FINAL ORDER - THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON OCTOBER 9, 2020

AS TO CLAIMANTS 1, 3 AND 4 PURSUANT TO RULE 21F-10(f) OF THE SECURITIES EXCHANGE ACT OF 1934

Notice of Covered Action:	

PRELIMINARY DETERMINATIONS OF THE CLAIMS REVIEW STAFF

In response to the above-referenced Notice of Covered Action, the U.S. Securities and Exchange Commission received whistleblower award claims from ("Claimant 1"), ("Claimant 3") and ("Claimant 4") (collectively, "Claimants") for the above-referenced matter(s). 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 the above claims in accordance with the criteria set forth in Rules 21F-1 through 21F-17.

The Claims Review Staff has preliminarily determined to recommend that the Commission deny the above award claims. The basis for this determination is marked below as follows:

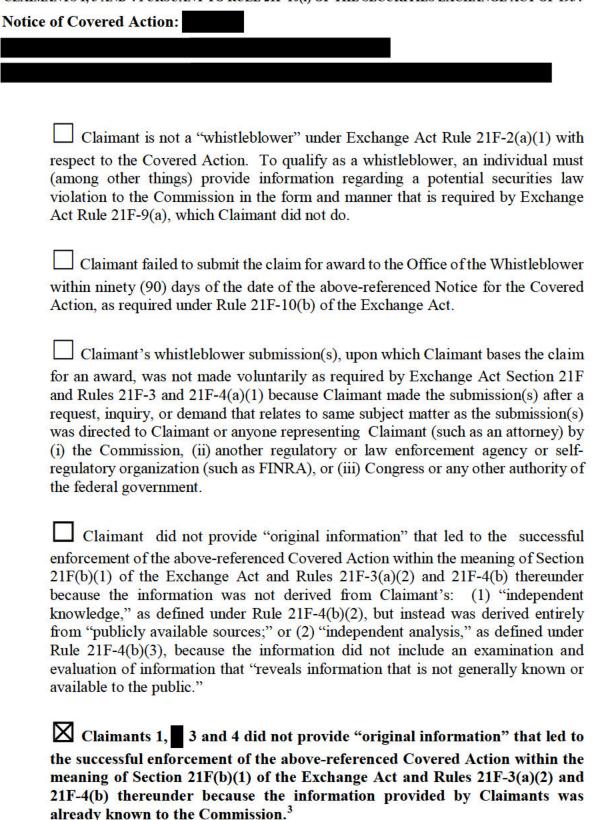
Claimants 1, 3 and 4 did not provide information that led to the successful enforcement of the above-referenced Covered Actions within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(3) and 21F-4(c) thereunder because any information provided did not, under Rule 21F-4(c)(1) of the Exchange Act: (1) cause the Commission to (a) commence an examination, open or reopen an investigation, or inquire into different conduct as part of a current Commission examination or investigation, and (b) thereafter bring an action based, in whole or in part, on conduct that was the subject of claimants' information; or (2) significantly contribute to the success of a Commission judicial or administrative enforcement action under Rule 21F-4(c)(2) of the Exchange Act.²

¹ To the extent Claimants have applied for an award in a related action, because Claimants are not eligible for an award in an SEC Covered Action, they are not eligible for an award in connection with any related action. See 15 U.S.C. § 78u-6(b); Exchange Act Rule 21F-3(b), (b)(1); Rule 21F-4(g) and (f); Rule 21F-11(a); see also Order Determining Whistleblower Award Claim, Release No. 34-86902 (Sept. 9, 2019).

² None of the Claimants provided information that caused the Covered Action investigation to open. Staff opened the investigation based on a source other than Claimants prior to receiving any information from Claimants. None of the Claimants provided information that significantly contributed to the success of the Covered Action. While Enforcement staff responsible for the Covered Action received information from the Claimants, their information was submitted after the investigation had opened and was duplicative of information staff was already aware of through their investigative efforts. None of the Claimants' information was used in or had any impact on the Commission's charges in the Covered Action.

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³ Claimant 1, 3 and 4's information was submitted after the Covered Action investigation had opened and was duplicative of information Enforcement staff had already learned during the course of the investigation prior to receiving Claimants' tips. Although not a basis for the denial,

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Notice of Covered Action:		
	Claimant did not provide "original information" that led to the successful enforcement of the above-referenced Covered Action within the meaning of Section 21F(b)(1) of the Exchange Act and Rules 21F-3(a)(2) and 21F-4(b) thereunder because the information was not provided to the Commission for the first time after July 21, 2010 (the date of enactment of the Dodd-Frank Wall Street Reform and Consumer Protection Act). ⁴ By: Claims Review Staff	
	Date: August 10, 2020	

we also note that Claimant 1's tips, which were submitted years after Enforcement staff opened the Covered Action investigation, appear to be derived from publicly available sources and did not include any additional analysis, evaluation or insight and did not reveal information that was not apparent from the face of the publicly available materials.

⁴ See Stryker v. SEC, 780 F.3d 163 (2d Cir. 2015).