

SUPREME COURT OF IOWA

State of Iowa v. Rodney Dee Brown

State v. Brown · No. 24-0409 · Decided February 27, 2026

SUMMARY

The Iowa Supreme Court affirmed the defendant’s conviction for attempting to entice a minor under Iowa Code section 710.10(4). The court held that the jury instruction did not need to define “illegal act” as an illegal sexual act and concluded that substantial evidence supported the jury’s finding of specific intent. A concurrence agreed with the result but expressed concern that the jury instruction should have identified the specific illegal act or acts alleged by the State.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Christensen, C.J.; Mansfield, J.; McDermott, J.; all other Iowa Supreme Court justices
JURISDICTION	Iowa Supreme Court
DECIDED	February 27, 2026
DOCKET	24-0409
DISPOSITION	affirmed
PROCEDURAL POSTURE	Brown was convicted by a jury of attempting to entice a minor under Iowa Code section 710.10(4). The Iowa Court of Appeals affirmed, and the Iowa Supreme Court granted further review.
STANDARD OF REVIEW	The court reviewed the jury-instruction challenge for correction of errors at law and reviewed the sufficiency-of-the-evidence challenge for correction of errors at law, viewing the evidence in the light most favorable to the State and affirming if substantial evidence supported the verdict.
PRECEDENTIAL VALUE	published, precedential Iowa Supreme Court opinion
PARTIES	Rodney Dee Brown v. State of Iowa

TOPICS

- jury instructions
- criminal procedure
- statutory interpretation
- appellate procedure
- evidence

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether Iowa Code section 710.10(4) requires a jury instruction specifying that the intended illegal act must be an illegal sexual act.
2. Whether substantial evidence supported the jury's finding that Brown acted with specific intent to commit an illegal act upon the minor.

HOLDINGS

1. No. A defendant may be convicted under section 710.10(4) without intending to commit an illegal sexual act; the statute encompasses illegal acts that are not sexual in nature.
2. Yes. The evidence, viewed in the light most favorable to the State, was sufficient for a rational jury to find beyond a reasonable doubt that Brown intended to commit an illegal act upon the minor.

KEY QUOTATIONS

“A defendant charged with enticing a minor under section 710.10(4) need not intend to commit an illegal sex act.” (6)

“Interpreting the evidence in the light most favorable to the jury verdict and the State, the jury had sufficient evidence of specific intent to convict Brown under Iowa Code section 710.10(4).” (8)

FACTUAL BACKGROUND

A thirteen-year-old girl encountered Brown, a seventy-one-year-old man, in a supermarket. Brown followed her, repeatedly approached her, asked her questions, and later pulled his vehicle alongside her in the parking lot and offered her a ride. The girl rejected the offer and ran home; Brown later told police that he thought she was eighteen and acknowledged that his conduct would be inappropriate if she were thirteen. A jury found that Brown acted with intent to commit an illegal act upon the minor.

PROCEDURAL HISTORY

Following a jury conviction in the Iowa District Court for Clinton County, Brown challenged the jury instructions and the sufficiency of the evidence. The court of appeals affirmed the conviction. On further review, the Iowa Supreme Court affirmed the court of appeals decision and the district court judgment.

DISPOSITION

affirmed

CASES CITED

- State v. Davis, 975 N.W.2d 1, 8 (Iowa 2022)

- State v. Bynum, 937 N.W.2d 319, 324 (Iowa 2020)
- State v. Benson, 919 N.W.2d 237, 242 (Iowa 2018)
- State v. Becker, 818 N.W.2d 135, 143 (Iowa 2012)
- State v. Mitchell, 568 N.W.2d 493, 501 (Iowa 1997)
- Alcala v. Marriott Int'l, Inc., 880 N.W.2d 699 (Iowa 2016)
- State v. McMullin, 421 N.W.2d 517, 518 (Iowa 1988)
- State v. Warren, 955 N.W.2d 848, 860 (Iowa 2021)
- Martins v. Dull (In re Est. of Dull), 303 N.W.2d 402, 407 (Iowa 1981)
- Antolik v. McMahon, 744 N.W.2d 82 (Iowa 2007)
- Clark v. Sweeney, 607 U.S. 7, 9 (2025)
- Lomax v. Ortiz-Marquez, 140 S. Ct. 1721, 1724 (2020)
- State v. Crawford, 972 N.W.2d 189, 195, 202 (Iowa 2020)
- State v. Tipton, 897 N.W.2d 653, 692 (Iowa 2017)
- State v. Williams, 695 N.W.2d 23, 27 (Iowa 2005)
- State v. Manning, 26 N.W.3d 385, 394 (Iowa 2025)
- State v. Ernst, 954 N.W.2d 50, 55 (Iowa 2021)
- State v. Radeke, 444 N.W.2d 476, 478-79 (Iowa 1989)
- State v. Cunningham, 463 N.W.2d 887, 889 (Iowa Ct. App. 1990)
- State v. Ellison, 985 N.W.2d 473, 480-81 (Iowa 2023)
- State v. Johnson, 7 N.W.3d 504, 509 (Iowa 2024)
- State v. Mesch, 574 N.W.2d 10, 14 (Iowa 1997)
- State v. Austin, 80 N.W. 303, 304 (Iowa 1899)
- State v. Wagoner, 74 N.W.2d 246 (Iowa 1956)
- State v. Holtz, No. 15-1058, 2016 WL 4036112, at *1, *3-4 (Iowa Ct. App. July 27, 2016)
- State v. Washpun, No. 03-0963, 2004 WL 1898470, at *1 (Iowa Ct. App. Aug. 26, 2004)

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