

**FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON JANUARY 27, 2025 AS TO CLAIMANT 5 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934**

[REDACTED]

Reference No. 01272025

**PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF**

In response to the above-referenced Notice of Covered Action, the Securities and Exchange Commission (“Commission”) received six whistleblower award claims for the above-referenced SEC enforcement action (“Covered Action”). 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-18. The Claims Review Staff sets forth its Preliminary Determination for each award claimant as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED] (Claimant 5)

The CRS has preliminarily determined to recommend that the Commission deny an award to Claimant 5.

To be eligible for an award, a putative whistleblower must voluntarily provide the Commission with original information that leads to the successful enforcement by the Commission of a federal court or administrative action in which the Commission obtains monetary sanctions totaling more than \$1,000,000.”<sup>1</sup> A submission is “voluntary” if it is provided “before a request, inquiry, or demand that relates to the subject matter of your submission is directed to you or anyone representing you (such as an attorney)” by the Commission or other federal agencies.<sup>2</sup> Claimant 5 does not satisfy the standard for voluntariness because Claimant 5 did not provide information to the Commission before Commission staff directed a request for information from Claimant 5.<sup>3</sup>

[REDACTED]

[REDACTED]

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<sup>1</sup> Exchange Act Rule 21F-3(a).

<sup>2</sup> Exchange Act Rule 21F-4(a)(1).

<sup>3</sup> Claimant 5’s information was first submitted to the Commission by another individual ([REDACTED]) over a year prior to Claimant 5’s TCR submission. After interviewing [REDACTED], and learning that Claimant 5 was on the audio recordings, Commission staff requested to interview Claimant 5. As such, Commission staff directed a request for information to Claimant 5 before Claimant 5 submitted information to the Commission.

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[REDACTED]

[REDACTED]

[REDACTED]

By: Claims Review Staff  
Date: November 26, 2024

<sup>4</sup> [REDACTED]