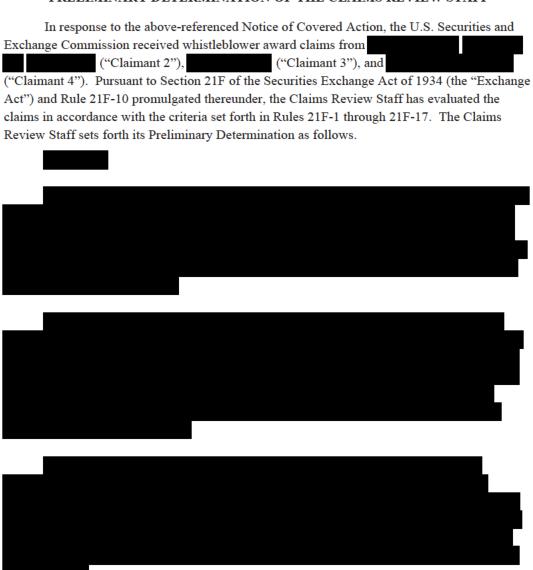
FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON AUGUST 17, 2020 AS TO CLAIMANTS 2, 3 AND 4 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

Notice of Covered Action	

PRELIMINARY DETERMINATION OF THE CLAIMS REVIEW STAFF



Claimant 2 and Claimant 3

Neither Claimant 2 nor Claimant 3 provided information that led to the successful enforcement of the above-referenced Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) thereunder because the information provided did not:

FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON AUGUST 17, 2020 AS TO CLAIMANTS 2, 3 AND 4 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

Notice of Covered Action	:

- a. cause 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
- b. significantly contribute 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 reflects that the Enforcement staff responsible for the Covered Action received no information from, nor had communications with, Claimant 2 or Claimant 3 before or during the Covered Action.

Claimant 4

Claimant 4 did not provide information that led to the successful enforcement of the abovereferenced Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) thereunder because the information provided did not:

- a. cause 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
- b. significantly contribute to the success of a Commission judicial or administrative enforcement action under Rule 21F-4(c) (2) of the Exchange Act.

In reaching this preliminary recommendation, we note that the record shows that Enforcement staff received Claimant 4's Form TCR after the Commission had filed its complaint in the Covered Action in and just one day prior to the court's entry of final judgment in the Covered Action. Additionally, while Claimant 4 and Claimant 4's counsel spoke with Enforcement staff responsible for the Covered Action prior to Claimant 4's filing of the Form TCR about the possibility of submitting a tip to the Commission, and Enforcement staff also spoke to Claimant 4 shortly after the final judgment was entered in this matter, none of the information provided by Claimant 4 was used in the Covered Action because it was received too late and was duplicative of information Enforcement staff had already received during the investigation, and as such, was not used in, and did not contribute in any way to the success of the Covered Action.

Additionally, Claimant 4 did not provide "original information" that led to the successful enforcement of the above-referenced Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(2) and 21F-4(b) thereunder because the information

FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON AUGUST 17, 2020 AS TO CLAIMANTS 2, 3 AND 4 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

Notice of Covered Action
provided by Claimant regarding the Covered Action Commission.
Furthermore, the Commission will not consider information to be derived from one's independent knowledge or independent analysis if it is obtained "in connection with the legal representation of a client on whose behalf [claimant] or [claimant's] employer or firm [was] providing service."

By: Claims Review Staff

Date: June 15, 2020