

SUPREME COURT OF IOWA

State of Iowa v. Timothy Lee Hall Jr.

Hall · No. 25-0306 · Decided May 22, 2026

SUMMARY

The Iowa Supreme Court affirmed Timothy Lee Hall Jr.'s conviction for second-degree harassment and the entry of a five-year no-contact order. The court held that harassment does not require the defendant to initiate the personal contact and that Hall's decision to remain, threaten, and confront the victim supported the conviction. The court also held that the no-contact-order challenge was reviewable on direct appeal and that Iowa Code section 664A.5 authorized the order upon Hall's qualifying conviction without additional findings or explanations.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	May, Justice; all other justices of the Supreme Court of Iowa
JURISDICTION	Iowa Supreme Court
DECIDED	May 22, 2026
DOCKET	25-0306
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hall appealed his bench-trial conviction for harassment in the second degree and the district court's entry of a five-year criminal no-contact order.
STANDARD OF REVIEW	The sufficiency challenge was reviewed for correction of errors at law under a highly deferential substantial-evidence standard. The statutory-interpretation challenge to the no-contact order was reviewed for errors at law, and the due-process challenge was reviewed de novo. Error-preservation issues concerning sentencing were considered under the court's sentencing-error-preservation doctrine.
PRECEDENTIAL VALUE	published
PARTIES	Timothy Lee Hall Jr. v. State of Iowa

TOPICS

- criminal procedure
- statutory interpretation
- sentencing
- appellate procedure
- due process

PRACTICE AREAS

criminal law

criminal procedure

appellate procedure

sentencing

constitutional law

QUESTIONS PRESENTED

1. Whether substantial evidence supported Hall's conviction for second-degree harassment when Vanhorn, rather than Hall, initiated the encounter.
2. Whether Hall's challenge to the no-contact order was reviewable on direct appeal despite his failure to object in district court and his failure to file a separate appeal.
3. Whether Iowa Code section 664A.5 requires additional civil-injunction findings, proof, or explanations before a district court may enter a five-year no-contact order following a qualifying harassment conviction.
4. Whether entry of the five-year no-contact order without additional findings or stated reasons violated due process.

HOLDINGS

1. Iowa Code section 708.7(1)(b) does not require the defendant to initiate the encounter. A defendant may purposefully have personal contact by choosing to prolong an encounter initiated by the victim and engaging in threatening conduct instead of leaving.
2. Substantial evidence supported Hall's conviction for second-degree harassment.
3. The no-contact-order challenge was reviewable on direct appeal because the district court incorporated the order into the sentencing order through probation conditions; Hall was not required to file a separate appeal.
4. Error preservation did not bar Hall's challenges because they concerned the sentencing court's chosen disposition and the reasons for that disposition, issues for which Iowa generally excuses preservation in the sentencing context.
5. After a qualifying conviction, Iowa Code section 664A.5 authorizes the district court to enter or continue a five-year no-contact order without considering additional civil-injunction elements, making additional factual findings, or providing special explanations.
6. The entry of the five-year no-contact order following Hall's harassment conviction did not violate due process.

KEY QUOTATIONS

“Although Hall did not initiate the encounter with Vanhorn, Hall purposefully had personal contact with Vanhorn by continuing to confront him and by threatening him—instead of just leaving as Vanhorn had requested.” (at 6)

“Therefore, as in Button, Hall’s conviction should be affirmed even though Hall’s victim initiated their discussion.” (at 8-9)

“The court is not required to consider additional proof, make additional findings, or offer additional explanations.” (at 13)

“We see no reason to think that Hall was deprived of either.” (at 13)

FACTUAL BACKGROUND

Hall visited a Casey's General Store in Guthrie Center on two consecutive days. On the second visit, store manager Joshua Vanhorn approached Hall and asked him to leave after an employee recognized Hall from an argument during the prior visit. Hall remained approximately two feet from Vanhorn, cursed at him, and threatened, words to the effect of, "Come outside and I'll bust your lip," before leaving. Hall was convicted of second-degree harassment, and the district court entered a five-year no-contact order protecting Vanhorn.

PROCEDURAL HISTORY

The Guthrie County Sheriff's Department filed a complaint charging Hall under Iowa Code sections 708.7(1)(b) and 708.7(3)(a). The Iowa District Court for Guthrie County entered a temporary no-contact order, convicted Hall after a bench trial, sentenced him to one year in jail suspended with probation, and entered a five-year no-contact order incorporated into the sentencing order through probation conditions. Hall appealed, challenging the sufficiency of the evidence and the no-contact order.

DISPOSITION

affirmed

CASES CITED

- State v. Lacey, 968 N.W.2d 792, 800, 802-03 (Iowa 2021)
- In re D.S., 856 N.W.2d 348, 352-54 (Iowa 2014)
- State v. Webb, 648 N.W.2d 72, 75-76 (Iowa 2002)
- Brokaw v. Winfield-Mt. Union Community School District, 788 N.W.2d 386, 393 (Iowa 2010)
- State v. Stephenson, 608 N.W.2d 778, 784 (Iowa 2000) (en banc)
- State v. Evans, 671 N.W.2d 720, 722-25 (Iowa 2003)
- State v. Evans, 672 N.W.2d 328, 330-31 (Iowa 2003)
- State v. Reynolds, 670 N.W.2d 405, 410 (Iowa 2003)
- State v. Button, 622 N.W.2d 480, 482, 484-85 (Iowa 2001) (en banc)
- State v. Benson, No. 04-1036, 2006 WL 1229992, at *5-6 (Iowa Ct. App. Apr. 26, 2006)
- State v. Rasmussen, 7 N.W.3d 357, 365 (Iowa 2024)
- State v. Kieffer, 17 N.W.3d 651, 661-62 (Iowa 2025)
- State v. Lynch, No. 20-0075, 2021 WL 2453362, at *2-4 (Iowa Ct. App. June 16, 2021)
- State v. Grover, No. 14-0072, 2014 WL 7343514, at *2 (Iowa Ct. App. Dec. 24, 2014)
- State v. Hallock, 31 N.W.3d 36, 41-43 (Iowa 2026)
- Ostergren v. Iowa District Court, 863 N.W.2d 294, 298 (Iowa 2015)

- Vance v. Iowa District Court, 907 N.W.2d 473, 481-83 (Iowa 2018)
- State v. Petro, 981 N.W.2d 686, 691 (Iowa 2022)
- State v. Hunter, No. 24-1999, 2026 WL 892487, at *2 (Iowa Ct. App. Apr. 1, 2026)
- State v. Cahill, 972 N.W.2d 19, 27 (Iowa 2022)
- State v. Hightower, 8 N.W.3d 527, 539 (Iowa 2024)

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