

The SEC's SolarWinds Enforcement FAQs

Earlier this week, we [blogged](#) about the SEC's SolarWinds enforcement inquiries. This morning, the SEC issued [guidance in the form of 19 FAQs](#) for responding to the voluntary request for information relating to a SolarWinds inquiry. For most companies, the important points are:

- The SEC identified the specific compromised versions of the software: Version 2020.2 (with no hotfix); Orion Platform software version 2020.2 HF 1; and Orion Platform software version 2019.4 HF 5.
- If a recipient's responses to Items 1(a) and 1(b) do not include any of those versions of the Orion Platform software, then it does not need to respond to Request Nos. 2-5 of Attachment A.
- The SEC repeated its position that Question 5, which seeks information about "other compromises" includes non-material events. Our prior guidance regarding how to respond to question 5 remains unchanged.

Authors



[Jason Day](#)

Partner

JDay@perkinscoie.com [303.291.2362](tel:303.291.2362)

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