

FINAL ORDER – THIS PRELIMINARY DETERMINATION BECAME THE FINAL ORDER OF THE COMMISSION ON JANUARY 14, 2025 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:	)
	)
Redacted (“Claimant 1”),	)
Redacted	)
	)
; 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 on Forms WB-APP from the claimants listed above (collectively, “Claimants”) in response to the above-referenced Notice of Covered Action regarding \*\*\*

Redacted

(“Order” or “Covered Action”). The Order imposed monetary sanctions totaling Redacted, of which Redacted has been collected.

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

1. The CRS has determined to recommend that the Commission deny Claimants’ applications because they fail to meet the requirements of Section 23 of the Act and the Rules.

2. Neither of the Claimants provided information that led to the successful enforcement of the Covered Action, as defined by Rule 165.2(i), 17 C.F.R. § 165.2(i). Such information is a requirement for an award. *See id.* § 165.5(a).

- Neither Claimant 1 nor Claimant 2 alleged conduct of the type at issue in the Covered Action.
- Claimant 2 named entities affiliated with the respondents in the Covered Action (“Respondents”) in his/her information, but not either of the Respondents. Additionally, Claimant 2’s award application cites only contact with Division staff not assigned to the Covered Action.
- Staff of the Commission’s Division of Enforcement (“Division”) who were assigned to the Covered Action obtained all the information for the Covered Action, including the information that caused the opening of the underlying investigation, from sources other than Claimants.
- These Division staff were not aware of and did not communicate with either of the Claimants in connection with the Covered Action.
- Claimants’ information did not contribute at all to the Covered Action, because Division staff assigned to the Covered Action did not use any of Claimants’ information in the course of the Covered Action.

By: Whistleblower Claims Review Staff  
Commodity Futures Trading Commission

Dated: November 14, 2024