*: Chuck Offenburger remains the quintessential "Iowa Boy." He's the boy who left Shenandoah to study at Vanderbilt University and see the world, only to return to write about it during a 26-year career at The Des Moines Register. For many years, Chuck was paid to ride a bike across Iowa and file stories about homemade pies and grilled meats. Chuck also covered the Persian Gulf War in Saudi Arabia, Kuwait, and Iraq. In 2001, Chuck continues providing commentary through blogging and web posts. His work has produced loyal readers, even more loyal friends, and a mutual love affair with Iowans. It has brought him many accolades, too, including Iowa Newspaper Association's Distinguished Service Award in 2012.

- r. *Kathleen Richardson*: Kathleen Richardson's first career—20 years at The Des Moines Register—demonstrated her skill and persistence as copy editor and copy desk chief, wire editor, news editor, features editor, book reviewer, and columnist. Her second career—as an educator—allowed her to shape the thinking and careers of hundreds of journalists who now serve and will continue to serve Iowa. Finally, as a member of the Iowa bar, Kathleen has provided unwavering First Amendment

advocacy for journalists and ordinary Iowans through her service as executive secretary of the Iowa Freedom of Information Council. Kathleen currently serves as Dean and professor of media law at the Drake University School of Journalism and Mass Communications. Governor Terry Branstad appointed Kathleen as one of the initial members of the Iowa Public Information Board, a state agency charged with providing a non-litigation alternative to enforcing Iowa's open-government laws. She has received the Iowa Newspaper Association Distinguished Service Award and the Governor's Volunteer Award; was honored by the state judicial branch for her service to the state legal system; and was named an Iowa Watch Free Press Champion and Iowa State University Greenlee School Friend of the First Amendment.

- s. *Ron Steele*: If you have watched television news in northeast Iowa any time in the last 49 years, you have heard Ron Steele's voice or seen his face. Since 1974, Ron has reported from the anchor desk of KWWL-TV, where he remains Iowa's longest sitting news anchor. Ron has covered breaking news throughout Iowa and reported about world affairs, including from Saudi Arabia about the Persian Gulf War during Desert Storm and the White House when American hostages returned from Iran. He received the Iowa Broadcast News Association's Jack Shelley Award, and the National Academy of Television Arts and Sciences honored him with its Silver Circle Award in 2011. Ron is a multiple Emmy award winner and nominee, a member of the Iowa Broadcasters Association Hall of Fame, and a member of the University of Iowa Hall of Fame. Ron has also taught electronic media writing at the University of Northern Iowa.
- t. *Herb Strentz*: As the common link among the 21 other friends of the court joining in this amicus brief, for the past 50 years, Herb Strentz has been a mentor, co-worker, teacher, and pal to these journalists and

educators and virtually most all other Iowans who work the news media or seek access to government and its meetings and records. Herb came to Iowa in 1975, joining the Drake University School of Journalism and Mass Communications as Dean. He is a founder of the Iowa Freedom of Information Council and served as its executive secretary from 1975 to 2000. In 2004, Herb was named to the “Heroes of the 50 States, The Open Government Hall of Fame” of the National Freedom of Information Coalition and the Society of Professional Journalists, the first of two Iowans inducted there. He also is a member of the Iowa Broadcasters Hall of Fame and a recipient of the Distinguished Service Award from the Iowa Newspaper Association. He is the author of “News Reporters and News Sources,” which was published by the United States Information Agency in Spanish, Chinese and Arabic.

- u. *Bill Tubbs*: In 1971, Bill Tubbs became the first resident co-owner and publisher of the North Scott Press. His family became sole owners in 2000. Under Bill’s leadership, the newspaper has garnered more than 200 state and national honors. Bill has served on the eight-member Rotary International Public Image Resource Group and the Iowa Public TV Foundation board. The National Newspaper Association awarded him its James O. Amos Award for distinguished service and leadership to the local press and community in 2015. Bill and his wife, Linda, established a digital media scholarship at Iowa State University. Bill received the Iowa Newspaper Association’s master editor and publisher award in 1995 and its Distinguished Service Award in 2008. He also served as president of the Iowa Freedom of Information Council in 1994.
- v. *Mark Witherspoon*: Mark served as the editorial advisor for the Iowa State Daily from 1999 until his retirement in August 2021. Before joining the Iowa State Daily, Mark was a reporter and editor for the Wichita Falls Record News and Fort Worth Star-Telegram. In 1987 he

transitioned into advising college newspapers, first at Texas Christian University and then at Southern Methodist University. During his tenure as editorial advisor, the Iowa State Daily won many high honors, including the Associated Collegiate Press' Pacemaker Award for Best Four-year Daily Newspaper in 2011 and 2017. Mark received the Iowa Newspaper Association's Distinguished Service Award in 2020, when the state press organization noted how Mark "has been educating student journalists – and positively impacting the world of journalism – for 30 years. Not to mention the decade plus spent editing prior to teaching. During this time, he has taught and mentored over 3,000 student journalists." Mark started First Amendment Day at Iowa State in 2003 and helped at least 20 other universities in the United States start their own First Amendment celebrations on their campuses. He served as President of the College Media Association from 1997-1999 and as CMA Vice President from 1995-1997. That national organization named Mark as its Distinguished 4-Year Multi Media Adviser in 1993. He also has received the Columbia Scholastic Press Association's Gold Key Award, the Society for Collegiate Journalists' Louis E. Ingelhart Award, and the Iowa College Media Association's John Eighmey Service Award.

8. These 22 Past and Present Iowa Journalists and Journalism

Educators possess a substantial and continuing interest in this case as they seek to preserve public and news media access to government records and information.

9. Additionally, the 22 Past and Present Iowa Journalists and

Journalism Educators prize the civic good served by open and accountable public officials in all branches of government, whether they are city

councilors, school board members, court clerks, or governors. This group believes an oath to discharge official duties faithfully encompasses a pledge to uphold all laws irrespective of whether you live in the county seat or at Terrace Hill. They accept that no man, or woman, is above the law.

10. Further, the ability of the 22 Past and Present Iowa Journalists and Journalism Educators to gather and report news and matters of public concern and to continue in their role of providing oversight on government conduct is implicated by the issues raised in this case.

11. In this regard, their experience, work, education, and training allow the 22 Past and Present Iowa Journalists and Journalism Educators to provide this Court with a unique, public policy-based perspective as to why the provisions of the Iowa Public Records Act, Iowa Code Chapter 22, should not be subordinated to generalized executive privilege notions.

12. Based on their experience, their broad geographic dispersion, and their continuing work, the 22 Past and Present Iowa Journalists and Journalism Educators are well suited to assist the Court by providing an independent, informed view as *Amici Curiae* on the issues presented in this case with a journalism and public interest perspective that the parties lack.

13. Therefore, the 22 Past and Present Iowa Journalists and Journalism Educators seek leave through this motion to file a Friend of the

Court brief to provide authority and argument in support of affirmance of the District Court's ruling under review on this interlocutory appeal.

14. Through counsel, the 22 Past and Present Iowa Journalists and Journalism Educators apprised an attorney of record for Rasmussen (Gary Dickey) and for the Office of the Governor (Sam Langholz) that they intended to seek leave to file their Brief of *Amici Curiae*. Those counsel for the parties indicated that their respective clients do not resist this motion or the leave it seeks.

15. In accordance with Iowa R. App. P. 6.18, the 22 Past and Present Iowa Journalists and Journalism Educators conditionally file their Brief of *Amici Curiae* with the Clerk of the Supreme Court concurrently with and as an attachment to this motion.

16. The undersigned counsel for the 22 Past and Present Iowa Journalists and Journalism Educators confirm that the Brief of the *Amici Curiae* was not authored in whole or in part by counsel for any party. Further, no party or their counsel contributed money to fund the preparation or submission of the Brief of the *Amici Curiae*. The undersigned counsel prepared and submitted the Brief of the *Amici Curiae* on behalf of the *Amici Curiae* on a *pro bono* basis, without contribution of money by any other person.

WHEREFORE, the 22 Past and Present Iowa Journalists and Journalism Educators identified above respectfully request that this Court grant them leave to participate in this matter as *amici curiae* and direct that the Clerk of the Supreme Court receive and accept their accompanying Brief of *Amici Curiae* for filing.

Dated: November 2, 2022.

/s/ Michael A. Giudicessi
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CERTIFICATE OF SERVICE

The undersigned certifies that in compliance with Iowa Rule of Appellate Procedure 6.31, she electronically filed the foregoing **Unresisted Motion of 22 Past and Present Iowa Journalists and Journalism Educators to File a Brief of *Amici Curiae* in Support of Plaintiff/Appellee** on November 2, 2022, with the Clerk of the Supreme Court and served it on counsel of record for all parties to this interlocutory appeal using EDMS.

/s/ Trisha Richey

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