In the Iowa Supreme Court

No. 25–1225

Submitted October 12, 2026—Filed November 13, 2026

State of Iowa,

Appellee,

vs.

Clarence Jaay Jackson,

Appellant.

On review from the Iowa Court of Appeals.

Appeal from the Iowa District Court for Buchanan County, John J. Sullivan, judge.

The defendant seeks further review of the court of appeals decision affirming his conviction for assault causing bodily injury. **Court of appeals decision and district court judgment affirmed.**

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

Katherine R.J. Scott (argued) of New Point Law Firm, PLC, Ames, for appellant.

Brenna Bird, Attorney General, and Joseph D. Ferrentino (argued), Assistant Attorney General, for appellee.

Christensen, Chief Justice.

It takes a village to raise a child. But does every member of that village have a right to use corporal punishment on the child? No. Clarence Jaay Jackson was convicted of assault causing bodily injury in violation of Iowa Code § 708.2(2) (2023) after he struck eight-year-old W.W. several times with a leather belt. At trial, Jackson raised a justification defense, claiming his actions constituted lawful corporal punishment. The district court held that the defense did not apply to Jackson because he was neither W.W.'s father nor stepfather and that, even if it did, his use of corporal punishment was unreasonable.

Jackson appealed, challenging the district court's determination that the corporal punishment defense did not apply to him and arguing that the district court abused its discretion by sentencing him to jail instead of granting him a deferred judgment. The court of appeals affirmed, and Jackson sought further review of the sufficiency of the evidence for the conviction for assault causing bodily injury, given the justification defense of corporal punishment. We accepted Jackson's application for further review, and we now affirm the decision of the court of appeals.

I. Background Facts and Proceedings.

Clarence Jackson and Ashley Walker met in 2017 and began a romantic relationship. They had three children together. Throughout her relationship with Jackson, Walker lived in Independence, Iowa, with their three children and her three older children, C.M., L.W., and W.W., while Jackson lived in Marion, Iowa. Jackson has never lived with Walker or with their children. Jackson and Walker

have no formal custody or visitation agreement, and there is no regularly paid child support.[1]

Prior to June 2023, Jackson visited Walker and his children approximately two weekends every month, usually for a couple hours, but sometimes stayed overnight. Walker gave Jackson a key to her house and allowed him to come and go as he pleased, so many of his visits were unplanned. While visiting, Jackson spent time playing with his kids, cutting their hair, and playing video games. Walker also encouraged Jackson to act as a disciplinary figure to all six kids by instructing them to do chores and talking to them when they acted out. On one occasion, Walker allowed Jackson to use his hand to spank a child, but she never gave him permission to use anything other than his hand. She testified that she did not spank her children or hit them with a belt and that she was unaware that Jackson was doing so.

Walker and Jackson dispute when their relationship ended: Walker testified that she and Jackson broke up in 2020, but Jackson testified that they were still in a relationship in June 2023.

On June 17, 2023, Jackson arrived at Walker's house between 8 and 8:30 p.m. The visit was unplanned, and Jackson let himself in. When he arrived, Walker was asleep in the basement, and L.W. and W.W. were awake on the main floor. Jackson told L.W. to clean the kitchen and her bedroom and W.W. to clean the living room and his bedroom. Jackson accused W.W. of not cleaning his bedroom, and W.W. argued that he had already cleaned it. Jackson told W.W. that if he did not clean his room, there would be consequences. W.W. understood

[1]Walker testified that she has received a total of two child support payments from Jackson, the second being a $14 payment made a few weeks before trial.

this to mean Jackson was going to get his belt and give him a "whoopin," so he told Jackson he would call his father, Christian Perry, if Jackson touched him.[2]

Jackson then went to his car and retrieved a black leather belt. When Jackson reentered the house, W.W. ran into his room. Jackson followed him and ordered him to pull his pants down. W.W. refused, so Jackson held him down on his bed and pulled them down. He then struck W.W. across the buttocks several times with the belt. Standing outside W.W.'s room, his sister, L.W., recorded the incident on her cellphone and texted the videos to W.W.'s father. In the texts, L.W. stated that the incident occurred ten to twenty minutes earlier and that Jackson had since left the house.

After receiving the texts from L.W., Perry immediately went to the Bremer County police station and spoke with an officer. The officer told Perry to contact the Independence police department and tell them about the situation. He was instructed to pick W.W. up as planned the next morning, let the child describe what had happened, inspect him for markings or bruises, and then go directly to the Independence police station if any markings were observed.

The next morning, Perry called the Independence police station, as instructed. He then picked up his son from Walker's house. He drove to a nearby Burger King,[3] brought W.W. into a private bathroom to examine him, and observed bruising on his buttocks. Together, they then went to the police station, where photos were taken of the bruises. W.W. stayed with his father for the next ten days, and Perry testified that the bruises remained visible for nearly a week.

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[2]W.W.'s father, Christian Perry, also testified that he had never spanked W.W. with a belt or other object and would not give another person permission to do so.

[3]Perry lived in Waverly, approximately a one-hour drive from Walker's house. He testified that he stopped at the Burger King because it was the first place he came upon that would have a somewhat private bathroom.

Jackson was charged with assault causing bodily injury in violation of Iowa Code § 708.2(2). During a bench trial, Jackson testified. He did not deny that he had spanked W.W. with a belt and offered no evidence to disprove the claim. Rather, he argued that his conduct was justified under the corporal punishment defense. The district court convicted Jackson, holding that the corporal punishment defense did not apply because he was not W.W.'s parent. Furthermore, the court found Jackson's infliction of corporal punishment on W.W. was not reasonable under the circumstances because it was abusive rather than corrective in character.

Jackson appealed, and we transferred his appeal to the court of appeals. The court of appeals affirmed the district court's decision, noting that because it agreed that Jackson's use of corporal punishment was unreasonable, it did not need to address whether the corporal punishment defense is available to nonparents. Jackson sought further review. We granted his request. We let the court of appeals decision stand on Jackson's abuse-of-discretion sentencing challenge. *See State v. Wade*, 7 N.W.3d 511, 514 (Iowa 2024) ("When we grant further review, we have discretion to let the court of appeals decision stand on specific issues."). Thus, we address only his sufficiency-of-the-evidence argument.

II. Analysis.

Jackson challenges the sufficiency of the evidence supporting his conviction, arguing that because of the corporal punishment defense, the evidence did not sufficiently support his conviction for assault causing bodily injury. We "review[] sufficiency of evidence claims for the correction of errors at law." *State v. Schooley*, 13 N.W.3d 608, 614 (Iowa 2024) (quoting *State v. Mathis*, 971 N.W.2d 514, 516 (Iowa 2022)); *see also State v. Myers*, 924 N.W.2d 823, 826

(Iowa 2019) ("We review a claim of insufficient evidence in a bench trial just as we do in a jury trial."). We will uphold the district court's verdict "as long as it is supported by substantial evidence 'sufficient to convince a rational trier of fact the defendant is guilty beyond a reasonable doubt.' " *Schooley*, 13 N.W.3d at 614 (quoting *Mathis*, 971 N.W.2d at 516–17). To determine whether the district court's verdict is supported by substantial evidence, "we view the evidence in the light most favorable to the verdict[,] . . . includ[ing] all inferences and presumptions fairly drawn from and supported by the evidence." *State v. Hawkins*, 27 N.W.3d 562, 568 (Iowa 2025).

On further review, Jackson argues that the district court and court of appeals erred by not applying the corporal punishment defense to him as a nonparent and by holding that his corporal punishment of W.W. was unreasonable. We conclude that based on the evidence admitted at trial, the defense does not apply to Jackson. Furthermore, we conclude that Jackson's conduct was unreasonable.

A. Iowa's Corporal Punishment Defense. In Iowa, common law establishes the right of parents—and qualifying nonparents—to discipline children using reasonable corporal punishment. *See, e.g.*, *Schooley*, 13 N.W.3d at 614; *State v. Arnold*, 543 N.W.2d 600, 603 (Iowa 1996); *Rowe v. Rugg*, 91 N.W. 903, 903–04 (Iowa 1902). An understanding of our current corporal punishment defense goes back over 120 years with *Rowe v. Rugg*, 91 N.W. at 903–04. There, we stated that a parent may administer "moderate and reasonable chastisement" and that the right extends to "those having the care, custody, and control of" the child as well as to certain persons whom the parent authorizes to administer the chastisement. *Id.*

In the decades that followed *Rowe*, we further explained what qualifies as a moderate and reasonable chastisement. *See, e.g.*, *State v. Bell*, 223 N.W.2d 181, 184 (Iowa 1974); *State v. Fischer*, 60 N.W.2d 105, 109–10 (Iowa 1953). Then, in *State v. Arnold*, we articulated our current standard for the corporal punishment defense: "[P]arents have a right to inflict corporal punishment on their child, but that right is restricted by moderation and reasonableness." 543 N.W.2d at 603. The punishment must be corrective rather than abusive, and "it must be for the purpose of behavior modification rather than to satisfy the passions of the enraged parent." *Id.* However, what is considered reasonable varies with the child's age, physical condition, and other characteristics, so we cannot precisely define what constitutes reasonable, corrective punishment. *Id.* There, we held that when a father spanked his nine-year-old daughter with a leather belt severely enough to cause several bruises, the jury had sufficient evidence to find that the father's punishment was not reasonable. *Id.* at 603–04.

In *Arnold*, because the defendant was the child's parent, we described the right to administer reasonable corporal punishment as belonging to parents. *Id.* In our subsequent cases, we continued to describe the right as belonging to parents because, like *Arnold*, those cases almost exclusively featured parents as defendants. *See, e.g.*, *Schooley*, 13 N.W.3d at 614–16 (holding that the jury had sufficient evidence to find a father's treatment of his nine-year-old daughter was not reasonable when he slapped her on the head, spanked her hard enough to cause bruising, and scratched her collarbone area while yanking a shirt over her head); *Bacon ex rel. Bacon v. Bacon*, 567 N.W.2d 414, 418–19 (Iowa 1997) (holding that the district court had sufficient evidence to conclude that a father threw his fifteen-year-old daughter against the bathroom wall and choked her and that such actions were not reasonable corporal punishment).

In *State v. Benson*, we encountered our first case since *Rowe* that involved a nonparent claiming the corporal punishment defense. 919 N.W.2d 237, 240 (Iowa 2018). There, we considered whether the fiancé of a child's mother had administered reasonable corporal punishment. *Id.* We held that the jury had sufficient evidence to conclude that the fiancé's actions exceeded reasonable corporal punishment. *Id.* at 242–43. In *Benson*, we did not address whether the defense was available to the defendant as the mother's fiancé. *Id.*

Since *Rowe*, we have developed guidelines for when conduct qualifies as reasonable corporal punishment. *See, e.g.*, *Arnold*, 543 N.W.2d at 603. But we have not further explained when a nonparent can claim the defense. The legislature and the department of human services, however, have imposed some limits, prohibiting corporal punishment by licensed foster parents; employees of public school districts, accredited nonpublic schools, and area education agencies; licensed child care centers; and certain in-home child care providers. *See* Iowa Code § 234.40; *id.* § 280.21(1); Iowa Admin. Code r. 441—120.8(6)(*a*) (2023)[4]; *id.* r. 441—109.12(2)(*a*).

B. Availability of the Corporal Punishment Defense to Jackson. In Iowa, the right to discipline children using reasonable corporal punishment extends to nonparents who "hav[e] the care, custody, and control of minor children." *Rowe*, 91 N.W. at 903. And parents may delegate the right to nonparents under certain circumstances. *Id.* at 903–04. Jackson argues that his treatment of W.W. was lawful because Walker authorized him to inflict corporal punishment on W.W. Alternatively, he argues that he had sufficient control over

[4]Effective January 1, 2027, the department has rescinded chapter 120. 49 Iowa Admin. Bull. 3219, 3219–20 (Oct. 28, 2026) (ARC 0692D). The same prohibition will appear in a new chapter 110 governing both registered child development homes and child care homes with a child care assistance provider agreement. 49 Iowa Admin. Bull. 3203, 3210 (Oct. 28, 2026) (ARC 0691D) (to be codified at Iowa Admin. Code r. 441—110.8(6)(*a*)).

W.W. to inflict reasonable corporal punishment regardless of Walker's instructions. As a result, Jackson contends that the district court and court of appeals erred in holding that his actions were not protected by the defense.

1. *Whether Walker authorized Jackson to use corporal punishment on W.W.* We first address whether Jackson's treatment of W.W. was lawful because his mother authorized Jackson to use reasonable corporal punishment on him. In *Rowe*, we stated that a parent may, under certain circumstances, authorize another person to administer physical punishment to their child. 91 N.W. at 904. There, an eight-year-old child sued his aunt to recover damages for the corporal punishment she administered. *Id.* at 903. The aunt admitted that she had "moderately chastised the child," and the jury found that the punishment was not excessive. *Id.* It "conclusively appeared" that the child's mother had authorized the aunt to administer the punishment. *Id.* As a result, one of the questions for this court was whether the mother could properly delegate her authority to use corporal punishment on her child. *Id.*

We held that under those particular circumstances, the mother could delegate the authority to the child's aunt. *Id.* at 904. The right to delegate is not without limits—we did not hold that "a parent may, without restraint, lawfully authorize any and all persons to administer physical punishment to his or her child." *Id.*; *see also M.B. v. C.D. ex rel. L.M.*, No. 25A-PO-1965, 2026 WL 1090726, at *3 (Ind. Ct. App. Apr. 22, 2026) (concluding, waiver notwithstanding, that a caregiver given permission by one parent to administer punishment was not a person in loco parentis and so could not assert the parental-privilege defense). But we suggested that when a parent places a child "in the temporary care of some person, in whom the parent has great confidence,

on account of relationship or otherwise," the parent may delegate the authority to correct the child "for the time being." *Rowe*, 91 N.W. at 904.

Under this set of circumstances, Walker did not place her child in Jackson's care on June 17. Furthermore, Walker did not give Jackson permission to use a belt to mete out discipline. First, Walker did not place W.W. in his temporary care. Jackson's visit on June 17 was unplanned. When he arrived, Walker was already in her bed, asleep. She did not know he was coming, so she could not have instructed him to care for W.W. or any of his siblings. In the past, particularly when she and Jackson had an ongoing, more positive relationship, Walker may have placed her children in Jackson's care and authorized him to use reasonable corporal punishment. But that authorization does not last forever and is not without limit. Jackson cannot turn up unannounced, at any time, and argue that because Walker previously entrusted him to watch her children, he had authority to use corporal punishment at all future times. *Cf. State v. Jansen*, 679 S.W.3d 96, 106 (Mo. Ct. App. 2023) (holding that under Missouri's corporal punishment defense, which requires nonparent defendants to present evidence that they were entrusted with the care and supervision of the child, testimony that the defendant was often asked to look after young children in the family was not sufficient evidence that the child victim was entrusted to the defendant's care at the time of the offense).

Additionally, Walker did not authorize Jackson to use a belt to discipline W.W. She testified that she asked Jackson to help her with discipline because the children were more likely to listen to someone who had a deeper voice and who was not their mother. On one occasion, she gave him permission to spank a child using his hand. However, Walker qualified that permission by testifying that she never gave him permission to spank her children with a belt or anything

other than his hand. She also testified that she did not know he had previously used a belt on her child and that she would not have consented to his doing so. Both Walker and Perry, W.W.'s father, testified that they believe spanking a child with a hand is notably different from spanking a child with a belt.

Jackson, on the other hand, testified that he believed Walker authorized him to strike W.W. with a belt. He testified that Walker told him the children needed "whoopings" and that he did not see a difference between spanking with a hand and spanking with a belt. The district court, acting as the factfinder, did not find Jackson's testimony credible. Therefore, by striking W.W. with a belt, Jackson exceeded any authority he may have had to discipline W.W.

Thus, we hold that Jackson's conduct was not protected corporal punishment because Walker did not place W.W. in his care and did not authorize him to strike W.W. with a belt.

2. *Whether Jackson had sufficient control of W.W. to administer reasonable corporal punishment.* Alternatively, Jackson argues that regardless of Walker's instructions, he had sufficient control of W.W. to administer reasonable corporal punishment. We agree that under some circumstances, the corporal punishment defense may be available to nonparents. *See Rowe*, 91 N.W. at 903 (stating that "those having the care, custody, and control of minor children may" administer reasonable corporal punishment "and this rule has been applied generally to all those occupying a position in loco parentis"). However, we disagree that Jackson had sufficient care, custody, and control of W.W. to trigger this defense.

To argue that the defense was available to him as a nonparent, Jackson points to three cases where he contends that the court assumed, without explicitly deciding, that the corporal punishment defense is available to nonparents. First, in *Benson*, we considered the corporal punishment defense

when the fiancé of a child's mother was charged with assault and child endangerment. 919 N.W.2d at 240. There, the fiancé was watching three children, ranging from approximately eight to eleven years old, while waiting for the children's father to arrive. *Id.* Upset about damage the children had allegedly done to some furniture, the fiancé struck the eight-year-old child twice on the back of his legs with a broom handle. *Id.* After the child's father noticed and reported the injuries, the fiancé was charged with assault causing bodily injury and child endangerment. *Id.* at 240–41. The fiancé argued that "his actions were within the bounds of legal corporal punishment." *Id.* at 241. We held that substantial evidence supported the jury's rejection of the corporal punishment defense: a reasonable jury could have concluded that the fiancé intended to cause pain, injury, or offensive contact and that the fiancé's actions were "abusive rather than corrective in character." *Id.* at 242–43 (quoting *Arnold*, 543 N.W.2d at 603).

Next, in *State v. Collins*, the court of appeals addressed a corporal punishment argument when the children's guardian was charged with child endangerment. No. 22–1832, 2024 WL 2045329, at *1, *3 (Iowa Ct. App. May 8, 2024). There, the children lived with the defendant and her husband. *Id.* at *1. The defendant was one child's step-grandmother, was more distantly related to the other child, and was both children's guardian. *See id.* Both children had lived with the defendant for several years. *See id.* at *1 & n.4. The defendant was convicted of child endangerment and appealed, challenging the sufficiency of the evidence supporting one of the alternative theories of guilt. *Id.* at *1–3. On appeal, the defendant "implie[d] the evidence [did] not show the acts were anything beyond reasonable corporal punishment." *Id.* at *3. The court affirmed, concluding that, viewing the evidence in the light most favorable to the State, the

jury could rationally find that the defendant's conduct went beyond reasonable corporal punishment. *See id.* at *3–4.

Finally, in *In re Marriage of Benhart*, a mother appealed the district court's denial of her petition to modify the physical care provision of her dissolution decree. No. 11–0017, 2012 WL 170610, at *1 (Iowa Ct. App. Jan. 19, 2012). The decree gave the father, who later moved to Florida, physical care of their three children. *Id.* The mother presented texts from her daughter accusing the father's wife of scratching the parties' son. *Id.* at *2. The father admitted that his wife was "hot-tempered" and had scratched his son while trying to discipline him. *Id.* Noting that Florida's human services agency had investigated certain abuse allegations and determined them to be unfounded, the court held that evidence that the children's father used corporal punishment and that his wife scratched their son while disciplining him was insufficient to justify modifying the physical care provision. *See id.*

We do not agree that these cases suggest Jackson is protected by the corporal punishment defense. First, Jackson does not point to a case where a nonparent defendant successfully sought refuge under the corporal punishment defense. In *Benson*, we reversed on a jury instruction issue but held that substantial evidence supported the jury's finding that the defendant's conduct was not reasonable corporal punishment. 919 N.W.2d at 243, 247. In *Collins*, the court upheld the defendant's convictions, noting that the jury had sufficient evidence to find that the defendant's conduct went beyond reasonable corporal punishment. *See* 2024 WL 2045329, at *3–4. Neither of those cases turned on the relationship between the nonparent and child at issue. And *Benhart* did not involve a criminal prosecution for the stepmother's treatment of the children. *See* 2012 WL 170610, at *1–2. Rather, their mother tried to use evidence of the

stepmother's scratching of the child while disciplining him to justify modifying a physical care provision of a dissolution decree. *See id.* at *2. The court held that this evidence was insufficient to justify modifying the physical care provision. *See id.*

Additionally, although the defendants in *Benson* and *Collins* and the stepmother in *Benhart* were not the children's parents, their relationships with the children were quite different from Jackson's relationship with W.W. In *Benson*, the defendant was the fiancé of the child's mother. 919 N.W.2d at 240. In *Collins*, the defendant was the children's legal guardian, and the children had lived with her for the past several years. *See* 2024 WL 2045329, at *1 & n.4. And in *Benhart*, the woman who allegedly harmed the child was married to the children's father and had helped care for the children. *See* 2012 WL 170610, at *1–2.

These examples are very different from Jackson's relationship with W.W. Jackson did not live, nor had he ever lived, with the child. He was neither married nor engaged to Walker. According to Walker, when the incident occurred, she and Jackson had not been in a formal relationship for over two years. Walker did not rely on him for child care. When he visited her home, he spent much of his time playing video games. He did not drive W.W. to school or cook meals for him. Other than ordering him to do chores, Jackson rarely interacted with W.W. Yes, Jackson had known W.W. for many years. But during those years, he was not a regular, dependable, father-like figure. At least in the few years preceding June 2023, he was in W.W.'s life intermittently, showing up at his home unexpectedly and spending little time with him. Jackson testified that he was more involved in W.W.'s life, spending most weekends at the house and regularly

supervising W.W. But the testimony of Walker, W.W., and his sister refuted this, and the district court did not find Jackson's testimony credible.

Benson, *Collins*, and *Benhart* do not suggest that Jackson had the right to use corporal punishment on W.W. merely because he occasionally visited W.W.'s home and had fathered his three younger half-siblings. Rather, they support our statement in *Rowe* that some nonparents can use reasonable corporal punishment, but they must have sufficient "care, custody, and control" of the child. 91 N.W. at 903. We leave for another day the question of what constitutes sufficient care, custody, and control to trigger a nonparent's use of corporal punishment. But in this case, it is enough to conclude that Jackson's relationship with W.W. plainly fails to qualify.

C. Reasonableness of Punishment. We would reach the same conclusion on the alternative ground of reasonableness, as argued by Jackson. Even if he qualified to use the defense of corporal punishment, it "is restricted by moderation and reasonableness." *Schooley*, 13 N.W.3d at 614 (quoting *Arnold*, 543 N.W.2d at 603). For the conduct to be reasonable, it "must be corrective rather than abusive in character." *Id.* And "[w]hen a parent's conduct surpasses 'the line of reasonable correction, his or her conduct becomes criminal.' " *Benson*, 919 N.W.2d at 242 (quoting *Arnold*, 543 N.W.2d at 603). To evaluate whether a person has crossed that line, courts consider "the age, physical condition, and other characteristics of a child as well as . . . the gravity of the child's misconduct." *Schooley*, 13 N.W.3d at 614 (quoting *Benson*, 919 N.W.2d at 242).

Jackson argues that his use of force was reasonable in light of his role as a disciplinarian and W.W.'s behavioral issues. He compares his actions with the facts in *State v. Schooley*, where we held that sufficient evidence supported the

jury's finding that a father's use of corporal punishment on his nine-year-old daughter was unreasonable. *Id.* at 611. In *Schooley*, there was sufficient evidence that the father had slapped his daughter on the head, grabbed her by the collar of her shirt, and spanked her every other day with sufficient force to cause bruising. *Id.* at 615–16. The father administered these punishments because the daughter was "getting into something." *Id.* at 616.

Jackson argues that unlike the father's severe punishments for the daughter's broad offense of "getting into something," his punishment of W.W. was narrow in scope—spanking with a belt—and tailored to correct a specific behavioral issue—talking back. However, the fact that the defendant administered more severe punishments in *Schooley* does not require us to find that all less severe punishments are per se reasonable. Rather, when the record contains evidence of a child's willful disobedience but also evidence that the defendant's discipline was unduly severe and harsh, "the reasonableness or excessiveness of the punishment [is] a question for the [factfinder]." *Id.* at 615 (first alteration in original) (quoting *Arnold*, 543 N.W.2d at 604). And in "view[ing] the evidence in the light most favorable to the verdict," we believe the record contains sufficient evidence to support the district court's conclusion that Jackson's conduct was unreasonable. *Hawkins*, 27 N.W.3d at 568.

First, based on Jackson's use of stern, vulgar language as evidenced by the phone videos admitted at trial, the district court found that Jackson acted out of anger. Because we view all "legitimate inferences and presumptions that may fairly and reasonably be deduced from the record evidence" in the light most favorable to the verdict, *Schooley*, 13 N.W.3d at 614 (quoting *Mathis*, 971 N.W.2d at 517), we believe that Jackson's specific language while disciplining W.W.

allowed the court to properly infer that his actions were abusive rather than corrective.

Additionally, evidence of W.W.'s age, the gravity of his misconduct, and the amount and means of force Jackson used allowed the court to properly find that his conduct crossed "the line of reasonable correction." *Benson*, 919 N.W.2d at 242 (quoting *Arnold*, 543 N.W.2d at 603). At trial, W.W. testified that Jackson became angry when W.W. told him he was not going to clean his room because it was already clean and he would call his dad if Jackson "whooped" him. Then, Jackson went to his car, retrieved a leather belt, followed W.W. into his room, pulled down W.W.'s pants, and hit him with the belt several times on his buttocks. Similarly, L.W. testified that Jackson went to his car to get the belt after W.W. told him he would not clean his room because it was already clean and that Jackson told W.W. not to disrespect him. When Jackson reentered the house with the belt, L.W. felt scared for her brother—scared enough that she decided to record the incident. And W.W.'s father testified that he could see bruises from the belt on his son's buttocks for at least five days after the incident occurred. The record also shows that Jackson is a 6′7″ tall, 247-pound adult man, and Walker believed he could make the children cooperate by simply using his voice.

At trial, Jackson testified that he did not spank W.W. out of anger or intend to cause him pain. Rather, he testified, he tailored the spanking specifically to W.W.'s failure to follow instructions and talking back. And he further testified that he used a stern voice because Walker had told him that his domineering tone causes the children to listen, not because he was angry. But the district court was not required to accept these assertions at face value. *See Arnold*, 543 N.W.2d at 604.

Although Jackson's conduct may have been less egregious and better tailored than the conduct in *Schooley*, the district court could still weigh the evidence and determine that his conduct was not reasonable discipline. *See State v. Lacey*, 968 N.W.2d 792, 800 (Iowa 2021) ("Evidence is not insubstantial merely because we may draw different conclusions from it . . . ." (quoting *Brokaw v. Winfield-Mt. Union Cmty. Sch. Dist.*, 788 N.W.2d 386, 393 (Iowa 2010))); *see also State v. Thompson*, No. 16–0443, 2017 WL 1733146, at *1, *3 (Iowa Ct. App. May 3, 2017) (holding that the jury properly weighed the evidence when finding that a father used unreasonable force when striking his thirteen-year-old daughter with a belt multiple times); *State v. Rollins*, No. 12–0548, 2013 WL 988853, at *6 (Iowa Ct. App. Mar. 13, 2013) ("[A] reasonable jury could have determined that spanking an eight-year-old child with a belt for failing to abide by a family code of silence exceeded the bounds of reasonable correction . . . .").

Reasonableness must be assessed in context. Here, a 6′7″, 247-pound man used a belt to punish an eight-year-old child for failing to clean his room. The disparity in size, strength, and power is striking. And the force he used left bruises that remained visible for days. Whatever the permissible bounds of corporal punishment, this conduct falls well outside them. Considering the evidence in the light most favorable to the State, there is substantial evidence from which the court could have found that spanking a child several times with a leather belt hard enough to leave bruises that lasted for nearly a week was not a reasonable punishment for an eight-year-old who refused to clean his room and talked back.

III. Conclusion.

For these reasons, we affirm Jackson's conviction for assault causing bodily injury.

Court of appeals decision and district court judgment affirmed.