FINAL ORDER- THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON JULY 23, 2020, WITH RESPECT TO JOINT CLAIMANTS PURSUANT TO RULE 21F-10(f) OF THE EXCHANGE ACT

Notice of Covered Action [redacted]

PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the Securities and Exchange Commission (the "Commission") received three timely whistleblower award claims. 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 each of these claims in accordance with the criteria set forth in Rules 21F-1 through 21F-17. The Claims Review Staff sets forth its Preliminary Determination as to each claimant as follows.

[redacted]

[redacted]

[redacted]

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Notice of Covered Action [redacted]

Joint Claimants [redacted]

The Claims Review Staff has preliminarily determined to recommend that the Commission deny joint claimants [redacted] award claims. Joint claimants [redacted] did not provide information that led to the successful enforcement of the above-referenced Covered Action within the meaning of Section 21F(b)(l) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) thereunder because the information they provided did not:

(1) cause the Commission to (a) commence an examination, open or reopen an investigation, or inquire into different conduct as part of a current Commission examination or investigation, and (b) thereafter bring an action based, in whole or in part, on conduct that was the subject of claimant's information under Rule 21F-4(c)(1) of the Exchange Act;

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

(3) involve (a) reporting 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 they reported them to the Commission, (b) the entity later providing their information to the Commission, or providing results of an audit or investigation initiated in whole or in part in response to information they reported to the entity, (c) the information the entity provided to the Commission satisfying either Rule 21F-4(c)(1) or Rule 21F-4(c)(2) of the Exchange Act, and (d) submitting the same information to the Commission in accordance with the procedures set forth in Section 240.21F-9 within 120 days of providing it to the entity under Rule 21F-4(c)(3) of the Exchange Act.

In reaching this preliminary recommendation, we note that the record reflects that the investigation that led to the Covered Action was not opened based on information provided by the joint claimants, but rather on the basis of self-reporting by the company as a result of tips that the company received from other persons which alerted the company to the violations that were ultimately charged in the Covered Action. In addition, none of the information provided by the

[2] We have preliminarily determined to treat the two claimants jointly as a "whistleblower" for purposes of the award determination given that they submitted their respective Forms WB-APP together, in a single package, via the same counsel and counsel has represented that the Form TCR, which was filed on an anonymous basis, was submitted on behalf of both applicants. *See* Exchange Act Section 21F(a)(6) (defining a "whistleblower" to include two or more individuals acting jointly who provide information relating to a violation of the securities laws to the Commission).

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Notice of Covered Action [redacted]

joint claimants contributed to the success of the Covered Action; the information did not relate to the conduct charged in the Covered Action and was not used in any way by the staff responsible for the investigation that resulted in the Covered Action.

By: Claims Review Staff

Dated: July 15, 2020