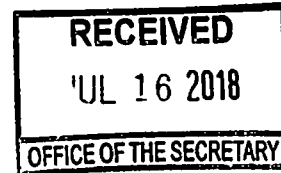


Mr. Clarence N. Daniels
[REDACTED]
[REDACTED]



Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Subject: File No: S7-16-18, Amendments to the Commission's Whistleblower Program Rules

Dear Brent Fields,

I would like to offer my comments concerning a specific section of the proposed subject changes as follows:

"IV. Request for comment regarding a potential discretionary award mechanism for Commission actions that do not qualify as covered actions, involve only a de minimis collection of monetary sanctions, or are based on publicly available information."

The above proposed change would be an infinitely positive incentive to reluctant or risk averse whistleblowers that may be near certain that their TCR(s) would or could result in a Commission successful enforcement action, or a "covered action", but for, "the particular form of an action that the Commission, DOJ, or a state attorney general acting in a criminal case may elect to pursue.", or "involve only a de minimis collection of monetary sanctions".

The proposed change would unmistakably solidify the Congress and the Commission's forthright intent to appropriately incentivize and absolutely reward whistleblower TCR(s) that result in any of the Commission's successful enforcement actions or "a particular form of an action", on a discretionary basis when enforcement actions resulting in monetary sanctions over \$1 million are not made or pursued in a particular form of an action.

*Congress explicitly noted the critical importance of providing financial incentives to promote whistleblowing to the SEC as it determined that "a critical component of the Whistleblower Program is the minimum payout that any individual could look towards in determining whether to take the enormous risk of blowing the whistle in calling attention to fraud." See "The Restoring American Financial Stability Act of 2010" report from the Committee on Banking, Housing, and Urban Affairs (April 30, 2010).

Thank you,

A handwritten signature in cursive script, appearing to read "Clarence N. Daniels".

Clarence N. Daniels