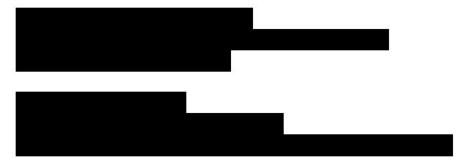


The Claims Review Staff has preliminarily determined to recommend that the Commission deny an award to Claimant 2 and Claimant 3. No information provided by Claimant 2 or Claimant 3 led to the successful enforcement of the above-referenced Notice of Covered Action within the meaning of Section 21F(b)(1) 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, and thereafter bring a successful enforcement action based in whole or in part on conduct that was the subject of the claimants' information, 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.²

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² In addition, Claimant 2 and Claimant 3 also applied for a related action award in connection with the Criminal Action. Because Claimant 2 and Claimant 3 do not qualify for an award in the Covered Action, their request for a related action award is denied. A related action award may be made only if, among other things, the claimant



In reaching this preliminary determination, we note that the record reflects that the investigation was opened based on information received from a source other than Claimant 2 and Claimant 3. By the time Enforcement staff responsible for the Covered Action received information from Claimant 2 and Claimant 3, the investigation had been ongoing for more than two years. The information provided by Claimant 2 and Claimant 3 related to alleged misconduct in provided by Claimant 2, respectively, and none of the charges brought by the Commission in the Covered Action related to misconduct occurring in either country. None of the information provided by Claimant 2 or Claimant 3 was used in, or had any impact on, the charges brought by the Commission in the Covered Action. The information provided by Claimant 2 and Claimant 3 did not save Commission time or resources nor did it lead to any additional charges against the company or help advance settlement discussions with the company.

By: Claims Review Staff

Date: September 19, 2022

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. 34-90247 (Oct. 22, 2020); Order Determining Whistleblower Award Claims, Release No. 34-84506 (Oct. 30, 2018); Order Determining Whistleblower Award Claims, Release No. 34-84503 (Oct. 30, 2018).

³ The record reflects that Claimant 2 also anonymously reported the alleged violations in to the company in and Claimant 3 anonymously reported the alleged violations in to the company in both of which were after the company self-reported to the Commission, which caused Enforcement staff to open the investigation that resulted in the Covered Action.

⁴ The record further reflects that the investigation into possible misconduct in was not based on information provided by Claimant 2. The record further reflects that the investigation into possible misconduct in the was not based on information provided by Claimant 3.