

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 100812 / August 23, 2024

WHISTLEBLOWER AWARD PROCEEDING
File No. 2024-36

In the Matter of the Claims for Awards

in connection with

Covered Action ^{Redacted}

^{Redacted}

^{Redacted}

ORDER DETERMINING WHISTLEBLOWER AWARD CLAIMS

The Claims Review Staff (“CRS”) issued Preliminary Determinations recommending that the Commission award joint claimants ^{Redacted} (the “Joint Claimants”) ^{Redacted} of the amounts collected or to be collected in the Covered Action,¹ or more than \$500,000 based on current collections, and award ^{Redacted} (“Claimant 4”) ^{Redacted} of the amounts collected to be collected in the Covered

¹ The Commission adopts the CRS’s recommendation ^{Redacted} ^{Redacted}, be considered part of the Covered Action under Securities Exchange Act Rule (hereafter “Rule”) 21F-4(d)(1) because the ^{Redacted} and the Covered Action arose from the same nucleus of operative fact. The claimants did not contest this recommendation.

The Commission also adopts the CRS’s recommendation to deny the Joint Claimants’ request ^{Redacted} ^{Redacted} be considered part of the Covered Action. ^{Redacted} ^{Redacted} which did not arise from the same investigation as the Covered Action and ^{Redacted} ^{Redacted}, involved different conduct and different defendants. The ^{Redacted} ^{Redacted} did not arise from the same nucleus of operative fact as the Covered Action. The Joint Claimants did not contest this recommendation.

Action, also more than \$500,000 based on current collections. None of the claimants contested the Preliminary Determinations.²

The recommendation of the CRS is adopted. The Joint Claimants voluntarily provided original information to the Commission that caused the Commission to open an investigation, and their original information led to the success of the Covered Action.³ The Joint Claimants provided independent analysis ^{Redacted} (“Issue A”).

Claimant 4 voluntarily provided original information to the Commission that significantly contributed to the success of the Covered Action by alerting Enforcement staff to a separate issue.⁴ Claimant 4 provided original information based on their independent knowledge ^{Redacted}

^{Redacted} (“Issue B”).

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^{Redacted}

Joint Claimants and Claimant 4

provided the Commission with information that was closely related to the conduct in the Covered

² The CRS also preliminarily determined to deny the claims of two other claimants. Those claimants did not contest their preliminary determinations, and their Preliminary Determinations have become Final Orders under Rule 21F-10(h).

³ See Rule 21F-4(c)(1), 17 C.F.R. § 240.21F-4(c)(1).

⁴ See Rule 21F-4(c)(2), 17 C.F.R. § 240.21F-4(c)(2).

⁵ Rule 21F-6(c)(1)(iv), 17 C.F.R. § 240.21F-6(c)(1)(iv).

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Action; and Claimant 4 also provided ongoing assistance in the form of a telephonic interview.

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The Commission finds it appropriate to set the Joint Claimants' award at ^{***} percent and Claimant 4's award at ^{***} percent. In making this determination, we have carefully considered the factors under Rule 21F-6(a) and the contributions of the claimants. Joint Claimants alerted the Commission to Issue A and caused Enforcement staff to open the investigation giving rise to the Covered Action. However, the Joint Claimants did not provide ongoing assistance and did not provide information to the Commission about Issue B. Claimant 4 alerted the Commission to Issue B, which helped increase the monetary sanctions the Commission was able to obtain from the respondent, but Claimant 4 did not alert the Commission to Issue A. Claimant 4 also provided ongoing assistance to Enforcement staff, as Claimant 4 engaged in a telephonic interview.

Accordingly, it is hereby ORDERED that the Joint Claimants shall receive an award of ^{Redacted} percent (^{***} %) and Claimant 4 shall receive an award of ^{Redacted} percent (^{***} %) of the monetary sanctions collected or to be collected in the Covered Action.

By the Commission.

Vanessa A. Countryman
Secretary