

FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAUSE THE FINAL ORDER OF THE COMMISSION ON DECEMBER 27, 2022 PURSUANT TO SECTION 165.7(h) OF THE WHISTLEBLOWER RULES, 17 C.F.R. PART 165, ADOPTED PURSUANT TO SECTION 23 OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 26.

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In the Matter of Claims for Award by: )  
 )  
Withdrawn (“Claimant 1”), )  
Withdrawn and )  
 )  
Redacted (“Claimant 2”), )  
Redacted )  
 )  
In Connection with )  
Notice of Covered Action No. Redacted )  
 )  
 )

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**PRELIMINARY DETERMINATION OF THE CLAIMS REVIEW STAFF**

The Commodity Futures Trading Commission (“Commission”) received whistleblower award applications from Claimant 1 and Claimant 2 (collectively, “Claimants”) in response to the above-referenced Notice of Covered Action regarding Redacted

Redacted (“Order” or “Covered Action”). The

Claims Review Staff has evaluated each of the applications in accordance with the Commission’s Whistleblower Rules, 17 C.F.R. pt. 165 (2021), promulgated pursuant to Section 23 of the Commodity Exchange Act, 7 U.S.C. § 26 (2018). The Claims Review Staff sets forth its Preliminary Determination for Claimants as follows:

1. The Claims Review Staff has determined to recommend that the Commission deny both applications because Claimants did not provide information that led to the successful enforcement outcome in the Covered Action. *See* 17 C.F.R. § 165.2(i). Division of Enforcement (“Division”) staff responsible for the investigation did not contact Claimants or use any information provided by Claimants to bring, investigate, or settle the Covered Action.

**PUBLIC VERSION**

2. Throughout the investigation leading to the Order, Division staff relied instead on documents and information provided by <sup>Redacted</sup> and other financial institutions, as well as statements made by their employees and former employees. Division staff also relied on data analysis conducted by Division economists and outside experts.

Dated: October 26, 2022

Whistleblower Claims Review Staff  
Commodity Futures Trading Commission  
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