

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No. 94789 / April 25, 2022

WHISTLEBLOWER AWARD PROCEEDING

File No. 2022-53

---

In the Matter of the Claim for Award

in connection with

Redacted

Notice of Covered Action Redacted

---

**ORDER DETERMINING WHISTLEBLOWER AWARD CLAIMS**

The Claims Review Staff (“CRS”) issued Preliminary Determinations recommending that joint claimants <sup>Redacted</sup> (“Claimant 1”) jointly receive a whistleblower award equal to <sup>Redacted</sup> percent ( <sup>\*\*\*</sup> %) of the monetary sanctions collected, or to be collected, in the above-referenced Covered Action. The CRS also recommended that joint claimants <sup>Redacted</sup> (“Claimant 2,” and together with Claimant 1, “Claimants”) jointly receive a whistleblower award equal to <sup>Redacted</sup> percent ( <sup>\*\*\*</sup> %) of the monetary sanctions collected, or to be collected, in the above-referenced Covered Action. The total whistleblower award to Claimants recommended by the CRS is approximately \$6 million. Claimants did not contest the Preliminary Determinations.<sup>1</sup>

The recommendation of the CRS is adopted. The record demonstrates that Claimants voluntarily provided original information to the Commission, and that this information led to the

---

<sup>1</sup> The CRS also preliminarily denied the award claims of one other claimant. That claimant did not seek reconsideration of the Preliminary Determinations, and therefore the denial of his/her claim was deemed to be the Final Order of the Commission under Exchange Act Rule 21F-10(f).

successful enforcement of the Covered Action.<sup>2</sup>

Applying the award criteria as specified in Rule 21F-6 of the Exchange Act based on the specific facts and circumstances here, we find that an award of \*\*\* % for Claimant 1 and \*\*\* % for Claimant 2 is appropriate.<sup>3</sup> In reaching that determination, we considered that Claimant 1 provided staff with key documents that led the staff to seek additional documents from the respondent, which formed the core of the Commission's case. Claimant 1 also provided ongoing assistance to the staff as the investigation progressed, providing documents and information to assist the staff's understanding of the respondent's business practices. With regard to Claimant 2, we considered that Claimant 2's information provided valuable first-hand accounts of the respondent's wrongdoing, and that Claimant 2 was familiar with the respondent's systems and business processes. Claimant 2 was also interviewed by the staff and provided continuing assistance, including on-the-record testimony.

Accordingly, it is hereby ORDERED that (1) Claimant 1 shall receive an award equal to <sup>Redacted</sup> percent (\*\*\* %) of the monetary sanctions collected, or to be collected, in the Covered Action, and (2) Claimant 2 shall receive an award equal to <sup>Redacted</sup> percent (\*\*\* %) of the monetary sanctions collected, or to be collected, in the Covered Action.<sup>4</sup>

By the Commission.

Vanessa A. Countryman  
Secretary

---

<sup>2</sup> See Exchange Act Section 21F(b)(1), 15 U.S.C. § 78u-6(b)(1); Exchange Act Rule 21F-3(a), 17 C.F.R. § 240.21F-3(a).

<sup>3</sup> In assessing the appropriate award amount for Claimants, Exchange Act Rule 21F-6 provides that the Commission consider: (1) the significance of information provided to the Commission; (2) the assistance provided in the Commission action; (3) law enforcement interest in deterring violations by granting awards; (4) participation in internal compliance systems; (5) culpability; (6) unreasonable reporting delay; and (7) interference with internal compliance and reporting systems. 17 C.F.R. § 240.21F-6.

<sup>4</sup> Unless Claimant 1 or Claimant 2, within ten (10) calendar days of the issuance of this Order, makes a joint request, in writing, for a different allocation of the award, the Office of the Whistleblower is directed to pay each member of Claimant 1 individually one-half of their joint award and to pay each member of Claimant 2 individually one-third of their joint award.