In the Iowa Supreme Court

No. 25–1889

Submitted September 9, 2026—Filed October 16, 2026
Amended October 16, 2026

Robert Teig,

Appellant,

vs.

Iowa Judicial Branch, Molly Weber, Robert Gast, Nicholas Critelli, Iowa Supreme Court Attorney Disciplinary Board, Iowa Office of Professional Regulation, and **Tara van Brederode,**

Appellees.

Appeal from the Iowa District Court for Polk County, Jeffrey Farrell, judge.

Robert Teig appeals from a district court judgment denying him access to confidential attorney disciplinary records and other relief. **District court judgment affirmed.**

Waterman, J., delivered the opinion of the court, in which all justices joined.

Robert L. Teig, Cedar Rapids, pro se appellant.

Brenna Bird, Attorney General; Patrick C. Valencia, Deputy Solicitor General; and Halle B. Kissell (until withdrawal), Assistant Solicitor General, for appellees.

Waterman, Justice.

In this appeal, we must decide whether a specific confidentiality requirement in Iowa Court Rule 35.4(3) prevails over general provisions for public access in Iowa Code chapter 22, the Open Records Act. A former attorney, Robert Teig, filed a complaint with the Iowa Supreme Court Attorney Disciplinary Board (ADB) alleging unethical conduct by several federal prosecutors. The ADB reviewed and dismissed Teig's complaint. Teig demanded that the ADB give him access to the prosecutors' responses to his complaint. When his requests for those responses and related communications were rebuffed, he sued. The district court denied Teig relief, determining that court rule 35.4(3) prevailed over the general provisions of chapter 22 and that additional records sought by Teig were protected from disclosure by the attorney–client privilege and work-product doctrine. Teig appealed, and we retained the case.

On our review, we affirm the district court's judgment for the reasons explained below. We hold that the specific confidentiality requirement in court rule 35.4(3), duly promulgated under our court's statutory authority over the legal profession, prevails over general provisions for public access to government records under chapter 22. The confidentiality rule encourages people to speak freely with investigators while protecting the reputation of the subject lawyer when the ADB determines that the complaint is unfounded. The legislature has enacted equivalent confidentiality requirements for the other licensed professions that prevail over the Open Records Act. *See* Iowa Code § 272C.6(4)(*a*) (2024); *Calcaterra v. Iowa Bd. of Med.*, 965 N.W.2d 899, 906 & n.2 (Iowa 2021). We also determine that the district court correctly applied our precedent, including *Teig v. Chavez,* 8 N.W.3d 484, 495 (Iowa 2024), protecting the attorney–client privilege and work product. We further conclude that the district

court did not abuse its discretion by denying Teig's request to cross-examine opposing counsel over a privilege log. Finally, we affirm the district court's ruling denying Teig relief for the failure by two defendants to designate individuals responsible for compliance with chapter 22.

I. Background Facts and Proceedings.

Teig, a former federal prosecutor who has been inactive as an attorney since 2024, found fault with how three Assistant United States Attorneys (AUSAs) handled a criminal case in the Northern District of Iowa. Teig sent a letter to the ADB requesting that it investigate the AUSAs for ethical violations. The ADB subsequently informed Teig that it had dismissed his complaint after reviewing responses to his allegations. Tara van Brederode, its director of attorney discipline, wrote Teig a letter in February 2023, which stated: "Many, if not all, of these concerns have been reviewed by judges in the Northern District of Iowa, Executive Office for United States Attorneys, and Office of Professional Responsibility for the U.S. Department of Justice." Teig responded that those federal disciplinary entities had refused his request to investigate and that no federal judge had looked at his ethics complaints.

In August 2024, Teig wrote van Brederode asking for copies of the AUSAs' responses to Teig's complaint and asserting that he believed those responses might contain misinformation. Van Brederode referred Teig to her supervisor, Nicholas (Tré) Critelli, executive director of the Office of Professional Regulation (OPR). Teig reached out to Critelli on August 19 to request the records. Critelli declined to produce the records, citing the confidentiality requirement of Iowa Court Rule 35.4(3) and asserting that the Open Records Act did not apply to the ADB or OPR.

On August 26, Teig emailed van Brederode and Critelli, again requesting records. He wrote: "Please provide a copy of any response provided by a respondent in complaint files No. 2022-313, 2022-314, and 2022-315 where I was the Complainant." After receiving no response, Teig emailed Critelli and van Brederode again on August 30.

Still receiving no response, Teig sent an email to the Iowa Judicial Branch freedom of information address on September 2 and copied Critelli and van Brederode. Teig's email again asked for the responses by the three attorneys named in Teig's complaint to the ADB. The next day, Critelli responded to Teig, stating that he was handling the records request and reiterating that the ADB must keep such disciplinary files confidential under rule 35.4(3). Teig then expanded his request to include "any records you considered or upon which you relied or based your response in denying my August 26 request. Also, please provide any records you considered or upon which you rely or base your response in replying to this new request."

On September 4, Iowa State Court Administrator Robert Gast responded to Teig's September 2 email, stating, "We received your email below sent to foia.admin@iowacourts.gov and foia.media@iowacourts.gov. We checked with the Office of Professional Regulation, and were told that they have already responded to your request." Teig responded with yet another records request, this time asking for all records that "discuss, deal with, respond to, or refer to my August 26 and September 3 requests to Mr. Critelli." The next day, Gast replied: "State Court Administration acknowledges receipt of your open records request below. We will conduct a search and respond again when we have more information." That email listed Molly Weber, legal counsel to the judicial branch, as the person now handling Teig's requests.

On September 10, Weber sent Teig (1) a letter from Gast and (2) redacted documents responding to Teig's September 4 records request. That same day, Teig sent another email to court administration requesting unredacted versions of the records provided in response to his September 4 email and reasserting his September 2 request for records related to his complaints against the AUSAs.

On October 1, Weber emailed Teig another letter from Gast. That letter denied Teig's request for access to the complaint files, asserting that both Iowa Code § 22.7(18) and Iowa Court Rule 35.4(3) shielded those records from public disclosure. Two days later, Teig responded with another email, this time outlining his position that Gast's legal analysis was incorrect. On October 15, Weber responded, stating: "I understand that you disagree, but we have responded to your request and will not be providing anything further."

On October 20, Teig yet again requested the ADB's complaint files and any communications "considered or relied upon or used in forming a response when replying to my requests and includes all records existing as of the date you grant or deny today's requests." Weber responded five days later and again denied the request. She stated that any documents related to Teig's latest request were protected by the attorney–client privilege and the work-product doctrine because they were created in anticipation of litigation. Teig asked Weber what litigation she referred to. Weber responded that she expected Teig to sue.

On November 26, Weber provided Teig with a privilege log called a *Vaughn* index. A *Vaughn* index is a file prepared by an agency in response to open records requests. The index names the legal justification for withholding each of the requested documents. *See Vaughn v. Rosen*, 484 F.2d 820, 826–28 (D.C. Cir. 1973).

On December 13, Teig sued, naming as defendants the Iowa Judicial Branch, ADB, OPR, van Brederode, Critelli, Weber, and Gast. Teig alleged that the defendants violated Iowa Code chapter 22 by (1) failing to provide him with the responses from the three attorneys named in his complaint to the ADB, (2) failing to provide records related to his document requests, and (3) failing to designate a records custodian for the ADB and OPR responsible for implementing the requirements of chapter 22. Teig sought statutory damages, attorney fees, and injunctive relief.

The defendants moved to dismiss Teig's suit, arguing (1) that the documents at issue were properly withheld and (2) that the Iowa Judicial Branch, Gast, and Weber were not the custodians of the records and, therefore, were not proper defendants in the case. Teig resisted. The district court granted the motion to dismiss in part, ruling that the attorney disciplinary records were confidential under court rule 35.4(3) promulgated under Iowa Code § 602.10101. The district court explained,

> Court Rule 35.4(3) requires the board to "keep all files confidential, unless the board chair or the chair's designee otherwise provides or directs in writing for disciplinary purposes or pursuant to a specific supreme court rule." This rule, and the comparable Rule 34.4(1) applicable to the grievance commission, are "designed to strike a proper balance between an attorney's protection from defamation and the public's protection from unethical conduct." *State v. Baker*, 293 N.W.2d 568, 576 (Iowa 1980). If the grievance commission determines that the attorney should be disciplined, then the balance shifts and some information regarding the investigation is made available to the public. Iowa Court Rule 34.4.
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> Absent any other provision of law, there is no question that the attorneys' responses to Tieg's [sic] disciplinary board complaint are confidential. They are part of a complaint file. There has been no finding of discipline against any of the three attorneys. The entire file is confidential under the court's rules.

The district court rejected Teig's argument that chapter 22 trumped court rule 35.4(3):

> [T]he court does not accept Tieg's [sic] premise that this is an evaluation whether a statute trumps a rule. First, defendants' argument is based on statutory support in Iowa Code section 602.10101 which gives the judicial branch the exclusive power to regulate attorneys and to adopt rules to carry out the legislature's intent. In doing so, the legislature has carved out the regulation of attorneys and handed exclusive control over that function to the judicial branch. In that sense, while the grant of authority to the judicial branch is broad, the area of regulation is specific to the supervision of the legal profession. On the other hand, chapter 22 is a general provision of law applicable to numerous units of government. Defendants' argument is supported, not just by a rule, but by a statute that is, in some respects, more specific than the general provisions of chapter 22.

(Citation omitted.) The district court ruled that the specific confidentiality requirement in court rule 35.4(3) prevailed over the general provisions of chapter 22. The district court noted that its ruling was consistent with precedent holding that "the complaint and investigative files of other professional licensing boards" remain confidential notwithstanding the lack of a specific exemption for such records in § 22.7.

The case proceeded on Teig's challenge to the defendants' claim that their communications were covered by the attorney–client privilege and work-product doctrine, and his challenge to their failure to designate records custodians for the ADB or OPR as required under § 22.1(2). The defendants moved for summary judgment. Teig resisted and cross-moved for summary judgment. The district court granted the defendants' motion and denied Teig's. The district court ruled that defense counsel's professional statement was sufficient to establish the foundation for the *Vaughn* index. The court denied Teig's request to cross-examine defense counsel. The court upheld the defendants' assertion of attorney–client privilege and work-product protection for their internal

communications prior to Teig's lawsuit. The district court noted that Teig was repeating arguments about attorney–client privilege that our court had rejected in *Chavez*, 8 N.W.3d at 495.

Finally, the district court found no actionable violation of Iowa Code § 22.1(2). The district court noted that the ADB and OPR are within the judicial branch and that the branch's public website provides contact information for open records requests. Teig appealed, and we retained the case.

II. Standard of Review.

"We review the district court's interpretation of chapter 22 for correction of errors at law." *Mitchell v. City of Cedar Rapids*, 926 N.W.2d 222, 228 (Iowa 2019) (quoting *Iowa Film Prod. Servs. v. Iowa Dep't of Econ. Dev.*, 818 N.W.2d 207, 217 (Iowa 2012)). We review the district court's ruling on a motion to dismiss claims under Iowa Code chapter 22 for correction of errors at law. *Belin v. Reynolds*, 989 N.W.2d 166, 170 (Iowa 2023). "We review a district court's grant of summary judgment for corrections of errors at law." *Chavez*, 8 N.W.3d at 490. "A district court's discovery rulings are reviewed for abuse of discretion." *Id.* We review a district court's decision to deny cross-examination of an attorney's professional statement for an abuse of discretion. *See Cogley v. Hy Vee Food Stores, Inc.*, 137 N.W.2d 310, 312–13 (Iowa 1965).

III. Analysis.

We first address whether Iowa Court Rule 35.4(3)'s specific confidentiality mandate for attorney disciplinary files held by the ADB must yield to the general transparency provisions for public records in Iowa Code chapter 22. We conclude that the district court correctly applied rule 35.4(3). Teig was not entitled to obtain the attorneys' confidential responses after the ADB dismissed Teig's complaint against them without charging any misconduct. Second, we address

whether the district court correctly upheld the defendants' claims of attorney–client privilege and work-product protection. We affirm those rulings, too, and hold that the district court acted within its discretion by denying Teig's request to cross-examine opposing counsel over the *Vaughn* index. Third, we address Teig's claim that the defendants violated Iowa Code § 22.1(2) by failing to name records custodians for the ADB and OPR. We conclude that while those entities must designate persons responsible for compliance with chapter 22 requests, Teig was not harmed by that violation. So we affirm the district court's denial of Teig's request for fees or statutory damages.

We note that while the individual defendants work within the judicial branch, none have taken part in our court's consideration of this case. *See Peterzalek v. Iowa Dist. Ct.*, 7 N.W.3d 37, 41 (Iowa 2024) (providing a similar disclosure of nonparticipation).

A. The AUSAs' Responses to Teig's Complaint. The district court correctly enforced the confidentiality mandate in Iowa Court Rule 35.4(3). That rule provides,

> The disciplinary board must keep all files confidential, unless the board chair or the chair's designee otherwise provides or directs in writing for disciplinary purposes or pursuant to a specific supreme court rule. All files must be available for examination and reproduction by the designated officer or agent of the Client Security Commission, pursuant to proceedings under chapter 39 of the Iowa Court Rules.

It is undisputed that the ADB dismissed Teig's ethics complaint against the AUSAs without imposing discipline. Under the plain meaning of the text of rule 35.4(3), the ADB "must keep all files confidential" when no discipline is imposed on the attorney who is the subject of an ethics complaint. "[A]ll files" includes the AUSAs' responses to Teig's complaint.

Teig relies on the absence of an exception for licensee disciplinary records in Iowa Code § 22.7. We squarely addressed and rejected that argument in *Calcaterra*, 965 N.W.2d at 905–06. We held that the confidentiality prescribed for complaints against licensed professionals under § 272C.6(4)(*a*) trumped chapter 22 absent a final written decision in the disciplinary proceeding. *Id.* at 906, 908. We made that determination notwithstanding the absence of an express exemption for licensee disciplinary files in § 22.7. *Id.* at 905–06. We reach the same conclusion here.

These confidentiality provisions serve important purposes, including "to assure a free flow of information" to licensing boards investigating complaints. Iowa Code § 272C.6(4)(*a*). "Individuals involved in an investigation need to be able to speak freely, and this is encouraged by confidentiality." *Calcaterra*, 965 N.W.2d at 908. "In addition, a professional's livelihood can be damaged by putting unproved allegations in public view . . . ." *Id.* Our attorney disciplinary rules provide for confidentiality "to prevent needless and potentially irreparable harm to an attorney's reputation when serious violations are not founded." *Iowa Sup. Ct. Att'y Disciplinary Bd. v. Att'y Doe No. 762*, 839 N.W.2d 620, 627 (Iowa 2013). Teig's position would undermine the important protections ensured by confidentiality. Complainants as well as licensees could suffer embarrassment and reputational harm if unfounded allegations and responses thereto were publicized. Teig's position would enable harassment of any lawyer in the state who draws unfounded but scurrilous complaints, including prosecutors, public defenders, legal aid lawyers, family law practitioners, and lawyer-legislators. It would expose all kinds of meritless accusations to viral circulation on the internet, including information that the complainants would have preferred not to become public. We enforce rule 35.4(3) as written to

preserve the confidentiality of complaints and responses alike in cases that don't proceed to formal disciplinary charges under rule 34.4.

We have long held that specific confidentiality laws supersede chapter 22's general disclosure requirements without the need for an enumerated exemption in § 22.7. For example, in *Burton v. University of Iowa Hospitals & Clinic*s, we reversed a district court ruling under chapter 22 that compelled public inspection of a state hospital's summaries of hospital-acquired infection data, which the hospital asserted were confidential under Iowa Code §§ 135.40–.42. 566 N.W.2d 182, 183, 185, 187–89 (Iowa 1997). We explained that the specific confidentiality provisions prevailed over the general disclosure obligations under the Open Records Act:

> [C]hapter 22 is a general provision allowing disclosure, with certain exceptions not relevant here, of public records. Sections 135.40–.42 are special provisions covering disclosure of infection data summaries which, under the facts of this case, are public records because they belong to a state hospital. . . . The irreconcilable conflict between chapter 22 and sections 135.40–.42 requires us to consider the latter as an exception to the former.

Id. at 189; *see also* Iowa Code § 4.7 (providing that the "special or local provision prevails as an exception to the general provision").

The same is true here: rule 35.4(3)'s specific confidentiality requirements for attorney discipline complaints and responses prevail over the general disclosure requirements for public records under chapter 22. Put another way, § 22.7's specific exceptions from the general disclosure requirement are supplemented by other statutes and rules mandating confidentiality. *See, e.g.*, *Chavez*, 8 N.W.3d at 495; *Calcaterra*, 965 N.W.2d at 906; *Burton*, 566 N.W.2d at 189.

The district court correctly rejected Teig's argument that he should prevail under chapter 22 because "a statute trumps a rule." Teig primarily relies on

State v. Thompson, where we held that a newly enacted statute specifically prohibiting pro se filings by represented defendants, Iowa Code § 814.6A, superseded Iowa Rule of Appellate Procedure 6.901(2), which allowed pro se supplemental briefs. 954 N.W.2d 402, 418 (Iowa 2021). *Thompson* is inapposite. *Thompson* does not address chapter 22 and in no way retreats from our precedent allowing specific confidentiality laws to prevail over general disclosure obligations under the open records statute.

Like the district court, we reject Teig's simplistic premise that a statute must prevail over a rule. Here, we have a general disclosure statute, chapter 22, and a specific confidentiality requirement in a rule promulgated under other statutes giving our court control over attorney licensure and discipline. Iowa Code § 602.10101 provides, "The power to admit persons to practice as attorneys and counselors in the courts of this state, or any of them, is vested exclusively in the supreme court which shall adopt and promulgate rules to carry out the intent and purpose of this article." And Iowa Code § 602.1206(1) authorizes our court to "prescribe rules as necessary to supervise the conduct of attorneys and judicial officers." Rule 35.4(3) was validly promulgated under this statutory grant of authority.

Notably, our rulemaking under § 602.10101 is *not* subject to the legislative review that another statute prescribes for many other court rules, such as the rule of appellate procedure at issue in *Thompson*. Specifically, Iowa Code § 602.4201(1) authorizes our court to prescribe rules of civil procedure, criminal procedure, appellate procedure, and evidence, subject to legislative review. Under § 602.4202, we must submit those rules to the legislative council, which may, within sixty days and by majority vote, delay their effective date for a limited period. *Id.* § 602.4202(1)–(3). And if "the general assembly enacts a bill changing

a rule or form, the general assembly's enactment supersedes a conflicting provision in the rule or form as submitted by the supreme court." *Id.* § 602.4202(4). The legislature imposed no such requirement for our rules of attorney discipline promulgated under § 602.10101 and § 602.1206.

We hold that the specific confidentiality mandate in rule 35.4(3) controls over the general provisions of chapter 22 granting access to public records. We affirm the district court's ruling that the ADB properly withheld the AUSAs' responses to Teig's ethics complaint against them.

B. The Attorney–Client Privilege and Work-Product Doctrine. The district court ruled that additional records sought by Teig are protected by the attorney–client privilege and the work-product doctrine. These are records listed on the *Vaughn* index identifying communications among the defendants and their counsel on how to respond to Teig's records requests.

Teig argues that the attorney–client privilege in Iowa Code § 622.10 must yield to chapter 22's disclosure requirements for two reasons: (1) § 22.7 has no exemption for that statutory privilege; and (2) § 622.10 protects only oral testimony, not written communications. We have squarely rejected both arguments. The district court correctly applied our holding in *Chavez*, 8 N.W.3d at 495. There, we reiterated that the attorney–client privilege protects both oral and written communications. *Id.* We further stated:

> As a general rule of disclosure, chapter 22 does not trump other specific statutory privileges protecting the confidentiality of documents. We extended this holding to documents broadly protected by the attorney–client privilege in *Horsfield*, where we held that Iowa Code section 622.10 protected emails exchanged with counsel for the City of Dyersville notwithstanding section 22.2's disclosure requirement.

Id. (citation omitted). To get around this precedent, Teig argues that our court is relying on matryoshka dicta—dicta within dicta. According to Teig, the

application of the attorney–client privilege was not properly before the court in *Horsfield Materials, Inc. v. City of Dyersville*, 834 N.W.2d 444, 463 (Iowa 2013), meaning that our statements about the application of the privilege were dicta. We addressed this argument in *Chavez*, stating plainly that *Horsfield*'s "holding was not dicta, as urged by Teig." 8 N.W.3d at 495. But, Teig contends, "the application of § 622.10(1) was not properly before the *Chavez* court" either. Therefore, as Teig sees it, the *Horsfield–Chavez* line of cases is dicta all the way down. We disagree and reiterate: our statements in *Horsfield* and *Chavez* were holdings, not dicta.

We recently held that the attorney–client privilege trumped the auditor of state's statutory right to inspect "confidential" records under Iowa Code § 11.41(3). *City of Davenport v. Off. of Auditor of State*, 34 N.W.3d 248, 254–55 (Iowa 2026). We relied in part on our holdings in *Horsfield* and *Chavez*. *City of Davenport*, 34 N.W.3d at 253. We did so even though the auditor of state's statutory right of access did not expressly exclude communications protected by the attorney–client privilege. *Id.* at 254. Our reasoning applies equally here:

> Because the common law attorney–client privilege has such an enduring and universal role in our legal system, we conclude that legislation to displace it must be explicit. Section 11.41 is not. It does not say that the Auditor may obtain attorney–client privileged materials or even mention that privilege. True, section 11.41 gives the auditor access to "all papers, books, records, and documents" subject to a list of exceptions that does not include attorney–client privileged communications. Iowa Code § 11.41(2). But in similar fashion, the Open Records Act confers access to "all records" subject to a list of exceptions that doesn't include attorney–client privileged communications, *see id.* §§ 22.1(3), .7, and we have still held that the privilege applies.

Id.

We hold yet again today that the attorney–client privilege exempts records from disclosure under chapter 22. We affirm the district court's ruling that the

documents at issue are protected by the attorney–client privilege and therefore exempt from disclosure under chapter 22.

We turn next to the work-product doctrine. Iowa Code § 22.7 expressly protects attorney work product from disclosure, stating in relevant part:

> The following public records shall be kept confidential, unless otherwise ordered by a court, by the lawful custodian of the records, or by another person duly authorized to release such information:
>
> . . . .
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> 4. Records which represent and constitute the work product of an attorney, which are related to litigation or claim made by or against a public body.

The district court correctly ruled that "work product" includes documents that an attorney creates in anticipation of litigation. It concluded that the defendants were justified in invoking the work-product doctrine to protect their internal communications because they anticipated Teig would sue for the records. We agree.

Teig argues that the work-product protection in chapter 22 is narrower than the protection under Iowa Code chapter 21, the Open Meetings Act. Teig relies on Iowa Code § 21.5(1)(*c*), which states:

> 1. A governmental body may hold a closed session only by affirmative public vote of either two-thirds of the members of the body or all of the members present at the meeting. A governmental body may hold a closed session only to the extent a closed session is necessary for any of the following reasons:
>
> . . . .
>
> *c.* To discuss strategy with counsel in matters that are presently in litigation or where litigation is imminent where its disclosure would be likely to prejudice or disadvantage the position of the governmental body in that litigation.

Teig reasons that because § 21.5(1)(*c*) refers to matters "where litigation is imminent," it protects work product created in anticipation of litigation. The

absence of similar language in § 22.7(4), according to Teig, indicates that the legislature did not include documents created in anticipation of litigation within the scope of the Open Records Act's work-product exemption. We disagree.

Section 22.7(4) exempts "work product." Work product is a term of art that includes "tangible material (or its intangible equivalent) prepared in anticipation of litigation or for trial." Iowa R. Evid. 5.502(*g*)(2). We hold that "work product" within the meaning of § 22.7(4) includes records prepared in anticipation of litigation. The defendants anticipated Teig would sue them, as he did, and the district court correctly applied the statutory exemption for their communications prepared in anticipation of Teig's litigation. We affirm the district court's ruling that the defendants properly withheld documents as work product.

Next, Teig challenges the district court's refusal to permit his cross-examination of opposing counsel regarding preparation of the *Vaughn* index. The district court treated the defendants' statement of undisputed facts as a professional statement by defense counsel merely to establish the foundation for the *Vaughn* index.[1] "Under Iowa law, professional statements are treated as affidavits and the attorney making the statement may be cross-examined regarding the substance of the statement." *Frunzar v. Allied Prop. & Cas. Ins.*, 548 N.W.2d 880, 888 (Iowa 1996). We review a failure to permit cross-examination of a lawyer's professional statement for abuse of discretion. *See Cogley*, 137 N.W.2d at 313.

Teig sought to cross-examine opposing counsel about counsel's selection of communications withheld as privileged or work product. In our view, the

[1]Attorneys should include their own affidavits in the summary judgment record when their personal knowledge is necessary to lay the foundation for supporting documents. *See* Iowa R. Civ. P. 1.981(5), (8). This opinion should not be read to condone relying on the statement of facts as a professional statement in lieu of an affidavit.

Vaughn index on its face establishes that the withheld documents were clearly generated in response to Teig's follow-up demands preceding his lawsuit and were demonstrably work product. The district court acted within its discretion by disallowing Teig's attempted fishing expedition.

C. The Failure to Designate Records Custodians for the ADB and OPR.

The district court found no actionable violation of Iowa Code § 22.1(2), which states in relevant part:

> Each government body shall delegate to particular officials or employees of that government body the responsibility for implementing the requirements of this chapter and shall publicly announce the particular officials or employees to whom responsibility for implementing the requirements of this chapter has been delegated.

The district court found that this section applies to the defendants. It further noted that the defendants established a system for handling open records requests through the Iowa Judicial Branch's website. The website designates different parties to handle different sorts of requests: (1) media requests are handled by the judicial branch communications director, (2) district court record requests are the responsibility of the clerk of court for the county in which the records are held, (3) appellate court record requests fall to the clerk of the Iowa Supreme Court, and (4) requests for judicial branch administrative records are overseen by Iowa's state court administrator. The website also provides an email address through which a person can make a state-level open records request, as well as a directory containing contact information for county clerks of court so that a person can make a county-level request. The district court determined that these protocols are sufficient to comply with the ADB's and OPR's obligations under § 22.1(2). We disagree. At least some of the documents sought

by Teig—i.e., the AUSAs' responses—do not appear to fall within any of the four website categories.

But Teig failed to show he was harmed by any violation of § 22.1(2). Teig's requests to the ADB and OPR in fact were handled by Critelli, van Brederode, and Weber, who communicated directly with him. The defendants timely produced to Teig all the nonconfidential records to which he was entitled. We have affirmed the district court's rulings rejecting Teig's claims for additional records protected by rule 35.4(3), the attorney–client privilege, or work-product doctrine. No records were withheld from Teig in violation of chapter 22. We have never recognized a stand-alone "failure-to-publicly-announce-custodian" claim for fees, costs, or statutory damages where the requester timely received the requested records. Reading Iowa Code §§ 22.1(2), 22.10(2), and 22.10(3)(*b*)–(*c*) together, we determine that the availability of a civil action is triggered by a failure to produce records. Under these circumstances, we conclude that Teig personally is not entitled to recover costs, attorney fees, or statutory damages for any failure by the ADB or OPR to publicly designate a records custodian under § 22.1(2). *See Save Our Stadiums v. Des Moines Indep. Cmty. Sch. Dist.*, 982 N.W.2d 139, 148–49 (Iowa 2022) (affirming denial of relief for a school district's technical violation of a statutory directory duty where the plaintiffs failed to show any resulting prejudice). On that basis, we affirm the district court's denial of Teig's request for relief for violations of § 22.1(2).

IV. Disposition.

For the foregoing reasons, we affirm the district court's judgment against Teig.

District court judgment affirmed.