

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 106555 / September 30, 2026

ADMINISTRATIVE PROCEEDING
File No. 3-20963

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In the Matter of	:	ORDER DIRECTING SECOND
	:	DISBURSEMENT OF FAIR FUND
Eagle Bancorp, Inc.,	:	
	:	
Respondent.	:	
	:	

On February 5, 2024, 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 Allison J.P. Moon, United States Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549. 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 during the comment period.

¹ Notice of Proposed Plan of Distribution and Opportunity for Comment, Exchange Act Rel. No. 99465 (Feb. 5, 2024).

² 17 C.F.R. § 201.1103.

On April 3, 2024, 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 of Allocation attached to the Distribution Plan as Exhibit A. 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 29, 2025, the Commission issued an Order Directing Disbursement of Fair Fund (“Disbursement Order”).⁴ Pursuant to the Disbursement Order, the Fund Administrator has disbursed \$14,382,280.39. There is \$581,293.13 left in the Fair Fund, of which \$155,227.47 is held by the Fund Administrator in the Fair Fund’s Escrow Account at The Huntington National Bank (the “Escrow Account”).

Given the amount remaining in the Fair Fund, and after taking into account a reserve of \$218,224.47 for any Administrative Costs, the Fund Administrator recommends further disbursement of the Fair Fund to Payees who successfully received their Distribution Payments in the first disbursement.

Pursuant to the Plan, the Fund Administrator has submitted a Payee List 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 Payee List 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 \$207,841.12 from the

³ Order Approving Plan of Distribution, Exchange Act Rel. No. 99899 (Apr. 3, 2024).

⁴ Order Directing Disbursement of Fair Fund, Exchange Act Rel. No. 104131 (Sep. 29, 2025).

Commission-designated account at the U.S. Department of the Treasury (the “Treasury Account”) to the Escrow Account for disbursement by the Fund Administrator in accordance with the Plan.

Accordingly, it is hereby ORDERED, that Commission staff shall transfer \$207,841.12 from the Treasury Account and add it to the \$155,227.47 held in the Escrow Account, for a total disbursement of \$363,068.59 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).