

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

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US DISTRICT COURT
HARTFORD CT

3:14CR165 (MPS)

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UNITED STATES OF AMERICA : CRIMINAL NO.

: VIOLATION:

- v. - : 18 U.S.C. § 1343

LLOYDS BANKING GROUP PLC, :

:

Defendant. :

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INFORMATION

The United States Department of Justice, Fraud Section, Criminal Division, and Antitrust Division, charges that at all times material to this Information:

COUNT ONE
(Wire Fraud)

1. Between approximately 2006 and at least 2009, Lloyds Banking Group plc, the defendant, through employees of certain subsidiaries, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and

artifice, to wit, the defendant, through employees of certain subsidiaries, engaged in a scheme to defraud counterparties to financial transactions executed on its behalf by secretly manipulating benchmark interest rates to which the profitability of those transactions was tied, and in furtherance of that scheme, on or about May 19, 2009, the defendant transmitted or caused the transmission of electronic communications - specifically, (1) an electronic chat between a money-markets trader and a U.S. Dollar LIBOR submitter, (2) a subsequent U.S. Dollar LIBOR submission from the defendant to Thomson Reuters, and (3) a subsequent publication of a U.S. Dollar LIBOR rate - through international and interstate wires.


In violation of Title 18, United States Code, Section 1343.

UNITED STATES OF AMERICA

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