

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**09 - 60129 CR-ZLOCH**

CASE NO. \_\_\_\_\_

**ROSENBAUM**

18 U.S.C. § 1519

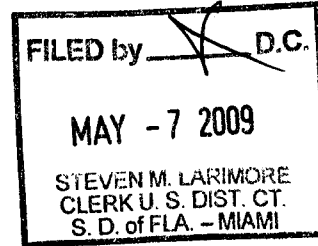
18 U.S.C. § 2

UNITED STATES OF AMERICA

v.

**BRUCE PERRAUD,**

**Defendant.**



**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**Destruction of Records in Federal Investigation  
(18 U.S.C. § 1519)**

At all times relevant to this Indictment:

1. Stanford Financial Group ("SFG") was the parent entity for a web of numerous affiliated financial services entities, including Stanford International Bank, Ltd. ("SIBL"), a private, offshore bank with offices on the island of Antigua and elsewhere.
2. SFG was headquartered in Houston, Texas, and maintained an affiliate office at 1150 Lee Wagener Boulevard, Suite 202, Fort Lauderdale, Florida.
3. Defendant **BRUCE PERRAUD** was employed as a "Global Security Specialist" for SFG at SFG's Fort Lauderdale office.
4. SIBL marketed certificates of deposit ("CD") through its affiliated entities in the

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United States. SIBL solicited investors by touting a higher rate of return on its CDs than was offered at domestic banks. Among other things, SIBL claimed that it maintained approximately \$8 billion in CD investments which were housed in relatively conservative, highly liquid holdings.

**United States Securities and Exchange Commission Complaint:  
Court Order Prohibiting Document Destruction**

5. On or about February 16, 2009, the United States Securities and Exchange Commission (“SEC”) filed a Complaint against SIBL, R. Allen Stanford, and related individuals and entities in the United States District Court for the Northern District of Texas. In the Complaint, the SEC charged that the CDs sold by SIBL were one mechanism by which the principals of SFG and its affiliated entities orchestrated a “massive, ongoing fraud.”

6. On or about February 16, 2009, based on the application of the SEC, the United States District Court for the Northern District of Texas, in *SEC v. Stanford International Bank, Ltd., et al.*, Case No. 3-09CV0298-L, issued an order appointing an individual, known as a receiver (the “Receiver”), to, among other things, exercise exclusive possession, custody, and control of SFG and its affiliated entities and to trace and identify assets in order to return deposits to defrauded investors.

7. On or about February 16, 2009, the United States District Court for the Northern District of Texas, in *SEC v. Stanford International Bank, Ltd., et al.*, Case No. 3-09CV0298-L, issued another order which provided, among other things, that SFG and its affiliated entities, including their “officers, directors, agents, servants, employees, attorneys, and all other persons in active concert or participation with them, . . . are restrained and enjoined from destroying, removing, mutilating, altering, concealing, or disposing of, in any manner, any books and records owned by, or pertaining to, the financial transactions and assets of” SFG and its affiliated entities.

8. On or about February 17, 2009, **BRUCE PERRAUD** sent an electronic mail (e-mail) message to one of his co-workers wherein he stated that he “had found a copy of the complaint from the Northern District Texas [sic], Dallas Division.”

9. On or about February 17, 2009, the Receiver sent an e-mail message to all employees of SIBL and affiliated entities, including SFG, alerting them to the SEC investigation and lawsuit, as well as the court order appointing the Receiver.

10. In the February 17 email from the Receiver, the Receiver stated that the court had mandated “preservation of documents” and that “all employees and agents of the Stanford Company cooperate with the Receiver . . . [and] all assets and records be turned over to the Receiver as requested.” The e-mail further instructed the employees that they “have been ordered to preserve (and not hide or destroy) any and all documents, notes, and records . . . [a]ccordingly [Stanford employees] may not hide, destroy or alter any document or electronic record relating to the company.”

11. On or about February 17, 2009, **BRUCE PERRAUD** opened the February 17 e-mail message from the Receiver.

12. On or about February 17, 2009, **BRUCE PERRAUD** placed a telephone call to his supervisor, during which **BRUCE PERRAUD** communicated the contents of the Receiver’s e-mail and the court order.

#### **Defendant Requests and Supervises Destruction of Documents**

13. On or about February 23, 2009, **BRUCE PERRAUD** placed a telephone call to a commercial document shredding company (“Shredding Company”) and requested that the Shredding Company come to the SFG office at 1150 Lee Wagener Boulevard, Suite 202, Fort Lauderdale,

Florida, to shred numerous records.

14. On or about February 25, 2009, a representative of the Shredding Company arrived at the SFG office in Fort Lauderdale. At that time, **BRUCE PERRAUD** met with the representative of the Shredding Company and escorted the individual to the documents.

15. **BRUCE PERRAUD** supervised the representative of the Shredding Company as that individual packed a 95-gallon bin with documents. **BRUCE PERRAUD** then accompanied the representative as the individual hauled the bin to a document shredder located in the Shredding Company's truck.

16. While **BRUCE PERRAUD** supervised the shredding of the documents, four additional SFG employees made approximately eight trips between the SFG office and the document shredder truck with additional documents for destruction. The SFG employees also retrieved files and documents located in automobiles parked in the SFG parking lot and delivered them to the representative of the Shredding Company for destruction.

17. From on or about February 23, 2009, through on or about February 25, 2009, at Fort Lauderdale, Broward County, in the Southern District of Florida, the defendant,


**BRUCE PERRAUD,**

did knowingly alter, destroy, and mutilate records, documents, and tangible objects with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of any department or agency of the United States, that is, the United States Securities and Exchange Commission, and in relation to and contemplation of any such matter and case, in that **BRUCE PERRAUD** ordered and supervised the destruction of records and documents of SFG and its affiliated entities knowing that such records were ordered to be preserved by the United States

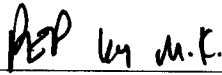
District Court for the Northern District of Texas in connection with an SEC investigation and lawsuit, *SEC v. Stanford International Bank, Ltd., et al.*, Case No. 3-09CV0298-L, in violation of Title 18, United States Code, Sections 1519 and 2.

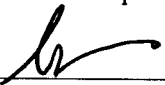
A TRUE BILL

FOREPERSON

  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

STEVEN A. TYRRELL  
Chief, Fraud Section  
United States Department of Justice

By:   
PAUL E. PELLETIER  
Principal Deputy Chief, Fraud Section  
United States Department of Justice

By:   
MATTHEW KLECKA  
Trial Attorney, Fraud Section  
United States Department of Justice

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

vs.

**CERTIFICATE OF TRIAL ATTORNEY\***

BRUCE PERRAUD,

Defendant.

**Superseding Case Information:**

**Court Division:** (Select One)

X  Miami   Key West  
 X  FTL   WPB   FTP

New Defendant(s) Yes   No    
Number of New Defendants    
Total number of counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No)  No   
List language and/or dialect \_\_\_\_\_

4. This case will take  2  days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)	
I 0 to 5 days	<u> X </u>	Petty <u> </u>
II 6 to 10 days	<u> </u>	Minor <u> </u>
III 11 to 20 days	<u> </u>	Misdem. <u> </u>
IV 21 to 60 days	<u> </u>	Felony <u> X </u>
V 61 days and over	<u> </u>	

6. Has this case been previously filed in this District Court? (Yes or No)  No

If yes: Judge: \_\_\_\_\_ Case No. \_\_\_\_\_

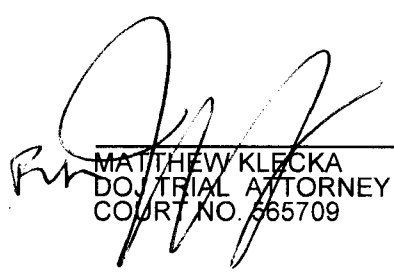
(Attach copy of dispositive order)  
Has a complaint been filed in this matter? (Yes or No)  No

If yes: Magistrate Case No. \_\_\_\_\_  
Related Miscellaneous numbers: \_\_\_\_\_  
Defendant(s) in federal custody as of \_\_\_\_\_  
Defendant(s) in state custody as of \_\_\_\_\_  
Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No)  No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003?   Yes  X  No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007?   Yes  X  No

  
MATTHEW KLECKA  
DOJ TRIAL ATTORNEY  
COURT NO. 065709

\*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** BRUCE PERRAUD **Case No:** \_\_\_\_\_

Count #: 1

Destruction of Records in Federal Investigation

18 U.S.C. § 1519

**\*Max Penalty:** 20 years' imprisonment

Counts #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max Penalty:** \_\_\_\_\_

Count #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max Penalty:** \_\_\_\_\_

Count #:

\_\_\_\_\_  
\_\_\_\_\_

**\*Max Penalty:** \_\_\_\_\_

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**