

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-15-1758  
07-CR-15-5082

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**State of Minnesota,**

Plaintiff,

vs.

**BRUCE ERIK KEITH DOB: 04/28/1954**

121 E Main St Apt #204  
Mankato, MN 56001

Defendant.

**COMPLAINT**

Summons

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The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

**COUNT I**

**Charge: Solicit Child or Believe to be a Child Through Electronic Communication to Engage in Sexual Conduct**

Minnesota Statute: 609.352.2a(1), with reference to: 609.352.4

Maximum Sentence: 3 years and/or \$5,000

Offense Level: Felony

Offense Date (on or about): 11/30/2015 to 12/01/2015

Control #(ICR#): 15000674

Charge Description: Bruce Erik Keith

On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Bruce Erik Keith, did as a person 18 years of age or older, use the Internet, a computer, computer program, computer network, computer system, an electronic communications system, or a telecommunications, wire, or radio communications system, or other electronic device capable of electronic data storage or transmission to commit any of the following acts, with the intent to arouse the sexual desire of any person; to wit: soliciting a child or someone the person reasonably believes is a child to engage in sexual conduct.

**COUNT II**

**Charge: Engage in Electronic Communication Relating or Describing Sexual Conduct with Child.**

Minnesota Statute: 609.352.2a(2), with reference to: 609.352.4

Maximum Sentence: 3 years and/or \$5,000

Offense Level: Felony

Offense Date (on or about): 11/30/2015 to 12/01/2015

Control #(ICR#): 15000674

Charge Description: Bruce Erik Keith

On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Bruce Erik Keith, did as a person 18 years of age or older, use the Internet, a computer, computer program, computer network, computer system, an electronic communications system, or a telecommunications, wire, or radio communications system, or other electronic device capable of electronic data storage or transmission to commit any of the following acts, with the intent to arouse the sexual desire of any person; to wit: engaging in communication with a child or someone the person reasonably believes is a child, relating to or describing sexual conduct.

### COUNT III

**Charge: Distribute via Electronic Communication Material that Relates/Describes Sexual Conduct to a Child**

Minnesota Statute: 609.352.2a(3), with reference to: 609.352.4

Maximum Sentence: 3 years and/or \$5,000

Offense Level: Felony

Offense Date (on or about): 11/30/2015 to 12/01/2015

Control #(ICR#): 15000674

Charge Description: Bruce Erik Keith

On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Bruce Erik Keith, did as a person 18 years of age or older, use the Internet, a computer, computer program, computer network, computer system, an electronic communications system, or a telecommunications, wire, or radio communications system, or other electronic device capable of electronic data storage or transmission to commit any of the following acts, with the intent to arouse the sexual desire of any person; to wit: distributing any material, language, or communication, including a photographic or video image, that relates to or describes sexual conduct to a child or someone the person reasonably believes is a child.

## STATEMENT OF PROBABLE CAUSE

Minnesota Bureau of Criminal Apprehension Special Agent Ben Rittmiller states that on the dates in question, he was assigned to the Minnesota Internet Crimes Against Children Task Force. On November 30, 2015, through December 1, 2015, he was involved in an investigation that focused on the use of Craigslist by individuals who were seeking to have a sexual encounter with children/juveniles. Through training and investigation, and the use of an undercover officer, Agent Rittmiller was aware that individuals tend to be specific in their posted requests. The undercover police officer searched for individuals and presented to them that the undercover officer was a 14-year-old female child based upon posts and requests.

The undercover officer began a search of Mankato "casual encounters" section of Craigslist. During the search, he observed a post from an individual seeking a "daughter." Agent Rittmiller reviewed electronic correspondence between the undercover officer and the poster, who was subsequently identified as Bruce Erik Keith. The undercover indicated that "her" father previously "did things to" her. Doing things to her were of a sexual nature. The poster asked if she would like him to do the same things her father did. The undercover responded to the posts as a 14-year-old female. An electronic conversation continued in a sexual nature to include that Keith wanted to take a bath with the undercover. Keith stated he had never taken a bath with anyone before "who was my young 'daughter.' I'd love to have you laying back against me, just relaxing together and talking, feeling good."

During the electronic exchange, Keith sent the undercover photographs with the same reply. One of the photographs was of a male in a state of undress, not wearing pants. Another photograph sent by Keith was of a male lying back with his penis exposed. On November 30, 2015, an electronic exchange and response from Keith to the undercover stated, "Promise me one thing, honey'you r really who u say u are right? I got worried for a sec this is some kind of sting or something. UR really u, right? I'm really me :)."

On December 1, 2015, surveillance was initiated at a residence said to be occupied by Keith as well as a vehicle said to be owned by Keith. At approximately 2:51 p.m., surveillance personnel observed a male, subsequently identified as Keith, leave the building and enter the vehicle. Surveillance maintained contact as the driver drove directly to the agreed-upon meeting location with the 14-year-old female. Upon arrival at the location, Keith remained in the vehicle for approximately five minutes.

In a post-Miranda statement, Keith acknowledged he was the original Craigslist poster and maintained the correspondence with the undercover. He acknowledged some of his communication was conducted at his residence and that he owns computer equipment.

A search warrant was subsequently executed, and computer-related items were recovered.

## SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or  
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

**Complainant**

Benjamin C Rittmiller  
Special Agent  
1430 Maryland Avenue E  
St. Paul, MN 55106  
Badge: 1367

Electronically Signed:  
12/15/2015 09:40 AM  
Blue Earth County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

**Prosecuting Attorney**

Patrick R. McDermott  
Assistant Blue Earth County  
Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
12/14/2015 08:39 AM

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

**SUMMONS**

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on **January 14, 2016 at 2:30 PM** before the above-named court at 401 Carver Rd, Mankato, MN 56002-0347 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

*Execute in MN Only*

*Execute Nationwide*

*Execute in Border States*

**ORDER OF DETENTION**

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$  
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: December 15, 2015.

**Judicial Officer**

Darci J. Bentz

Electronically Signed: 12/15/2015 12:49 PM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF BLUE EARTH  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**BRUCE ERIK KEITH**

Defendant

**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**  
*I hereby Certify and Return that I have served a copy of this  
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent: