

SUPREME COURT OF IOWA

Matthew Lewis Hunter v. City of Des Moines, Iowa

Hunter · No. 24-0735 · Decided April 24, 2026

SUMMARY

The Iowa Supreme Court reviewed a disability-discrimination and failure-to-accommodate action brought by former Des Moines police sergeant Matthew Lewis Hunter under the Iowa Civil Rights Act. The court held that Hunter’s disability-discrimination claim was properly submitted to the jury but that a flawed jury instruction required a new trial, and it held that the failure-to-accommodate claim failed as a matter of law. The court affirmed the court of appeals, reversed the district court judgment, and remanded for a new trial limited to the disability-discrimination claim.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Mansfield, J.; all justices joined
JURISDICTION	Iowa Supreme Court
DECIDED	April 24, 2026
DOCKET	24-0735
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The City appealed after a jury found it liable under the Iowa Civil Rights Act for disability discrimination and failure to accommodate, and the Iowa Court of Appeals reversed the district court judgment and remanded for a new trial on the disability-discrimination claim. The Iowa Supreme Court granted further review.
STANDARD OF REVIEW	Motions for directed verdict and judgment notwithstanding the verdict are reviewed for correction of errors at law, viewing the evidence in the light most favorable to the party opposing the motion. Alleged jury-instruction errors are also reviewed for correction of errors at law.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	City of Des Moines, Iowa v. Matthew Lewis Hunter

TOPICS

disability discrimination

reasonable accommodation

municipal liability

appellate procedure

standard of review

PRACTICE AREAS

employment law

civil rights

disability discrimination

reasonable accommodation

municipal law

QUESTIONS PRESENTED

1. Whether sufficient evidence supported submitting Hunter's disability-discrimination claim to the jury, including whether he was qualified to perform the essential functions of a police officer and whether his disability was a motivating factor in his termination.
2. Whether Hunter's request for time and treatment as an accommodation, made after his misconduct and after termination had been recommended, was timely and legally sufficient to support a failure-to-accommodate claim.
3. Whether the district court's stereotypes jury instruction misstated the law by allowing liability without proof of intentional discrimination because of disability.
4. Whether the district court properly refused the City's proposed rules-of-conduct and comparator-evidence jury instructions.

HOLDINGS

1. A diagnosis of PTSD does not, as a matter of law, render a law-enforcement officer unqualified. Because the evidence could support a finding that Hunter could perform the essential functions of the position with or without reasonable accommodation, the qualification issue was properly submitted to the jury.
2. Hunter presented sufficient evidence to create a jury question on whether his PTSD disability was a motivating factor in the City's termination decision.
3. Hunter's request for time and treatment made after his terminable misconduct and after termination had been recommended was too late to support a failure-to-accommodate claim.
4. The stereotypes instruction was erroneous because it permitted the jury to find unlawful discrimination based on unrecognized or unconscious bias and treatment different from how the employee would have been treated without a disability, without requiring proof of intentional discrimination because of disability and the other elements of a disparate-treatment claim.
5. The district court properly refused the City's proposed rules-of-conduct instruction because existing instructions adequately addressed termination for misconduct and the same-decision defense. It also properly refused the proposed comparator instruction because requiring identical conduct without mitigating or distinguishing circumstances was too restrictive.

KEY QUOTATIONS

"We also agree with the court of appeals that the plaintiff's failure-to-accommodate claim fails as a matter of law." (3)

“We reaffirm what we recently said in Rumsey—that seeking an accommodation after engaging in terminable misconduct is too late” (23-24)

“An employer who is “unaware of bias”—the paradigm of Instruction No. 26—normally can’t be engaging in intentional discrimination.” (26-27)

“The ICRA does not “eradicate discrimination in all forms.” Rather, as relevant here, it prohibits certain types of discrimination, specifically discharging an employee who was otherwise qualified because of their disability.” (27)

“As for the City’s comparator instruction, we agree with the court of appeals that it was too restrictive.” (36)

FACTUAL BACKGROUND

Matthew Hunter was a Des Moines police sergeant whose former partner and close friend died by suicide. After experiencing psychological symptoms, Hunter drank heavily at a wedding celebration, drove away, and engaged in abusive, threatening, and sometimes homophobic and misogynistic conduct toward other law-enforcement officers during his arrest and detention. He later sought counseling and was diagnosed with PTSD related to the suicide, disclosing the diagnosis to the police chief during a pre-disciplinary meeting. The chief terminated Hunter the next day, and Hunter alleged that the termination discriminated against him because of PTSD and denied him a reasonable accommodation.

PROCEDURAL HISTORY

After exhausting administrative remedies, Hunter sued the City in Polk County District Court under the Iowa Civil Rights Act. A jury found for Hunter on disability discrimination and failure to accommodate and awarded more than \$2.6 million in damages; the district court also awarded attorney fees. The Iowa Court of Appeals held that the disability-discrimination claim was supported by sufficient evidence but required a new trial because of an erroneous stereotypes instruction, and held that the City was entitled to judgment as a matter of law on the accommodation claim. The Iowa Supreme Court affirmed the court of appeals, reversed the district court judgment, and remanded for a new trial on the disability-discrimination claim.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for a new trial limited to Hunter's disability-discrimination claim. The failure-to-accommodate claim is resolved in favor of the City as a matter of law.

CASES CITED

- Selden v. Des Moines Area Community College, 2 N.W.3d 437, 443 (Iowa 2024)
- Godfrey v. State, 962 N.W.2d 84, 99 (Iowa 2021)
- DeBoom v. Raining Rose, Inc., 772 N.W.2d 1, 5, 12-13 (Iowa 2009)

- Boyle v. Alum-Line, Inc., 710 N.W.2d 741, 748-49 (Iowa 2006)
- Rumsey v. Woodgrain Millwork, Inc., 962 N.W.2d 9, 22-23, 31, 33 (Iowa 2021)
- Casey's General Stores, Inc. v. Blackford, 661 N.W.2d 515, 519 (Iowa 2003)
- Goodpaster v. Schwan's Home Service, Inc., 849 N.W.2d 1, 6, 14-16 (Iowa 2014)
- McClure v. E.I. du Pont de Nemours & Co., 23 N.W.3d 33, 39, 41, 46 (Iowa 2025)
- Haskenhoff v. Homeland Energy Solutions, LLC, 897 N.W.2d 553, 582 (Iowa 2017)
- Feedback v. Swift Pork Co., 988 N.W.2d 340, 350-51 (Iowa 2023)
- Hawkins v. Grinnell Regional Medical Center, 929 N.W.2d 261, 272 (Iowa 2019)
- Price Waterhouse v. Hopkins, 490 U.S. 228, 258 (1989) (plurality opinion)
- Boelman v. Manson State Bank, 522 N.W.2d 73, 80 (Iowa 1994)
- Courtney v. American National Can Co., 537 N.W.2d 681, 685 (Iowa 1995)
- Burroughs v. City of Springfield, 163 F.3d 505, 508 (8th Cir. 1998)
- McKenzie v. Dovala, 242 F.3d 967, 973-75 (10th Cir. 2001)
- McKenzie v. Benton, 388 F.3d 1342, 1345-46, 1356 (10th Cir. 2004)
- Hoback v. City of Chattanooga, 550 F. App'x 257, 260 (6th Cir. 2013)
- Johnson v. City of Blaine, 970 F. Supp. 2d 893, 909-10 (D. Minn. 2013)
- Hoffman v. City of Bethlehem, 739 F. App'x 144, 149 (3d Cir. 2018)
- Todd v. Fayette County School District, 998 F.3d 1203, 1217 (11th Cir. 2021)
- Halpern v. Wake Forest University Health Sciences, 669 F.3d 454, 465 (4th Cir. 2012)
- Schaffhauser v. United Parcel Service, Inc., 794 F.3d 899, 906 (8th Cir. 2015)
- Hill v. Kansas City Area Transportation Authority, 181 F.3d 891, 894 (8th Cir. 1999)
- Shock v. Webster Industries, Inc., No. 24-3944, 2025 WL 3083072, at *4 (6th Cir. Sept. 16, 2025)
- Trahan v. Wayfair Maine, LLC, 957 F.3d 54, 65-66 (1st Cir. 2020)
- DeWitt v. Southwestern Bell Telephone Co., 845 F.3d 1299, 1318 (10th Cir. 2017)
- EEOC v. Abercrombie & Fitch Stores, Inc., 575 U.S. 768, 774 (2015)
- Pippen v. State, 854 N.W.2d 1, 9 (Iowa 2014)
- Iowa Civil Rights Commission v. Woodbury County Community Action Agency, 304 N.W.2d 443, 451-52 (Iowa Ct. App. 1981)
- Palmer College of Chiropractic v. Davenport Civil Rights Commission, 850 N.W.2d 326, 333 (Iowa 2014)
- Stacks v. Southwest Bell Yellow Pages, Inc., 27 F.3d 1316, 1323-24 (8th Cir. 1994)
- Stacks v. Southwest Bell Yellow Pages, Inc., 996 F.2d 200, 201 n.1, 202-03 (8th Cir. 1993) (per curiam)
- Brooks v. Woodline Motor Freight, Inc., 852 F.2d 1061, 1064 (8th Cir. 1988)
- Syvock v. Milwaukee Boiler Manufacturing Co., 665 F.2d 149, 154-55 (7th Cir. 1981)
- Moe v. Grinnell College, 556 F. Supp. 3d 916, 929-33 (S.D. Iowa 2021)
- EEOC v. W&O, Inc., 213 F.3d 600, 607, 611 (11th Cir. 2000)
- United States v. Young, 6 F.4th 804, 808-09, 812 (8th Cir. 2021) (Kelly, J., concurring)
- Rivera v. Woodward Resource Center, 865 N.W.2d 887, 892 (Iowa 2015)

- Vroegh v. Iowa Department of Corrections, 972 N.W.2d 686, 696 (Iowa 2022)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/iowa-supreme-court-supreme-court-of-iowa/2026/matthew-lewis-hunter-v-city-of-des-moines-iowa-4gq7as7f>