

COURT OF APPEALS OF IOWA

Craig Malin v. Sarah Watson, Deb Anselm, Astrid Garcia, and Lee Enterprises, Inc.

No. 25-1310 (Iowa Ct. App. May 13, 2026) · No. No. 25-1310 · Decided May 13, 2026

SUMMARY

The Iowa Court of Appeals affirmed summary judgment for Lee Enterprises and its journalists on Craig Malin’s claims for defamation, defamation by implication, and false-light invasion of privacy. The court held that Malin qualified as a public figure, the challenged statements were substantially true or immaterial, and he failed to establish falsity, actual malice, or sufficient reputational injury. The court also rejected his argument that the Iowa Constitution guaranteed a jury trial for civil defamation claims and held that his judicial-notice challenge was not preserved for appellate review.

CASE DETAILS

COURT	Court of Appeals of Iowa
WRITING FOR THE COURT	Schumacher, P.J.; Ahlers, J.; Badding, J.
JURISDICTION	Iowa Court of Appeals
DECIDED	May 13, 2026
DOCKET	No. 25-1310
DISPOSITION	affirmed
PROCEDURAL POSTURE	Malin appealed the Iowa District Court's grant of summary judgment for the defendants on claims for defamation, defamation by implication, and false-light invasion of privacy, as well as the denial of his motion to reconsider.
STANDARD OF REVIEW	Summary judgment is reviewed for correction of errors at law. Summary judgment is proper when the entire record shows no genuine issue of material fact and the moving party is entitled to judgment as a matter of law; the evidence is viewed in the light most favorable to the nonmoving party.
PRECEDENTIAL VALUE	published; precedential
PARTIES	Craig Malin v. Sarah Watson, Deb Anselm, Astrid Garcia, Lee Enterprises, Inc.

TOPICS

defamation

invasion of privacy

summary judgment

constitutional law

preservation of error

PRACTICE AREAS

torts

constitutional law

civil procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether Malin qualified as a public official or public figure and therefore had to prove falsity and actual malice under the heightened constitutional standard.
2. Whether the challenged statements about Malin's resignation, the casino controversy, and Spiegel's job title were false, defamatory, or made with actual malice.
3. Whether Malin's defamation-by-implication and false-light claims survived summary judgment.
4. Whether article I, section 7 of the Iowa Constitution guarantees a jury trial or precludes summary judgment in civil defamation actions.
5. Whether Malin preserved his challenge to the district court's refusal to take judicial notice of alleged adjudicative facts.

HOLDINGS

1. Malin qualified as a public figure for the limited range of issues concerning his former public employment, the casino controversy, and related public reporting.
2. A public figure asserting defamation against a media defendant must show by clear and convincing evidence that the challenged statements were false and were published with actual malice; Malin failed to create a genuine issue of material fact on either element.
3. Malin's defamation-by-implication claim did not survive summary judgment because the alleged implications did not create a defamatory purpose or establish malice.
4. Malin's false-light claim failed because he could not prove falsity, actual malice, or that the alleged false light would be highly offensive to a reasonable person.
5. Article I, section 7 does not require a jury trial or prohibit summary judgment in civil defamation actions.
6. Malin failed to preserve his challenge to the denial of judicial notice because he first raised the issue in his motion to reconsider rather than in his summary-judgment filings.

KEY QUOTATIONS

"Malin has "voluntarily inject[ed] himself . . . into a particular public controversy and thereby [is] a public figure for a limited range of issues." (p. 7)

"Because Malin cannot prove falsity of the alleged defamatory reporting by Lee, his defamation and false-light claims fail to generate a genuine issue of material fact to survive summary judgment." (p. 10)

“We agree with the district court that article I, section 7 is properly understood to only apply to criminal prosecutions.” (p. 12)

FACTUAL BACKGROUND

Craig Malin served as Davenport's city administrator from 2001 through 2015, with responsibilities including implementing city policies, overseeing departments, negotiating agreements, communicating with reporters, and lobbying for the city. In 2015, the Quad-City Times published reports concerning Malin's role in a casino-groundwork agreement and his departure from city employment. A 2023 Lee Enterprises article, discussing Malin's work as an expert in litigation arising from a collapsed Davenport apartment building, stated that Malin's resignation followed controversy over the casino deal and referred to Corri Spiegel as the assistant city administrator. Malin claimed those statements were false and defamatory, but the court concluded that the challenged reporting was substantially true and that the record did not establish falsity, actual malice, reputational injury, or a highly offensive false light.

PROCEDURAL HISTORY

Malin filed a 107-page petition concerning a 2023 Lee Enterprises article about his former employment as Davenport city administrator and his involvement in a casino project. The district court held that the article was substantially true, that Malin failed to show falsity, malice, injury, or offensiveness, and granted summary judgment to the defendants. The court denied reconsideration, including Malin's requests concerning judicial notice and a jury trial under the Iowa Constitution.

DISPOSITION

affirmed

CASES CITED

- Malin v. Quad-City Times, No. 19-1838, 2021 WL 1399837, at *3 (Iowa Ct. App. Apr. 14, 2021)
- Malin v. Lee Enterprises, No. 22-1940, 2024 WL 260087, at *4 (Iowa Ct. App. Jan. 24, 2024)
- Linn v. Montgomery, 903 N.W.2d 337, 342 (Iowa 2017)
- Stevens v. Iowa Newspapers, Inc., 728 N.W.2d 823, 826-831 (Iowa 2007)
- Bertrand v. Mullin, 846 N.W.2d 884, 892-894 (Iowa 2014)
- Bierman v. Weier, 826 N.W.2d 436, 451-452, 465 (Iowa 2013)
- Jones v. Palmer Communications, Inc., 440 N.W.2d 884, 894 (Iowa 1989)
- Schlegel v. Ottumwa Courier, a Division of Lee Enterprises, 585 N.W.2d 217 (Iowa 1998)
- Rosenblatt v. Baer, 383 U.S. 75, 85, 87 n.14 (1966)
- Gertz v. Robert Welch, Inc., 418 U.S. 323, 342 (1974)
- Behr v. Meredith Corp., 414 N.W.2d 339, 342 (Iowa 1987)
- Bauer v. Brinkman, 958 N.W.2d 194, 198, 202 (Iowa 2021)
- Meier v. Senecaut, 641 N.W.2d 532, 537 (Iowa 2002)

- State v. White, 9 N.W.3d 1, 10-11 (Iowa 2024)
- Villarini v. Iowa City Community School District, 21 N.W.3d 129, 135-136 (Iowa 2025)
- Bandstra v. Covenant Reformed Church, 913 N.W.2d 19, 55 (Iowa 2018)
- Winger Contracting Co. v. Cargill, Inc., 926 N.W.2d 526, 543 (Iowa 2019)
- Harvest Credit Management VII, L.L.C. v. Lucas, No. 08-0014, 2009 WL 1676660, at *2 (Iowa Ct. App. June 17, 2009)

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