

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 102512 / March 3, 2025

WHISTLEBLOWER AWARD PROCEEDING
File No. 2025-19

In the Matter of the Claim for an
Award in connection with
Redacted
Redacted
Notice of Covered Action Redacted

ORDER DETERMINING WHISTLEBLOWER AWARD CLAIM

The Claims Review Staff (“CRS”) issued a Preliminary Determination recommending that Redacted (“Claimant”) receive a whistleblower award of ten percent (10%) of the monetary sanctions collected, or to be collected, in the above-referenced Covered Action (the “Covered Action”), which based on current collections would result in no payment. Claimant provided written notice of Claimant’s decision not to contest the Preliminary Determination.

The recommendation of the CRS is adopted. The record demonstrates that Claimant voluntarily provided original information to the Commission that led to the successful enforcement of the Covered Action.

Rule 21F-6(c) establishes a presumption of a statutory maximum award of 30% where (1) the maximum award would be \$5 million or less; (2) none of the negative award factors under Rule 21F-6(b)—*i.e.*, culpability or involvement in the misconduct, unreasonable reporting delay, or interference with an internal compliance and reporting system—are present; and (3) the award claim does not trigger Rule 21F-16.¹ The Commission may depart from the presumption if (1)

¹ Rule 21F-16 concerns whistleblowers who engage in culpable conduct. *See* 17 C.F.R. § 240.21F-16.

the assistance provided by the whistleblower was, “under the relevant facts and circumstances, limited,” or (2) a maximum award “would be inconsistent with the public interest, the promotion of investor protection, or the objectives of the whistleblower program.”² The Commission does not apply the presumption of a maximum award here because of Claimant’s involvement in the underlying misconduct.

In determining the amount of an award for Claimant, the Commission considered the factors set forth in Rule 21F-6 of the Exchange Act as they apply to the facts and circumstances of Claimant’s application: (i) the significance of information provided to the Commission; (ii) the assistance provided in the Covered Action; (iii) the law enforcement interest in deterring violations by granting awards; (iv) participation in internal compliance systems; (v) culpability or involvement in the misconduct; (vi) unreasonable reporting delay; and (vii) interference with internal compliance and reporting systems.

The Commission positively assesses that (1) Claimant’s information was significant in that it alerted staff to the fraud and caused the Commission to open the investigation that led to the Covered Action; (2) Claimant continued to provide information that assisted the investigation, and (3) Claimant’s information conserved Commission resources.

The Commission negatively assesses that, although Claimant did not know about the fraud the Commission charged, Claimant was involved in the misconduct

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Claimant’s role in the

fraud therefore warrants a significant reduction in the award.

Accordingly, it is hereby ORDERED that Claimant shall receive an award of ten percent (10%) of the monetary sanctions collected or to be collected in the Covered Action.

By the Commission.

J. Matthew DeLesDernier
Deputy Secretary

² Rule 21F-6(c)(1)(iv); 17 C.F.R. § 240.21F-6(c)(1)(iv).