

FINAL ORDER- THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION WITH RESPECT TO CLAIMANT 10 ON OCTOBER 5, 2020 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

Notice of Covered Action [REDACTED]

PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the Securities and Exchange Commission received twelve whistleblower award claims, two of which were submitted jointly, for the above-referenced matter. Pursuant to Section 21F of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 21F-10 promulgated thereunder, the Claims Review Staff has evaluated the award claims in accordance with the criteria set forth in Rules 21F-1 through 21F-17. The Claims Review Staff sets forth its Preliminary Determinations as to each claimant as follows:

[REDACTED]

[REDACTED]

[REDACTED]

¹ [REDACTED]

² [REDACTED]

[REDACTED]

(Claimant 10)

No information provided by [REDACTED] Claimant 10, [REDACTED] led to the successful enforcement of the above-referenced Notice of Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) because none of the information that these claimants submitted:

1. caused the Commission to (i) commence an examination, (ii) open or reopen an investigation, or (iii) inquire into different conduct as part of a current Commission examination or investigation under Rule 21F-4(c)(1) of the Exchange Act; or
2. significantly contributed to the success of a Commission judicial or administrative enforcement action under Rule 21F-4(c)(2) of the Exchange Act.

In making this preliminary recommendation, we note that the record demonstrates that Enforcement staff responsible for the Covered Action opened the investigation based on [REDACTED] and not because of information provided by Claimants [REDACTED] 10, [REDACTED].

In addition, the information provided by Claimants [REDACTED] and 10 related to alleged misconduct by [REDACTED] occurring in countries other than [REDACTED], and none of the charges

[REDACTED]

brought by the Commission in the Covered Action related to alleged misconduct by [REDACTED] outside of [REDACTED]. The record demonstrates that the information submitted by these claimants had no role in any settlement negotiations or in determining the monetary sanctions in the Covered Action, which were exclusively based on misconduct by [REDACTED] in [REDACTED]. Therefore, Claimants [REDACTED] and 10 did not significantly contribute to the success of the Covered Action under Rule 21F-4(c)(2).⁴

[REDACTED]

⁴

[REDACTED]

⁵

[Redacted]

[Redacted]

By: Claims Review Staff

Date: July 15, 2020

7 [Redacted]