



## U.S. Securities and Exchange Commission

# Tips, Complaints, and Referrals

## Summary Page - Before Submission

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The Complaint Form questions that you responded to, the answers you entered for those questions, and any documents that you have uploaded to this TCR are listed below.

### What is your complaint about?

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**Please select the option that best describes your complaint.**

Material misstatement or omission in a company's public filings or financial statements, or a failure to file

**Please select the specific category that best describes your complaint.**

Mergers and acquisitions

**Is this supplemental information to a previous complaint?**

Yes

**What is the Submission Number of the previous complaint?**

ResponseHO0083802

**In your own words, describe the conduct or situation you are complaining about.**

Date: October 10, 2025

U.S. Securities and Exchange Commission  
Office of the Whistleblower / TCR Intake  
100 F Street, NE  
Washington, DC 20549

Subject: Tips, Complaints and Referrals (TCR) — Suspected Material  
Misstatements/Omissions and Scheme to Taint Stockholder Approval in Luminar’s “Project  
Condor” Acquisition of Solstice Research, Inc. (June 2022) and Subsequent Conduct

To the Commission:

I submit this Tip, Complaint, and Referral (TCR) to alert the SEC to evidence that, in connection with Luminar Technologies, Inc.’s (“Luminar”) June 15, 2022 acquisition of substantially all assets of Solstice Research, Inc. (“Solstice”) via Condor Acquisition Sub II, insiders structured closing conditions and side arrangements that (i) embedded undisclosed employment-contingent inducements and selective release waivers; (ii) appear to have tainted the stockholder approval process; and (iii) may have resulted in material misstatements or omissions in Luminar’s public reporting of the transaction economics and related compensation. The facts below are taken from executed deal documents, sworn filings, and adversarial correspondence and are being actively litigated in the Delaware Court of Chancery in a related books-and-records action. Key excerpts and citations are provided throughout.

## I. Executive Summary

The core concern. The Asset Purchase Agreement (“APA”) for Project Condor hard-wired employment-contingent closing conditions for named “Key Employees,” required specific insider release agreements at closing, and tied a portion of the purchase price (deferred shares) to those insiders’ continuing employment (“Employment Condition”). These design choices created powerful inducements for fiduciaries to secure consents and releases and, if not fully and fairly disclosed to all stockholders or investors, rendered public descriptions of consideration and approvals materially incomplete.

How approval may have been tainted. The same APA provisions mandated (a) acceptance of Buyer offer letters, (b) execution of Buyer CIAs/restrictive covenants, and (c) insider releases as conditions to closing — mechanics that, as a matter of deal architecture, embed individualized economic incentives into the vote-and-close pathway.

Where the paper should exist. The APA's exhibits expressly include a Form of Seller Release Agreement (Exhibit H), a Seller Officer's Certificate, and a closing checklist/binder, among other deliverables. These are closing documents that any buyer conducting reasonable diligence and accurate reporting would possess and preserve.

What's unusual in the communications trail. The APA's Notices clause routes official transaction notices for the seller through a personal Gmail account of the then-CEO — a structure that, per Delaware authority, triggers inspection of informal ESI when formal minutes are incomplete and suggests deal-critical communications may have moved outside ordinary corporate systems.

Why the Commission's remit is implicated. If Luminar failed to obtain, analyze, and accurately reflect the economics and risks of employment-contingent consideration, selective releases, and inducements — particularly where these conditions affected whether and how consideration would flow — then its SEC filings (8-K, MD&A, risk factors, compensation and acquisition disclosures) may have contained material misstatements or omissions. A contemporaneous books-and-records record requests buyer-side SEC-facing drafts, comment matrices, and disclosure committee materials precisely because disclosure adequacy is at issue.

## II. Parties, Roles, and Procedural Posture

Buyer / Parent: Luminar Technologies, Inc. ("Parent"), with Buyer entity "Condor Acquisition Sub II, Inc." (Delaware). APA executed June 15, 2022.

Seller: Solrice Research, Inc. (Delaware).

Key Insiders: Named "Key Employees" include Scott Harvey and Stefan Safko (among others); insiders obligated to execute Seller release agreements include, inter alia, Safko and Harvey (and others), with releases referenced as Exhibit H.

Reporter / Complainant: A current Luminar stockholder pursuing targeted inspection of

Luminar's records under 8 Del. C. §220 to validate disclosure integrity and valuation/approval mechanics.

Related Delaware proceeding: An ongoing §220 action seeks necessary and essential materials (2024-1296-SEM) — including executed insider agreements, releases, and related ESI — because board minutes are silent regarding these compensation and release arrangements.

Adversarial correspondence from Luminar's outside counsel (Orrick) rejects the inspection and frames the purpose as unrelated to Luminar; the follow-up asserts credible basis and buyer-side custodial obligations, pointing to "document parking" with the buyer. These letters crystallize the dispute and the disclosure risks.

### III. Timeline and Transaction Architecture

A. Deal execution (June 15, 2022). The APA was executed on June 15, 2022. Exhibits include forms of key closing documents: stockholder consent, officer/secretary certificates, IP assignments, and a Seller Release Agreement template (Exhibit H).

B. Consideration mechanics and deferral. Consideration included immediate "Consideration Base Shares" and Deferred Shares, the latter expressly conditioned on the Employment Condition of each Key Employee one year after closing; failure of any Key Employee to meet that condition reduces deferred consideration by one-third per Key Employee. This interlocks the purchase price with insider employment status — a material feature for investors.

C. Employment-contingent closing and insider releases. The APA required (i) Key Employees to accept offer letters and execute Buyer confidentiality and restrictive covenant agreements, and (ii) specified insiders to execute releases regarding accrued amounts, with a separate global Seller-to-Buyer release (including §1542 waiver) — collectively evidencing an inducement-plus-waiver structure embedded in the close.

D. Notices and ESI custody. The APA directs formal notices to the seller CEO's personal Gmail, evidencing that deal-critical communications were routed off corporate systems, reinforcing the necessity to inspect email and cloud artifacts for the "real story."

E. Cloud accounts and “Books and Records.” The APA speaks directly to Cloud Software Accounts and the migration of data and electronic embodiments of seller IP to buyer-designated accounts — underscoring that the transaction included digital records and that closing deliverables would capture those.

#### IV. Evidence Already Identified and Where It Should Be Found

A §220 exhibit ledger and briefing in the Chancery proceeding map precisely where responsive paper and ESI live, including:

Executed APA (June 15, 2022) and closing binder (checklist/index) that should list Key-Employee offers, CIAs/RCs, and Seller Releases as deliverables.

Seller Officer’s Certificate confirming satisfaction of §7.2(e) (employment arrangements) and receipt of Seller Releases.

Key-Employee Offer Letters (accepted) and Buyer CIA/Restrictive Covenants effective at closing.

Transmittal emails / signature packets / routing sheets (May–June 2022) showing circulation and execution of those deliverables.

These category descriptions are not speculative; they are drawn from the APA’s text and standard closing practice and are echoed in plaintiff’s filings seeking tailored inspection relief because the minutes omit the insider compensation details.

#### V. How These Mechanics Can Produce Material Misstatements or Omissions

A. Employment-contingent consideration affects valuation and disclosure. The Deferred Shares exist and are expressly keyed to Key-Employee employment status one year post-close. That is a value driver (and risk factor) that investors must understand, including the possibility of one-third reductions per Key Employee shortfall and how such reductions interplay with purchase price allocation, goodwill, and later impairments.

B. Embedded releases and individualized inducements require precise, complete disclosure. The transaction mandated specific insider releases (Exhibit H) and Key-

Employee obligations. If these arrangements were not fully and fairly disclosed — especially where they functioned as quid-pro-quo for consents or approvals — the omission would cut to the heart of Corwin-type “fully informed, uncoerced” cleansing and could mislead markets about who got what, when, and why.

C. Why “minutes-only” is insufficient and email/cloud artifacts matter. The APA’s routing of notices to a personal Gmail address, and its treatment of cloud accounts and digital books and records as purchased assets, indicates that the contemporaneous “story” lives in ESI. Where minutes are silent on compensation/release details, investors are entitled to assurance that the company obtained and considered the operative documents and disclosed material terms accurately.

D. The record sought from Luminar’s own disclosure pipeline. The inspection request seeks 8-K drafts, comment matrices, disclosure committee materials, risk-factor evolution, MD&A discussions, and earnings call scripts tied to Project Condor — because if disclosures downplayed or omitted the inducement/release architecture or the employment-contingent nature of deferred consideration, that could render filings materially misleading.

## VI. Valuation Trajectory, Vote Dynamics, and Credible Basis

The contemporaneous correspondence explains a suspicious price trajectory (from analyses supporting \$20+ million to a lower ultimate price), linked temporally to consent mechanics, and sets forth damages models that include rescission and rescissory damages — underscoring why accurate investor disclosure around consideration and approvals is material.

The brief further explains why minutes silence on insider compensation is itself a red flag that triggers inspection of countersigned paper and targeted ESI; that “necessary and essential” showing is met.

## VII. Buyer-Side Custody and “Document Parking”

The follow-up letter to Orrick makes clear that deal documents and deliverables were “parked with the buyer,” a commonplace reality of M&A closings; it argues Luminar cannot disclaim custody while simultaneously relying on the closing packet. This speaks to whether Luminar had the information needed to make accurate SEC disclosures — and, if it had it, whether it used it properly.

## VIII. What Luminar’s Counsel Says — and Why It Heightens SEC Interest

In letters dated September 23 and October 7, 2025, Luminar’s counsel contends the demand is unrelated to Luminar’s stockholder status and lacks a credible basis. But the demand itself expressly asserts a proper purpose to investigate mismanagement and disclosure issues at Luminar related to the Condor acquisition, including inducements and releases that were conditions to closing and may not be reflected in board minutes or public filings. The disagreement underscores the need for independent regulatory review of Luminar’s disclosure controls and record-keeping for Project Condor.

## IX. Specific SEC-Facing Categories Warranting Review

Based on the APA and the inspection categories, the Commission should review whether Luminar’s SEC disclosures for the Condor deal accurately and completely reflected:

1. Purchase Price Structure — Base vs. Deferred Shares and how the Employment Condition could diminish deferred consideration; whether PPA/goodwill and subsequent impairments transparently accounted for employment-contingent purchase price risk.
2. Insider Agreements — Key-Employee offer letters, Buyer CIAs/RCs, Seller Release Agreements (Exhibit H); who received what, and whether individualized terms created disparate economics not visible to public investors.
3. Approval Mechanics — Whether any selective release waivers or inducements were used to secure consents or quash opposition; if so, whether SEC filings disclosed these facts and their effect on disinterested approval narratives.
4. Disclosure Controls — Drafts of the 8-K and internal comment matrices, disclosure committee materials, and risk-factor evolution around Condor.
5. Record Custody — Whether Luminar maintained a complete closing binder, including the

Seller Officer's Certificate attesting to satisfaction of employment conditions and receipt of releases, and whether any "document parking" impeded internal or public reporting accuracy.

## X. Why This Matters to Investors

The architecture here is not cosmetic. The APA ties purchase price and closing to insider employment and releases. If investors were presented a simplified narrative of consideration and approvals while the operative economics turned on individualized arrangements and selective waivers, then reported transaction value, risk assessments, and governance representations could be materially misleading. The inspection submissions explicitly request goodwill testing and auditor communications to understand the economic arc post-closing — another category with disclosure implications.

## XI. Requested SEC Actions

I respectfully request that the Commission:

1. Open an inquiry into Luminar's disclosures and controls for Project Condor, focusing on (a) insider employment-contingent closing conditions and (b) selective releases tied to consents.
2. Obtain the complete closing record (including Exhibit H releases, Key-Employee offers, Buyer CIIAAs/RCs, the Seller Officer's Certificate, and closing checklists/indices), together with transmittals, DocuSign envelopes, and routing sheets demonstrating circulation/execution.
3. Review disclosure committee materials, 8-K/10-Q/10-K draft iterations, comment matrices, MD&A notes, and risk-factor evolution around Condor; compare those with the actual compensation/release structures.
4. Assess whether public filings fully and fairly disclosed (a) the employment-contingent nature of deferred consideration and (b) any selective releases/inducements that influenced approvals and consideration flows.
5. Evaluate potential control deficiencies if crucial communications were conducted via personal email and cloud channels without adequate corporate retention, and whether that



affected reporting.

## XII. Supporting Materials and Representative Citations

APA (June 15, 2022) — Parties, exhibits (incl. Exhibit H: Seller Release Agreement), and consideration scheme with Employment Condition for deferred shares.

Seller Officer's Certificate — Attesting to satisfaction of employment-related closing conditions and receipt of releases.

Closing checklist/binder index — Should list Key-Employee offers, Buyer CIIAAs/RCs, and Seller Releases as deliverables.

Transmittals/signature packets — Email/DocuSign evidence of execution and routing.

Inspection demand and categories — Requesting executed agreements, RSU grants, SEC-facing disclosure workstreams, advisor communications, and valuation materials.

Adversarial letters — Orrick's rejections vs. the follow-up rebutting custody/credible-basis, illustrating the live disclosure controversy.

## XIII. Additional Context Relevant to Materiality

Valuation & Goodwill. The APA's Deferred Shares are tied to a one-year post-close Employment Condition — a structure that can change the effective purchase price ex-post. Accurate purchase price allocation and goodwill testing require a clear view of those conditions and any subsequent reductions (one-third per Key Employee). Investors evaluating impairments or subsequent performance must be able to connect these mechanics to reported outcomes.

Selective Releases and Consent Dynamics. Where selective releases or inducements are used to secure consents or suppress objections, uniformity and candor in disclosure become paramount. The inspection categories call for mailing/notice logs and solicitation architecture, reflecting concern that statutory notice/compliance and equal treatment were compromised — issues that, if mirrored on the buyer-side in disclosure choices, would implicate federal securities law.

Minutes Silence / ESI Necessity. Filings emphasize that board minutes are silent on key

compensation arrangements and thus cannot, by themselves, verify fairness or accuracy. That is why executed paper and ESI are “necessary and essential” — and why an issuer relying on thin minutes without reconciling the actual, countersigned agreements risks misleading disclosure.

#### XIV. Why the SEC Is the Proper Audience (Beyond Chancery)

The Delaware §220 process is designed to surface the corporate record. But whether Luminar complied with federal disclosure obligations about Condor is an SEC question. The categories sought in inspection — 8-K drafts, disclosure committee materials, risk-factor edits — are squarely within the SEC’s purview when evaluating whether investors received a full and fair picture of (i) the consideration structure, (ii) the approval mechanics, and (iii) compensation/release arrangements that could change outcomes or incentives.

#### XV. Relief Sought from the Commission

1. Open a formal inquiry into Luminar’s Condor disclosures and controls.
2. Compel production of the complete closing record and disclosure-process materials (not just minutes), including executed Exhibit H releases, Key-Employee offers, Buyer CIIAAs/RCs, the Seller Officer’s Certificate, and the closing binder/checklist with transmittals and DocuSign envelopes.
3. Compare internal drafts and committee deliberations with final SEC filings to assess the completeness and accuracy of public statements about consideration, approvals, and insider compensation/release arrangements.
4. Assess internal controls and record-retention where formal notices and coordination used personal email/cloud channels; determine whether this impaired accurate reporting.

#### Appendix A — Representative, Pin-Cited Materials

1. APA (Executed June 15, 2022) — Parties, exhibits (incl. Exhibit H: Seller Release), consideration, and Employment Condition for deferred shares.
2. Seller Officer's Certificate / Closing Binder Index — Proof of receipt/satisfaction of employment-related conditions and releases; should exist in buyer's closing packet.
3. Key-Employee Offers / Buyer CIIAAs / RCs (Accepted) — Executed at closing; confirm inducement structure tied to close.
4. Transmittal Emails / DocuSign Envelopes — Routing/execution evidence for H-I and releases.
5. Inspection Demand & Categories — Proper purposes (mismanagement, disclosure violations) and targeted scope (executed agreements, RSUs, SEC disclosure materials, valuation files).
6. Luminar Counsel Letters (Sept. 23 & Oct. 7, 2025) — Rejections framing the dispute and underscoring disclosure stakes.
7. Plaintiff Filings — Minutes silence on insider compensation; necessity of executed paper and ESI; tailored, inside-out relief.

## Appendix B — SEC-Facing Inspection Categories (Illustrative)

SEC Reporting & Disclosure Controls: 8-K drafts and comment matrices; disclosure committee materials; risk-factor evolution; MD&A drafts; earnings call scripts.

Valuation & PPA: Initial/revised valuation models; purchase price allocation; goodwill testing; auditor communications.

Approval & Notice Mechanics: §228(e) mailing and tracking logs; solicitation architecture; equal-treatment analysis.

Employment/Release Architecture: Key-Employee offers; Buyer CIIAAs/RCs; Seller Releases (Ex. H); global releases; RSU/award letters; countersignatures and transmittals.

## Appendix C — Why “Document Parking” and Personal Email Matter

Buyer Custody: In standard practice, buyers maintain complete closing packets. Assertions that documents are “Solfice’s, not Luminar’s” conflict with M&A realities and the APA’s own deliverables; buyers cannot rely on closing satisfaction without holding the paper.

Personal Gmail for Notices: The APA itself channels official notices to a personal Gmail

account, anchoring a need for ESI review and raising internal-controls questions about record capture for SEC reporting.

If the Commission desires, I can furnish copies of the referenced documents and help identify custodians, including buyer outside counsel (Orrick), seller counsel, and deal coordinators referenced in the closing materials. Thank you for your attention to this matter.

Enclosures/References (available on request):

EXHIBIT C — Asset Purchase Agreement (Executed 6/15/22); and related closing exhibits (forms) including Exhibit H — Seller Release Agreement.

Inspection Demand and Supporting Submissions (Delaware Chancery) — showing minutes silence on compensation and the targeted categories sought (executed agreements; ESI; SEC reporting artifacts).

Adversarial Correspondence (Orrick letters, Sept. 23 & Oct. 7, 2025) — contesting proper purpose/credible basis and buyer custody.

End of TCR Letter

**Are you having or have you had difficulty getting access to your funds or securities?**

No

**Did you suffer a loss?**

Yes

**Enter amount of loss to nearest dollar without characters (e.g., 15000, not \$15,000.00).**

100000000

**When did you become aware of the conduct? (mm/dd/yyyy)**

12/19/2024

**When did the conduct begin? (mm/dd/yyyy)**

12/10/2019

**Is the conduct ongoing?**

Yes

**Has the individual or firm acknowledged the conduct?**

Yes

**How did you learn about the conduct? You may select more than one answer.**

Conversations, Internal business documents

**Have you taken any action regarding your complaint? You may select more than one answer.**

Complained to firm, Legal action

**Provide details.****Luminar (Corporate Secretary)**

Who was contacted: Corporate Secretary, Luminar Technologies, Inc.

How/When: Section 220 demand sent by email & courier; dated September 5, 2025.

What they did: Luminar's outside counsel (Orrick) responded on Luminar's behalf rejecting the demand (see Orrick entries below).

**Luminar Outside Counsel (Orrick, Herrington & Sutcliffe LLP — M. Todd Scott)**

Who was contacted: M. Todd Scott (Email: tscott@orrick.com:mailto:tscott@orrick.com), counsel to Luminar.

How/When (Your outreach): Your rebuttal letter was sent September 23, 2025 to Mr. Scott, with the Register in Chancery copied.

What Orrick did (Response #1): On September 23, 2025, Orrick rejected the Section 220 demand, arguing lack of proper purpose and credible basis related to Luminar.

What Orrick did (Response #2): On October 7, 2025, Orrick reiterated the rejection, again asserting improper purpose and insufficient evidence of Luminar wrongdoing; stated the company would not engage further on the demand.

**Delaware Court of Chancery (Register in Chancery)**

Who was contacted: Register in Chancery (copied).

How/When: Copied on your September 23, 2025 rebuttal to Orrick.

What they did: The letter reflects a courtesy copy; no specific action by the Register is recorded in the materials provided.

**Company Counsel (Historical — Solfice Counsel)**

Who contacted you: "Company counsel" (seller-side) previously transmitted a power-of-attorney request tied to a \$500,000 discretionary payout, and presented release waiver requests.

What you did: You declined to sign/authorize these requests.

Why this matters: These contacts form part of the inducement/release context underlying your inspection and SEC tip.

**Defendants/Counterparties in the Delaware §220 Litigation (Seller-side)**

Who was contacted / engaged via litigation process: The seller-side defendants and their counsel in the Chancery action (Safko/Harvey et al.).

What they did (as reflected in filings):

Pressed threshold motions (e.g., jurisdiction/standing/service) rather than addressing inspection merits.

Raised service objections despite receipt; used these as delay tactics.

Resisted custodial certifications and refused to make reasonable requests/certifications to counterparties, impeding inspection.

Sought dismissal, prompting your Request to Deny Motion to Dismiss and request for a staged production protocol with deadlines.

Your Follow-On Actions (for completeness)

Who you contacted: Luminar (Corporate Secretary) via the original demand; Orrick via rebuttal; Chancery Register via courtesy copy.

What you did:

Served a detailed §220 demand enumerating categories (executed releases, employment/CIIAA, waterfall analyses, disclosure materials).

Sent a legal rebuttal to Orrick's rejection articulating buyer-side custody and credible basis.

Filed briefing requesting denial of dismissal and a two-stage production protocol with sworn search certifications.

One-line summary

Contacts: Luminar's Corporate Secretary; Luminar's counsel (Orrick/M. Todd Scott);

Delaware Register in Chancery (cc); historical contacts from seller-side counsel to you.

Actions taken: Luminar (through Orrick) rejected the §220 demand on Sept 23 and again on Oct 7, 2025; seller-side defendants pressed threshold objections and resisted certifications; you rebutted, pressed for staged production, and moved to deny dismissal.

## Who are you complaining about?

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### Person or Firm 1

**Are you complaining about a person or a firm?**

Firm

**Select the title that best describes the firm the complaint is about.**

Publicly held company

**Are you or were you associated with the person or firm when the alleged conduct occurred?**

No

### Identifier Type

Ticker Symbol

### Ticker Symbol

LAZR

**Are you a current or former Employee, Officer, Partner, or Employee Director of any entity you are complaining about?**

No

**Are you a current or former Non-Employee Director, Consultant, Contractor or Trustee of any entity you are complaining about?**

No

### Firm Name

Luminar Technologies Inc

### Street Address

2603 Discovery Drive,

### Address (Continued)

Suite 100

### Country

United States



**Zip / Postal Code**

32826

**City**

ORLANDO

**State / Province**

FL

**Website**<https://www.luminartech.com/>

**If the complaint is about an entity or person that has custody or control of your investments, have you had difficulty contacting that entity or person?**

Yes

**Person or Firm 2**

**Are you complaining about a person or a firm?**

Firm

**Select the title that best describes the firm the complaint is about.**

Private/Closely Held Company

**Are you or were you associated with the person or firm when the alleged conduct occurred?**

Yes

**How are you or were you associated with the person or firm you are complaining about?**

Passive Stockholder with 27% ownership

**Are you a current or former Employee, Officer, Partner, or Employee Director of any entity you are complaining about?**

Yes

**Check all that apply.**

Employee, Officer, Partner, Employee Director

**Are you a current or former Non-Employee Director, Consultant, Contractor or Trustee of any entity you are complaining about?**

No

**Firm Name**

Solfice Research, Inc Represented by Perkins Coie

**Street Address**

3150 Porter Dr

**Address (Continued)**

Operating under Del Sec 278

**Country**

United States

**Zip / Postal Code**

94304

**City**

PALO ALTO

**State / Province**

CA

**Website**

<http://www.perkinscoie.com/>

**If the complaint is about an entity or person that has custody or control of your investments, have you had difficulty contacting that entity or person?**

Yes

## Which investment products are involved?

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**Select the type of product involved in your complaint.**

Equities (e.g., common stock, preferred stock)

**Please select the category that best describes the security product.**

Common stock (exchange-traded stock)

**Enter the ticker symbol, if known.**

LAZR

## About you

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**Are you filing this tip under the SEC's whistleblower program?**

Yes

**Are you an attorney filling out this form on behalf of an anonymous whistleblower client who is seeking an award?**

No

**Title**

Mr

**First Name**

Shanmukha

**Middle Name**

Sravan

**Last Name**

Puttagunta

**Street Address**

254 Bonita Ln

**Country**

United States

**Zip / Postal Code**

94404

**City**

Foster City

**State / Province**

CA

**Home Telephone**

415-710-2791

**Email Address**

[sravan.puttagunta@gmail.com](mailto:sravan.puttagunta@gmail.com)

**What is the best way to reach you?**

Email

**Are you represented by an attorney in connection with this matter, or would you like to provide your attorney's contact information?**

No

**Select the profession that best represents you.**

Other

**For Other, please specify.**

Previous Director, Original Founder of Solrice Research, Inc

**Have you reported the matter at issue in this submission to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism for reporting possible violations at any entity you are complaining about?**

No

**Were you retaliated against for reporting the matter at issue in this submission either internally at the entity or to a regulator?**

No

**Has anyone taken steps to prevent you from reporting this violation to the SEC?**

No

**Are documents or other information being submitted that could potentially identify the whistleblower?**

Yes

**Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity.**

The Section 220 Demand letter, I have several Affidavits there. There might be a joinder by the court.

**Does the whistleblower want to be eligible to apply for a whistleblower award?**

Yes

**1. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer or employee of the Department of Justice; the Securities and Exchange Commission; the Comptroller of the Currency; the Board of Governors of the Federal Reserve System; the Federal Deposit Insurance Corporation; the Office of Thrift Supervision; the Public Company Accounting Oversight Board; any law enforcement organization; or any national securities exchange, registered securities association, registered clearing agency, or the Municipal Securities Rulemaking Board?**

No

**2. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer, or employee of a foreign government, any political subdivision, department, agency, or instrumentality of a foreign government, or any other foreign financial regulatory authority as that term is defined in Section 3(a)(52) of the Securities Exchange Act of 1934 (15 U.S.C. Section §78c(a)(52))?**

No

**3. Did you acquire the information being submitted to us through the performance of an engagement required under the federal securities laws by an independent public accountant?**

No

**4. Are you providing this information pursuant to a cooperation agreement with the SEC or another agency or organization?**

No

**5. Are you a spouse, parent, child, or sibling of a member or employee of the SEC, or do you reside in the same household as a member or employee of the SEC?**

No

**6. Have you or anyone representing you received any request, inquiry or demand that relates to the subject matter of your submission (i) from the SEC; (ii) in connection with an investigation, inspection or examination by the Public Company Accounting Oversight Board, or any self-regulatory organization; or (iii) in connection with an investigation by Congress, any other authority of the federal government, or a state Attorney General or securities regulatory authority?**

No

**7. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information you are submitting to the SEC?**

No

**8. Did you acquire the information being provided to us from any person described in Questions 1 through 7?**

No

**I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information, and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the SEC, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry.**

Agree

## Attach Files

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### Upload Document(s)

- *EXHIBIT C - Project Condor - Asset Purchase Agreement - Executed 6.15.22.pdf* (778.14 KB)
- *EXHIBIT B - Condor Term Sheet 12\_7\_21.pdf* (54.83 KB)
- *PLAINTIFF's BRIEF REGARDING MEET AND CONFER.pdf* (377.97 KB)
- *EXHIBIT A - Puttagunta - 220 Demand (00822156-6xACD46).pdf* (2.35 MB)
- *PLAINTIFF MOTION .pdf* (84.4 KB)
- *CERTIFICATE\_OF\_SERVICE.pdf* (93.74 KB)
- *Proposed\_Short\_Form\_Order\_Section\_220.pdf* (75.94 KB)
- *EXHIBIT D - Solrice Research Inc (Full Cap Table) 2022-01-07.pdf* (417.47 KB)
- *EXHIBIT\_L - Scott Harvey Proof Of Service.pdf* (184.5 KB)
- *10.7.2025 T. Scott Letter Regarding Inspection Demand on Luminar.pdf* (31.64 KB)
- *9.23.2025 T. Scott Letter Regarding Inspection Demand on Luminar 4128-8162-8000 v.pdf* (32.94 KB)
- *9.23.2025 S. Puttagunta Letter Response to Luminar 220 Rejection.pdf* (481.59 KB)
- *Section\_220\_Demand\_Letter(signed)\_0.pdf* (176.28 KB)
- *EXHIBIT A - PROOF OF DELIVERY.pdf* (119.37 KB)
- *Proof\_of\_Ownership\_TradeConfirmations\_0076\_070825.pdf* (275.21 KB)

