IN THE IOWA DISTRICT COURT IN AND FOR LEE SOUTH - KEOKUK COUNTY

STATE OF IOWA,

Plaintiff,

VS.

BENJAMIN G. TRANE.

Defendant.

CRIMINAL NO.: FECR009152

APPLICATION FOR TRANSCRIPT AT STATE EXPENSE

COMES NOW the Defendant, pursuant to Iowa Code § 815.4, Iowa Rule of Criminal Procedure 2.20(4), and *English v. Missildine*, 311 N.W.2d 292 (Iowa 1981), and for his Application for Trial Transcript at State Expense, states as follows:

- 1. The State charged Mr. Trane with Sexual Abuse in the Third Degree, a Class C Felony, in violation of Iowa Code §§ 709.1, 709.4(1)(a), and 903B.1 (Count I); Sexual Exploitation by a Counselor, a Class D Felony, in violation of Iowa Code §§ 709.15(1), 709.15(2)(a)(1), 709.15(4)(a), and 903B.2 (Count II); and, Child Endangerment, an Aggravated Misdemeanor, in violation of Iowa Code §§ 726.6(1)(a) and 726.6(7) based on actions alleged to have occurred between September 18, 2014, and January 31, 2016.
- 2. Mr. Trane is presently out of custody. Sentencing is scheduled for March 12, 2018.
 - 3. On September 8, 2017, this court deemed Mr. Trane financially indigent.
- 4. Mr. Trane lacks the requisite financial resources to pay for the costs associated to obtain a copy of the trial transcript. (Financial Affidavit has been filed).
- 5. In order to properly brief a motion for new trial, Mr. Trane must be able to review the trial transcript.
 - 6. It is in the interest of justice to grant this application.

WHEREFORE, the Defendant respectfully requests this Court to grant this application and allow the Defendant to receive a complete copy of the trial transcript and any other relief in favor of Defendant that the court deems appropriate.

PARRISH KRUIDENIER DUNN BOLES GRIBBLE GENTRY BROWN & BERGMANN L.L.P.

BY: /s/ Alfredo Parrish

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ATTORNEY FOR DEFENDANT

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause by:

- () personal service () first class mail () certified mail, return receipt requested () facsimile
- () Airborne Express (overnight) (X) electronic filing

() e-mail

on January 12, 2018.

I declare that the statements above are true to the best of my information, knowledge and belief.

/s/ Brenda Mozena	

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ATTORNEY FOR DEFENDANT

Benjamin Trane **DEFENDANT**