



**B. Scheme and Artifice to Defraud**

3. That from on or about 2002, continuing to on or about December 2008, in the District of Idaho, the defendant, **DAREN PALMER**, devised and intended to devise a scheme and artifice to defraud for obtaining money and property by means of material false and fraudulent pretenses, representations and promises;

4. It was part of the scheme that the defendant solicited clients to invest in a program which **DAREN PALMER** typically described as hedge fund investing, offered through **TRIGON GROUP, LLC**.

5. It was part of the scheme and artifice that **DAREN PALMER** and other individuals acting at his direction and on his behalf made various misrepresentations to investors and potential investors. Included in these misrepresentations were the following:

a. That **DAREN PALMER** represented he had an investment opportunity that provided 20% to 25% guaranteed rates of return to investors with little or no risk to investors.

b. That **DAREN PALMER** had a 10-year track record of proven success.

c. That **DAREN PALMER** received compensation by keeping investor-trading profits in excess of a stated amount, typically 20% to 25%.

d. That **DAREN PALMER** provided investors with monthly account statements reflecting profits from their investments.

e. That investor's return on investments would be paid from profits made through the purchase and sale of investments.

6. It is further a part of the scheme and artifice that **DAREN PALMER** willfully failed to disclose material facts relevant to current or potential investors. Lack of disclosures included:

a. Investors were not told that prior investments had not paid a return.

b. Investors were not told that the return on investment would be paid from the funds raised from other investors.

c. Investors were not told that investor funds would be used to pay the personal expenses of **DAREN PALMER**.

7. It was further part of the scheme that between on or about 2002, and December, 2008, **DAREN PALMER** received approximately \$75.8 million from approximately sixty-eight investors, wherein the defendant then and there misapplied a substantial sum of said funds to his own personal use and caused investors to lose in excess of \$20 million.

**C. Execution of the Scheme**

8. On or about September 8, 2008, in the District of Idaho, the defendant, **DAREN PALMER**, for the purpose of executing and attempting to execute the scheme and artifice, did knowingly cause to be delivered by electronic mail, a Powerpoint presentation, to David Swenson, in violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

**Money Laundering-Transacting in Property Derived from Unlawful Activity  
18 U.S.C. § 1957**

9. The allegations set forth in Paragraphs 1-8 are realleged and incorporated herein.


10. On or about December 4, 2007, in the District of Idaho, **DAREN PALMER**, did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial

institution, that is the transfer of funds contained in the TRIGON GROUP, LLC bank account at Bank of America, last four digits of account number, 0221, to O.C. Tanner, a dealer in precious metals, stones, or jewels, \$110,550.00, which transaction affected interstate commerce and which consisted of criminally derived property of a value greater than \$10,000.00, such property having been derived from a specified unlawful activity, that is: fraud by wire in violation of Title 18, United States Code, Section 1343; all in violation of Title 18, United States Code, Section 1957.

Dated this 18<sup>th</sup> day of May, 2011.

WENDY J. OLSON  
United States Attorney

By:

  
JACK B. HAYCOCK  
Assistant United States Attorney

# CRIMINAL COVERSHEET

U.S. COURTS

<p><b>DEFENDANT'S NAME:</b> DAREN PALMER</p> <p><b>DEFENSE ATTORNEY:</b> Steven V. Richert Address: 757 N. 7<sup>th</sup> Ave., Pocatello, Idaho 83201</p> <p>Telephone No.: 208-478-2046</p> <p><b>INVESTIGATIVE AGENT:</b> Troy Smoot Telephone No.: 208-522-5921 <b>AGENCY:</b> FBI</p>	<p style="text-align: right;">JUVENILE: <u>NO</u> <span style="float: right;">MAY 18 2011</span></p> <p style="text-align: center;">Rcvd _____ Filed <u>1</u> Time _____</p> <p style="text-align: center;">PUBLIC or SEIZED PUBLIC WITH CLERK, DISTRICT OF IDAHO</p> <p style="text-align: center;"><b>SERVICE TYPE:</b> Summons (Summons or Warrant or Notice (if Superseding))</p> <p style="text-align: center;"><b>ISSUE:</b></p> <p style="text-align: center;"><b>INTERPRETER:</b> No If YES, language:</p>
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<b>CASE INFORMATION:</b> (Miscellaneous, CVB, other related defendants/case numbers)	<b>RELATED COMPLAINT:</b> No
<b>CASE NUMBER:</b>	

## CRIMINAL CHARGING INFORMATION

**CHARGING DOCUMENT:** Information

Felony: Yes County of Offense: Bonneville

Class A Misdemeanor: \_\_\_\_\_ Estimated Trial Time: plea

Class B or C Misdemeanor: \_\_\_\_\_  
(Petty Offense)

STATUTE (Title and Section(s))	COUNT/ FORFEITURE ALLEGATION	BRIEF DESCRIPTION	PENALTIES (Include Supervised Release and Special Assessment)
18 U.S.C. § 1342	1	<i>Wire Fraud</i>	<i>Maximum of twenty (20) years imprisonment and/or a \$250,000.00 fine; not more than three (3) years supervised release; and \$100 special assessment</i>
18 U.S.C. § 1957	2	<i>Money Laundering</i>	<i>Maximum of ten (10) years imprisonment and/or a \$250,000.00 fine; not more than three (3) years supervised release; and \$100 special assessment</i>

Date: May 26, 2011

Assistant U.S. Attorney: Jack B. Haycock

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