

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

FILED

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UNITED STATES OF AMERICA

:

CRIMINAL NO.

2015 APR 23 P 4:25  
3:15CR61(RNC)  
DISTRICT COURT  
HARTFORD CT

:

VIOLATIONS:

18 U.S.C. § 1343

15 U.S.C. § 1

- v. -

DEUTSCHE BANK AG

:

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 2003 and at least 2010, the  
defendant, DEUTSCHE BANK AG, 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, all affecting a

financial institution, 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 July 20, 2006, the defendant transmitted or caused the transmission of electronic communications - specifically, (1) an electronic chat between a United States Dollar derivatives trader who was located in the United States at the time of the chat and a United States Dollar LIBOR submitter, (2) a subsequent United States Dollar LIBOR submission from the defendant to Thomson Reuters, and (3) a subsequent publication of a United States Dollar LIBOR rate - through international and interstate wires.

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

COUNT TWO  
(Price Fixing)

2. From at least as early as 2008 through at least 2010, the defendant, DEUTSCHE BANK AG, through its employees, and its co-conspirators, engaged in a combination and conspiracy in unreasonable restraint of interstate and foreign commerce. The aforesaid combination and conspiracy consisted of an agreement, understanding and concert of action among the Defendant and its co-conspirators, the substantial terms of which were to fix the price

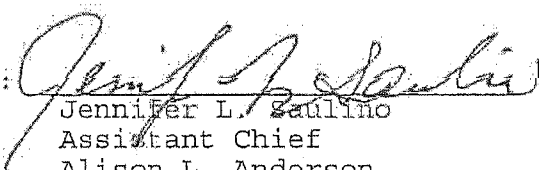
of Yen LIBOR-based derivative products by fixing Yen-LIBOR, a key component of the price thereof, on certain occasions.

In violation of Title 15, United States Code, Section 1.

UNITED STATES OF AMERICA

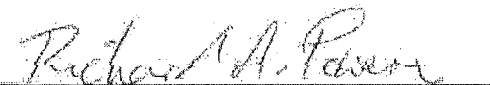
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