

Claimant's information was quite significant because it, and it alone, caused the Division of Enforcement ("Division") to open the investigation underlying the Covered Action and described the conduct that ultimately appeared in the Order. *See* 17 C.F.R. §§ 165.2(i)(1), 165.9(b)(1). Claimant observed that

likewise highlighted , and the Order

. Also, Claimant noted , and the Order similarly refers to

Claimant's information also proved significant because it was useful during the investigation. Division staff were able to use Claimant's information as a basis for

However, Claimant's assistance was limited to the information he/she provided in two duplicate TCR submissions to the Commission. Division staff did not have any contact with Claimant or receive additional information from Claimant in connection with the Covered Action. Nor does Claimant claim to have assisted the Commission in any way besides his/her TCR submissions.

The CRS considered all the factors, including whether Claimant participated in internal compliance systems. *See* 17 C.F.R. § 165.9(b)(4). However, as noted above, Claimant was an employee of the type described in Rule 165.2(g)(5), 17 C.F.R. § 165.2(g)(5). The Commission designed this award percentage factor to "provide whistleblowers who are otherwise pre-disposed to report internally ... with additional economic incentives to continue to report internally." Whistleblower Incentives and Protection, 76 Fed. Reg. 53,172, 53,194 (Aug. 25, 2011). Any "employee whose principal duties involved compliance or internal audit responsibilities" is not "pre-disposed" to report internally, but required and paid to do so. Thus, the CRS did not recommend increasing the award percentage based on this factor under these circumstances.

The Commission agrees with the CRS's recommended award percentage. As of the date of this Order Determining Whistleblower Award Claims, of the in monetary sanctions imposed in the Covered Action has been collected, so this award will yield a payment of for Claimant. Accordingly, it is hereby ORDERED that Claimant shall receive *** of the monetary sanctions collected, or to be collected, in the Covered Action.

By the Commission.

A handwritten signature in black ink that reads "Robert Sidman". The signature is written in a cursive style with a horizontal line underneath it.

Robert Sidman
Deputy Secretary of the Commission
Commodity Futures Trading Commission

Dated: March 14, 2024