Preliminary Determination of the Claims Review Staff

In response to the above-referenced Notice of Covered Action (the “Covered Action”), the Securities and Exchange Commission received timely whistleblower award claims hereinafter referred to as “Claimant 1”), and separately submitted by (“Claimant 2”) (collectively, Claimants 1 and Claimant 2 are referred to as the “Claimants”). 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 these claims in accordance with the criteria set forth in Rules 21F-1 through 21F-17.

The Claims Review Staff has preliminarily determined to recommend to the Commission that the Claimants’ claims for awards in the Covered Action be denied. The information provided by the Claimants did not lead to the successful enforcement 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) thereunder because it 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.¹

By: Claims Review Staff

Date: September 27, 2018

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