

COMPLAINT

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 Sexual Exploitation by a Counselor 709.15(2)(a)(1) and 709.15 (4)(a)
(Name the Offense and Code or Ordinance Section)

a Class D Felony, in that the defendant on the 15th day of

November, 20 15, 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 September of 2014 through January 2016, the Defendant did as a counselor or therapist, engage in a pattern, practice, and/or scheme of conduct to engage in any sexual conduct with emotionally dependent patients or clients for the purpose of arousing or satisfying the sexual desires of the Defendant.

(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, 20 17.

STATE OF IOWA, COUNTY OF LEE, ss.



Notary public, State of Iowa

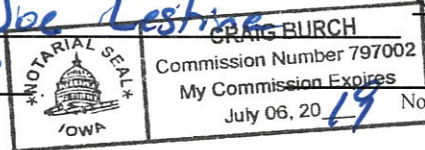
I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons from the basis for my belief that Benjamin Trane the defendant committed the crime charged:

During September 2014 through January 2016, defendant was the owner and director of the Midwest Academy, a private for-profit therapeutic boarding school. Defendant held himself out to students as a counselor and therapist. Defendant proctored and participated in individual and group counseling sessions with female students, which included "body image therapy". The "body image therapy" involved the defendant having the female students undress and stand in front of mirror to discuss what aspects of their body they did not like or felt uncomfortable with. Defendant further engaged in sexually explicit conversations with female students through conversation and written questionnaires and had physical contact with some of the female students. These acts were done for the purpose of sexual arousal, gratification and attempted grooming.

Joe Lestina, Special Agent

Subscribed and sworn to before me by the said Joe Lestina

this 31st day of August, 20 17



Signature

Notary public, State of Iowa