



U.S. Department of Justice

Criminal Division
Office of International Affairs

MDR:KJH:JEC:AML

182-42609 (Please use when responding)

Washington, D.C. 20530

Date: March 20, 2015

TO: The Central Authority of Sweden

SUBJECT: Third Supplemental Request for Assistance in the Investigation of VimpelCom, Ltd. ("VimpelCom"), Mobile TeleSystems OJSC ("MTS"), and TeliaSonera AB ("TeliaSonera")

INTRODUCTION

The Central Authority of the United States requests the supplemental assistance of the appropriate authorities in Sweden, pursuant to the 2004 United States-Sweden Instrument on Mutual Legal Assistance in Criminal Matters (the "Instrument") and the 1997 Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions ("OECD Convention"), which entered into force on February 15, 1999. The United States Department of Justice, Criminal Division, Fraud and Asset Forfeiture and Money Laundering Sections, as well as the United States Securities and Exchange Commission ("SEC") (collectively, the "U.S. authorities"), are conducting investigations into whether three companies—VimpelCom, MTS and TeliaSonera—(1) made improper payments to foreign government officials for the purpose of obtaining or attempting to obtain mobile telecommunications licenses, (2) improperly recorded and manipulated accounting records, and (3) committed money laundering violations.

The United States submitted an original request for assistance on September 27, 2013, for access to the related Swedish investigative file. The United States also submitted a supplemental

request on December 19, 2013, seeking official and business records, and a second supplemental request, on August 27, 2014, seeking voluntary production of documents from TeliaSonera, PricewaterhouseCoopers AB and Ernst & Young AB. U.S. authorities now seek assistance from Swedish authorities in restraining \$30,450,000 of criminal proceeds on deposit in an account at Nordea Bank in Sweden.

TIME CONSTRAINTS

U.S. authorities ask that execution of this request, and in particular the restraint of the \$30,450,000 at Nordea Bank, be granted without delay.

FACTS

The Facts, Offenses, and Persons and Entities Involved, as provided in the September 27, 2013, original request, the December 19, 2013, supplemental request, and the August 27, 2014, second supplemental request, are incorporated by reference herein. As explained in the previous requests, the U.S. investigation has revealed that Vimpelcom, MTS, and TeliaSonera paid bribes to Uzbek officials to obtain mobile telecommunications business in Uzbekistan and that funds involved in the scheme were laundered through shell companies and financial accounts around the world, including accounts held in Sweden, to conceal the true nature of these illegal payments.

On March 20, 2015, the United States District Court for the Southern District of New York issued a warrant authorizing the seizure of assets located in Sweden after finding probable cause to believe that the assets constitute the proceeds of crime or are assets involved in illegal money laundering related to the investigation. The assets are defined as all funds up to an amount totaling \$30,450,000 at Nordea Bank, account number [REDACTED], with a beneficiary identified as Takilant Limited.

ASSISTANCE REQUESTED

U.S. authorities request that, in accordance with the laws of Sweden, all funds up to \$30,450,000 on deposit at Nordea Bank, account number [REDACTED], in an account held by Takilant Limited, be immediately restrained in order to prevent their removal or dissipation, as a preliminary step to forfeiture under U.S. law.

PROCEDURES TO BE FOLLOWED

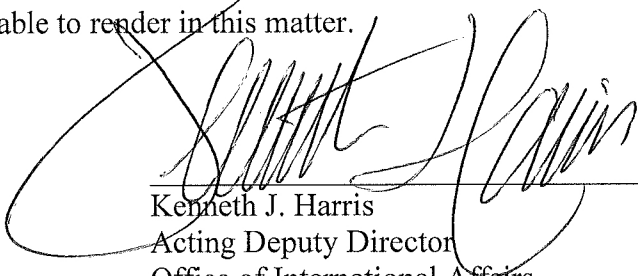
1. Restrain all funds up to \$30,450,000 in the above-noted account pursuant to Articles 1(2)(g) and 18 of the Instrument and Articles 3(3) and 9 of the OECD Convention.
2. Notify the U.S. Authorities of the specific amount restrained pursuant to this request.

CONTACT INFORMATION

Please coordinate the execution of this request with [REDACTED], Trial Attorney, U.S. Department of Justice, Office of International Affairs, by telephone at [REDACTED] or by email at [REDACTED]. In addition, Swedish Chief Prosecutor Gunnar Stetler has agreed to serve as a point of contact for collaborative investigatory efforts, and can be reached at telephone number [REDACTED] or by email at [REDACTED].

The U.S. Department of Justice thanks the Kingdom of Sweden for its attention to this request and for any assistance it may be able to render in this matter.

March 20, 2015
Date


Kenneth J. Harris
Acting Deputy Director
Office of International Affairs
Criminal Division