

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-15-1760  
07-CR-15-5094

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**State of Minnesota,**

Plaintiff,

vs.

**ANDREW JOHN VERSTEEG DOB: 10/20/1983**

105 Creekside Dr  
Eagle Lake, MN 56024

Defendant.

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**COMPLAINT**

Summons

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#): 15000672

Charge Description: On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Andrew John Versteeg, 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#): 15000672

Charge Description: On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Andrew John Versteeg, 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#): 15000672

Charge Description: On or between November 30, 2015 and December 1, 2015, in the County of Blue Earth, said Defendant, Andrew John Versteeg, 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, Special Agent Rittmiller and others in law enforcement were engaged in an internet based investigation that focused on the use of Craig's List by individuals who wished to have a sexual encounter with children/juveniles.

An undercover officer posted online as a 14-year-old female. The undercover officer began a search of the Mankato 'casual encounters' section of Craig's List. During a review of various posts, the undercover observed a post as follows: 'looking for a girl to give me a nice hand job, if this sounds fun email me well go from there thanks.' The undercover officer noted the request was ambiguous with regard to any preference of the age for a 'girl' he sought. Based upon the request, the undercover responded 'were checking ads, my friends want me to do it, I am 14, u cool with that.' An electronic exchange took place discussing the situation and asking for photographs. An agreed upon time and location was made. The poster asked specifically for the young girl to wear 'rings.'

As the electronic correspondence continued, the original poster advised that he was 26 years old and requested that the undercover tell him that 'she' was 18 years of age. The undercover responded that 'she' could not lie about her age and maintained that she was 14 years old. They agreed on the meeting location and time.

At approximately 4:27 p.m., surveillance personnel advised of a suspect vehicle driving in the area. A check noted that the vehicle was registered to Andrew John Versteeg. Surveillance personnel noted that Versteeg was the only occupant and remained in the vehicle for approximately seven minutes. A traffic stop was subsequently made and the driver was positively identified as Versteeg.

In a post Miranda interview, Versteeg acknowledged he was the poster and that he was seeking a 'hand job' which he acknowledged was a sexual act. Versteeg stated he was the individual that posted the electronic correspondence and acknowledged that he believed the undercover was in fact a 14-year-old female.

A search warrant for Versteeg's residence was subsequently executed and computers and computer-related equipment 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 09:41 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 08:42 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 02:41 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.

**ANDREW JOHN VERSTEEG**

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: