

STATE OF IOWA, vs.

**BENJAMIN TRANE**

Defendant

Before (Judge, Magistrate) \_\_\_\_\_

Criminal Case No. \_\_\_\_\_

**COMPLAINT**

The defendant is accused of the crime of Sex Abuse 3rd 709.4(1)(a), a Class D Felony

(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

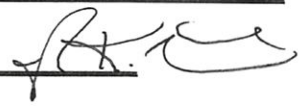
(Here locate the City, or Township where the offense occurred)

in Lee County, did during the timeframe of January of 2015 through December 2015, the Defendant did sexually abuse C.S. by performing a sex act against her will or by force, whether or not the other person is the person's spouse or cohabitating with the person.

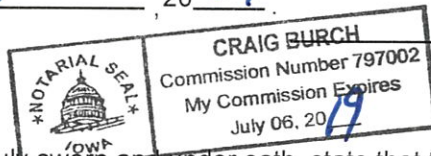
(State the acts or omissions constituting the offense)

Joe Lestina, Special Agent

(Complainant)



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



Craig Burch  
Notary public, State of Iowa

STATE OF IOWA, COUNTY OF LEE, ss.

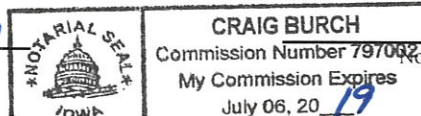
I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons from the basis for my belief that Benjamin Trane the defendant committed the crime charged:

During January 2015 through December 2015, defendant was the owner and director of the Midwest Academy, a private for-profit therapeutic boarding school. C.S. was a student enrolled at the school and attending the program. Defendant exercised control over C.S. through his position of owner and director of the school, as C.S.'s family representative and point of contact in the program, and as C.S.'s counselor. On multiple occasions, Defendant performed sexual acts on C.S., including but not limited to digital vaginal penetration, oral sex, and sexual intercourse. Defendant coerced C.S. to engage in the sex acts in order for her to successfully participate and "level up" in the program and to be able to contact her family members.

Joe Lestina, Special Agent

Subscribed and sworn to before me by the said Joe Lestina

this 31st day of August, 2017



Craig Burch  
Notary public, State of Iowa