

SUPREME COURT OF IOWA

Wilson v. Good Will Publishers and Cincinnati Companies

671 N.W.2d 479 (Iowa 2003) · No. No. 00-2066 · Decided November 13, 2003

SUMMARY

The Iowa Supreme Court held that David Wilson failed to establish legal causation for a workers' compensation claim arising from a heart attack suffered while traveling for work. The court concluded that Wilson was not impelled by employment requirements to continue working after his symptoms began, vacated the court of appeals' decision, and affirmed the district court's denial of benefits.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Larson, Justice; Larson; Wiggins
JURISDICTION	Iowa
DECIDED	November 13, 2003
DOCKET	No. 00-2066
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from a workers' compensation benefits denial. The district court affirmed the industrial commissioner's denial, and the court of appeals reversed and remanded. The Supreme Court of Iowa reviewed the decision.
STANDARD OF REVIEW	Review under Iowa Code chapter 17A is limited to correction of legal errors. The commissioner's findings are treated like jury verdicts and are construed broadly to uphold the decision. A district court may not substitute its findings of fact for those of the commissioner when the commissioner's findings are supported by substantial evidence.
PRECEDENTIAL VALUE	published precedential opinion of the Supreme Court of Iowa
PARTIES	L. David Wilson v. Good Will Publishers, Cincinnati Companies

TOPICS

- workers compensation
- judicial review of agency action
- administrative law
- standard of review
- appellate procedure

PRACTICE AREAS

workers compensation

administrative law

appellate procedure

QUESTIONS PRESENTED

1. Whether Wilson established legal causation under Iowa's workers' compensation rules for heart-attack claims based on continued employment-related exertion after the onset of symptoms.
2. Whether the district court improperly substituted its factual findings for those of the industrial commissioner regarding whether Wilson was impelled to continue working.
3. Whether the court needed to decide whether the Sondag impelled-to-continue standard is subjective or objective.
4. Whether the denial of benefits could be affirmed because Wilson failed to establish medical causation.

HOLDINGS

1. A claimant relying on the continued-exertion theory must show that employment obligations impelled the claimant to continue working after the onset of heart-attack symptoms, such that the employment contributed causally to the aggravation or final injury. Wilson failed to satisfy that requirement because he was free to stop and seek medical attention.
2. A district court may not substitute its factual findings for those of the industrial commissioner when the commissioner's findings are supported by substantial evidence.
3. The court need not decide medical causation when the claimant must prove both legal and medical causation and fails to establish legal causation.
4. The court declined to decide whether the impelled-to-continue standard is judged subjectively or objectively because the issue was waived.

KEY QUOTATIONS

“The most obvious relevance of this [third] element (continuing exertion after symptoms) is in showing causal connection between the obligations of the employment and the final injury; for if the workman, for some reason, feels impelled to continue with his duties when, but for these duties, he could and would have gone somewhere to lie down at once, the causal contribution of the employment to the aggravation of the condition is clear.” (481)

“We conclude this was error; a district court is not free to substitute its findings of fact for that of the commissioner if the commissioner's findings are supported by substantial evidence.” (482)

“This claim must fail for lack of proof of legal causation.” (482)

FACTUAL BACKGROUND

Wilson, a sales trainer for Good Will Publishers, was traveling from Iowa to Missouri to train a new representative when he developed symptoms he believed were indigestion. He continued traveling to Dexter, Missouri, where he sought medical attention after recognizing that his condition might be a heart attack; he

ultimately underwent open-heart surgery. Wilson had significant underlying coronary artery disease, largely associated with heavy cigarette smoking, and sought workers' compensation benefits on the ground that the heart attack arose out of his employment.

PROCEDURAL HISTORY

A deputy workers' compensation commissioner denied Wilson benefits because he failed to establish legal or medical causation. The commissioner affirmed that decision. The district court affirmed, substituting its own findings on legal causation but concluding that medical causation was not established. The court of appeals reversed, determining that Wilson had presented substantial evidence of both legal and medical causation. The Supreme Court of Iowa vacated the court of appeals' decision and affirmed the district court's judgment.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The court of appeals' decision was vacated, and the district court's judgment was affirmed. No further remand instructions were issued.

CASES CITED

- Riley v. Oscar Mayer Foods Corp., 532 N.W.2d 489, 492-93 (Iowa Ct. App. 1995)
- Briar Cliff College v. Campolo, 360 N.W.2d 91, 94-95 (Iowa 1984)
- Sondag v. Ferris Hardware, 220 N.W.2d 903, 905-06 (Iowa 1974)
- Cargill, Inc. v. Conley, 620 N.W.2d 496, 500 (Iowa 2000)
- Second Injury Fund v. Shank, 516 N.W.2d 808, 812 (Iowa 1994)

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