

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	INFORMATION <i>CR 11-121 PAM</i>
Plaintiff,)	
)	(15 U.S.C. § 77q(a))
v.)	(15 U.S.C. § 77(x))
)	(18 U.S.C. § 2)
MICHELLE WEBSTER PALM,)	(18 U.S.C. § 1001)
)	
Defendant.)	

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Securities Fraud)

From in or about September 2007 through in or about 2008, the defendant,

MICHELLE WEBSTER PALM,

aiding and abetting other individuals, and being aided and abetted by such individuals, did knowingly, willfully, and unlawfully, by the use of means and instrumentalities of interstate commerce, directly and indirectly, use and employ manipulative and deceptive devices in connection with the purchase and sale of securities, and did make untrue statements of material facts and omit to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading in connection with the purchase and sale of said securities, in violation of Title 15, United States Code, Sections 77q(a) and 77(x).

SCANNED
APR - 5 2011
U.S. DISTRICT COURT MPLS

FILED **APR 5 2011**
RICHARD D. SLETTEN
JUDGMENT ENTD _____
DEPUTY CLERK _____

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COUNT 2
(False Statement)

On December 14, 2010, in the State and District of Minnesota, in a matter within the jurisdiction of the Securities and Exchange Commission, the defendant,

MICHELLE WEBSTER PALM,

did knowingly and willfully make a material false statement and representation to the Securities and Exchange Commission, an agency of the United States, all in violation of Title 18, United States Code, Section 1001(a)(2).

Forfeiture Allegations

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

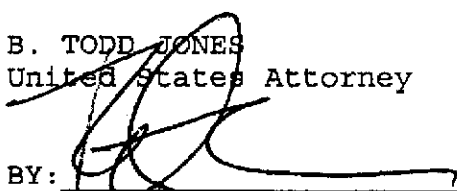
As the result of the offense alleged in Count 1 of this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 371.

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If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Date: April 5, 2011

B. TODD JONES
United States Attorney

BY: 
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Attorney ID Number: 017516X
Assistant U.S. Attorneys