

COMPLAINT

STATE OF IOWA, COUNTY OF LEE

North Lee

South Lee

STATE OF IOWA, vs.

BENJAMIN TRANE

Defendant

Before (Judge, Magistrate) _____

Criminal Case No. _____

COMPLAINT

The defendant is accused of the crime of **Child Endangerment 726.6(7) Aggravated Misdemeanor**

(Name the Offense and Code or Ordinance Section)

_____ , in that the defendant on the 15th day of November, 2015, at the 2416 340th Street, Keokuk, IA

(Here locate the City, or Township where the offense occurred)

in Lee County, did During September of 2014 through January 2016 the Defendant being a parent, guardian or person having custody or control over a child, did knowingly act in a manner that created substantial risk to the child's physical, mental or emotional health or safety.

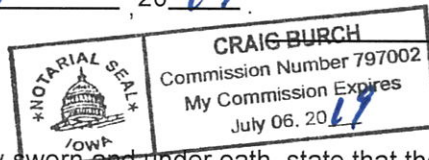
(State the acts or omissions constituting the offense)

Joe Lestina, Special Agent

(Complainant)

Subscribed and sworn to before me by the said Joe Lestina, Complainant, on the 31st day of August, 2017.

STATE OF IOWA, COUNTY OF LEE, ss.



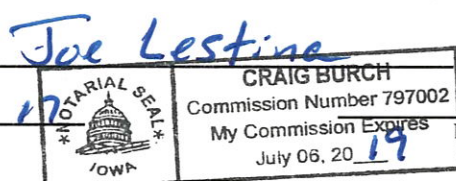
Notary public, State of Iowa

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons from the basis for my belief that Benjamin Trane the defendant committed the crime charged:

During September of 2014 through January 2016, Defendant was the owner and director of the Midwest Academy, a private for-profit therapeutic boarding school. Through contract with legal guardians and parents the Defendant had custody and control of the students who were residing at the school. The Defendant implemented and enforced polices and maintained an environment which created a substantial risk to the students' physical, mental, or emotional health and/or safety, including but not limited to solitary confinement for extended periods of time.

Joe Lestina, Special Agent

Subscribed and sworn to before me by the said Joe Lestina this 31st day of August, 2017.



Notary public, State of Iowa