

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

2012 DEC 19 P 2:12
Crim. No. 12cr268 (RNC)

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UNITED STATES OF AMERICA :

- v. - :

UBS SECURITIES JAPAN CO., LTD., :

Defendant. :

VIOLATIONS:

18 U.S.C. §§ 1343 & 2

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INFORMATION


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

COUNT ONE
(Wire Fraud)

Between approximately 2006 and at least 2009, in the District of Connecticut and elsewhere, UBS SECURITIES JAPAN CO., LTD., the defendant, 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 devised and 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 February 25, 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 broker employed at an interdealer brokerage firm, (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.

In violation of Title 18, United States Code, Sections 1343 and 2.


DENIS J. MCINERNEY
Chief, Fraud Section
Criminal Division
United States Department of Justice