Specifically, the Government intended to hold senior management responsible for the alleged scheme in its settlement with Deutsche Bank as late as April 15, 2015—just eight days before the final settlement was entered. On that day, the Government forwarded a draft of its Deferred Prosecution Agreement ("Draft DPA") to the FCA, which included language about the scope of senior management's knowledge of and role in the alleged conduct. (See Levine Decl. Ex. 12.) Specifically, under a heading titled "DB Management Awareness of the Conduct, Tolerance of the Conflicts of Interest and Promotion of Culpable Individuals," the Draft DPA stated: 98. Certain DB managers and senior managers were aware of requests by DB derivatives traders to submit LIBOR and EURIBOR rates that benefitted trading positions. Evidence suggests that Senior Manager-1, a senior manager and the head of GFFX in London, knew that traders and submitters coordinated LIBOR 77 submissions and encouraged the coordination. Senior Manager-1 was the head of the primary division at DB engaged in the LIBOR manipulation and was present on occasions when Submitter-1 received requests to manipulate DB's USD LIBOR submissions. . . . 101. In addition, DB senior managers and managers . . . recklessly disregarded two significant conflicts of interests: 1) having pool traders who submitted LIBOR and EURIBORs on behalf of DB also trade derivatives tied to the same rates and 2) encouraging open communications between traders and submitters and seating many of them together in London and in Frankfurt. 102. When Senior Manager-1 took over the position of global head of GFFX, he instituted an initiative to promote an open culture where traders across divisions and locations shared information. At least part of the motivation for this sharing of information was to ensure that the bank coordinated conduct among traders and the submitters to benefit the bank as a whole. . . . 104. DB managers promoted the sharing of information by sitting traders who stood to benefit from moves in LIBOR and EURIBOR in very close proximity to other traders who had the responsibility to submit LIBOR and EURIBOR rates on behalf of DB. . . . 105. Managers, in particular Senior Manager-1, presided over all of these efforts to share information . . . . Senior Manager-1 continued to allow an environment where traders were permitted and even encouraged to share with other traders – including traders with LIBOR and EURIBOR submitting responsibilities – the derivatives trading positions they held and further how these positions would be impacted by upcoming fixings. (See Levine Decl. Ex. 12 at 50-53.) As part of its deal with Deutsche Bank, the Government's allegations in these paragraphs were largely removed, leaving references only to desk level managers, a mid-level manager, and one senior manager—David Nicholls, identified as "Senior Manager-1". (See Levine Decl. Ex. 57 at 7.) The Government apparently made this decision because, as was revealed by the Kastigar discovery, inclusion of other members of senior management, specifically Anshu Jain, became a "stumbling block" in the Government's efforts to coordinate with the FCA and other agencies. (Levine Decl. Ex. 23 at 1; see also Ex. 15 at DOJ-DB-KAST-0003539 ("FCA: We basically stop at Nicholls. We say management knew of the risk, but not about knowing of the conduct.").)