



A. EXECUTIVE SUMMARY

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to serve as the Independent Compliance Auditor for Herbalife International of America, Inc.,
Herbalife International, Inc. and Herbalife Ltd. (Herbalife) pursuant to an Order for
Permanent Injunction and Monetary Judgment (the Stipulated Order), entered on July 25,
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Manhattan District Attorney W 5 DFNHWV %XUHDX DQG 7ULDO 'LYLVLI
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of the Westies gang and the prosecution of John Gotti and members and associates of the
Gambino Organized Crime Family. Mr. Schlanger is a graduate of the State University of
New York at Binghamton and New York University School of Law.

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honed in some of the largest financial institutions and law enforcement agencies in the
country, Mr. Pollitt brings not only leadership but powerful forensic accounting and
investigations experience to the Exiger team.

Mr. Pollitt joined Exiger after a 17-year career as a Special Agent for the Federal Bureau of
Investigation in New York City. With the FBI, Mr. Pollitt developed a deep expertise
investigating frauds involving money laundering, bid

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Before returning to the Manhattan District \$ W W R Office to serve as the Chief Assistant DA, Mr. Alonso spent four years as a litigation partner in the New York office of Kaye Scholer LLP, where his practice focused on, among other areas, internal investigations. While there, he served, at the recommendation of the Commodity Futures Trading Commission and by appointment of a U.S. District Judge, as the Receiver of a fraudulent investment entity called IA Trading.com whose founder had perpetrated a \$43 million Ponzischeme in South America and elsewhere.

As part of his duties at Exiger, Mr. Alonso serves on the Executive Committee overseeing the HSBC

Companies

second line of defense financial crime compliance assurance capability, whilst under a Deferred Prosecution Agreement.

In her time at Barclays, she also worked as the Global Head of Barclays Internal Audit Quality Assurance function, where she was responsible for assuring the audits covering risk disciplines. She has also held roles as the Regional Head Audit (UK/EME) for Barclays Investment Bank and served as an IT Audit Director.

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senior management staff or other external groups using excellent communication skills. Additionally, Penny has extensive experience in training and developing professional staff.

Previously, Penny was employed by Kroll Investigative and forensic accounting practice, where she was most recently a Director in the Toronto office of Kroll Canada. Between 2003 and 2009, Penny was a member of the teams of lawyers, auditors and law enforcement specialists who acted as Independent Monitors for the Los Angeles Police Department and the Detroit Police Department. In these roles Penny was the lead auditor for the LAPD WHDP DQG VKH SURYLGHG SHHU UHYLHZ IRU WKH '3' police performance audits to determine if they met the standards outlined in the respective & RQVHQW 'HFUHHV 3HQQ\ DOVR FRDFKHG WKH FOLHG skills.

Erika Peters

(ULND 3HWHUV LV D 'LUHFWRU EDVHG Focus on the .V 1HZ ILUP.V UHJXODWR-money laundering, operational risk, and due diligence and audit assurance practices. Ms. Peters joined Exigen from the Internal Audit department at American Express, where she served as a Senior Compliance Manager.

Prior to her time at American Express, Ms. Peters spent 10 years at Deutsche Bank in various risk and control capacities. She was Assistant Vice President within Internal Audit at Deutsche Bank in New York. While there, she executed compliance audits, with a particular focus on financial crime compliance, money laundering and transaction

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support to the internal audit teams covering money laundering, know your customer,
sanctions, fraud, security and data protection, U.S. Foreign Account Tax Compliance Act,
bribery and corruption.

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DATA MANAGEMENT

As noted above, Exiger is intimate with the secure storage of data. Likewise, in executing our assignments we manage our data with a data repository, sometimes referred to as a data room, which maintains an auditable trail of inclusion, examination and removal of any and

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money laundering and sanctions compliance programs. Schlanger served as the Deputy
Monitor on this project, from its inception until his return to public service in February
2014, and upon his joining Exiger in May 2015, has continued to play a supervisory role in
the monitorship. Mr. Alonso also plays a supervisory role in the monitorship, and Mr. Pollitt
and Mr. Ball have played key roles in particular related segments of the monitorship.
Contact AUSA Laura Billings of the Asset Forfeiture and Money Laundering Section of the
Department of Justice at 202-305-1245 and Stuart Levey, General Counsel of HSBC Bank at
011 44 20 7991 8822

New York City, Department of Investigation Pursuant to an RFP process, Exiger was
chosen in 2015 by the New York City Department of Investigation (DOI) to be the
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assessment tasks will be reported on in each report. As indicated above, the MADC will outline the methodology and metrics by which substantial compliance will be assessed. The report will specify whether the specific assessment task is a Key, DQ, Q & R, P, S, O, L, D, Q, F

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Simplified LLC
Order (SO)

Number

SO Title

Collection of Retail Sales Information

SO Description: Merchant shall collect from business opportunity participants and

1. the method of payment;

2. the date

Compliance

Compliance with this provision will be achieved when the following

Appendix B



