

**IN THE IOWA DISTRICT COURT FOR POTTAWATTAMIE COUNTY
AT COUNCIL BLUFFS**

STATE OF IOWA,

Plaintiff,

CASE NO. _____

VS.

SCOTT A. BELT,

Defendant.

**PETITION FOR REMOVAL
FROM OFFICE
(VERIFIED)**

COMES NOW the State of Iowa, through Pottawattamie County Attorney Matthew D. Wilber, pursuant to the provisions of Chapters 66 and 331 of the Code of Iowa (2025), and in support of this verified petition for removal of Scott A. Belt from the office of County Supervisor for Pottawattamie County, Iowa, states as follows:

1. Jurisdiction of the court is conferred by Chapter 66 of the Code of Iowa, including but not limited to, Iowa Code § 66.2(3).
2. Authority of the undersigned to file this petition for removal is conferred by Chapter 66 of the Code of Iowa, including but not limited to, Iowa Code § 66.3(5) and § 66.11.
3. Upon the filing of a petition under Chapter 66, the court shall set a date for hearing on the petition of not less than ten days nor more than twenty days after service. Iowa Code § 66.6.
4. Removal proceedings are summary in nature and triable in equity. Iowa Code § 66.18.
5. The State acknowledges that “the remedy provided by statute for the removal of duly elected public officials is heroic in nature and relatively drastic in a system where the usual method of removing officeholders is by resort to the ballot.” *State v. Bartz*, 224 N.W.2d 632 (Iowa 1974).

6. With the understanding that the filing of a petition for removal is an extraordinary measure, the undersigned personally asked the Defendant to voluntarily vacate his position in lieu of this filing.
7. Upon presentation of the petition to the court, the court may immediately suspend the accused from office prior to hearing on the petition. Iowa Code § 66.7.
8. Defendant Scott A. Belt is a duly-elected and presently-serving member of the Pottawattamie County Board of Supervisors.
9. Defendant was elected to a full four-year term in November 2022 and began his present term in January 2023.
10. Iowa Code § 66.1A(6) provides for removal from office for intoxication.
11. “The burden is on the State to prove the alleged ground for removal by evidence which is clear, satisfactory and convincing.” *State v. Callaway*, 268 N.W.2d 841, 842 (Iowa 1978).
12. Iowa court case law has held that intoxication must be related to official business to justify removal and that intoxication purely in the capacity of a private citizen does not provide justification for removal from office. *See State v. Watkins*, 914 N.W.2d 827 (Iowa 2018) (noting without ruling upon district court decision that intoxication was not proven to have affected the defendant’s official duties); *State v. Welsh*, 79 N.W. 369, 371 (Iowa 1899) (holding that “[i]ntoxication, when not occurring while in the discharge of an official duty, is not a ground of removal from office.”); **however, see also** *State v. Henderson*, 124 N.W. 767, 769 (Iowa 1910) (holding that intoxication of mayor during regular business hours was grounds for removal regardless of whether official duties were being performed at the time); *Millsap v. Cedar Rapids Civil Service Commission*, 249 N.W.2d 679, 687 (Iowa 1977) (upholding removal of a police officer for off-duty intoxication).
13. The Pottawattamie County Board of Supervisors held an official town hall meeting (although no decisions were to be made at that meeting) at the Carson Community Center on Wednesday,

November 5, 2025, at 6:30 p.m. which had an agenda that was posted in accordance with Iowa Code Chapter 21. **See** Exhibit A.

14. Prior to the start of this meeting, the Defendant drove to the Bar’N and Grill in downtown Carson where he consumed a beer at the bar and a portion of a mixed drink with a shot of vodka and a shot of Kahlua. The bartender placed the remainder of the mixed drink in a plastic cup which the Defendant took with him out of the bar.
15. The patrons at the bar indicated that it was very quickly apparent that the Defendant was already intoxicated upon his arrival.
16. While at the bar, the Defendant was acting in an obnoxious and rude manner, poked one of the female customers in the back a couple of times after a weird argument about the customer being from Cass County, and his behavior was concerning enough that the customer sent a text message to the bartender about the situation.
17. Also while at the bar, the Defendant leaned over and into the personal space of a couple of female patrons at the bar while rambling about uncomfortable topics such as transgender bathrooms.
18. One of the patrons at the bar who had been drinking with the Defendant said that the Defendant was “smoked” and he informed the Defendant that he should not go to the Board meeting in his condition.
19. The Defendant replied to the patron that the meeting was really just a “meet and greet” and that he was “fine.”
20. While there is no audio available, the events at the bar in Carson were mostly captured by video surveillance cameras.
21. The Defendant then left the bar and drove to the Carson Community Center.
22. As the Chair of the Pottawattamie County Board of Supervisors on November 6th, the Defendant was to be in charge of presiding over the meeting at the Carson Community Center.

23. While heading up the stairs onto the stage at the meeting, the Defendant ran into a Pottawattamie County banner and tripped over a chair leg nearly falling.
24. The Defendant led the attendees in the Pledge of Allegiance and, according to at least one witness, had difficulty with the words and the pace.
25. After the Pledge of Allegiance, the Defendant began a series of rambling remarks, appearing at times to have slurred speech, which lasted for nearly five minutes and which was video recorded.
26. During a pause in these remarks, the Defendant knocked the microphone off of its stand and it dropped to the floor.
27. After turning the microphone over to Doug Reed, Pottawattamie County Emergency Management Agency Director, the Defendant left the stage and took a seat at a table next to the other members of the Board of Supervisors.
28. While seated, and during Reed's presentation, the Defendant loudly moved various papers around, including tearing various sheets out of a packet on the table.
29. The Defendant then appeared to wander back onto the stage where he took up a position behind the table hosting the meeting's presenters.
30. The Defendant walked behind Suzanne Watson, Community Services Director, put his hands on her shoulders, and essentially got into her personal space – again captured on video.
31. Watson indicates that she was not groped in any manner, but that the Defendant was merely jostling her around.
32. Reed indicated that Belt's behavior during his presentation was distracting to the individuals present, and that it was obvious that while he was speaking all eyes were actually on the Defendant on the stage.
33. The Defendant was eventually helped off the stage by Starlyn Perdue, a local citizen and county Republican Party chair.

34. Perdue escorted the Defendant out of the room, where they were met by Supervisor Brian Shea.
35. Supervisor Tim Wichman joined the three of them in the entry area of the Community Hall shortly thereafter.
36. The Defendant wanted to return to the room and Supervisor Shea told him that he could not go back.
37. The Defendant became loud and belligerent, calling Shea a “jackoff” and the Defendant physically threatened to “kick his ass” on multiple occasions. Much of this encounter was captured on audio and video by Community Hall surveillance cameras. **See Exhibit B.**
38. The Defendant was loud enough that the acting Carson City Clerk, Kristina Hansen, came out and shut the doors between the lobby area and the main room.
39. Supervisor Wichman debated on calling for law enforcement assistance, but ended up soliciting the assistance of Matt Wyant, County Planning and Development Director, who was in the main room waiting to give his own presentation. Wichman’s intent was to have Wyant come to the Defendant’s location and to try to de-escalate the situation.
40. By this time, the Defendant had been directed to a side room on the other side of the Community Hall by Kristina Hansen, acting Carson City Clerk.
41. Wyant arrived in the side room and was able to talk the Defendant into letting Wyant drive him home.
42. The Town Hall meeting itself was attended by approximately 50 people – half county staff and half interested citizens, as well as a reporter with the Council Bluffs Daily Nonpareil newspaper.
43. On November 6, 2025, the Defendant agreed to be interviewed by the Daily Nonpareil and admitted that he had driven to the meeting and that he was driven home by a county employee. **See Exhibit C.**

44. During that same interview, the Defendant denied being drunk and stated that “his behavior was caused by medication, as he has undergone medical procedures recently.” **See** Exhibit C.
45. On November 7, 2025, the Defendant provided a list of seven medications to the undersigned – several of which should never be combined with alcohol in any amount.
46. Once word of the events of November 6th at the Town Hall became publicly widespread, the undersigned began receiving communications from various individuals with similar stories of intoxication by the Defendant during the performance of the Defendant’s official duties.
47. On November 11, 2025, the undersigned was contacted by a former member of the Pottawattamie County Conservation Board who attended an event on October 9, 2024, along with the Defendant, which was hosted by MAPA in which Pottawattamie County Conservation was receiving an award. The Defendant was an official participant in that meeting and helped to give a welcome to participants in his capacity as a member of the Pottawattamie County Board of Supervisors.
48. The Defendant was obviously intoxicated according to the former Conservation Board member. The Defendant smelled of alcohol, repeatedly dropped his silverware, and was visibly agitated. The Defendant confronted the Conservation Board member about traffic at the recent Chappell Roan concert, called event organizers and Westfair Board members names, and said that he was going to start limiting attendance at Westfair Amphitheater events in the future. When the individual tried to inform the Defendant that he was on the Conservation Board and not the Westfair Board, the Defendant merely continued on his rant.
49. Supervisor Shea indicates that the Defendant was also consuming alcohol before official business in early March 2025 at a conference in Washington, D.C., when he had two double-shots of Baileys Irish Cream (an alcoholic liqueur) in his coffee at breakfast before heading into classes at the 2025 NACo Legislative Conference. Just prior to ordering the first round of alcohol at

breakfast, the Defendant told Supervisor Shea, “Your problem is that you don’t know how to drink.”

50. Iowa West Foundation and Council Bluffs staff reported to the undersigned that the Defendant was apparently intoxicated at an invite-only event on the afternoon of September 24, 2025, at the Hoff Center in Council Bluffs where Iowa West was releasing the results of its recent Community Survey to community leaders prior to its release to the general public.
51. The Defendant was on the invitation list at the Hoff Center due to his position as a County Supervisor and was representing Pottawattamie County at that event.
52. Specific observations of the event at the Hoff Center included that the Defendant had a stained shirt, was slurring his words, had two drinks simultaneously in his hands at the bar, and smelled of alcohol.
53. Council Bluffs staff reported to the undersigned that the Defendant was apparently intoxicated at a MAPA Council of Officials Annual Meeting on October 8, 2025, in Fort Calhoun, Nebraska, where the Defendant was attending in his official capacity.
54. Also recently learned is that the Defendant was intoxicated at the Smith Wildlife Refuge in Garner Township, Pottawattamie County, on November 2, 2025. Pottawattamie County is responsible for maintenance of the parking lot at that location. Mark Webb, a private citizen in Pottawattamie County, was walking his dog and was approached by the Defendant who was driving his own pickup truck and who had a cooler in the back seat.
55. The Defendant asked Webb if he was happy with the maintenance at the location, and the Defendant then took responsibility for getting the light installed at that location. The Defendant introduced himself as Pottawattamie County Supervisor Scott Belt and handed Webb his official county business card.

56. Webb asked the Defendant if he was one of the Supervisors who voted to fire former County Engineer John Rasmussen and Belt replied affirmatively and referred to Rasmussen as a “fucking asshole.” Webb tossed the business card back into the Defendant’s truck and the Defendant began directing profanities at Webb. The Defendant kept berating Webb who asked the Defendant if he wanted to be on video showing how he treats his constituents. The Defendant “spun out” and drove rapidly out of the parking lot all while continuing to direct profanities at Webb. Webb’s opinion was that the Defendant “appeared to be an angry drunk.”
57. Jasmine Elmore, Pottawattamie County Human Resources Director, has fielded several recent complaints from Pottawattamie County employees alleging bullying and verbally abusive behavior by the Defendant in the workplace which are presently under investigation. **See** Exhibit D.
58. These complaints, coupled with the Defendant’s impairment at the Town Hall meeting and his threats of violence toward Supervisor Shea, have led several employees to express concerns regarding their physical and psychological wellbeing to the Human Resources Director and the undersigned, should the Defendant be allowed to continue in his position as a member of the Board of Supervisors.
59. On the morning after the Town Hall Meeting, the Pottawattamie County Sheriff’s Office, having responsibility over security at the Pottawattamie County Courthouse, temporarily suspended the Defendant’s security badge access to the courthouse pending the resolution of the present situation, due to employee safety and wellbeing concerns.
60. The Defendant, through his representation, informed the undersigned on November 10, 2025, that he was in the process of contacting his doctors to see if they would be willing to have a conversation about the Defendant’s medications.

61. On the afternoon of November 11, 2025, the Defendant, again through his representation, provided a list of two treating physicians and indicated a willingness to sign a HIPAA waiver for those treatment providers.
62. The Defendant signed HIPAA waivers on the morning of November 12, 2025 which were immediately forwarded to the appropriate medical treatment providers with requests to discuss the Defendant's medications, any recent changes in the same, and potential for interaction of those medications with alcohol.
63. The undersigned was able to have a telephone conversation with one of the Defendant's medical treatment providers on the evening of November 13, 2025. That provider did not support the Defendant's contention that his medications, taken as prescribed, could explain his behavior at the town hall meeting. This provider also indicated that none of these medications that could simulate the odor of alcohol on his breath.
64. The undersigned was able to have a telephone conversation with the Defendant's other medical treatment provider on the morning of November 14, 2025. That provider also did not support the Defendant's contention. This provider indicated that he has not seen the Defendant since September and has not recently adjusted dosages in any of his medications.
65. The Defendant's intoxication on at least seven occasions in the past thirteen months, while acting in his official capacity as a member of the Pottawattamie County Board of Supervisors, constitutes a violation of Iowa Code § 66.1A(6) and this misconduct warrants his removal from that office.

WHEREFORE, the State of Iowa requests the Court:

- A. To set this matter for hearing in accordance with Iowa Code § 66.6, and that upon hearing, Scott A. Belt be removed from the office of County Supervisor of Pottawattamie County, Iowa, for intoxication as authorized by Iowa Code § 66.1A(6), and for other such relief as is equitable.

B. To review the petition and affidavits presented in support of the charges contained therein, and immediately suspend Scott A. Belt from office pending the final resolution of this matter as authorized by Iowa Code § 66.7.

RESPECTFULLY SUBMITTED,



MATTHEW D. WILBER (AT0015611)
Pottawattamie County Attorney
227 South 6th Street
Council Bluffs, Iowa 51501
Telephone: (712) 328-5649
Email: matthew.wilber@pottcounty-ia.gov

VERIFICATION

The undersigned Affiant, Matthew D. Wilber, hereby verifies under oath that an investigation of the foregoing allegations in this Petition has occurred and the allegations in said Petition are true and correct as I verily believe.

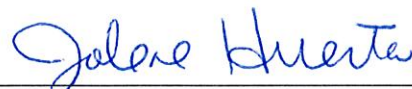
AFFIANT,



MATTHEW D. WILBER

STATE OF IOWA)
) ss
POTTAWATTAMIE COUNTY)

Subscribed, sworn to, and acknowledged before me by the said, Matthew D. Wilber on this the 14th day of November, 2025.



NOTARY PUBLIC



Posted Tuesday, November 4 @ 9:30 A.M.



Board of Supervisors

Chairperson Scott Belt
Susan Miller
Tim Wichman
Brian Shea
Jeff Jorgensen

BOARD OF SUPERVISORS' HEARING ROOM
POTTAWATTAMIE COUNTY COURTHOUSE, 2ND FLOOR
227 South 6th Street
Council Bluffs, IA 51501
Ph: 712-328-5644 | Fax: 712-328-5770
PottCounty-ia.gov

Town Hall Meeting

Wednesday, November 5, 2025

6:30 – 8:30 P.M.

Location:

Carson Community Center

316 S Commercial St

Carson, IA 51525

Department Updates

- Board of Supervisors
- Emergency Management Agency (EMA)
- Sheriff's Office
- Conservation
- Community Services/Western Iowa Services
Collaborative Disability Access Point
- Auditor
- Public Health
- Veteran Services Office (VSO)

***No deliberation or formal action will be taken at this meeting.**



AFFIDAVIT OF BRIAN M. SHEA

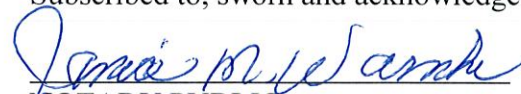
COMES NOW Brian M. Shea, 1901 Old Lincoln Highway, Crescent, Iowa, and hereby deposes and states as follows:

1. I am a member of the Pottawattamie County Board of Supervisors having last been elected in 2024 and serving through 2028.
2. I attended a NACo (National Association of Counties) conference in Washington, D.C., with Supervisor Scott A. Belt in early March 2025.
3. This conference was paid for by Pottawattamie County and we were there on official business.
4. I met Supervisor Belt for breakfast on one of the mornings of that conference at 7:00 a.m.
5. During that breakfast, Supervisor Belt stated to me, "Your problem is that you don't know how to drink."
6. Subsequent to that comment, Supervisor Belt ordered a coffee with a double shot of Baileys Irish Cream.
7. Supervisor Belt finished off his coffee and ordered another one with another double shot of Baileys Irish Cream.
8. After breakfast, we headed to the conference morning classes which began at 8:00 a.m.
9. I felt uncomfortable with this situation and did not sit with Supervisor Belt during those morning classes.
10. On November 6, 2025, I attended the town hall meeting at the Carson Community Hall.
11. Supervisor Belt was obviously intoxicated and those of us in attendance were initially at a loss on how to address it.
12. I was sure that if I tried to get Supervisor Belt off of the stage myself there would be a physical confrontation.
13. Starlyn Perdue entered the town hall late and she was able to retrieve Supervisor Belt from the stage and get him out of the room.
14. Supervisor Belt was adamant that he be allowed to go back inside.
15. I clearly smelled alcohol on Supervisor Belt and I told him, "Scott, I can't let you go back in there."
16. Supervisor Belt then called me a "jackoff" and he physically threatened me by yelling, "I'm going to kick your ass."
17. I have seen surveillance video with audio from the lobby of the community hall which supports my statements.
18. Supervisor Belt repeated this threat at least another four times during the following minutes.

FURTHER AFFIANT SAYETH NOT.


BRIAN M. SHEA

Subscribed to, sworn and acknowledged before me this 10 day of November, 2025.


NOTARY PUBLIC



https://nonpareilonline.com/news/local/government-politics/article_49b193c3-b910-47a4-bee3-76ff4aa434a5.html

FEATURED TOP STORY TOPICAL

POTTAWATTAMIE COUNTY

Supervisor Scott Belt left a town hall early after speaking and moving erratically

Andrew Smith

Nov 6, 2025

The chair of the Pottawattamie County Board of Supervisors introduced a town hall meeting in Carson on Wednesday evening with rambling, slurred speech and uncoordinated body movements.

Scott Belt kicked off what was otherwise a routine meeting updating residents about the county's efforts for rural communities after a recitation of the Pledge of Allegiance.

Belt bounced between a couple remarks before asking the room to pray for the troops, their grandkids and whatever is going on in their lives. He thanked the audience for attending before — incredibly quickly — touching on government transparency, meeting times, his experience in government and tourism.

People are also reading...

- 1 Remembering Dorothy Strohhahn, Council Bluffs' first female mayor



3 Pedestrian killed after being struck by a car Thursday afternoon in Council Bluffs

4 Pottawattamie County Supervisors schedule vote to remove Scott Belt as chair



Scott Belt, chair of the Pottawattamie County Board of Supervisors, speaks at a town hall in Carson the night of Wednesday, Nov. 5, 2025.

ANDREW SMITH, THE NONPAREIL

"I mean, we're a huge county," Belt said. "It's easy to say that, you know, we're not transparent, we're not this, we're not that. We can meet, you know, on Tuesdays, Wednesdays, Thursdays since I've been there. I'm talking about my experience there. I mean, I spent 14 years' experience in the city, and they do their stuff different than the county ... I mean, we're the largest population-wise, the way the government sees it, in Iowa."

Belt, while he was introducing the Pottawattamie County Emergency Management Agency, laughed about the number of natural disasters that have hit the area in recent years.

Matt Wyant, director of planning and development, verbally pushed Belt towards introducing the first speaker.

"I don't have all my elected or department officials here tonight, and I don't know that you would want to take up that much time to have them all here tonight — or me," Belt said before his sentence devolved into laughter.



Two people listen to presentations from Pottawattamie County officials in Carson on Wednesday.
ANDREW SMITH, THE NONPAREIL

Belt told The Nonpareil in a phone interview Thursday that his behavior was caused by medication, as he has undergone medical procedures recently. He said he visited the doctor Thursday morning to “figure out what was going on.”

He briefly apologized and thanked county staff.

“We got a wonderful staff, and I think they probably did a yeoman's work there last night,” Belt said. “I appreciate them, understanding that we all have struggles that we have to work through, and hopefully it all can get better.”

Belt did not elaborate any further on his medical history, describing it as a “HIPAA deal.” HIPAA is an acronym for federal medical privacy laws that pertain to health care providers, health insurance providers and health care information clearinghouses, prohibiting those covered entities from disclosure without patient consent.

Carson resident Laura Stephens questioned whether Belt was inebriated.

“It was a good meeting; there was a few hiccups,” Stephens said after the meeting. “He was drunk. That guy was drunk. He got escorted out.”

After Belt eventually passed the microphone to Doug Reed, director of Pottawattamie County Emergency Management, he returned to his seat at a table with the rest of the supervisors.

While seated, Belt loudly flipped through papers — tearing sheets out of a packet. Towards the end of Reed's segment, Belt stood up and walked back onstage behind the night's presenters.



Scott Belt, chair of the Pottawattamie County Board of Supervisors, walks onstage while Doug Reed, emergency management director, speaks at a town hall in Carson the night of Wednesday, Nov. 5, 2025.

ANDREW SMITH, THE NONPAREIL

A video taken by The Nonpareil shows Belt touching the shoulders of Community Services Director Suzanne Watson and speaking to her. Moments later, Belt was helped offstage by a woman.

At that point, Belt was escorted into a hall outside the event alongside Supervisors Brian Shea and Tim Wichman. A few brief loud noises could be heard from the hall before doors were shut.

The county's human resources director, Jasmine Elmore, also went into the hall. The officials returned to the room a few minutes later without Belt.



Supervisor Scott Belt's nameplate remains at his seat after he was escorted out of a town hall in Carson on Wednesday, Nov. 5, 2025.
ANDREW SMITH, THE NONPAREIL

Belt denied being drunk. He told The Nonpareil: "I don't know that that would be accurate."

Belt drove himself to the meeting but was driven home by a county employee, he said Thursday. Pottawattamie County Attorney Matt Wilber said that is also his understanding.

Wilber, speaking on behalf of the county, was not at the meeting but has been made aware of the situation. Officials did not publicly acknowledge Belt's behavior during the meeting.

"All I can really comment is that we're investigating the matter," Wilber said. "We have a variety of options that are on the table."

Pottawattamie County
Supervisors schedule vote t...



andersonc 4d

Not only was he slurring and not making sense, he put his hands ...

Top Comment



Some county investments
lacked proper paperwork,...



andersonc 6 Oct

Thank you, Andrew, for always making sure we stay informed...

Top Comment



Iowa AG Brenna Bird pledges
to 'pull the curtain back' on ...



Alan Fisher 3 Aug

I don't understand. DEI helps so many disadvantaged students g...

Top Comment



Council Bluffs Cit
member Jill Shud



Chris Harrim

I'm glad to see Ms S against Little Matt s...

Top Comment

AFFIDAVIT OF JASMINE ELMORE

COMES NOW Jasmine Elmore, Human Resources Director of Pottawattamie County, Iowa, and hereby deposes and states as follows:

1. I became the Human Resources Director for Pottawattamie County on October 6, 2025.
2. Upon my hiring, I received recent complaints from several county employees about alleged verbally abusive and bullying conduct by Supervisor Scott Belt.
3. My main concern is to ensure that these employees feel like they have a safe workplace both physically and psychologically.
4. I met with various county staff to discuss the best way to handle these complaints, including meeting with the County Attorney to discuss the potential hiring of an independent investigator.
5. Before we could address the complaints, I attended the November 6, 2025, town hall meeting at the Carson Community Hall.
6. Supervisor Belt appeared to be intoxicated at that event.
7. On the morning of November 7, 2025, I went to the Pottawattamie County Courthouse and fielded concerns from multiple employees who were concerned about their physical and psychological well-being should Supervisor Belt come back to the Courthouse. In response to concerns about one employee's well-being, I temporarily relocated that employee's workplace to another county building.
8. I consulted with the County Attorney and County Sheriff and the Sheriff decided to temporarily disable Supervisor Belt's badge access to the courthouse.
9. The physical threats made by Supervisor Belt toward Supervisor Brian Shea outside of the town hall meeting became common knowledge almost immediately and this has added to the sense of stress for employees of Pottawattamie County.

FURTHER AFFIANT SAYETH NOT.


JASMINE ELMORE

Subscribed to, sworn and acknowledged before me this 12 day of November, 2025.


NOTARY PUBLIC

