

I support the proposed changes to the whistleblower program. I am grateful for the efforts taken by the SEC in this proposal to support and reward individuals who expose crime.

Of the three reward-structure options outlined I am in favor of the 1. Comparability approach, 2. Top-off approach and 3. Whistleblower's choice approach, in that order.

My reason for preferencing the Comparability approach versus the Top-off approach is due to the SEC's comment that the top-off and offset options both entail a lot of additional work and processing delay. However, in support of the Top-off approach I would make the argument that allowing one or more whistleblower programs to share in the cost of reward payouts may be both an effective and ethical approach to reporting crime. By distributing the financial pressure of reward payout across multiple parties each party might then be further incentivized to make noise and take action at their own level of agency. (A hypothetical example being if a state agency whistleblower program is repeatedly forced to payout for misconduct that agency itself then has immediate incentive for addressing the underlying causes, while the SEC would be helpful as a support to the whistleblower and as a federal presence to insure compliance by the entity on the hook for payouts.)

I would further support any future proposal in which SEC employees and the SEC itself are rewarded 10~20% of the payout from any major successful actions against entities engaging in illegal behavior.

Regarding the request for comment on the ten bullet points at the end of the proposal: I do not have the nuance or understanding to have well-formed opinions about the details involved in each case. My general opinions on a few of the topics are as follows: 1) Using a percentage-based threshold instead of a fixed dollar amount threshold is more future-proof in case the program rules are not regularly updated. 2) Claimants failing to comply with the rules of the program should forfeit increasing percentages of the potential reward based on the extent of their failure to comply, but should not be wholly disqualified from reward unless egregious or malicious malcompliance is evidenced. 3) Please reconsider Rule 21F-3(b)(3) as noted in bulletpoint 4 and allow the SEC to award jointly with the CFTC instead of first-come-first served. As an individual investor I do not trust the CFTC to make decisions in my or the public's interest. In regards to this rule that includes willfully undercutting the SEC or other agencies by rewarding claimants first then purposefully not following up with actions that other agencies may then have taken.