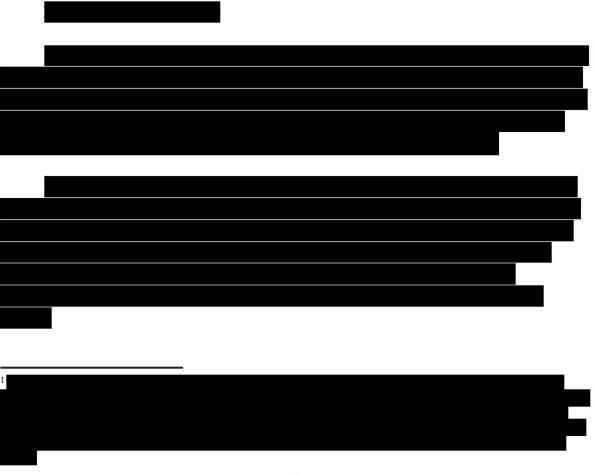


Reference Number: 09252023

PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the Securities and Exchange Commission ("Commission") received eleven 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:







The CRS has preliminarily determined to recommend that the Commission deny an award to Claimants 8, 9, and 11. No information submitted by Claimant 8, 9, or 11 led to the successful enforcement of the Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) because none of their information:

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

In making the determination, the CRS notes that the record reflects that the information submitted by Claimants 8, 9, and 11, respectively, did not cause the opening of the Covered Action investigation, which was opened based on a news report. Additionally, none of the information submitted by Claimants 8, 9, or 11, respectively, contributed to the success of the Covered Action. Enforcement staff responsible for the Covered Action did not receive or review information submitted by Claimants 8, 9, or 11, respectively, or communicate with them. Therefore, information submitted by Claimants 8, 9, and 11 had no impact on the staff's investigation or the Covered Action.

By: Claims Review Staff

Date: July 26, 2023

Rules 21F-3(b)(1); 21F-11(a).

⁴ Because Claimants 8, 9, and 11 are not eligible for an award in an SEC Covered Action, they are not eligible for an award in a related action. See Order Determining Whistleblower Award Claims, Exchange Act Release No. 86902 (Sept. 9, 2019). Additionally, the settled civil action brought by state civil action, and as such, does not qualify as a related action under the Commission's whistleblower rules. See