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IN THE SUPREME COURT OF IOWA

Upon the Petition of TAYLOR VAN KOOTEN n/k/a TAYLOR AHRENS, Petitioner-Appellee-Applicant And Concerning NATHAN VAN KOOTEN, Respondent-Appellant-Resister	S.C. No. 25-1345 Poweshiek County Case No. CDCV004009

APPEAL FROM THE DISTRICT COURT OF POWESHIEK COUNTY
THE HONORABLE CRYSTAL S. CRONK, JUDGE

APPELLANT'S RESISTANCE TO APPELLEE'S APPLICATION FOR FURTHER REVIEW OF THE IOWA COURT OF APPEALS RULING FILED JULY 8, 2026

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STATEMENT IN RESISTANCE TO FURTHER REVIEW

Applicant, Taylor Ahrens, Application for Further Review urges the Supreme Court to retain this case for three reasons, none of which support further review:

First, Taylor alleges that the Court of Appeals ruling is contradictory to In re Marriage of Frazier, 1 N.W.3d 775 (Iowa 2024) and Venechuk v. Landherr, 20 N.W.3d 471 (Iowa 2025). This principle is incorrect. The Court of Appeals in the instant case analyzes Frazier and Venechuk precisely for what they say and the

precedent those cases set in reaching the decision in Van Kooten regarding modification of a custody decree.

Frazier stands for the principle that the Court is without authority to answer a "free floating" question regarding the raising of a child without a proper request to modify or enforce a decree. Frazier at 787-88. Venechuk stands for the principle that, contrary to Frazier, "[A] court that entered a custody decree has authority to modify it when requested to do so. The requested modification does not have to relate to who has legal custody but can relate to another aspect of the decree." Venechuk at 472. The Court of Appeals in Van Kooten analyzed this case, correctly, under those principles, and determined proper authority to modify the decree upon a petition to modify and a showing of a change in circumstances. As such: 1. The court had jurisdiction (the fundamental flaw in the Frazier case) to modify the decree by way of the petition to modify filed in Van Kooten (as opposed to answering a free floating legal question), and; 2. The court had authority to modify the decree per the analysis set forth in Venechuk relating to the nature of a custody decree as a continuing judgment. Venechuk at 477.

Accordingly, Taylor's first ground for further review, that the Court of Appeals has entered a decision in conflict with a decision of the Supreme Court, fails because the Court of Appeals correctly analyzed Frazier and Venechuk in making the decision on appeal.

Second, Taylor alleges, again, that the Court of Appeals has failed to follow the precedent set by the Supreme Court by modifying the schooling provisions of the Van Kooten despite no specific language being contained in the Van Kooten decree regarding choice of school district. Taylor's attack on this decision is framed as a decision by the Court of Appeals which decides an important question of law that has not been, but should be, settled by the Supreme Court. In reality, Taylor's second argument simply reiterates Taylor's first argument that Taylor believes the Court of Appeals ruling is contrary to the principles of Frazier and Venechuk. Alleging that the appellate court has never modified a decree to decide an issue regarding a change in school district ignores the long history of the appellate court doing exactly that, as cited with positive affirmation by the Supreme Court in Frazier and Venechuk as well as Judge Langholz in the Venechuk dissent at the Court of Appeals. See: Venechuk v. Landherr, No. 23-0826, 2024 WL 2312559 (Iowa Ct. App. May 22, 2024) (dissent at p. 3-5).

The issue of school choice has been decided by the appellate court numerous times. Neither Frazier nor Venechuk overturned that linage of caselaw. Frazier and Venechuk simply affirmed the process necessary to get there – a petition to modify with a substantial change in circumstance or a request to enforce the decree.

Accordingly, Taylor's second ground for further review, that the Court of Appeals has decided an important question of law that has not been, but should be,

settled by the Supreme Court, fails because the Court of Appeals did not decide anything new at all – the Court of Appeals followed the long history of the court in deciding this issue pursuant to the appropriate standard set forth by Frazier and Venechuk.

Third, Taylor argues that the issues presented in this appeal are of broad public importance which the Supreme Court should ultimately determine. Nathan agrees the issue of where a child goes to school is important. Nathan agrees that the issue of legal custody is important. This very specific issue, the manner in which a decree may be modified to allow the court to determine the issue of school choice, is one of procedure, has already been decided, and the procedural issue in and of itself is not of such broad public importance that it needs to be revisited by the Supreme Court anew. The combination of Frazier, Venechuk, and the long line of cases cited therein make it clear – the Court may decide this issue when properly presented before the Court on a petition to modify or request to enforce the decree, with a showing of a substantial change in circumstances, and applying the best interests standard. That is the law, has been the law, and Frazier and Venechuk do nothing more than reiterate this law.

Accordingly, Taylor's Application for Further Review should be denied, as same does not meet the specific discretionary grounds stated by Taylor in her application and required by Iowa Rule of Appellate Procedure 6.1103(1)(b).

STATEMENT OF THE CASE

The ultimate question to be answered in this case is rather straightforward – where should a minor child attend school? Not an uncommon discussion between parents – married or divorced, living together or separate. In this specific case we have two divorced parents, Taylor Ahrens and Nathan Van Kooten, who by all accounts co-parent and communicate exceptionally well and serve as a shining example of what the court expects of joint legal custodians following a divorce. They simply did not agree on one issue – should B.V.K. be home schooled? The trial court determined the only way to make the decision of home schooling was to sever Nathan's legal custody rights to all three of the minor children – a decision which was not grounded in fact or law considering the high standard necessary for sole legal custody and the children's best interests.

The Court of Appeals affirmed the decision with regards to home schooling being in B.V.K.'s best interests but reversed the decision to sever Nathan's legal custody rights. While not the decision Nathan advocated for with regards to home schooling, the Court of Appeals properly recognized that the law does not require the severing of legal custody in order to make these determinations in custody cases and, further, that the facts do not support the severing of Nathan's legal custody rights.

The basic facts of the case are as follows: Taylor and Nathan have three children together, E.V.K, nine years old, B.V.K., six years old, and A.V.K., five years old. (D0159, Tr. p. 7:18-8:19).

At the time of trial, E.V.K. was in third grade and attended school in Montezuma. (D0159, Tr. p. 10:23-11:1). E.V.K. did well in school and does not have any behavioral problems at school. (D0159, Tr. p. 11:4-13).

B.V.K. had just finished kindergarten at Montezuma. (D0159, Tr. p. 11:16-19). B.V.K. did have some behavioral issues at school. (D0159, Tr. p. 12:5-15). The parties had multiple conversations regarding addressing B.V.K.'s behavior at school, including the possibility of home schooling B.V.K. (D0159, Tr. p. 17:7-24; 18:2-23; 23:13-22; 24:13-22; 24:20-25:20; 27:23-28:11; 29:12-16).

Taylor subsequently unilaterally decided that B.V.K. would be home schooled beginning February 1, 2024. D0159, Tr. p. 31:20-22; 33:4-10; 160:7-11). Taylor does not recall having any discussions about the home schooling curriculum or what Taylor would be teaching if she home schooled B.V.K. (D0159, Tr. p. 36:10-12).

Taylor testified that she wanted to be awarded sole legal custody, while acknowledging that, other than the home schooling issue, she and Nathan are able to communicate and co-parent well. (D0159, Tr. p. 48:21-49:14).

Nathan also agreed that he and Taylor have gotten along well and work together in regard to child custody and visitation. (D0159, Tr. p. 65:15-66:18). Taylor

and Nathan also communicate with each other in an appropriate manner. (D0159, Tr. p. 66:1-8). Nathan does not believe it is in the children's best interests to be home schooled, and that it would be best for the children to attend public school. (D0159, Tr. p. 70:1-71:5). Nathan had participated in all of the IEP meetings concerning B.V.K. (D0159, Tr. p. 71:20-72:2). Nathan wants to remain a joint legal custodian of his children and his input is important to their lives. (D0159, Tr. p. 85:1-13). Nothing meaningful has changed about Nathan's ability to communicate and jointly make decisions with Taylor since the two got divorced. (D0159, Tr. p. 103:17-24). The only thing that Nathan and Taylor disagree about is whether the children should attend private school or public school. (D0159, Tr. p. 104:5-9). When E.V.K. and B.V.K. started school she started in the Montezuma School District which was something both Nathan and Taylor agreed upon. (D0159, Tr. p. 105:1-14).

Taylor does not dispute that she and Nathan get along and communicate well. (D0159, Tr. p. 107:9-15). Taylor also acknowledges that school is the only issue that she and Nathan have not been able to agree upon, otherwise they get along well have had little reason for disagreement. (D0159, Tr. 107:21-108:7). Taylor further acknowledges that E.V.K. enjoys school, and she has a lot of friends at school, and she enjoys doing activities at school. (D0159, Tr. p. 113:13-19). Taylor agrees that E.V.K. is doing well in public school. (D0159, Tr. p. 114:1-14).

ARGUMENT

I. THE COURT MAY MAKE SPECIFIC DETERMINATIONS REGARDING LEGAL CUSTODY ISSUES UPON THE FILING OF A PETITION TO MODIFY.

This section addresses sections I, II, and III of Appellee-Applicant's Argument.

Taylor consistently reverts to Frazier concerning her arguments in this case, which ignores Venechuk entirely and the manner in which Venechuk frames Frazier. Frazier is ultimately a case about procedure. Absent a petition to modify, a substantial change in circumstances, and a finding that the request is in the child's best interests – the Court is without ability to act. The fact that Frazier contained no petition to modify – the mechanism necessary to engage the court with jurisdiction to act – the court was without ability to act. Any other reading of Frazier is inconsistent with the Frazier opinion itself and the cases affirmatively cited in Frazier. Frazier makes this clear with no less than five positive affirmations of cases wherein the court was authorized to make "tie-breaker" decisions regarding legal custody questions for a minor child on modification:

> [Example 1]
> "Ultimately, the cases Mary cites as examples of the district court acting as a tiebreaker are distinguishable **because those issues were properly before the district court on either a trial of the initial dissolution action or an action to modify their decree.**"
>
> Frazier at 783.
>
> [Example 2]

"For instance, while the dissent is correct that the court of appeals remanded the case to the district court to determine which school would be in the child's best interest in *In re Marriage of Flick*, No. 20-1535, 2021 WL 2453111, at *5–6 (Iowa Ct. App. June 16, 2021), **that dispute over school choice was properly before the district court as part of the mother's petition for modification in which the mother requested various changes to the decree.** *Id.* at *1."

Frazier at 783-784.

[Example 3]
"Similarly, *In re Marriage of Comstock*, No. 20-1205, 2021 WL 1016601 (Iowa Ct. App. Mar. 17, 2021), arose from the mother's decision to enroll her children in private school over the father's objection while the **mother's petition for modification was already pending**. *Id.* at *2. That decision prompted the father to file a motion for determination regarding the school choice, which resulted in the district court ruling that the mother, as the parent with primary physical care of the children, held the tiebreaker in the dispute. *Id.* The court of appeals reversed this decision and remanded to the district court for a determination as to which school was in the children's best interests. *Id.* But it did so with the following caveat:

The present appeal, however, involves what we believe to be a temporary order, issued following the filing of a petition for modification. A final hearing on the petition for modification has not yet been held. Therefore, we do not engage in a full discussion of the issue at this time but reverse the decision of the district court and remand for the court to make a determination as to whether the children's attendance at Waukee School District or St. Francis of Assisi School is in their best interests.

Id. (footnote omitted). The court of appeals also included a footnote informing the parties that they "may wish to consider filing a joint stipulated request for expedited issuance of procedendo" if they wished to proceed with the modification hearing scheduled later that month, indicating the school issue was one of many to be heard at the modification hearing. *Id.* at *2 n.5."

Frazier at 784.

[Example 4]

"And as we already noted above, *In re Marriage of Jacobs* and *In re Marriage of Beal* did not involve any challenge to the use of an application for determination to institute those proceedings. *See Jacobs*, 2017 WL 5185435, at *1–2; *Beal*, 2006 WL 1279054, at *1, 720 N.W.2d 192. Plus, nothing in *Beal* indicates how the district court ruled on those applications. *See Beal*, 2006 WL 1279054, at *1–2, 720 N.W.2d 192. **The appeal in that case stemmed from a petition for modification, which we reiterate was the proper course of action for Mary to invoke the district court's authority here. *Id.* at *1. That's also the course that the parents took in *In re Marriage of Laird*, No. 11-1434, 817 N.W.2d 32, 2012 WL 1449625, at *2 (Iowa Ct. App. Apr. 25, 2012), when both parents filed petitions for modification after they disagreed about changing their daughter's school district. *Id.***

Frazier at 784.

[Example 5]
"To be clear, we agree with the dissent and other jurisdictions that **courts should apply a best-interest standard to resolve disputes between joint legal custodians over important issues affecting the child**. The issue on appeal is not what standard we should apply to resolve disputes between joint legal custodians, and the dissent attempts to put the cart before the horse in claiming otherwise. Instead, the issue on appeal is whether the court has the authority to resolve those disputes in the first place. *See, e.g.*, *Wallace v. Wildensee*, 990 N.W.2d 637, 645 (Iowa 2023) ("If a district court lacks authority to issue a judgment, decree, or order, it cannot act, even if both parties are in agreement.").

Frazier at 787-788.

Example 5, quoted above from Frazier, provides even more clear evidence that Frazier is a case about procedure. The following words make that evident:

"The issue on appeal is not what standard we should apply to resolve disputes between joint legal custodians, and the dissent attempts to put the cart before the horse in claiming otherwise. Instead, the issue on appeal is whether the court has the authority to resolve those disputes in the first place."

The dissent in Frazier was well-reasoned and it is hard to disagree with **unless** you read Frazier to be a case about procedure, only. Venechuk later proves that by virtue of serving as the "tie-breaker" in a joint legal custody dispute. Essentially, Venechuk affirms all of the rationale in the dissent of Frazier – except – in Venechuk, the issue was properly before the Court on a petition to modify.

Frazier tells us that this is exactly the problem – the dissent in Frazier is not wrong analytically – the dissent in Frazier is wrong because it is analyzing the wrong problem. The issue on appeal in Frazier was whether the court has the authority to resolve the Frazier dispute in the first place. Without a petition to modify engaging the jurisdiction of the court, the court is without jurisdiction (authority) to act on a modification. Frazier does not prohibit or overturn the Court's long history of serving as the "tie breaker" in legal custody disputes.

Venechuk then applies Frazier and the decades of law positively affirmed in Frazier (and the dissent in Frazier) to authorize the court to make a decision regarding a specific issue of legal custody without unbundling or otherwise affecting joint legal custody. The cases cited in Frazier, cited in the dissent in Frazier, and Judge Langholz dissent at the Court of Appeals in Venechuk v. Landherr, No. 23-0826, 2024 WL 2312559 (Iowa Ct. App. May 22, 2024) (dissent at p. 3-5) reiterate the Court's long history of doing exactly what the Supreme Court did in Venechuk

and the instant case when there is an impasse on a legal custody issue – decide the impasse. Frazier does not change that. Venechuk affirms this.

The lack of a specific school choice provision in the Van Kooten decree does not change the analysis or ability of the Court to act as the tie breaker in a legal custody impasse. The Court of Appeals in the instant case addresses this issue correctly at pages 11-18. Taylor attempts to argue that the Court of Appeals is *supplementing* the decree and not *modifying* the decree by adding the provision that B.V.K. may be homeschooled. There is no distinction to be made there. Every modification of every decree supplements, changes, modifies, or otherwise creates different language and terms than initially present. That is what a modification action does. And the Court of Appeals correctly cites that custody decrees are judgments that grant continuing relief and may be modified based on changed circumstances. Venechuk states as such. Venechuk at 477. Nothing prohibits this court from modifying, supplementing, adding to, deleting from, or otherwise changing this custody decree based upon a change in circumstances.

Nathan acknowledges that choice of school is a legal custody question, but the directive as to which school the child attends – something our Courts have decided for decades – is not a modification of legal custody. Nor should it be. Inherent in joint legal custody is that the parents have equal participation in the decision making for their children's education, medical care, religious instruction,

extracurricular activities and legal status. Iowa Code §598.1(3); Frazier at 779. The court is not modifying that, nor parceling it out, in this case. The Court is deciding an issue specific to a child's education, specifically the school which the child shall attend, and the parents retain the same full equal participation in every aspect of the children's education, medical care, religious instruction, extracurricular activities and legal status. Akin to a declaratory judgment as to what is in the minor child's best interests, the Court's jurisdiction was invoked, a substantial change in circumstances was determined to have occurred, and the Court determined a modification was warranted in the minor child's best interests. Nothing prohibits this when the Court's jurisdiction is properly invoked, and it has no effect on the parents' continuing right to equal participation in legal custody decisions.

In summary, Frazier is a case about procedure. A petition to modify, a change in circumstances, and best interests is required to modify a decree. Not simply an application for determination citing no change in circumstances and no request to modify. Venechuk affirms that upon proper application to modify, these questions are properly before the court to determine if a modification is warranted based upon a change in circumstances and best interests. Which is exactly what the Court of Appeals did in the instant case.

II. THE COURT OF APPEALS REMEDY IS THE PROPER RESULT AND MAINTAINS THE BEST INTERESTS OF THE MINOR CHILDREN.

This section addresses Section IV of Taylor's Appellee-Applicant's Argument.

To the extent Taylor attempts to introduce new evidence and argument herein, error is not preserved and new evidence is not admissible. Taylor appears to argue in Section IV of her Application for Further Review that, even if the result was wrong at the district court, it should be upheld to maintain the status quo for the children. The law does not support such an argument, and, if it did, it would be true of every single appeal in every single child custody case. Further, the argument does not lend to the criteria for further review in Iowa Rule of Appellate Procedure 6.1103(1)(b).

Taylor argues, in the face of her own statements at trial, that it is in the children's best interests that Nathan's legal custodial rights be severed. This argument is simply opposite of the substance as to what Taylor testified at trial.

Nathan is an excellent father. Taylor testified:

1. That Nathan is a good dad. (D0159, Tr. P.107:9-10)
2. That Taylor and Nathan, for the most part, get along pretty well. (D0159, Tr. P.107:11-13)
3. That Taylor and Nathan communicate well. (D0159, Tr. P.107:14-15)

4. That Taylor trusts Nathan to make good decisions for the children when they are in Nathan's care. (D0159, Tr. P.107:16-18)
5. That Taylor believes Nathan trusts Taylor. (D0159, Tr. P.107:19-20)
6. That since the parties divorced, things have gone pretty well. (D0159, Tr. P.107:21-23)
7. Other than the issue of school for B.V.K., Taylor and Nathan have not had much reason for disagreement. (D0159, Tr. P.107:24-25; 108:1-4)
8. Taylor and Nathan can modify or change visitation times fairly easily. (D0159, Tr. P.108:5-7)

The parties are excellent joint legal custodians. They simply disagreed on one issue.

Further, and importantly, to sever Nathan's legal custody rights, the court must find clear and convincing evidence that joint custody is not reasonable and not in the best interests of the children to the extent Nathan's legal custody rights must be severed. Iowa Code §598.41(2)(b). Neither the trial court nor the appellate court made that determination. Nowhere in the trial court's ruling are the words "clear and convincing evidence". The appellate court found opposite that the parents in this case the parents communicate and cooperate well and joint legal custody is

reasonable and in the children's best interests. (Slip Op. p. 6) Accordingly, the criteria for sole legal custody has not been met.

The alternative result is, joint legal custody remains, the school choice question goes unanswered, and decades of precedent of the court making these determinations is overturned. The undersigned does not believe that is the proper result. While the determination that home schooling is in B.V.K's best interests was not what Nathan advocated for, the legitimate dispute between the parents regarding this issue, against the backdrop of two parents who historically have enjoyed a positive joint legal custody relationship, does not warrant the severing of Nathan's legal custodial rights to all three children.

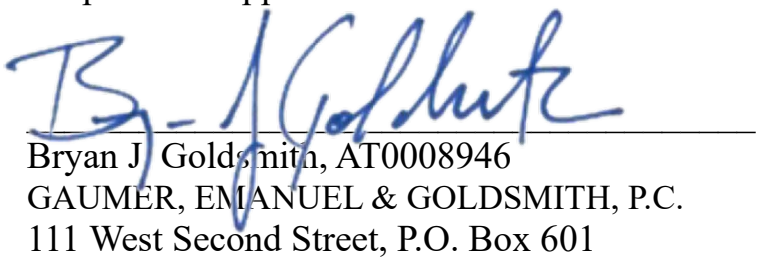
CONCLUSION

In conclusion, reading Frazier and Venechuk in tandem, when a petition to modify or enforce is filed regarding a joint legal custody decision, the district court has authority to serve as the tie-breaker without being limited to only determining that sole legal custody is the appropriate result. It is important, however, that the determination be in the child's best interests, and there must be a showing of a change in circumstances and better ability to administer to the needs of the children. The Court of Appeals was correct in the analysis of this case. Accordingly, there is no issue of conflicting law, the Court of Appeals has not set new precedent reserved for the Supreme Court, and there is no issue of broad public importance herein.

WHEREFORE, Nathan Van Kooten respectfully requests that this Court deny the Application for Further Review.

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This resistance complies with the type-volume limitation of Iowa R. App. P. 6.1103(5) because this resistance has been prepared in a proportionally spaced typeface using Times New Roman point 14 font and contains 3,870 words, excluding the parts of the brief exempted by Iowa R. App. P. 6.1103(5)(a).

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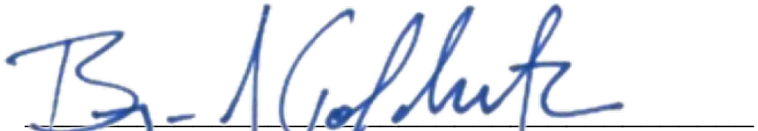
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Respondent-Appellant's Brief and Argument was served August 7, 2026 upon the following parties:

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The undersigned further certifies that on August 7, 2026, I will electronically file this document with the Clerk of the Iowa Supreme Court.



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