# MEXICAN GOVERNMENT BONDS ANTITRUST CLASS ACTION SETTLEMENT

# DID YOUR BUSINESS ENTER INTO A MEXICAN GOVERNMENT BOND TRANSACTION?

## YOU MAY BE ELIGIBLE TO RECOVER MONEY!

#### **Eligible Class Members:**

All persons or entities (excluding the United States and Mexican governments) who or which, from January 1, 2006 through April 19, 2017, entered into a "Mexican Government Bond Transaction" where such person or entity was either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted in the United States or its territories. Included in the class are "Investment Vehicles", i.e. any investment company, separately managed account or pooled investment fund, including, but not limited to: (i) mutual fund families, exchange-traded funds, funds of funds and hedge funds; and (ii) employee benefit plans. Investment Vehicles shall not be excluded solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants.

#### **Definition of "Mexican Government Bond Transaction":**

Mexican Government Bonds means any debt securities issued by the United Mexican States ("Mexico") that are Mexican Peso-denominated, including, but not limited to, CETES, Bondes D, UDIBONOS, and BONOS. A "Mexican Government Bond Transaction" means any purchase, sale, or exchange of Mexican Government Bonds, whether in the primary, secondary, or any other market.

#### The "Settling Defendants" include:

1) Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively, "Barclays"); and 2) JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively, "JPMorgan").

#### The Non-Settling Defendants include:

Banco Bilbao Vizcaya Argentaria, S.A., BBVA Securities, Inc., BBVA Compass Bancshares, Inc., BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer, Grupo Financiero BBVA Bancomer, S.A. de C.V., Banco Santander S.A., Santander Investment Securities, Inc., Santander Holdings USA, Inc., Banco Santander (Mexico) S.A. Institución de Banca Múltiple, Grupo Financiero Santander Mexico, Santander Investment Bolsa, Sociedad de Valores, S.A.U., Bank of America N.A., Bank of America Corporation, BankAmerica International Financial Corporation, Bank of America Mexico, S.A., Institución de Banca Múltiple. Grupo Financiero Bank of America, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Citiaroup Inc., Citiaroup

Global Markets Inc., Citigroup Financial Products Inc., Citigroup Global Markets Holdings Inc., Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex, S.A. de C.V., Credit Suisse Group AG, Credit Suisse AG, Grupo Financiero Credit Suisse (Mexico), S.A. de C.V., Banco Credit Suisse (Mexico), S.A., Deutsche Bank AG. Deutsche Bank Securities Inc., Deutsche Bank Americas Holding Corp., Deutsche Bank México, S.A. Institución de Banca Múltiple, HSBC Holdings plc, HSBC Bank plc. HSBC Securities (USA) Inc., HSBC Markets (USA) Inc., HSBC México, S.A., Institución de Banca Múltiple, Grupo Financiero HSBC, HSBC North America Holdings Inc., HSBC Latin America Holdings (UK) Limited, ING Groep N.V., ING Bank, N.V., and ING Financial Markets LLC.

## **ELIGIBILITY SUMMARY**

Fund Amount: **\$20.7 Million** 

Purchase Dates: January 1, 2006 -April 19, 2017

\*Filing Deadline: **Passed** 

\*Claims may still be filed and acceptance is subject to Court approval.

## THIS IS NOT AN OFFICIAL COURT NOTICE. INFORMATION CONTAINED IN THIS SUMMARY IS SUBJECT TO CHANGE.

The Services FRS Provides: Financial Recovery Strategies (FRS) is a class action claims management consultant; we are not a court appointed claims administrator or class counsel. If you hire FRS, FRS will work within your guidelines to manage the claims process. The services that FRS provides include the following: (i) notifying you when we believe that you may be eligible to participate in settlements likely to be valuable to you; (ii) endeavoring to enhance the likelihood that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; (iii) to reduce the support needed from your in-house staff, providing advice on what, if any, documents need to be collected and maintained, and, when requested, assisting in that effort; (iv) when required documents are not available or are too burdensome to collect, attempting to develop innovative alternatives to satisfy documentation requirements and striving to obtain approval of those alternatives; (v) preparing, assembling and submitting your claim package, and managing it throughout the claims processing phase, including working with you to address any concerns or questions claims administrators may have; (vi) providing regular updates on the recovery process; (vii) reviewing your payment to assure that it has not been under calculated; and (viii) following up with you to assure that your recovery check is deposited. FRS's recovery specialists are always available to answer any questions you may have.

How to Retain FRS: If you wish to hire FRS to file and manage a claim on your behalf, you must return a signed Claims Management Agreement and a signed Authority to File and Manage Claims. Before doing so, it is important that you understand their terms and make sure that all information about you is correct.

#### **CLASS ACTION SUMMARY**

## MEXICAN GOVERNMENT BONDS ANTITRUST CLASS ACTION SETTLEMENT





### **Case History**

A class action lawsuit was filed in 2018 alleging the Defendants conspired to fix prices in the Mexican Government Bond market in violation of federal antitrust laws. Since then, the class entered into settlements with Barclays (\$5.7 million) and JPMorgan (\$15 million) for an aggregate amount of approximately \$20.7 million. These settlements are pending final approval. The litigation is currently ongoing against the Non-Settling Defendants, and it is possible that additional funds may become available to the class as the result of a trial or future settlements. FRS will update this Summary as the case progresses and new information becomes available.

Class Counsel or the Settlement Administrator may be contacted for additional settlement information.

You also may visit the Court-approved website.

Please understand that you have the right to file on your own.

To learn more about our services, visit www.FRSco.com.

The Services FRS Provides: Financial Recovery Strategies (FRS) is a class action claims management consultant; we are not a court appointed claims administrator or class counsel. If you hire FRS, FRS will work within your guidelines to manage the claims process. The services that FRS provides include the following: (i) notifying you when we believe that you may be eligible to participate in settlements likely to be valuable to you; (ii) endeavoring to enhance the likelihood that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; (iii) to reduce the support needed from your in-house staff, providing advice on what, if any, documents need to be collected and maintained, and, when required documents are not available or are too burdensome to collect, attempting to develop innovative alternatives to satisfy documentation requirements and striving to obtain approval of those alternatives; (v) preparing, assembling and submitting your claim package, and managing it throughout the claims processing phase, including working with you to address any concerns or questions claims administrators may have; (vi) providing regular updates on the recovery process; (vii) reviewing your payment to assure that it has not been under calculated; and (viii) following up with you to assure that your recovery check is deposited. FRS's recovery specialists are always available to answer any questions you may have.

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