FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON JANUARY 22, 2021 AS TO CLAIMANTS 1 AND 2 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

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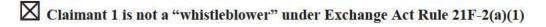
PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the U.S. Securities and Exchange Commission received whistleblower award claims from ("Claimant 1") and ("Claimant 2") 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 above claims in accordance with the criteria set forth in Rules 21F-1 through 21F-17.

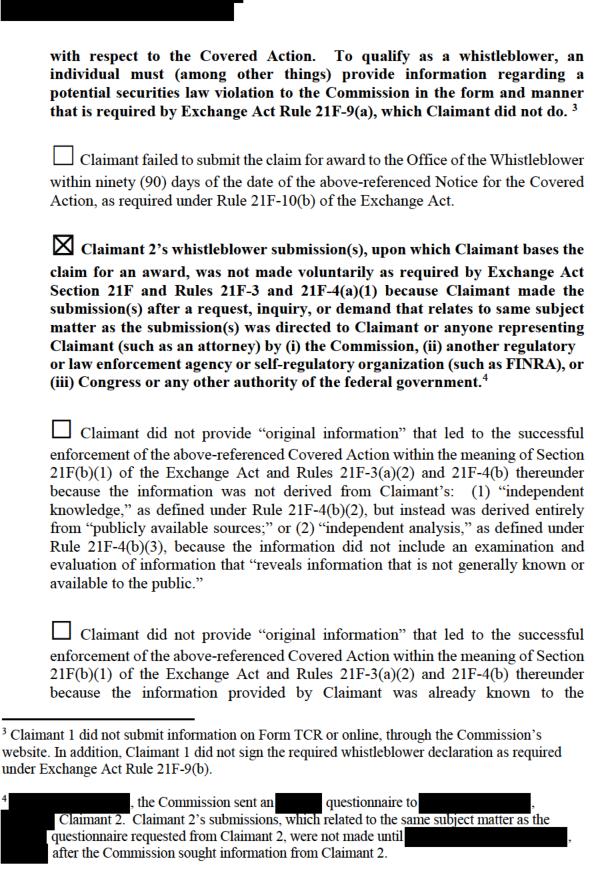
The Claims Review Staff has preliminarily determined to recommend that the Commission deny the above award claims.¹ The basis for this determination is marked below as follows:

Claimant 1 did not provide information that led to the successful enforcement of the above-referenced Covered Actions within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) thereunder because any information provided did not, under Rule 21F-4(c)(1) of the Exchange Act: (1) cause the Commission to (a) commence an examination, open or reopen an investigation, or inquire into different conduct as part of a current Commission examination or investigation, and (b) thereafter bring an action based, in whole or in part, on conduct that was the subject of claimants' information; or (2) significantly contribute to the success of a Commission judicial or administrative enforcement action under Rule 21F-4(c)(2) of the Exchange Act.²



¹ To the extent Claimants have applied for an award in a related action, because Claimants are not eligible for an award in an SEC Covered Action, they are not eligible for an award in connection with any related action. See 15 U.S.C. § 78u-6(b); Exchange Act Rule 21F-3(b), (b)(1); Rule 21F-4(g) and (f); Rule 21F-11(a); see also Order Determining Whistleblower Award Claim, Release No. 34-86902 (Sept. 9, 2019).

The information provided to the staff by Claimant 1 did not cause the staff to open the investigation of or inquire into different conduct as part of the investigation and the action filed was not based in whole or in part on conduct that was the subject of the information provided by Claimant 1. Enforcement staff opened the investigation based on Claimant 1 also did not significantly contribute to the success of the Covered Action, as Claimant 1's information was submitted approximately three years after the investigation was opened and shortly before the Commission filed the action. Claimant 1's information was duplicative of information staff had already learned or obtained during the course of the investigation.



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Notice of	f Covered Action:		
	Commission.		
	Claimant did not provide "original information" that led to the successification of the above-referenced Covered Action within the meaning of Section F(b)(1) of the Exchange Act and Rules 21F-3(a)(2) and 21F-4(b) thereund cause the information was not provided to the Commission for the first time after 21, 2010 (the date of enactment of the Dodd-Frank Wall Street Reform a consumer Protection Act). ⁵		
		By: C	laims Review Staff
		Date:	November 23, 2020

⁵ See Stryker v. SEC, 780 F.3d 163 (2d Cir. 2015).