

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Ryan Wolterman v. Shawn Syverson, Individually and in His Official Capacity as a Law Enforcement Officer; Gregory Baloun, Individually and in His Official Capacity as Sheriff; Dickinson County, Iowa

Wolterman · No. 24-1482 · Decided January 14, 2026

SUMMARY

The United States Court of Appeals for the Eighth Circuit affirmed summary judgment for Dickinson County, Sheriff Gregory Baloun, and Deputy Sheriff Shawn Syverson in Ryan Wolterman's action under 42 U.S.C. § 1983 and Iowa law. The court held that Syverson had reasonable suspicion to conduct a Terry stop and reasonably relied on another officer's probable-cause determination in assisting with Wolterman's arrest. The court also rejected Wolterman's Monell, false-arrest, negligent-supervision, and respondeat-superior claims.

CASE DETAILS

COURT	United States Court of Appeals for the Eighth Circuit
WRITING FOR THE COURT	Gruender, Circuit Judge; Smith, Circuit Judge; Shepherd, Circuit Judge
JURISDICTION	United States Court of Appeals for the Eighth Circuit
DECIDED	January 14, 2026
DOCKET	24-1482
DISPOSITION	affirmed
PROCEDURAL POSTURE	Wolterman appealed the Northern District of Iowa's grant of summary judgment to the defendants and denial of his motion for partial summary judgment in an action under 42 U.S.C. § 1983 and Iowa law.
STANDARD OF REVIEW	Summary judgment is reviewed de novo, viewing the record in the light most favorable to the nonmoving party and giving that party the benefit of all reasonable inferences. Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	Published and precedential opinion of the United States Court of Appeals for the Eighth Circuit.

PARTIES

Ryan Wolterman v. Shawn Syverson, Gregory Baloun, Dickinson County, Iowa

TOPICS

qualified immunity

section 1983

fourth amendment

search and seizure

summary judgment

PRACTICE AREAS

civil rights

constitutional law

criminal procedure

municipal liability

state tort law

appellate procedure

QUESTIONS PRESENTED

1. Whether Deputy Syverson violated Wolterman's Fourth Amendment rights by conducting an investigative stop without reasonable suspicion.
2. Whether Deputy Syverson violated Wolterman's Fourth Amendment rights by assisting in Wolterman's arrest without independently establishing probable cause.
3. Whether the absence of a constitutional violation defeated Wolterman's Monell claim against Sheriff Baloun and Dickinson County.
4. Whether Deputy Syverson was liable for false arrest under Iowa law.
5. Whether Sheriff Baloun and Dickinson County were liable for negligent supervision under Iowa law.
6. Whether Dickinson County was liable under respondeat superior for negligence by Deputy Syverson.

HOLDINGS

1. Deputy Syverson had reasonable suspicion to conduct a Terry stop because Wolterman matched the general description of the suspected participant and was temporally and geographically proximate to the reported altercation.
2. Deputy Syverson did not violate Wolterman's constitutional rights because, as an assisting officer, he reasonably relied on Officer Hoss's probable-cause determination and was not required independently to establish probable cause.
3. Deputy Syverson was entitled to qualified immunity because the undisputed facts established no violation of Wolterman's Fourth Amendment right to be free from unreasonable seizure.
4. Wolterman's Monell claim against Sheriff Baloun and Dickinson County failed because there was no underlying constitutional violation by Deputy Syverson.
5. Deputy Syverson was not liable for false arrest because the detention was not unlawful; he reasonably relied on Officer Hoss's decision to arrest.
6. Wolterman's negligent-supervision claim against Sheriff Baloun and Dickinson County failed because he did not establish that Deputy Syverson engaged in wrongful or tortious conduct.
7. Dickinson County was not liable under respondeat superior because Wolterman failed to establish that Deputy Syverson acted negligently.

KEY QUOTATIONS

“A police officer may effect a temporary investigative detention if the officer has reasonable suspicion that criminal activity ‘‘may be afoot.’’” (-5-)

“An assisting officer may rely on the probable cause determination and follow the directions of an officer who is directing the arrest as long as the reliance is reasonable.” (-7-)

“Absent a constitutional violation by an employee, there can be no § 1983 or Monell liability.” (-8-)

FACTUAL BACKGROUND

Deputy Sheriff Shawn Syverson responded to a reported fight at a bar and pursued a person described by a witness as wearing a green shirt. After losing sight of that person, Syverson encountered Ryan Wolterman nearby, believed Wolterman resembled the person he had seen, and stopped him for questioning. Officer Jesse Hoss then handcuffed Wolterman and escorted him back to the bar; Wolterman was later taken to jail and charged with public intoxication, although the charge was voluntarily dismissed approximately eight months later. Wolterman's breath test showed a blood-alcohol content of .016.

PROCEDURAL HISTORY

Wolterman sued Deputy Sheriff Shawn Syverson, Sheriff Gregory Baloun, Dickinson County, and others after his detention and arrest following a bar fight. Claims against the City of Arnolds Park and several officers were dismissed pursuant to a settlement agreement. The district court granted summary judgment to the remaining defendants on the federal and Iowa-law claims and denied Wolterman's motion for partial summary judgment. The Eighth Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- *Fatemi v. White*, 775 F.3d 1022, 1040 (8th Cir. 2015)
- *Monell v. Department of Social Services of New York City*, 436 U.S. 658 (1978)
- *De Mian v. City of St. Louis*, 86 F.4th 1179, 1182 (8th Cir. 2023)
- *Flores v. United States*, 689 F.3d 894, 902 (8th Cir. 2012)
- *Pearson v. Callahan*, 555 U.S. 223, 231 (2009)
- *Ashcroft v. al-Kidd*, 563 U.S. 731, 743 (2011)
- *Stanley v. Finnegan*, 899 F.3d 623, 627 (8th Cir. 2018)
- *Terry v. Ohio*, 392 U.S. 1, 30 (1968)
- *Heien v. North Carolina*, 574 U.S. 54, 60 (2014)
- *United States v. Quinn*, 812 F.3d 694, 697-99 (8th Cir. 2016)
- *Navarette v. California*, 572 U.S. 393, 403 (2014)
- *Baude v. Leyshock*, 23 F.4th 1065, 1074 (8th Cir. 2022)

- *Chiaverini v. City of Napoleon*, 602 U.S. 556, 562-63 (2024)
- *Stearns v. Wagner*, 122 F.4th 699, 704 (8th Cir. 2024)
- *Thomas v. Marion County*, 652 N.W.2d 183, 186 (Iowa 2002)
- *Estate of Harris v. Papa John's Pizza*, 679 N.W.2d 673, 680 (Iowa 2004)
- *Godar v. Edwards*, 588 N.W.2d 701, 705 (Iowa 1999)

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