

FREQUENTLY ASKED QUESTIONS

WHISTLEBLOWER REWARDS FOR INFORMANTS WHO REPORT VIOLATIONS OF WILDLIFE TRAFFICKING LAWS

Prepared in Conjunction with the Remarks of
Stephen M. Kohn, Executive Director
National Whistleblower Center¹
Before the Advisory Council on Wildlife Trafficking

www.whistleblowers.org
contact@whistleblowers.org

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1. Are wildlife whistleblowers eligible for rewards?

Yes! The Lacey Act includes language providing monetary incentives to anyone who discloses information about wildlife crimes.² Further, the Fish and Wildlife Improvement Act explicitly ensures that rewards can be paid to whistleblowers who report violations of **any** law administered by the United States Fish and Wildlife Service or by the National Marine Fisheries Service relating to fish, wildlife or plants.³

Other laws that protect wildlife also contain similar reward provisions, including the Endangered Species Act and the Rhinoceros and Tiger Conservation Act. Additionally, whistleblowers who report illegal wildlife trafficking may also be covered under other, more traditional, whistleblower reward laws, such as the Foreign Corrupt Practices Act (bribery of foreign officials) or the False Claims Act (customs violations).

¹ Stephen M. Kohn is a partner in the law firm of Kohn, Kohn & Colapinto, LLP (<http://www.kkc.com>.) and the Executive Director of the National Whistleblower Center (<http://www.whistleblowers.org>.) He has represented whistleblowers since 1984, is the author of seven books on whistleblower law (including the popular *Whistleblower's Handbook*) and teaches whistleblower law at Northeastern University School of Law. He currently represents whistleblowers, including national and international clients under the False Claims Act, Foreign Corrupt Practices Act, Lacey Act and the Dodd Frank Act. He frequently consults with Congressional committees on whistleblower legislation, and provided assistance in the drafting of the Whistleblower Protection Enhancement Act, Sarbanes-Oxley Act and Dodd-Frank Act, among others. In 2016 the NWC was selected as a Grand Prize winner of the Wildlife Crime Tech Challenge, a program sponsored by the U.S. Agency for International Development, in partnership with National Geographic, the Smithsonian Institute and TRAFFIC. Information on the NWC's program can be found at: <https://wildlifecrimetech.org/grandprizewinners> and https://wildlifecrimetech.org/blog?article_id=10.

² 16 U.S.C. § 3375(d).

³ 16 U.S.C. § 7421(k).

(See Exhibits 1 and 2 for the relevant statutory text included in the Lacey Act and the Fish and Wildlife Improvement Act).

(For a complete overview of the wildlife trafficking whistleblower laws *see* “Monetary Rewards for Wildlife Whistleblowers: A Game-Changer in Wildlife Trafficking Detection and Deterrence, 46 ENVIRONMENTAL LAW REPORTER 10054 (2016).”⁴

2. Why did Congress include the reward provisions referenced above?

Congress amended the Lacey Act in 1981 to provide “powerful”, “more effective enforcement tools to the wildlife agencies of the state and the Federal Government.”⁵

3. Have similar reward laws been successful in other arenas?

Absolutely! The effectiveness of incentivizing insiders to report corruption has been praised by *all* federal agencies with authority to grant rewards.⁶ These agencies and programs include:

- Department of Justice - False Claims Act:
 - The “impact” of the reward laws “has been nothing short of profound. Some of these [cases] may have saved lives. All of them saved money.”
--Eric Holder, Attorney General⁷
- Securities and Exchange Commission - Foreign Corrupt Practices Act:
 - The “whistleblower program . . . has rapidly become a tremendously effective force-multiplier, generating high quality tips, and in some cases virtual blueprints laying out an entire enterprise, directing us to the heart of the alleged fraud.”
--Mary Jo White, Chair, Securities and Exchange Commission⁸

(See Exhibit 3 for additional words of support)

⁴ “Monetary Rewards” is linked at https://www.kkc.com/assets/site_18/files/reward-wildlife-whistleblowers.pdf.

⁵ H.R. REP. 97-276 (“A massive illegal trade in fish and wildlife . . . has been uncovered . . . The serious consequences of such trade may include the introduction of exotic diseases which threaten the agriculture and pet industries . . . and the ultimate threat to the survival of the species itself. The purpose of [the 1981 amendment] is to provide more effective enforcement tools to the wildlife agencies of the state and the Federal Government to control this trade.”)

⁶ *See*, NWC, “*The Importance of Whistleblower Rewards in Combating International Corruption*,” linked at, https://www.kkc.com/assets/site_18/files/anti-corruption-report.pdf.

⁷ Remarks at the 25th Anniversary of the False Claims Act (Jan. 31, 2012), <http://www.justice.gov/opa/speech/attorney-general-eric-holder-speaks-25th-anniversary-false-claims-act-amendments-1986>.

⁸ Mary Jo White, Chair, U.S. Securities & Exchange Comm’n, Remarks at the Securities Enforcement Forum (Oct. 9, 2013), <https://www.sec.gov/News/Speech/Detail/Speech/1370539872100>.

4. Has the success been objectively quantified?

Yes. The Department of Justice has attributed **69% of the total United States civil fraud recoveries** between October 1, 1987 and September 30, 2016 to whistleblowers. Because of whistleblowers, the U.S. government has recovered more than \$37.685 billion dollars.⁹

(See Exhibit 4)

5. Are there any academic studies that have validated whistleblower rewards?

Yes. The University of Chicago Booth School of Business studied all reported fraud cases in large U.S. companies between 1996 and 2004 to determine the most effective mechanisms for detecting corporate fraud.¹⁰ The study concluded that whistleblowers were the key to fraud detection:

- “A strong monetary incentive to blow the whistle does motivate people with information to come forward.”
- “Having...monetary rewards has a significant impact on the probability a stakeholder becomes a whistleblower”
- “[T]here is no evidence that having stronger monetary incentives to blow the whistle leads to more frivolous suits.”

6. Is there a reward law similar to the Lacey Act that has been successfully used?

Yes, the reward provision in the Act to Prevent Pollution from Ships (APPS) is very similar to the Lacey Act reward provision, and has been crucial to enforcement. APPS governs the illegal dumping of oil on the high seas in violation of the MARPOL Convention. Both the wildlife protection laws and APPS cover violations of international conventions that occur outside the United States. The Department of Justice has explained that the reward program “serves a valuable law enforcement purpose by *encouraging those most likely to know of the illegal conduct to report it and cooperate with law enforcement*,”¹¹ and has made the United States the leading country in enforcing MARPOL. Over 50% of prosecutions under APPS rely on whistleblowers.¹²

⁹ Civil Division, Department of Justice, “Fraud Statistics – Overview,” (Oct. 1, 1987-Sept. 30, 2016). The DOJ reward chart is linked at

https://www.kkc.com/assets/site_18/files/blog/2016dojfraudrecoveries.pdf.

¹⁰ See I.J. Alexander Dyck et al., *Who Blows the Whistle on Corporate Fraud?* 4 (Chicago Booth School of Business Research Paper Series No. 08-22, Center for Research in Securities Prices Working Paper No. 618 Oct. 2008), linked at

<http://www.whistleblowers.org/storage/documents/univofchicagowhoblowswhistle.pdf>.

¹¹ Motion for Statutory Award Payment at 2, *United States v. Noble Drilling (U.S.) LLC*, No. 3:14-cr-00114-RRB (D. Alaska Dec. 18, 2014)

¹² Marine Defenders, Rewards for Whistleblowers, <http://www.marinedefenders.com/commercial/rewards.php>.

However, the APPS whistleblower provision is weaker than the wildlife whistleblower laws. Under APPS, the Justice Department must ask a court to approve a whistleblower rewards, and the rewards are capped at 50% of any collected penalty. The wildlife laws have no such cap and do not require the government to file a separate motion.

(See Exhibit 5)

7. Why is the APPS whistleblower award provision necessary?

In the words of the Department of Justice:

- “The APPS whistleblower award provision serves a valuable law enforcement purpose. Violations of the kind seen in this action are exceedingly difficult to detect. They typically occur far offshore beyond monitoring by the Coast Guard. Illegal dumping is easy to conceal...The only way such offenses are likely to come to the attention of the Coast Guard is where low ranking crew members with knowledge step forward.

“Unfortunately, crew members seldom step forward because providing incriminating information against senior officers is fraught with peril. While at sea, crew members are vulnerable to physical harm and other abuses. At the conclusion of a voyage, crew members risk being fired and subsequently blacklisted from future employment on other vessels....

“A monetary award under APPS serves several important functions. It rewards crew members for taking the personal and professional risks associated with coming forward and providing information. With respect to future offenses, it provides an incentive to crew members to alert inspectors and investigators to crimes. Finally, it provides some measure of compensation when crew members are financially harmed as a result of their cooperation.”¹³

8. Is paying rewards consistent with the current mandate from Congress?

Yes. As Congress recently reiterated in enacting the Eliminate, Neutralize and Disrupt [END] Wildlife Trafficking Act of 2016, “it is the policy of the United States to take immediate actions to stop the illegal global trade in wildlife and wildlife products and associated transnational organized crime.” 16 U.S.C. § 7612(1). The statutory language builds on the policies set forth in Executive Order No. 13648, which established the Presidential Taskforce on Wildlife Trafficking.

¹³ *United States v. Norbulk Shipping UK, LTD*, Government’s Unopposed Motion for Whistleblower Awards, No. 15-CR-00294 (D. N.J. July 16, 2015), linked at <http://www.whistleblowers.org/storage/docs2/APPS/NorbulkShippingUK/motion%20for%20reward.pdf>.

The reward provisions in the Fish and Wildlife Improvement Act provide the perfect tool to accomplish the policy goals set forth in the END Wildlife Trafficking Act. Congress explained that one of the purposes of the END Act was to “support the efforts of, and collaborate with, individuals, communities, local organizations and foreign governments to combat poaching and wildlife trafficking.” 16 U.S.C. § 7611(5). Because many of the violations that comprise wildlife trafficking offenses originate in foreign commerce or are extraterritorial in inception, international whistleblowers cannot take advantage of many of the protections granted to United States citizens under other U.S. laws. Rewarding whistleblowers who report wildlife trafficking violations that could result in a successful prosecution if jurisdiction was ultimately established under U.S. law is key to promoting the detection of wildlife crimes.

(See Exhibit 6)

9. Has the United States paid rewards to non-U.S. citizens?

Yes! Foreign sources have been an invaluable asset to the United States. All federal agencies that implement laws for which the violations can originate overseas actively solicit and support foreign whistleblowers.

The Securities and Exchange Commission (SEC) ’s Office of the Whistleblower has noted, “allowing foreign nationals to receive awards under the program best effectuates the clear Congressional purpose underlying the award program.”¹⁴ Between FY 2011 and 2015, the SEC received 1,557 international whistleblower tips.¹⁵

(See Exhibit 7)

10. Will paying rewards interfere with or detract from funds for conservation?

Absolutely not. Paying rewards will incentivize reporting, which in turn will allow the government to prosecute more crimes, resulting in increased criminal penalties and thus more money for direct conservation. This cycle is exemplified in Act to Prevent Pollution from Ships (APPS) prosecutions. The total amount collected from successful prosecutions is substantially higher than the reward paid to the whistleblower (without whom there often would be no case). Specifically, the whistleblower reward is only based on monies obtained for the APPS violation. Most APPS cases also include convictions based on laws for which rewards are not included, such as obstruction of justice or violations of the Clean Water Act.

In the 70 most recent APPS cases in the public record for which a whistleblower was responsible for detecting the violation and triggering the successful investigation, the plea agreements/judgments entered by the courts have directed \$45 million to environmental and conservation organizations, returned \$100 million to the U.S. Treasury, and awarded

¹⁴ SEC, Annual Report on the Dodd-Frank Whistleblower Program (2014).

¹⁵ SEC, Annual Report on the Dodd-Frank Whistleblower Program (2015).

whistleblowers \$31.8 million. The whistleblower's share of the collected proceeds was the smallest portion of the required payments.

Far more important than the sanctions obtained, the whistleblower disclosures were able to hold wrongdoers accountable, force companies to enter into aggressive compliance agreements to prevent future pollution and act as a deterrent on other ship owners.

11. What is the difference between a tip line and a reward program?

It is well documented that monetary incentives motivate those with information to come forward.¹⁶ "One of the critical challenges facing both [Enforcement and Compliance] officers and government enforcement officials is convincing employees to step forward when misconduct occurs."¹⁷ Without such an incentive, those with information are unlikely to put their jobs and safety at risk and call a tip line.

Further, employees who report wrongdoing under a reward law are incentivized to provide detailed and high quality evidence, and are further incentivized to work closely with law enforcement on an ongoing basis in order to help ensure that there is a successful prosecution. The whistleblower is rewarded based on the quality of his or her information, and the ability of the United States to obtain credible and admissible evidence as a result of their cooperation.

This has led officials who work with whistleblowers under these programs to comment as to the high quality of information provided under whistleblower reward programs:

- "The Securities and Exchange Commission's whistleblower program . . . has resulted in investigative staff receiving a **substantial volume of high quality information**. It has allowed our investigative staff to work more efficiently and permit permitted us to better utilize agency resources."¹⁸
- "[T]he [Securities and Exchange Commission]'s whistleblower program . . . has rapidly become a **tremendously effective force-multiplier**, generating high quality tips and, in some cases, **virtual blueprints laying out an entire enterprise, directing us to the heart of an alleged fraud**."¹⁹

¹⁶ See I.J. Alexander Dyck et al., *Who Blows the Whistle on Corporate Fraud?* 4 (Chicago Booth School of Business Research Paper Series No. 08-22, Center for Research in Securities Prices Working Paper No. 618 Oct. 2008).

¹⁷ "Blowing the Whistle on Workplace Misconduct," Ethics Resource Center (Dec. 2010)

¹⁸ Securities and Exchange Commission Chair Mary Jo White, Testimony on "Oversight of the [Securities and exchange Commission]'s Agenda, Operations and FY 2015 Budget Request" April 29, 2014.

¹⁹ *Remarks at the Securities Enforcement Forum*, Securities and Exchange Commission Chairman (Oct. 9, 2014).

12. Is there legislative support for reward laws?

Yes, whistleblower reward laws enjoy strong bipartisan support. Senator Charles Grassley, the Chairman of the Senate Judiciary Committee, was the author of the 1986 False Claims Act amendments that created the modern whistleblower reward programs, and is the Chair of the Senate Whistleblower Protection Caucus, which has strong bi-partisan membership.²⁰ In 2016, Senator Grassley and the Vice Chair of the Whistleblower Caucus, Senator Wyden introduced Senate Resolution 522, National Whistleblower Appreciation Day. It was unanimously approved by the Senate.²¹

In a recent hearing before the House Government Oversight Committee on the use of fees and fines collected by the federal government, *all* Members of the Committee (Democrat and Republican) praised whistleblowers and the positive impact that Congressionally approved reward laws have on detection, oversight and accountability.

- “I can assure you that whistleblowers are a vital part of what we do from an oversight standpoint...”²²
--Chairman Mark Meadows (R-NC)

- “Mr. Kohn, I want you to rest assured. I’ve read your testimony and I actually called my chief of staff and told him that we needed to make sure that whistleblowers are compensated and protected.”²³
--Rep. Gary Palmer (R-AL), the principle sponsor of the fee-related bill under consideration

²⁰ “Lincoln’s Law” Slows Washington’s Gravy Train,” (Nov. 24, 2015),

<http://www.grassley.senate.gov/news/commentary/lincoln-s-law-slows-washington-s-gravy-train>.

²¹ S. Res. 522, 114th CONG. (2016), <https://www.govtrack.us/congress/bills/114/sres522/text>.

²² *Restoring the Power of the Purse: Legislative Options: Hearing on H.R. 5499 Before the H. Comm. on Oversight and Gov’t Reform*, 114th CONG. at 0:34:32 (Dec. 1, 2016) (statement of Chairman Mark Meadows)(available at <https://oversight.house.gov/hearing/restoring-power-purse-legislative-options>).

²³ *Restoring the Power of the Purse: Legislative Options: Hearing on H.R. 5499 Before the H. Comm. on Oversight and Gov’t Reform*, 114th CONG. at 1:21:09 (Dec. 1, 2016) (statement of Rep. Gary Palmer)(available at <https://oversight.house.gov/hearing/restoring-power-purse-legislative-options>).

Exhibits to Frequently Asked Questions

Exhibit 1: The Lacey Act

Exhibit 2: The Fish and Wildlife Improvement Act

Exhibit 3: Support for Reward Programs

Exhibit 4: Quantitative Success of Whistleblower Rewards

Exhibit 5: The Act to Prevent Pollution from Ships (APPS)

Exhibit 6: The Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016

Exhibit 7: Rewards for Foreign Whistleblowers

Exhibit 1: The Lacey Act

16 U.S.C. § 3375. ENFORCEMENT

(d) Rewards and certain incidental expenses

Beginning in fiscal year 1983, the Secretary or the Secretary of the Treasury shall pay, from sums received as penalties, fines, or forfeitures of property for any violation of this chapter or any regulation issued hereunder (1) a reward to any person who furnishes information which leads to an arrest, a criminal conviction, civil penalty assessment, or forfeiture of property for any violation of this chapter or any regulation issued hereunder, and (2) the reasonable and necessary costs incurred by any person in providing temporary care for any fish, wildlife, or plant pending the disposition of any civil or criminal proceeding alleging a violation of this chapter with respect to that fish, wildlife, or plant. The amount of the reward, if any, is to be designated by the Secretary or the Secretary of the Treasury, as appropriate. Any officer or employee of the United States or any State or local government who furnishes information or renders service in the performance of his official duties is ineligible for payment under this subsection.

Exhibit 2: The Fish and Wildlife Improvement Act

16 U.S.C. § 742l. ENFORCEMENT AUTHORITY FOR THE PROTECTION OF FISH AND WILDLIFE RESOURCES

[(a)-(j)]

(k) Law enforcement operations. With respect to any undercover or other enforcement operation which is necessary for the detection and prosecution of violations of any laws administered by the United States Fish and Wildlife Service or the National Marine Fisheries Service relating to fish, wildlife, or plants, the Secretary of the Interior or the Secretary of Commerce may, notwithstanding any other provision of law--

- (1) direct the advance of funds which may be deposited in commercial banks or other financial institutions;
- (2) use appropriations for payment for information, rewards, or evidence concerning **violations**, without reference to any rewards to which such persons may otherwise be entitled by law, and any moneys subsequently recovered shall be reimbursed to the current appropriation; and
- (3) use appropriations to establish or acquire proprietary corporations or business entities as part of an undercover operation, operate such corporations or business entities on a commercial basis, lease space and make other necessary expenditures, and use the proceeds from such undercover operations to offset necessary and reasonable expenses incurred in such operations: Provided, That at the conclusion of each such operation the proceeds shall be deposited in the Treasury of the United States as miscellaneous receipts.

Exhibit 3: Support for Reward Programs

“In Fiscal Year 2014 alone, the Federal Government recovered nearly \$6 billion under the Act. That makes more than. . . \$42 billion since 1986.”

“These recoveries represent victories across a wide array of industries and government programs.”

“Whistleblowers have always been crucial. . . . It is simple common sense . . .”

--Senator Charles Grassley, Chairman of the Senate Judiciary Committee, and principle sponsor of the 1986 False Claims Act²⁴

The “impact” of the reward laws “has been nothing short of profound. Some of these [cases] may have saved lives. All of them saved money.”

--Eric Holder, Attorney General²⁵

The “whistleblower program . . . has rapidly become a tremendously effective force-multiplier, generating high quality tips, and in some cases virtual blueprints laying out an entire enterprise, directing us to the heart of the alleged fraud.”

The rewards “create powerful incentives” for informants “to come to the Commission with **real evidence** of wrongdoing . . . and **meaningfully contributes** to the **efficiency and effectiveness** of our enforcement efforts.”

--Mary Jo White, Chair, Securities and Exchange Commission²⁶

²⁴ *Oversight of the False Claims Act*, Hearing Before the House Comm. on the Judiciary, Subcomm. On the Constitution and Civil Justice, 113th CONG. (July 30, 2014)(prepared floor statement of Sen. Charles Grassley, then-Ranking Member, S. Comm. on the Judiciary), <http://www.grassley.senate.gov/news/news-releases/grassley-testimony-benefits-false-claims-act>

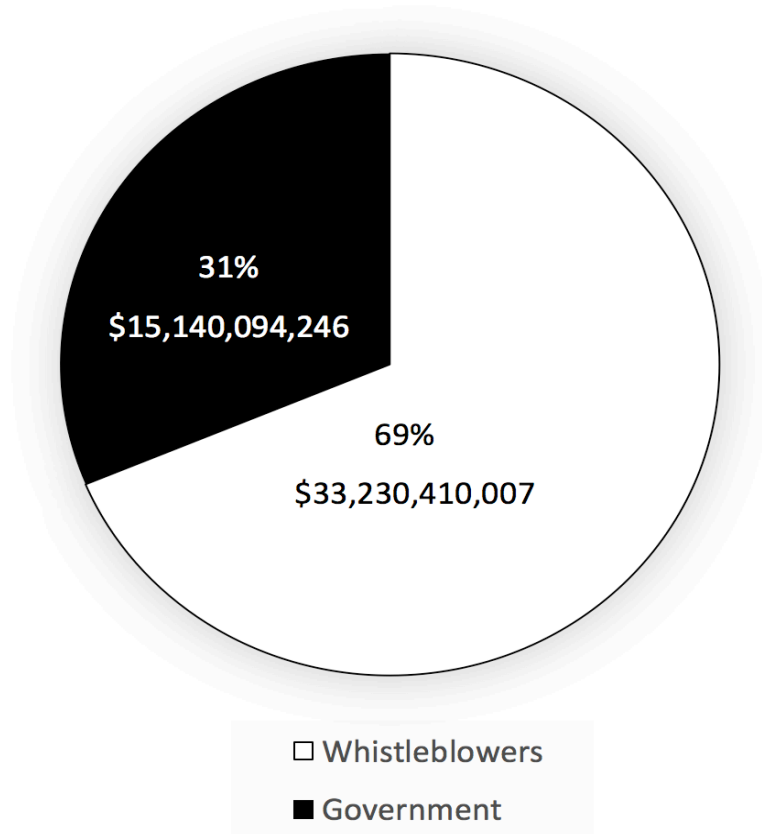
²⁵ Remarks at the 25th Anniversary of the False Claims Act (Jan. 31, 2012), <http://www.justice.gov/opa/speech/attorney-general-eric-holder-speaks-25th-anniversary-false-claims-act-amendments-1986>.

²⁶ Mary Jo White, Chair, U.S. Securities & Exchange Comm’n, Remarks at the Securities Enforcement Forum (Oct. 9, 2013), <https://www.sec.gov/News/Speech/Detail/Speech/1370539872100>

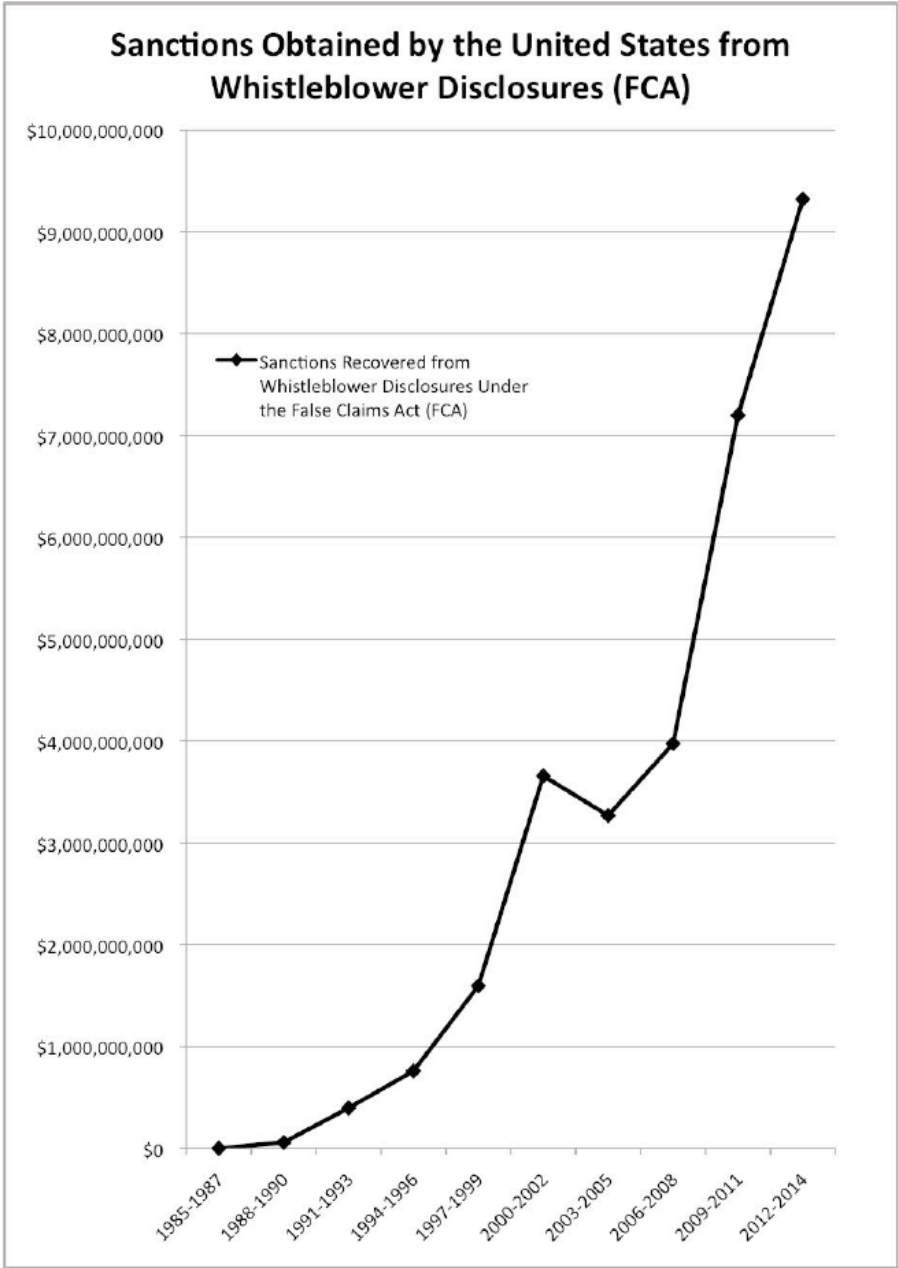
Exhibit 4: Quantitative Success of Whistleblower Rewards

Total U.S. Civil Recovery: From Whistleblowers and Government Investigation

October 1, 1987 - Sept. 30, 2015

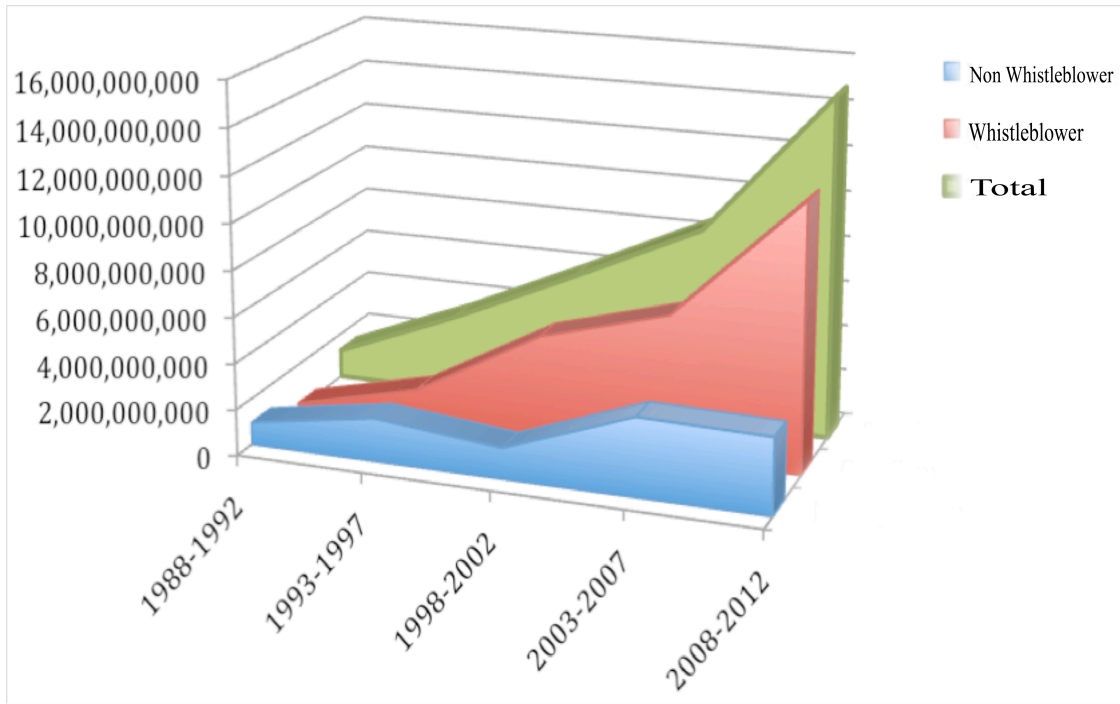


Civil Division, U.S. Department of Justice, "Fraud Statistics - Overview," (Oct. 1, 1987 - Sept. 30, 2015).



Source: "Fraud Statistics-Overview" Civil Division, U.S. Department of Justice (October 1, 1987-September 30, 2014).

False Claims Act Whistleblower Reward:



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²⁷ National Whistleblower Center, 2014

Exhibit 5: The Act to Prevent Pollution from Ships (APPS)

33 U.S.C. § 1908: PENALTIES FOR VIOLATIONS

(a) Criminal penalties; payment for information leading to conviction

A person who knowingly violates the MARPOL Protocol, Annex IV to the Antarctic Protocol, this chapter, or the regulations issued thereunder commits a class D felony. In the discretion of the Court, an amount equal to not more than 1/2 of such fine may be paid to the person giving information leading to conviction

Exhibit 6: The Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016

Public Law 114-231 – Oct. 7, 2016

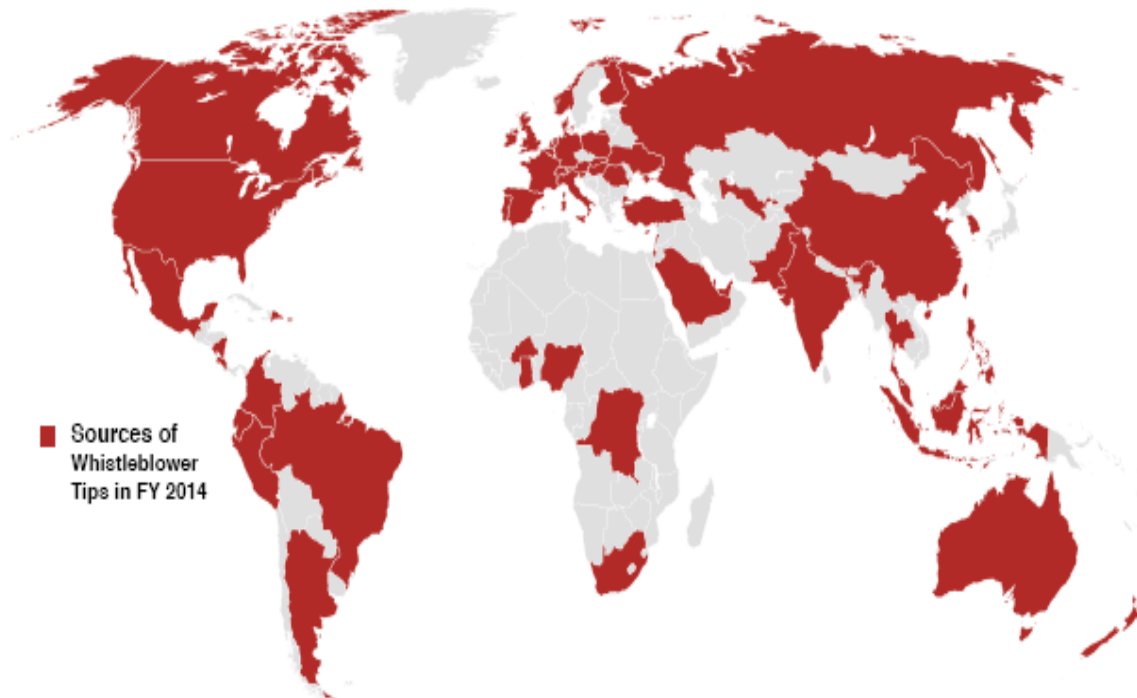
Sec. 101. PURPOSES

The purposes of this Act are--

- (1) to support a collaborative, interagency approach to address wildlife trafficking;
- (2) **to protect and conserve the remaining populations of wild elephants, rhinoceroses, and other species threatened by poaching and the illegal wildlife trade;**
- (3) to disrupt regional and global transnational organized criminal networks and to prevent the illegal wildlife trade from being used as a source of financing for criminal groups that undermine United States and global security interests;
- (4) to prevent wildlife poaching and trafficking from being a means to make a living in focus countries;
- (5) **to support the efforts of, and collaborate with, individuals, communities, local organizations, and foreign governments to combat poaching and wildlife trafficking;**
- (6) to assist focus countries in implementation of national wildlife anti-trafficking and poaching laws....

Exhibit 7: Rewards for Foreign Whistleblowers

The SEC's Foreign Corrupt Practices Act Whistleblower Reward Program is being used by International Whistleblowers



International Whistleblower Tips FY 2011-2015

United Kingdom	221	Slovenia	4
Canada	216	Ukraine	4
China, People's Republic of	164	Ecuador	3
India	153	El Salvador	3
Australia	97	Greece	3
Ireland	51	Hungary	3
Germany	40	Indonesia	3
Russia	39	Kuwait	3
Brazil	27	Qatar	3
Mexico	27	Vietnam	3
Israel	24	Belize	2
Argentina	23	Botswana	2
Singapore	22	Costa Rica	2
South Africa	21	Cyprus	2
Switzerland	21	Czech Republic	2
Hong Kong	19	Lebanese Republic	2
Netherlands, The	19	Panama	2
Curaçao	18	Saudi Arabia	2
France	18	Zambia	2
Spain	18	Bahamas, The	1
New Zealand	17	Bangladesh	1
Malaysia	15	Burkina Faso	1
Thailand	15	Cameroon	1
Turkey	14	Cayman Islands	1
Italy	13	Democratic Rep. of the Congo	1
Chile	11	Denmark	1
United Arab Emirates	11	Egypt	1
South Korea	10	Honduras	1
Norway	9	Iceland	1
Philippines	9	Jamaica	1
Belgium	8	Jordan	1
Bulgaria	8	Kazakhstan, Republic of	1
Japan	8	Kenya	1
Poland	8	Luxembourg, Grand Duchy of	1
Portugal	8	Maldives	1
Romania	8	Malta	1
Sweden	8	Mauritius	1
Venezuela	8	Monaco	1
Slovak Republic	7	Montenegro	1
Taiwan	7	Morocco	1
Austria	6	Nicaragua	1
Colombia	6	Papua New Guinea	1
Finland	6	Peru	1
Ghana	6	Rwanda	1
Pakistan	6	Serbia	1
Dominican Republic	5	Uruguay	1
Nigeria	4	Uzbekistan	1
Total Tips Received	1557		

Source: SEC, ANNUAL REPORT ON THE DODD-FRANK WHISTLEBLOWER PROGRAM (2014); SEC, ANNUAL REPORT ON THE DODD-FRANK WHISTLEBLOWER PROGRAM (2015).