

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 90347 / November 5, 2020

ADMINISTRATIVE PROCEEDING
File No. 3-17212

In the Matter of :

Logitech International, S.A. :
Michael Doktorczyk and :
Sherralyn Bolles, CPA, :

Respondents. :

ORDER DIRECTING
DISBURSEMENT OF FAIR FUND

On September 6, 2018, the Secretary, 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 The Notice advised interested persons that they could obtain a copy of the Proposed Plan of Distribution (“Proposed Plan”) from the Commission’s public website or by submitting a written request to Catherine E. Pappas, Senior Adviser, United States Securities and Exchange Commission, One Penn Center, 1617 JFK Blvd., Ste. 520, Philadelphia, PA 19103. 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. On October 26, 2018, the Secretary, pursuant to

¹ Exchange Act Rel. No. 84044 (Sept. 6, 2018).

² 17 C.F.R. § 201.1103.

delegated authority, issued an order approving the Proposed Plan,³ and posted the Plan of Distribution (the “Plan”).

The Plan provides for the distribution of the Fair Fund,⁴ plus accumulated interest, less taxes, fees, and expenses (the “Net Fair Fund”), to the harmed investors according to the methodology set forth in the Plan.

In accordance with the Plan, the Fund Administrator has submitted a Payee List in a Commission-approved format, along with a reasonable assurance letter as to its completeness and accuracy. The Commission staff has reviewed the Payee List⁵ and reasonable assurance letter 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 \$2,892,751.29 from the Fair Fund to the Fair Fund’s escrow account at The Huntington National Bank for distribution by the Fund Administrator to the Eligible Claimants in accordance with the Plan. In accordance with the Plan, the Claim Deadline has passed and all timely submitted claims have been processed by the Fund Administrator. All investors whose claims have been determined ineligible, in whole or in part, have been notified and provided the opportunity to cure.

³ See Exchange Act Rel. No. 84493 (Oct. 26, 2018).

⁴ The Fair Fund includes the \$7.575 million in civil money penalties paid by the Respondents, as well as an additional \$224,000 collected in a related district court proceeding against two former officers of Logitech. See *SEC v. Bardman, et al.*, 16-cv-2023 (N.D. Cal.), Dkt. No. 97.

⁵ Capitalized terms not defined herein are defined in the Plan.

Accordingly, it is hereby ORDERED, that Commission staff shall transfer \$2,892,751.29 from the Fair Fund to the Fair Fund's escrow account at The Huntington National Bank, and the Fund Administrator shall distribute such monies to the Eligible Claimants in accordance with the Plan.

By the Commission.

Vanessa A. Countryman
Secretary