

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 106362 / September 15, 2026

ADMINISTRATIVE PROCEEDING
File No. 3-20310

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In the Matter of	:	ORDER DIRECTING SECOND
	:	DISBURSEMENT OF FAIR FUND
S&P Dow Jones Indices, LLC,	:	
	:	
Respondent.	:	
	:	

On March 21, 2022, the Division of Enforcement, pursuant to delegated authority, published a Notice of Proposed Plan of Distribution and Opportunity for Comment (“Notice”),¹ pursuant to Rule 1103 of the Commission’s Rules on Fair Fund and Disgorgement Plans (“Commission’s Rules”);² and simultaneously posted the Proposed Plan of Distribution (the “Proposed Plan”). The Notice advised interested persons that they could obtain a copy of the Proposed Plan from the Commission’s public website or by submitting a written request to Amy A. Sumner, United States Securities and Exchange Commission, Byron Rogers Federal Office Building, 1961 Stout Street, Suite 1700, Denver, CO 80294-1961. The Notice also advised that all persons desiring to comment on the Proposed Plan could submit their comments, in writing, within 30 days of the Notice. The Commission received no comments on the Proposed Plan

¹ See Exchange Act Rel. No. 94480 (Mar. 21, 2022).

² 17 C.F.R. § 201.1103.

during the comment period. On May 12, 2022, the Division of Enforcement, pursuant to delegated authority, issued an order approving the Proposed Plan,³ and posted the approved Plan of Distribution (the “Plan”).

The Plan provides for the distribution of the Fair Fund, plus accumulated interest, less taxes, fees, and expenses, to the harmed investors according to the methodology set forth in the Plan. In accordance with the Plan, the Claims Bar Date has passed and all timely submitted claims have been processed by the Fund Administrator. All investors whose claims have been denied, in whole or in part, have been notified and provided the opportunity to cure.

On September 18, 2023, the Commission issued an Order Directing Disbursement of Fair Fund (“Disbursement Order”).⁴ Pursuant to the Disbursement Order, the Fund Administrator has disbursed \$9,048,493.23. There is \$75,374.20 left in the Fair Fund as of July 24, 2026.

Given the amount remaining in the Fair Fund and after taking into account any taxes or administrative costs, the Fund Administrator recommends further distribution of the Fair Fund to two late claimants whose claims calculate above the Minimum Distribution Amount of \$10.00 as provided in the Plan of Distribution.

Pursuant to the Plan, the Fund Administrator has submitted a payment file to Commission staff with a reasonable assurances letter as to the completeness and accuracy of the information contained therein. The Commission staff has reviewed and accepted the payment file and requests, pursuant to Rule 1101(b)(6) of the Commission’s Rules, 17 C.F.R. § 201.1101(b)(6), that the Commission authorize the transfer of \$1,510.78 from the Fair Fund to the Fair Fund’s escrow account at Huntington National Bank for distribution by the Fund Administrator to the two claimants in accordance with the Plan.

³ See Exchange Act Rel. No. 94905 (May 12, 2022).

⁴ See Exchange Act Rel. No. 98414 (Sep. 18, 2023).

Accordingly, it is hereby ORDERED, that Commission staff shall transfer \$1,510.78 from the Fair Fund to the Fair Fund's escrow account, for a total distribution of \$1,510.78 by the Fund Administrator in accordance with the Plan.

For the Commission, by the Division of Enforcement, pursuant to delegated authority.⁵

Vanessa A. Countryman
Secretary

⁵ 17 C.F.R. § 200.30-4(a)(21)(v).