

United States District Court
District of Connecticut
FILED AT HARTFORD

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

By

Robert D. Tabors, Clerk

Deputy Clerk

April 12, 2013

UNITED STATES OF AMERICA,

:

CRIMINAL NO.

3:13CR73MPS

v.

:

VIOLATION:

18 U.S.C. § 1343

RBS SECURITIES JAPAN LIMITED

:

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 2010, in the District of Connecticut and elsewhere, RBS SECURITIES JAPAN LIMITED, the defendant, through its employees, 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 communication 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 its employees, engaged in a scheme to defraud counterparties to

interest rate derivatives trades executed on its behalf by secretly manipulating benchmark interest rates to which the profitability of those trades was tied, and in furtherance of that scheme, on or about October 5, 2009, the defendant transmitted or caused the transmission of electronic communications - specifically, (1) an electronic chat between a derivatives trader employed by the defendant and a derivatives trader employed by the defendant's parent company, (2) a subsequent Yen LIBOR submission from a bank to Thomson Reuters, and (3) a subsequent publication of a Yen LIBOR rate - through international and interstate wires, at least one of which passed through, among other locations and facilities, servers located in Stamford, Connecticut.

All in violation of Title 18, United States Code, Section 1343.

UNITED STATES OF AMERICA

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