

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 105170 / April 8, 2026

WHISTLEBLOWER AWARD PROCEEDING
File No. 2026-13

In the Matter of the Claim for an Award

in connection with

Redacted

Notice of Covered Action Redacted

ORDER DETERMINING WHISTLEBLOWER AWARD CLAIM

The Claims Review Staff (“CRS”) issued a Preliminary Determination in connection with the above-referenced Covered Action (the “Covered Action”)¹ recommending that the Commission award Redacted, Executor of the Estate of Redacted (“Claimant”), *** percent (%) of the monetary sanctions collected in the Covered Action, equal to a payment of over \$500,000.² Claimant provided written notice of Claimant’s decision not contest the Preliminary Determination.

The recommendation of the CRS is adopted. The record demonstrates that Claimant voluntarily provided original information to the Commission that led to the successful enforcement of the referenced Covered Action pursuant to Section 21F(b)(1) of the Exchange Act and Rule 21F-3(a) promulgated thereunder. The record supports the conclusion that Claimant satisfies the “led to” requirement under Exchange Act Rule 21F-4(c)(3).³ Here,

¹ Pursuant to Securities Exchange Act of 1934 (“Exchange Act”) Rule 21F-4(d)(1), we find that the Covered Action includes the following additional proceeding because it arose out of the same nucleus of operative facts as the Covered Action: Redacted .

² The CRS also preliminarily denied the award claim of another claimant who did not seek reconsideration. Accordingly, the preliminary denial became the Final Order of the Commission pursuant to Exchange Act Rule 21F-10(f), 17 C.F.R. § 240.21F-10(f).

³ Exchange Act Rule 21F-4(c)(3) provides that a claimant’s original information will be deemed to have led to a successful enforcement action if: (1) the whistleblower reported original information through an entity’s internal whistleblower, legal, or compliance procedures for reporting allegations of possible violations of law before or at the same time the whistleblower reported them to the Commission; (2) the entity later provided the whistleblower’s information to the Commission, or provided results of an audit or investigation initiated in whole or in part in

Claimant reported his/her concerns internally, including to his/her direct supervisor as well as to ^{Redacted} the Board of Directors of the company. Claimant's internal reporting caused the company to report the conduct to Commission staff, prompting the opening of the staff's investigation. The charges in the Covered Action closely align with the Claimant's internal reports to the company. Claimant also provided a TCR to the Commission within 120 days of providing the information to the company.⁴

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In coming to this determination, we

note that the record supports the conclusion that Claimant repeatedly reported his/her concerns to the company, which prompted an internal investigation by the company. Claimant also provided additional critical information to the staff during its investigation, including through investigative testimony, and ^{Redacted}

Redacted

Accordingly, it is hereby ORDERED that Claimant shall receive an award of ^{***} percent (^{***} %) of the monetary sanctions collected in the Covered Action.

By the Commission.

Vanessa A. Countryman
Secretary

response to information the whistleblower reported to the entity; and (3) the information the entity provided to the Commission satisfies either paragraph (c)(1) or (c)(2) of Rule 21F-4. Additionally, under paragraph (c)(3), the whistleblower must also submit the same information to the Commission in accordance with the procedures set forth in §240.21F-9 within 120 days of providing it to the entity.

⁴ The record also supports the conclusion that Claimant satisfies the "led to" requirement under Exchange Act Rule 21F-4(c)(2) as his/her information significantly contributed to the success of the Covered Action. Claimant provided critical additional information to the staff during the course of the investigation.