

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

<p>PETER OLSEN, Plaintiff, v. MARIE GLEASON, LAURA BELIN, and BLEEDING HEARTLAND, LLC Defendants.</p>	<p>No. _____ PETITION - JURY TRIAL DEMANDED</p>
--	--

Parties, Jurisdiction, and Venue

1. Plaintiff Peter Olsen is a natural person and a resident of Scott County, Iowa.
2. Defendant Marie Gleason is a natural person and a resident of Scott County, Iowa. Defendant Laura Belin is a natural person and a resident of Polk County, Iowa. Defendant Bleeding Heartland, LLC is an Iowa Limited Liability Company. Belin is the sole member of Bleeding Heartland, LLC.
3. Because one defendant is a resident of Scott County, Iowa and the conduct causing injury and the resulting damage occurred in Scott County, Iowa, venue is proper in this Court.

Factual Background

4. Plaintiff is a parent in the Pleasant Valley School District. During the 2021-22 academic year, the district received a complaint from a different parent about the inclusion of the book *All Boys Aren't Blue* in the district curriculum because, in part, the book includes graphical depictions of minors engaged in sexual acts.

5. Following school board policy, the Pleasant Valley School District Reconsideration Committee met to take information on the complaint for the purpose of making a recommendation about whether the book should be retained or removed as curricular material. The committee met on April 29, 2022, at the school district's offices for a public meeting. Both plaintiff and defendant Gleason were in attendance. During introductory remarks, the committee chairperson described the purpose of the meeting was to get input from the school district community.

6. During the public meeting, plaintiff spoke in support of the removal of *All Boys Aren't Blue* from the curriculum. Mindful of the meeting's purpose to provide community input to the superintendent and school board, plaintiff stated that the board would be held accountable for its decisions and that he would hold their names accountable for their vote.

7. After deliberations, the committee recommended that *All Boys Aren't Blue* remain in the curriculum.

8. On May 14, 2022, defendant Gleason wrote an article¹ titled "How one Iowa school district rebuffed attempted book ban" published on the website of *Bleeding Heartland*.² The website is under the control of defendant Belin and is owned by defendant Bleeding Heartland, LLC. A copy of the May 14, 2022, article is attached as Exhibit A.

9. Defendant Belin is the owner, operator, and primary reporter for *Bleeding Heartland*. Defendant Belin devotes her full-time professional efforts to gathering,

1 <https://perma.cc/HB9J-PGMA>

2 www.bleedingheartland.com

writing, and editing news content and commentary for *Bleeding Heartland* which in 2023 alone, published 498 news articles and commentaries featuring the work of more than 125 authors. The website typically gets 2,000 to 5,000 or more unique daily visitors, including lawmakers, staffers, and other insiders. During the 2023 legislative session, the website got between 88,000 and 119,000 monthly views.

10. Defendant Belin's work enjoys a strong reputation among Iowa journalists. Information that appears on *Bleeding Heartland* is regularly seen by individuals involved in the crafting of public policy in the State of Iowa.

11. Defendant Belin solicits reader contributions to support her reporting and publishing activities. Defendant Belin is entitled to all distributions and profits from *Bleeding Heartland*. Defendant Belin is paid a full-time salary for her reporting on *Bleeding Heartland*. Defendant Belin exercises editorial control over all news articles and commentaries that appear on *Bleeding Heartland*.

12. The May 14, 2022, article published on *Bleeding Heartland* described the April 29, 2022, meeting of the Pleasant Valley School District Reconsideration Committee.

13. The May 14, 2022, article included the following statement about plaintiff:

As if trying to ban a book weren't bad enough, Peter Olsen of Bettendorf threatened the committee with a comment along the lines of, "I know who you are, and I know where you live."

14. As revealed by the audio recording of the meeting, the accusation that plaintiff made "a comment along the lines of, 'I know who you are, and I know where you live.'" is false. Plaintiff did not make that statement or any similar statement.

15. Because defendant Gleason was present at the April 29, 2022, meeting she had actual knowledge that the claim made in her May 14, 2022, article was false.

16. Defendant Belin never contacted plaintiff to verify the allegation made against him in the May 14, 2022, article. If Belin had done so, she would have learned that the allegation in defendant Gleason's article was false.

17. Upon information and belief, defendant Belin did not obtain a copy of the audio recording of the April 29, 2022, meeting to verify the claim made by defendant Gleason.

18. Because of Belin's exercise of editorial control over the content in *Bleeding Heartland*, she and Bleeding Heartland, LLC are responsible for the publishing of the false statement in defendant Gleason's May 14, 2022, article.

19. The publication of the false statement about plaintiff caused harm to his reputation in the community.

20. This harm to reputation included, but is not limited to, an October 12, 2023, incident where a Pleasant Valley School District teacher complained to her classes about individuals who objected to certain books in schools. The teacher identified plaintiff by name and said he had threatened the book review committee by stating that he knew who they were and where they lived. The students who heard this false information expressed immediate concern and alarm.

21. The harm to plaintiff's reputation was exacerbated by a November 7, 2023, article³ in the Pleasant Valley School District student newspaper, *Spartan Shield*, about the 2023 school board election in which plaintiff was a candidate. The article discussed the four seats up for election, the issues in the election (including the district's continued use of sexually explicit materials such as *All Boys Aren't Blue*), and the claim that, "Olsen's behavior at a book ban deliberation last year has come into question..." The article included a hyperlink to defendant Gleason's May 14, 2022, article. It should be noted that the student journalist, unlike defendants Gleason and Belin, included the word "allegedly" to describe the claim that Olsen had threatened the committee.

22. Because of this harm to his reputation, the plaintiff suffered emotional distress and humiliation. The value of the harm done to plaintiff is more than the jurisdictional amount for a small claim. *See* Iowa Code § 631.1(b).

Count I - Libel

23. Defendant Gleason published a statement about plaintiff that she knew was false and with reckless disregard for its truth or falsity.

24. Defendants Belin and Bleeding Heartland, LLC, published a statement about plaintiff that they knew was false and with reckless disregard for its truth or falsity.

25. The statement published about plaintiff was not a matter of public concern.

26. The plaintiff suffered damage because of the actions of the defendants.

27. Plaintiff demands jury trial of his claims.

³ <https://perma.cc/M8RZ-EJBH>

Wherefore, plaintiff respectfully requests this Court enter judgment in his favor against all defendants in an amount that will fully and fairly compensate plaintiff for his losses, plus punitive damages, the costs of this action, interest on the judgment as permitted by law, and all other such relief as may be just and proper under the circumstances.

PETER OLSEN

By:

/s/ Alan R. Ostergren

Alan R. Ostergren

ALAN R. OSTERGREN, PC

500 East Court Avenue, Suite 420

Des Moines, Iowa 50309

(515) 207-0134

alan.ostergren@ostergrenlaw.com