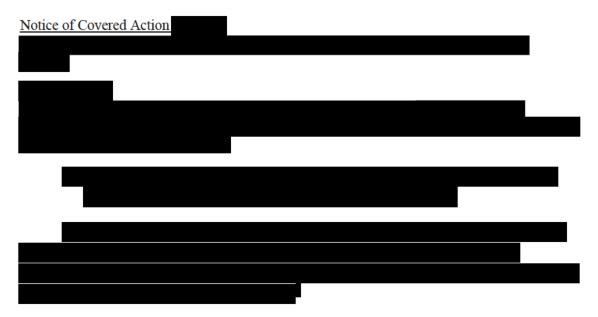


#### PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the Securities and Exchange Commission ("Commission") received whistleblower award claims from ("Claimant 3") (collectively, "Claimants") for the above-referenced Covered Action and Criminal Action. Pursuant to Section 21F of the Securities Exchange Act of 1934 (the "Exchange Act") and Rules 21F-10 and 21F-11 promulgated thereunder, the Claims Review Staff ("CRS") has evaluated these claims in accordance with the criteria set forth in Rules 21F-1 through 21F-18. The CRS sets forth its Preliminary Determinations for the award claimants as follows.







#### Claimant 3

The CRS has preliminarily determined to recommend that the Commission deny an award to Claimant 3. No information submitted by Claimant 3 led to the successful enforcement of the 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 the Claimant 3 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 determination, the CRS notes that the record demonstrates that Claimant 3's information was submitted after the Covered Action was filed and that Claimant 3's information did not pertain to violations of the federal securities laws or pertain to the charges in





the Covered Action. Claimant 3's information was not reviewed by the Enforcement staff that worked on the investigation that led to the Covered Action.<sup>3</sup>

By: Claims Review Staff
Date: September 27, 2021

<sup>&</sup>lt;sup>3</sup> To the extent that Claimant 3 applied for a related action award in connection with the Criminal Action, because Claimant 3 does not qualify for an award in the Covered Action, Claimant 3 is not eligible for a related action award in connection with the Criminal Action. A related action award may be made only if, among other things, the claimant satisfies the eligibility criteria for an award for the applicable covered action in the first instance. *See* 15 U.S.C. § 78u-6(b); Exchange Act Rule 21F-3(b), (b)(1); Rule 21F-4(g) and (f), and Rule 21F-11(a); Order Determining Whistleblower Award Claims, Release No. 34-84506 (Oct. 30, 2018); Order Determining Whistleblower Award Claims, Release No. 34-84503 (Oct. 30, 2018).