IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN/WATERLOO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 12-2021
Plaintiff,	)	**INDICTMENT**
vs.	)	COUNTS 1-31
RUSSELL R. WASENDORF, SR.,	)	18 U.S.C. § 1001(a)(3): Making and Using False Documents
Defendant.	)	

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY
And filed 8/13/12
ROBERT L. PHELPS, CLERK

The Grand Jury charges:

COUNTS 1-2

On or about the following dates, in the Northern District of Iowa, defendant RUSSELL R. WASENDORF, SR., did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, false writings or documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries. That is, on behalf of Peregrine Financial Group, Inc. (PFG), defendant submitted and caused to be submitted year-end financial statements for PFG to the United States Commodity Futures Trading Commission that overstated the value of PFG's customer segregated funds by at least tens of millions of dollars, well knowing and believing the actual value of PFG's customer segregated funds was at least tens of millions of dollars less than stated in the financial statements.

COUNT	SUBMISSION DATE	DOCUMENT SUBMITTED
1	March 31, 2011	Year-end financial statement for 2010
2	March 30, 2012	Year-end financial statement for 2011

This was in violation of Title 18, United States Code, Section 1001(a)(3).

COUNTS 3-31

On or about the following dates, in the Northern District of Iowa, defendant RUSSELL R. WASENDORF, SR., did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, false writings or documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries. That is, on behalf of Peregrine Financial Group, Inc. (PFG), defendant submitted and caused to be submitted monthly reports for PFG to the United States Commodity Futures Trading Commission that overstated the value of PFG's customer segregated funds by at least tens of millions of dollars, well knowing and believing the actual value of PFG's customer segregated funds was at least tens of millions of dollars less than stated in the monthly reports.

COUNT	SUBMISSION DATE	DOCUMENT SUBMITTED
3	February 24, 2010	Monthly report for January 2010
4	March 23, 2010	Monthly report for February 2010
5	April 26, 2010	Monthly report for March 2010
6	May 25, 2010	Monthly report for April 2010
7	June 23, 2010	Monthly report for May 2010
8	July 26, 2010	Monthly report for June 2010
9	August 24, 2010	Monthly report for July 2010
10	September 24, 2010	Monthly report for August 2010

COUNT	SUBMISSION DATE	DOCUMENT SUBMITTED
11	October 25, 2010	Monthly report for September 2010
12	November 23, 2010	Monthly report for October 2010
13	December 20, 2010	Monthly report for November 2010
14	January 26, 2011	Monthly report for December 2010
15	February 24, 2011	Monthly report for January 2011
16	March 23, 2011	Monthly report for February 2011
17	April 26, 2011	Monthly report for March 2011
18	May 24, 2011	Monthly report for April 2011
19	June 23, 2011	Monthly report for May 2011
20	July 26, 2011	Monthly report for June 2011
21	August 23, 2011	Monthly report for July 2011
22	September 26, 2011	Monthly report for August 2011
23	October 25, 2011	Monthly report for September 2011
24	November 23, 2011	Monthly report for October 2011
25	December 23, 2011	Monthly report for November 2011
26	January 26, 2012	Monthly report for December 2011
27	February 24, 2012	Monthly report for January 2012
28	March 23, 2012	Monthly report for February 2012
29	April 25, 2012	Monthly report for March 2012
30	May 23, 2012	Monthly report for April 2012
31	June 25, 2012	Monthly report for May 2012

This was in violation of Title 18, United States Code, Section 1001(a)(3).

A TRUE BILL

s/Foreperson

8-13-12

Grand Jury Foreperson

STEPHANIE M. ROSE
United States Attorney

By: _____
PETER E. DEEGAN, JR.
Assistant United States Attorney

By: _____
for MATTHEW J. COLE
Assistant United States Attorney