



### **SEC Investigation Updates September 12, 2023**

John P. Gavin, CFA

## **Updates on SEC Investigative Activity for 100 US-Listed Companies**

Alexander's Inc.	ALX
Altisource Portfolio Solutions S.A.	ASPS
American Assets Trust, Inc.	AAT
Artisan Partners Asset Mgmt.	APAM
Autozone, Inc.	AZO
Biogen Inc.	BIIB
BorgWarner, Inc.	BWA
Build-A-Bear Workshop, Inc.	BBW
Cameco Corp.	CCI
Chart Industries, Inc.	GTLS
Citi Trends Inc.	CTRN
Construction Partners, Inc.	ROAD
Core Molding Technologies, Inc.	CMT
CSG Systems International Inc.	CSGS
CTS Corporation	CTS
Dentsply Sirona, Inc.	XRAY
DHT Holdings, Inc.	DHT
Diamondback Energy, Inc.	FANG
Dime Community Bancshares, Inc.	DCOM
Domino's Pizza, Inc.	DPZ
Eagle Bulk Shipping, Inc.	EGLE
Edgewell Personal Care Co.	EPC
Enanta Pharmaceuticals, Inc.	ENTA
Encore Wire Corp.	WIRE
Enviva, Inc.	EVA
EPR Properties	EPR

Equity LifeStyle Properties, Inc.	ELS
Euronet Worldwide Inc.	EEFT
Evergy, Inc.	EVRG
Floor & Décor Holdings, Inc.	FND
Fortinet, Inc.	FTNT
Gossamer Bio, Inc.	GOSS
Halliburton Company	HAL
Haverty Furniture Companies Inc.	HVT
HCA Healthcare, Inc.	HCA
Helix Energy Solutions Group, Inc.	HLX
Henry, Jack & Associates Inc.	JKHY
Herc Holdings Inc.	HRI
Highwoods Properties, Inc.	HIW
Hillenbrand Inc.	HI
HNI Corp.	HNI
Home Bancshares, Inc.	номв
Hormel Foods Corp.	HRL
Intercontinental Exchange, Inc.	ICE
Invitae Corp.	NVTA
Jeld-Wen Holding, Inc.	JELD
John Bean Technologies Corp.	JBT
Kiniksa Pharmaceuticals Ltd.	KNSA
LCI Industries	LCII
Lennar Corp.	LEN
Linde Plc.	LIN
Manulife Financial Corporation	MFC

Marathon Oil Corporation	MRO
Marcus & Millichap Inc.	MMI
Medpace Holdings, Inc.	MEDP
Mesa Laboratories Inc.	MLAB
Motorola Solutions, Inc.	MSI
National Instruments Corp.	NATI
Nautilus Inc.	NLS
Newell Brands, Inc.	NWL
NGM Biopharmaceuticals, Inc.	NGM
Olin Corp.	OLN
Olympic Steel Inc.	ZEUS
Omega Flex, Inc.	OFLX
OneSpaWorld Holdings Ltd.	OSW
Onto Innovation, Inc.	ONTO
PacWest Bancorp	PACW
Palomar Holdings, Inc.	PLMR
PAR Technology Corp.	PAR
Park Aerospace Corp.	PKE
Photronics Inc.	PLAB
Realty Income Corp.	0
Redwood Trust, Inc.	RWT
Revvity, Inc., fka, PerkinElmer, Inc.	RVTY/PKI
Science Applications International	SAIC
Shockwave Medical Inc.	SWAV
Simply Good Foods Co.	SMPL
SkyWest Inc.	SKYW
·	





Spirit Airlines, Inc.	SAVE
Sturm, Ruger & Company, Inc.	RGR
Sun Communities, Inc.	SUI
Teradata Corp.	TDC
Tetra Tech Inc.	TTEK
TEVA Pharmaceutical Industries	TEVA
Titan International, Inc.	TWI
Tootsie Roll Industries, Inc.	TR

Trane Technologies plc.	TT
UDR, Inc.	UDR
Ultra Clean Holdings, Inc.	UCTT
Universal Electronics Inc.	UEIC
Upland Software, Inc.	UPLD
Urban Edge Properties	UE
Uxin Ltd.	UXIN
Vanda Pharmaceuticals, Inc.	VNDA

Vericel Corp.	VCEL
Veritex Holdings, Inc.	VBTX
Virtus Investment Partners Inc.	VRTS
Visteon Corp.	VC
WEC Energy Group Inc.	WEC
Zebra Technologies Corp.	ZBRA

Disclosure Insight research provides data, commentary, and analysis on public company interactions with investors and with the SEC. Our work is heavily reliant on company disclosures and our expertise in using the Freedom of Information Act.

Important: The SEC reminds us that its assertion of the law enforcement exemption should not be construed as an indication by the Commission or its staff that any violations of law have occurred with respect to any person, entity, or security.

The data reflected in this report are only current as of the dates indicated for each individual company. SEC investigative activity could theoretically begin or end after the date covered by the latest information in this report which would not be reflected here. Similarly, public company activities and/or disclosures made since the dates indicated herein could impact your analysis. Companies with undisclosed SEC investigations are maintained on our Watch List of companies with undisclosed SEC investigations. Additional disclosures and information appear at the end of this report.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW = A new warning.	NF = Nothing Found.	<b>Update</b> or <b>Alert</b> = New information.	<b>Docs</b> = SEC documents received.	<b>Removed</b> = Off Watch List.

	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	Alexander's Inc.	ALX	17-Aug-2023	FOIA Response	\$193.73	989	No recent SEC investigative activity found.
NF	Altisource Portfolio Solutions S.A.	ASPS	21-Aug-2023	FOIA Response	\$4.14	86	No recent SEC investigative activity found.
NF	American Assets Trust, Inc.	AAT	21-Aug-2023	FOIA Response	\$20.59	1,250	No recent SEC investigative activity found.
NF	Artisan Partners Asset Management Inc.	APAM	21-Aug-2023	FOIA Response	\$38.44	3,074	No recent SEC investigative activity found.
NF	Autozone, Inc.	AZO	25-Aug-2023	FOIA Response	\$2,528.24	45,882	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW	A new warning. NF = Not	hing Found	l. <b>Update</b> or	Alert = New	information.	<b>Docs</b> = SE	C documents received. <b>Removed</b> = Off Watch List.
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
Update on Disclosed SEC Probe	Biogen Inc.	ВІІВ	7-Aug-2023	FOIA Appeal Response	\$258.44	37,428	Confirmed Update - Disclosed SEC investigation confirmed as on-going, as of 07-Aug-2023. From at least Apr-2018 to Oct-2020, Biogen made generic disclosure of the investigation by regulatory agencies. Sales practices was one of the items targeted. That went dark starting with the 10-K filed on 03-Feb-2021, until the 10-K filed a year later, on 03-Feb-2022, when we saw first disclosure of a new SEC probe. This was in the 10-K filed on 03-Feb-2022, as follows, "In addition, the Company has received a civil investigative demand from the Federal Trade Commission and an inquiry from the Securities and Exchange Commission seeking information relating to ADUHELM, including healthcare sites, ADUHELM's approval and ADUHELM's marketing." There have been no updates, only cutand-paste repeat of earlier disclosures since. We do not the 10-Q filed 25-Jul-2023, does refer to "multiple subpoenas" from the SEC. Dl's Take: A protracted, formal SEC investigation with multiple subpoenas flying. Not good. Company updates are shoddy at a time they need to be robust.
NF	BorgWarner, Inc.	BWA	18-Aug-2023	FOIA Response	\$41.34	9,718	No recent SEC investigative activity found.
NF	Build-A-Bear Workshop, Inc.	BBW	24-Aug-2023	FOIA Response	\$27.95	406	No recent SEC investigative activity found.
NF	Cameco Corp.	CCI	22-Aug-2023	FOIA Response	\$38.14	16,531	No recent SEC investigative activity found.
NF	Chart Industries, Inc.	GTLS	21-Aug-2023	FOIA Response	\$176.05	7,524	No recent SEC investigative activity found.



CTS Corporation

NF



16-Aug-2023 FOIA Response

### **SEC Investigation Updates**

**September 12, 2023** 

phone 763.595.0900 (USA)
Direports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

CTS

Market data as of the close on Tuesday, 12-Sep-2023

No recent SEC investigative activity found.

NEVV	= A new warning. NF = Noth	iing Found	. <b>Upaate</b> or	Alert = New I	injormation.	Docs = SE	$\mathbf{R}$ documents received. <b>Removed</b> = $\mathbf{O}$ $\mathbf{J}$ $\mathbf$
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	Citi Trends Inc.	CTRN	23-Aug-2023	FOIA Response	\$21.36	183	No recent SEC investigative activity found.
NF	Construction Partners, Inc.	ROAD	28-Aug-2023	FOIA Response	\$36.27	1,912	No recent SEC investigative activity found.
NF	Core Molding Technologies, Inc.	СМТ	21-Aug-2023	FOIA Response	\$25.29	218	No recent SEC investigative activity found.
NF	CSG Systems International Inc.	CSGS	24-Aug-2023	FOIA Response	\$53.76	1,707	No recent SEC investigative activity found.

\$41.50

1,302





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW =	A new warning.	<b>NF</b> = Nothing Found	l. <b>Update</b> or	Alert = New	information.	Docs = SE	EC documents received. <b>Removed</b> = Off Watch List.
	Company N	Name Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
Update on Disclosed SEC Probe	Dentsply Sirona, I	Inc. XRAY	7-Aug-2023	FOIA Appeal Response	\$36.65	7,759	Confirmed Update - Disclosed SEC investigation confirmed as on-going, as of 07-Aug-2023. XRAY's been dealing with a Gong Show of accounting problems. The current SEC matter was first disclosed in a NT 10-Q filed 10-May-2022. An earlier matter was first disclosed in the 10-Q filed on 9-Aug-2017. Earlier SEC activity was related to the XRAY's accounting and disclosures. In that case it involved, "accounting and disclosures relating to transactions with a significant distributor of the Company." That makes this ongoing matter the second one in a short period of time. The 10-K filed in Mar-2021 talked of the SEC investigation having ended. The 10-K filed Mar-2022, was then silent on SEC investigative activity. The 10-K filed on 01-Mar-2023 was the first time the word 'investigation' was used regarding the newer matter. Previously, the company spoke of having voluntarily contacted the SEC about this matter. That means it's now a formal investigation, though XRAY is not calling it that. Aug-2022: Ejection of Chief Accounting Officer; and, new CEO, effective 12-Sep-2022. He replaces in Interim CEO in the role since Apr-2022. Nov-2022, 8-K: Restatement. DI's Take: Disclosures on the ongoing matter are/were expansive, and more analytically helpful than on the earlier matter. The earlier one used images instead of text, which made it hard for people to easily find that there was an SEC investigation here. With a long history of accounting and related problems keep in mind a company culture that permits this doesn't change overnight.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW	= A new warning. <b>NF =</b> Noth	ing Found	l. <b>Update</b> or	Alert = New	information.	<b>Docs</b> = SE	C documents received. <b>Removed</b> = Off Watch List.
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	DHT Holdings, Inc.	DHT	28-Aug-2023	FOIA Response	\$8.85	1,437	No recent SEC investigative activity found.
NF	Diamondback Energy, Inc.	FANG	16-Aug-2023	FOIA Response	\$156.31	27,951	No recent SEC investigative activity found.
NF	Dime Community Bancshares, Inc.	DCOM	16-Aug-2023	FOIA Response	\$20.61	800	No recent SEC investigative activity found.
NF	Domino's Pizza, Inc.	DPZ	24-Aug-2023	FOIA Response	\$393.59	13,813	No recent SEC investigative activity found.
NF	Eagle Bulk Shipping, Inc.	EGLE	22-Aug-2023	FOIA Response	\$41.35	411	No recent SEC investigative activity found.
NF	Edgewell Personal Care Co.	EPC	17-Aug-2023	FOIA Response	\$38.09	1,935	No recent SEC investigative activity found.
NF	Enanta Pharmaceuticals, Inc.	ENTA	21-Aug-2023	FOIA Response	\$13.07	275	No recent SEC investigative activity found.
NF	Encore Wire Corp.	WIRE	21-Aug-2023	FOIA Response	\$166.94	2,806	No recent SEC investigative activity found.
NEW Addition to Watch List	Enviva, Inc.	EVA	7-Aug-2023	FOIA Appeal Response	\$7.72	575	New Warning. Added to Watch List. SEC investigation confirmed. An early signal of undisclosed SEC investigative activity first found on 31-May-2023, was then confirmed as ongoing on 07-Aug-2023. This is our first time researching this company. A search of EDGAR filings for the past two years found no clear disclosure of SEC investigative activity. Internal controls problem first disclosed in 10-K filed on 01-Mar-2023, still unresolved as of 10-Q filed on 03-Aug-2023. Abrupt change in CFO in late Aug-2023. DI's Take: Abrupt turnover in the CFO slot in the presence of an undisclosed SEC investigation is troubling. In the presence of ongoing internal controls problems, even more so.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

Market data as of the close on Tuesday, 12-Sep-2023

**NEW** = A new warning. **NF** = Nothing Found. **Update** or **Alert** = New information. **Docs** = SEC documents received. **Removed** = Off Watch List.

	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	EPR Properties	EPR	16-Aug-2023	FOIA Response	\$43.27	3,259	No recent SEC investigative activity found.
NF	Equity LifeStyle Properties, Inc.	ELS	18-Aug-2023	FOIA Response	\$65.89	12,274	No recent SEC investigative activity found.
NF	Euronet Worldwide Inc.	EEFT	21-Aug-2023	FOIA Response	\$83.00	4,122	No recent SEC investigative activity found.
NF	Evergy, Inc.	EVRG	22-Aug-2023	FOIA Response	\$53.01	12,177	No recent SEC investigative activity found.
NF	Floor & Décor Holdings, Inc.	FND	18-Aug-2023	FOIA Response	\$93.75	9,979	No recent SEC investigative activity found.
NF	Fortinet, Inc.	FTNT	17-Aug-2023	FOIA Response	\$63.50	49,869	No recent SEC investigative activity found.
NF	Gossamer Bio, Inc.	GOSS	21-Aug-2023	FOIA Response	\$0.95	214	No recent SEC investigative activity found.
NF	Halliburton Company	HAL	21-Aug-2023	FOIA Response	\$42.36	38,062	No recent SEC investigative activity found.
NF	Haverty Furniture Companies Inc.	HVT	16-Aug-2023	FOIA Response	\$30.83	507	No recent SEC investigative activity found.
NF	HCA Healthcare, Inc.	HCA	22-Aug-2023	FOIA Response	\$260.87	70,954	No recent SEC investigative activity found.
NF	Helix Energy Solutions Group, Inc.	HLX	17-Aug-2023	FOIA Response	\$11.00	1,659	No recent SEC investigative activity found.
NF	Henry, Jack & Associates Inc.	JKHY	16-Aug-2023	FOIA Response	\$153.00	11,159	No recent SEC investigative activity found.
NF	Herc Holdings Inc.	HRI	22-Aug-2023	FOIA Response	\$126.21	3,573	No recent SEC investigative activity found.
NF	Highwoods Properties, Inc.	HIW	17-Aug-2023	FOIA Response	\$23.05	2,436	No recent SEC investigative activity found.
NF	Hillenbrand Inc.	н	16-Aug-2023	FOIA Response	\$42.78	2,991	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW	= A new warning. <b>NF =</b> Not	thing Found	l. <b>Update</b> or	Alert = New	information.	<b>Docs</b> = SE	C documents received. <b>Removed</b> = Off Watch List.
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	HNI Corp.	HNI	17-Aug-2023	FOIA Response	\$31.73	1,477	No recent SEC investigative activity found.
NF	Home Bancshares, Inc.	номв	17-Aug-2023	FOIA Response	\$22.06	4,469	No recent SEC investigative activity found.
NEW Addition to Watch List	Hormel Foods Corp.	HRL	7-Aug-2023	FOIA Appeal Response	\$37.40	20,438	New Warning. Added to Watch List. SEC investigation confirmed. An early signal of undisclosed SEC investigative activity first found on 11-Jun-2023, was then confirmed as ongoing on 07-Aug-2023. This is a change from a response dated 03-Aug-2022, at which time no signs of on-going SEC investigative activity were found. First time on our Watch List since we first started covering Hormel in Oct-2012. A search of EDGAR filings for the past two years found no clear disclosure of SEC investigative activity. We have no documents from closed SEC probe(s) of this company. DI's Take: Timing of SEC responses to us suggests management may have known about an SEC probe since at least Jun-2023.





**September 12, 2023** 

phone 763.595.0900 (USA)
Direports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW =	<b>NEW</b> = A new warning. <b>NF</b> = Nothing Found.		. <b>Update</b> or	<b>Update</b> or $\frac{Alert}{}$ = New information.			Docs = SEC documents received. Removed = Off Watch List.		
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations		
Watch List Confirmed Update	Intercontinental Exchar Inc.	<sup>nge,</sup> ICE	7-Aug-2023	FOIA Appeal Response	\$116.01	66,254	Warning Reiterated — Maintained on Watch List. An early signal of undisclosed SEC investigative activity first found on 03-Jun-2022. On-going enforcement proceedings now confirmed on appeal two times since, most recently on 07-Aug-2023. This remains a change from a response dated 17-Mar-2021, at which time no signs of ongoing SEC investigative activity were found. We have no documents from closed SEC probe(s) of this company. DI's Take: A subsidiary, PRD, had an SEC investigation that involved PRD's legacy business practices with respect to "broker quotes." That SEC investigation settled in Dec-2020, leaving us no reason to believe it's connected to today's indications of investigative activity.		
NF	Invitae Corp.	NVTA	16-Aug-2023	FOIA Response	\$0.86	231	No recent SEC investigative activity found.		
NF	Jeld-Wen Holding, Inc.	JELD	17-Aug-2023	FOIA Response	\$13.82	1,177	No recent SEC investigative activity found.		
NF	John Bean Technologie Corp.	s JBT	25-Aug-2023	FOIA Response	\$108.07	3,441	No recent SEC investigative activity found.		
NF	Kiniksa Pharmaceutical	s Ltd. KNSA	17-Aug-2023	FOIA Response	\$17.16	1,204	No recent SEC investigative activity found.		
NF	LCI Industries	LCII	28-Aug-2023	FOIA Response	\$118.17	2,993	No recent SEC investigative activity found.		
NF	Lennar Corp.	LEN	17-Aug-2023	FOIA Response	\$116.51	37,139	No recent SEC investigative activity found.		
NF	Linde Plc.	LIN	22-Aug-2023	FOIA Response	\$387.92	189,284	No recent SEC investigative activity found.		
NF	Manulife Financial Corporation	MFC	25-Aug-2023	FOIA Response	\$18.88	34,561	No recent SEC investigative activity found.		





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW = A new warning.	NF = Nothing Found.	<b>Update</b> or <b>Alert</b> = New information.	<b>Docs</b> = SEC documents received.	<b>Removed</b> = Off Watch List.
----------------------	---------------------	--	---------------------------------------	----------------------------------

	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	Marathon Oil Corporation	MRO	17-Aug-2023	FOIA Response	\$27.13	16,432	No recent SEC investigative activity found.
NF	Marcus & Millichap Inc.	ММІ	21-Aug-2023	FOIA Response	\$32.29	1,242	No recent SEC investigative activity found.
NF	Medpace Holdings, Inc.	MEDP	17-Aug-2023	FOIA Response	\$279.54	8,544	No recent SEC investigative activity found.
NF	Mesa Laboratories Inc.	MLAB	28-Aug-2023	FOIA Response	\$122.87	662	No recent SEC investigative activity found.
NF	Motorola Solutions, Inc.	MSI	16-Aug-2023	FOIA Response	\$281.30	46,983	No recent SEC investigative activity found.
NF	National Instruments Corp.	NATI	17-Aug-2023	FOIA Response	\$59.67	7,924	No recent SEC investigative activity found.
NF	Nautilus Inc.	NLS	17-Aug-2023	FOIA Response	\$0.88	32	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW = A new	warning. <b>NF</b> = Not	hing Found. Up	date or Alert = New	information.	Docs = SE	EC documents received. <b>Removed</b> = Off Watch List.
	Company Name	Ticker	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
SEC Probe	l Brands, Inc.		g-2023 FOIA Appeal Response	\$9.66		Confirmed Update - Disclosed SEC investigation confirmed as on-going, as of 07-Aug-2023. The following excerpt from the Newell Brands 10-Q filed on 28-Jul-2023, sums it up well: "The Company previously disclosed that it had received a subpoena and related informal document requests from the SEC primarily relating to its sales practices and certain accounting matters for the time period beginning from January 1, 2016. The Company cooperated with the SEC in connection with its investigation and requests for documents, testimony and information. Since January 2023, the Company has been discussing with the SEC the possibility of reaching a settlement to resolve the investigation, which now relates to certain time periods within the Company's 2016 and 2017 fiscal years Further, on June 30, 2021, the Company received a subpoena from the SEC requesting the production of documents related to its disclosure of the potential impact of the U.S. Treasury regulations described in [the 10-K filed 15-Feb-2023]. Notable Change in Disclosures: The second SEC probe first showed up in the Newell 10-Q filed on 30-Jul-2021. A sentence saying the investigation, "related to the impairment of goodwill and other intangible assets", that was included in earlier disclosures, was left out of the 10-K filed in Feb-2021. It has not returned. Dl's Take: Don't grab your pom-poms yet. This management has been happy-talking settlement of one of its SEC investigations for well over a year now, with zero update on the other one. You also need to ask what happened to that part about goodwill and intangibles.
© 2023, Disclos	ure Insight, Inc. All ri	ghts reserved.	www.dis	closureinsigh	t.com	Page 10 of 15





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

Market data as of the close on Tuesday, 12-Sep-2023

**NEW** = A new warning. **NF** = Nothing Found. **Update** or **Alert** = New information. **Docs** = SEC documents received. **Removed** = Off Watch List.

	3	3			,		33
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	NGM Biopharmaceuticals, Inc.	NGM	18-Aug-2023	FOIA Response	\$1.51	125	No recent SEC investigative activity found.
NF	Olin Corp.	OLN	17-Aug-2023	FOIA Response	\$50.16	6,311	No recent SEC investigative activity found.
NF	Olympic Steel Inc.	ZEUS	28-Aug-2023	FOIA Response	\$49.96	556	No recent SEC investigative activity found.
NF	Omega Flex, Inc.	OFLX	18-Aug-2023	FOIA Response	\$82.14	829	No recent SEC investigative activity found.
NF	OneSpaWorld Holdings Ltd.	osw	17-Aug-2023	FOIA Response	\$11.75	1,169	No recent SEC investigative activity found.
NF	Onto Innovation, Inc.	ONTO	17-Aug-2023	FOIA Response	\$125.64	6,165	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
Direports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW =	A new warning.	NF = Nothing Found	l. <b>Update</b> or	Alert = New	information.	Docs = SE	C documents received. <b>Removed</b> = Off Watch List.
	Company N	ame Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NEW Addition to Watch List	PacWest Bancorp	PACW	7-Aug-2023	FOIA Appeal Response	\$8.14	965	New Warning. Added to Watch List. SEC investigation confirmed. An early signal of undisclosed SEC investigative activity first found on 07-Jun-2023, was then confirmed as ongoing on 07-Aug-2023. This is a change from a response dated 08-Aug-2022, at which time no signs of on-going SEC investigative activity were found. First time on our Watch List since we first started covering PacWest in Dec-2012. A search of EDGAR filings for the past two years found no clear disclosure of SEC investigative activity. Chair, CEO, and CFO turnover announced in 21-Nov-We have no documents from closed SEC probe(s) of this company. Dl's Take: The failure of Silicon Valley Bank in Mar-2023, sent enough shockwaves through the financial system we think it ensnared PacWest in a broader SEC investigation. This management team served up so much happy talk about their financial strength at the time, do you really expect them to tell you about an SEC probe now? Timing of SEC responses to us suggests management may have known about an SEC probe since at least Jun-2023. Note: PacWest to soon operate under the Banc of California name and brand. Expected close is late 2023 or early 2024.
NF	Palomar Holdings,	Inc. PLMR	17-Aug-2023	FOIA Response	\$52.22	1,292	No recent SEC investigative activity found.
NF	PAR Technology Co	orp. PAR	28-Aug-2023	FOIA Response	\$42.01	1,153	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW	= A new warning. <b>NF</b>	= Nothing Found	. <b>Update</b> or	Alert = New	information.	<b>Docs</b> = SE	C documents received. <b>Removed</b> = Off Watch List.
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	Park Aerospace Corp.	PKE	17-Aug-2023	FOIA Response	\$14.32	290	No recent SEC investigative activity found.
NF	Photronics Inc.	PLAB	18-Aug-2023	FOIA Response	\$19.99	1,250	No recent SEC investigative activity found.
NF	Realty Income Corp.	0	16-Aug-2023	FOIA Response	\$55.15	39,090	No recent SEC investigative activity found.
NF	Redwood Trust, Inc.	RWT	24-Aug-2023	FOIA Response	\$7.79	890	No recent SEC investigative activity found.
NEW Addition to Watch List	Revvity, Inc., fka, PerkinElmer, Inc.	RVTY / PKI	7-Aug-2023	FOIA Appeal Response	\$109.17	13,261	New Warning. Added to Watch List. SEC investigation confirmed. An early signal of undisclosed SEC investigative activity first found on 06-Jun-2023, was then confirmed as ongoing on 07-Aug-2023. This is a change from a response dated 01-Jun-2022, at which time no signs of on-going SEC investigative activity were found. A search of EDGAR filings for the past two years found no clear disclosure of SEC investigative activity. We have no documents from closed SEC probe(s) of this company. DI's Take: Timing of SEC responses to us suggests management may have known about an SEC probe since at least Jun-2023.
NF	Science Applications International Corp.	SAIC	23-Aug-2023	FOIA Response	\$111.28	5,891	No recent SEC investigative activity found.
NF	Shockwave Medical Ind	s. SWAV	17-Aug-2023	FOIA Response	\$213.00	7,828	No recent SEC investigative activity found.
NF	Simply Good Foods Co.	SMPL	28-Aug-2023	FOIA Response	\$33.44	3,329	No recent SEC investigative activity found.
NF	SkyWest Inc.	SKYW	23-Aug-2023	FOIA Response	\$43.27	1,820	No recent SEC investigative activity found.
NF	Spirit Airlines, Inc.	SAVE	21-Aug-2023	FOIA Response	\$17.28	1,886	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

Market data as of the close on Tuesday, 12-Sep-2023

**NEW** = A new warning. **NF** = Nothing Found. **Update** or **Alert** = New information. **Docs** = SEC documents received. **Removed** = Off Watch List.

	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations
NF	Sturm, Ruger & Company, Inc.	RGR	25-Aug-2023	FOIA Response	\$50.73	899	No recent SEC investigative activity found.
NF	Sun Communities, Inc.	SUI	23-Aug-2023	FOIA Response	\$122.67	15,263	No recent SEC investigative activity found.
NF	Teradata Corp.	TDC	17-Aug-2023	FOIA Response	\$44.03	4,399	No recent SEC investigative activity found.
NF	Tetra Tech Inc.	TTEK	21-Aug-2023	FOIA Response	\$154.53	8,228	No recent SEC investigative activity found.
NF	TEVA Pharmaceutical Industries Ltd.	TEVA	17-Aug-2023	FOIA Response	\$10.03	10,906	No recent SEC investigative activity found.
NF	Titan International, Inc.	TWI	17-Aug-2023	FOIA Response	\$11.70	734	No recent SEC investigative activity found.
NF	Tootsie Roll Industries, Inc.	TR	24-Aug-2023	FOIA Response	\$30.14	2,125	No recent SEC investigative activity found.
NF	Trane Technologies plc.	TT	18-Aug-2023	FOIA Response	\$208.46	47,612	No recent SEC investigative activity found.
NF	UDR, Inc.	UDR	16-Aug-2023	FOIA Response	\$38.73	12,761	No recent SEC investigative activity found.
NF	Ultra Clean Holdings, Inc.	UCTT	24-Aug-2023	FOIA Response	\$29.71	1,331	No recent SEC investigative activity found.
NF	Universal Electronics Inc.	UEIC	25-Aug-2023	FOIA Response	\$8.88	115	No recent SEC investigative activity found.
NF	Upland Software, Inc.	UPLD	24-Aug-2023	FOIA Response	\$3.99	130	No recent SEC investigative activity found.
NF	Urban Edge Properties	UE	16-Aug-2023	FOIA Response	\$16.50	1,941	No recent SEC investigative activity found.
NF	Uxin Ltd.	UXIN	24-Aug-2023	FOIA Response	\$1.56	73	No recent SEC investigative activity found.
NF	Vanda Pharmaceuticals, Inc.	VNDA	21-Aug-2023	FOIA Response	\$4.66	268	No recent SEC investigative activity found.





**September 12, 2023** 

phone 763.595.0900 (USA)
DIreports@disclosureinsight.com

### **Updates on SEC Investigative Activity for US-Listed Companies**

NEW	= A new warning. <b>NF</b> = Noth	ning Found	<b>Update</b> or <b>Alert</b> = New information.			<b>Docs</b> = SEC documents received. <b>Removed</b> = Off Watch List.		
	Company Name	Ticker	Date of Response	Response Type	Price	Mkt Cap \$MM	Analyst Notes / Observations	
NF	Vericel Corp.	VCEL	22-Aug-2023	FOIA Response	\$36.52	1,740	No recent SEC investigative activity found.	
NF	Veritex Holdings, Inc.	VBTX	22-Aug-2023	FOIA Response	\$17.92	973	No recent SEC investigative activity found.	
NF	Virtus Investment Partners Inc.	VRTS	23-Aug-2023	FOIA Response	\$201.98	1,465	No recent SEC investigative activity found.	
NF	Visteon Corp.	VC	24-Aug-2023	FOIA Response	\$139.68	3,939	No recent SEC investigative activity found.	
NF	WEC Energy Group Inc.	WEC	22-Aug-2023	FOIA Response	\$84.45	26,638	No recent SEC investigative activity found.	
NF	Zebra Technologies Corp.	ZBRA	23-Aug-2023	FOIA Response	\$251.31	12,902	No recent SEC investigative activity found.	
	<b>₩</b> 🚇 🗆						End of SEC Investigation Updates	





To learn more about our research process, including how to best use this information in your own decision-making, click here.

Our Terms of Service, relevant disclosures, and other legal notices can be found here.

#### **Copyright Warning and Notice**

The works of authorship contained in the accompanying material, including but not limited to all data, design, text, images, charts and other data compilations or collective works are owned by Disclosure Insight, Inc. or one of its affiliates and may not be copied, reproduced, transmitted, displayed, performed, distributed, rented, sublicensed, altered, or stored for subsequent use, in whole or in part in any manner, without the prior written consent of Disclosure Insight, Inc.

Photocopying or electronic distribution of any of the accompanying material or contents without the prior written consent of Disclosure Insight, Inc. violates U.S. copyright law, and may be punishable by statutory damages of up to \$150,000 per infringement, plus attorneys' fees (17 USC 504 et. seq.). Without advance permission, illegal copying includes regular photocopying, faxing, excerpting, forwarding electronically, and sharing of online access.

#### **Intellectual Property**

© 2016-2023, Disclosure Insight, Inc. All rights reserved. Disclosure Insight®; Probes Reporter®; They Know it. Now You Know It.®; Better Disclosure for Better Decisions®; Assess the Risk. Achieve the Return™; DI™; and, Disclosure Games®, are trademarks of Probes Reporter, LLC and are proprietary.