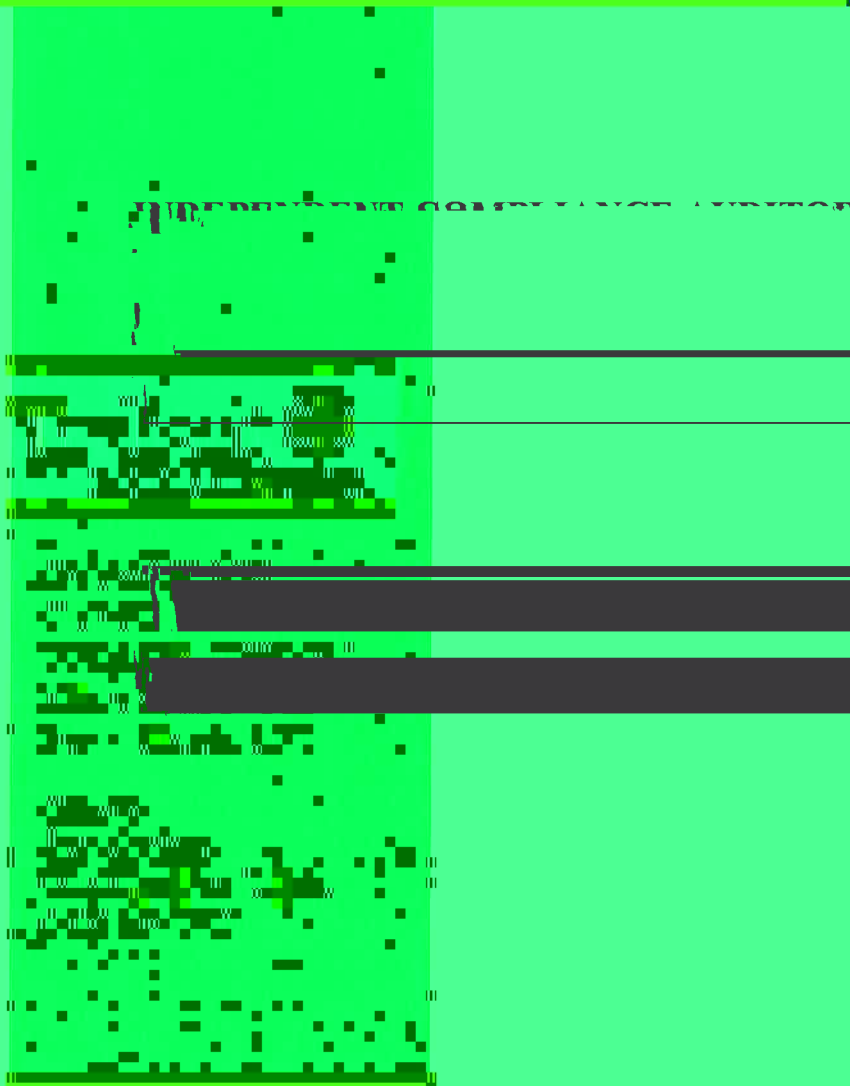


# Federal Trade Commission

reliant   
RISK ADVISORS

1255 23<sup>rd</sup> St. NW  
Suite 500  
Washington, DC 20037  
Phone: 202.249.7950  
Fax: 202.223.3071

Contact:  
Susanna Tisa



[REDACTED]

Executive Summary

[REDACTED]

ETC and Herbalife conducting walk-throughs of Herbalife locations, obtaining and reviewing remediation

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

plans and status thereof, completion of Reforms, and preparing a detailed project work plan. Treliant and

[REDACTED]

[REDACTED]

documented in a formal Continuous Monitoring Report and communicated to Herbalife and if it involves

[REDACTED]

taken by Herbalife in response to issues raised through continuous monitoring may be leveraged by

TriPoint during its next level audit and will be rolled up into each report as necessary to fully and

[REDACTED]

program areas and continues to monitor key developments at the SEC and other bank and financial regulatory agencies. Mr. Sporkin is a Partner of the law firm BuckleySandler, L.L.P. in Washington, D.C. His practice focuses on compliance counseling, internal investigation, private litigation, and enforcement defense.

Mr. Sporkin has particular experience with whistleblower matters, having been one of the leaders in launching the SEC's Whistleblower Office and writing the whistleblower rules called for by the Dodd-Frank Act. Drawing from his experience and insights, he is often called upon to advise financial institutions and public companies on sensitive whistleblower issues.

Before joining BuckleySandler, Mr. Sporkin spent 20 years with the SEC's Enforcement Division, most recently as Chief of the Office of Market Intelligence where he oversaw a multidisciplinary staff of more than 50 senior enforcement attorneys, accountants, market surveillance specialists, and analysts tasked with identifying and investigating conduct that could give rise to violations of the federal securities laws.

Amy Walsh, a partner in the New York office of Morvillo LLP, is the former Chief of the Business and Securities Fraud Section of the United States Attorney's Office for the Eastern District of New York. Amy serves as the court-appointed monitor in JPMorgan Chase's settlement with the United States Trustee Program of the Department of Justice. Her experience includes representing individuals and institutions in government investigations, enforcement actions, and prosecutions conducted by various government agencies, including the U.S. Department of Justice, the Securities and Exchange

[REDACTED]

Commission, the Commodity Futures Trading Commission and the Internal Revenue Service.

Prior to entering private practice, Amy was an Assistant United States Attorney for 12 years in the United States Attorney's Office in the Eastern District of New York, where she led dozens of investigations and cases on behalf of government, and supervised several sections within the Office. Amy holds a J.D. from Fordham University School of Law and a B.A. from Vassar College.

***Project Team***

Numerous senior Compliance Officer roles for both domestic and international businesses - banking

New York law firms; New York State Attorney General's Office, Bureau of Investor Protection & Securities - Securities Examiner. Ross has extensive experience in remediating regulatory issues and in

credit cards (add on products and collections) and AMI/PSA (cardiac activity monitoring and alert

[REDACTED]

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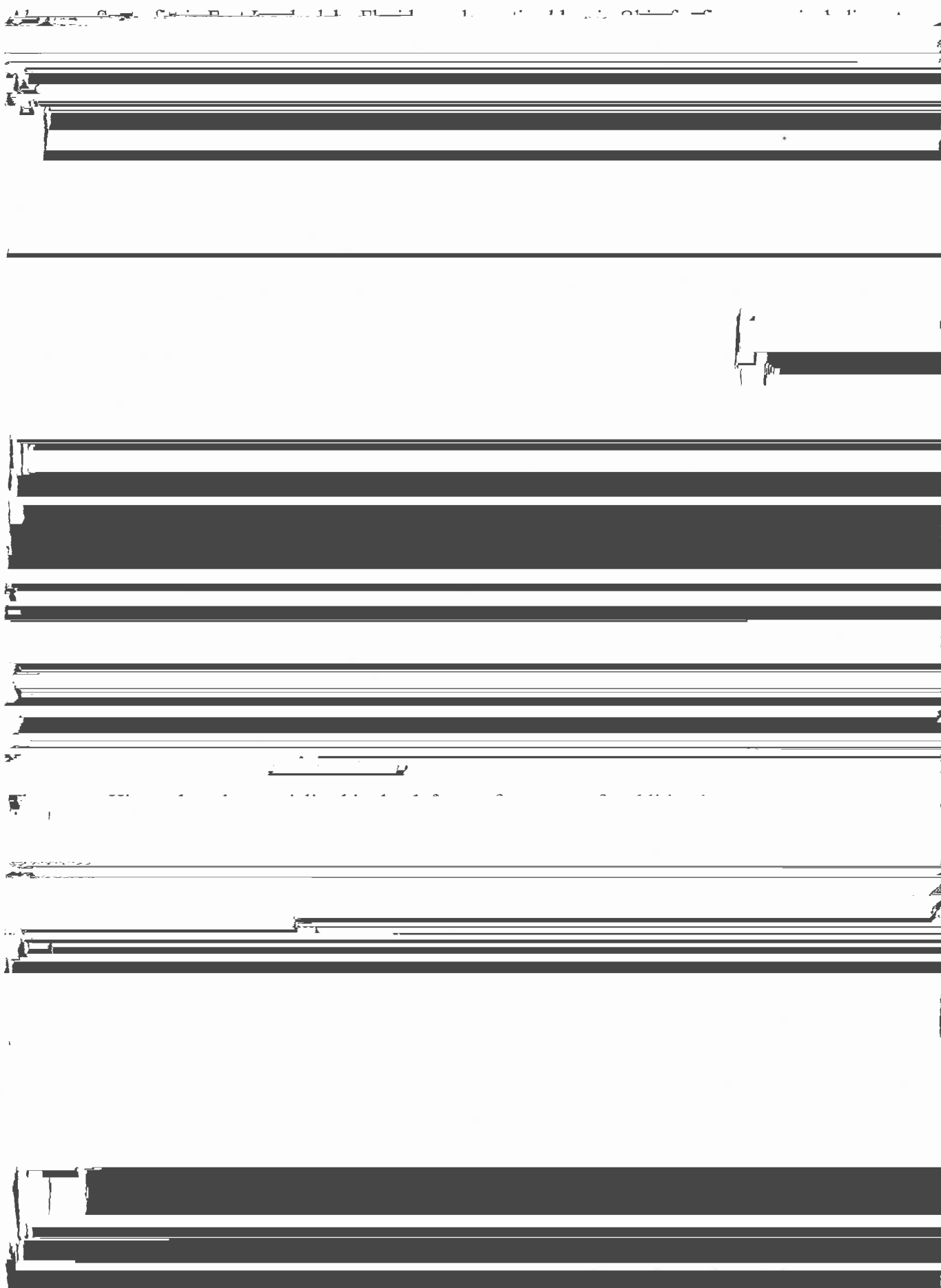
[REDACTED]

[REDACTED]

[REDACTED]

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**Kenneth Will - Senior Manager**

Ken Will has over 11 years of experience working with financial institutions in roles primarily focused on financial crimes compliance. He has substantial experience in building, implementing, and auditing the

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

control environments of both domestic and international financial crimes compliance programs, specializing in the areas of surveillance/transaction monitoring, optimizing and monitoring threshold settings, risk and control analysis, risk assessment methodology, sanctions, audit methodology, and

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

development of GE Capital Bank's online retail deposit platform (savings/CDs) by providing real time feedback to bank executives on the effectiveness of risk identification and control development. Ben also

[REDACTED]

instrumental in the BSA e-filing initiative and the rollout of the new FinCEN SAR and CTR reports, including presenting the two FinCEN webinars regarding their proper use and completion.

[REDACTED]

Compliance Manager (CRCM).

**Phillip S. Hubert - Senior Consultant**

Phil Hubert is a Senior Consultant with Treliant Risk Advisors. He has 11 years of experience in

[REDACTED]

Prior to joining Treliant, Jessica served as an officer in both the Surveillance and Investigations Unit as well as the Financial Intelligence Unit in the role of Senior AML Compliance Analyst at First Niagara Bank. She began her career in banking at KeyBank performing various roles, including branch Operations Supervisor.

Jessica holds an MBA from Medaille College. She also obtained a BA in Art History from Buffalo State and an AS in Music from Niagara County Community College prior to completing her graduate degree.

**Lauren E. T. Chriss – Consultant**

[REDACTED]

Before joining Truist, Ms. Nails was a Consultant at the Capital and Collateral Consulting Group, where

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[REDACTED]

she helped build out a third-party vendor management program by developing and improving processes supporting governance, risk, and compliance. She was also a Senior Consultant with Protiviti's Risk and Compliance Practice, where she worked on Bank Secrecy Act/Anti-Money Laundering (BSA/AML) consent order validation, mortgage control environment assessment, Basel II internal audit, and commercial loan reviews. She began her career at BB&T Capital Markets as a Risk Management Analyst

data integration and reporting for quarterly peer research publications and client conference events. She also constructed client surveys on investment strategy and risk assessment in partnership with investment directors. Prior to Cambridge Associates LLC, Courtney was a Client Service Associate at IXI

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

**Luke Sheehan - Analyst**

Luke Sheehan is an Analyst with Treliant Risk Advisors. His professional experience includes project

[REDACTED]



Prior to joining Treliant, Etienne served at Accenture, Oracle Financial Services, SAS Institute and IBM Global Business Services. As a senior managing consultant, he has served clients including some of the largest Banks in US and Europe.

He recently led the BASEL III, Financial Regulatory Reporting and CCAR programs for State Street bank, BNP Paribas and American Express Bank. He also played a key role in models validation and

[REDACTED]

scenarios management for multiple AML & Fraud Detection initiatives for Oracle Financial Services

[REDACTED]

Etienne holds an MBA from ESSEC Business School & Duke University's Fuqua School, a Doctorate Degree in Management Information Systems, and a Master Degree in Statistics, Econometrics from Paris-Dauphine University.

Curt Dugling is a Manager with Treliant Risk Advisors. He is an experienced professional with over 25

years specializing in information security, compliance, operational risk, and enterprise infrastructure and operations for clients in the financial services, manufacturing, healthcare, e-commerce, publishing, non-profit, and distribution industries.

Prior to joining Treliant, Curt founded Free Range Consulting, LLC, an information technology consulting company that served a variety of industries including financial, manufacturing, managed service providers, and professional services firms. He was also a co-founder and partner in McMurray Technology Group, LLC, an information technology consulting firm that served industries including financial, health care, and software development firms.

discovery and risk management vendor, Kroll Ontrack, Margaret combined her deep knowledge of

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]



- Ben Mathew and Ken Will – Audit and Continuous Monitoring management, including scoping, planning, execution and reporting.

Erinna Lopez, Brent Chintamani, Carl Buehler and Margaret Small – Data extraction and

Tim Stokes, Phil Hubert, Jessica Nichele, Lauren Chriss, Naila Eisa, Courtney Larson and Ryan May – Audit Execution and Continuous Monitoring.

Luke Sheehan – Project management.

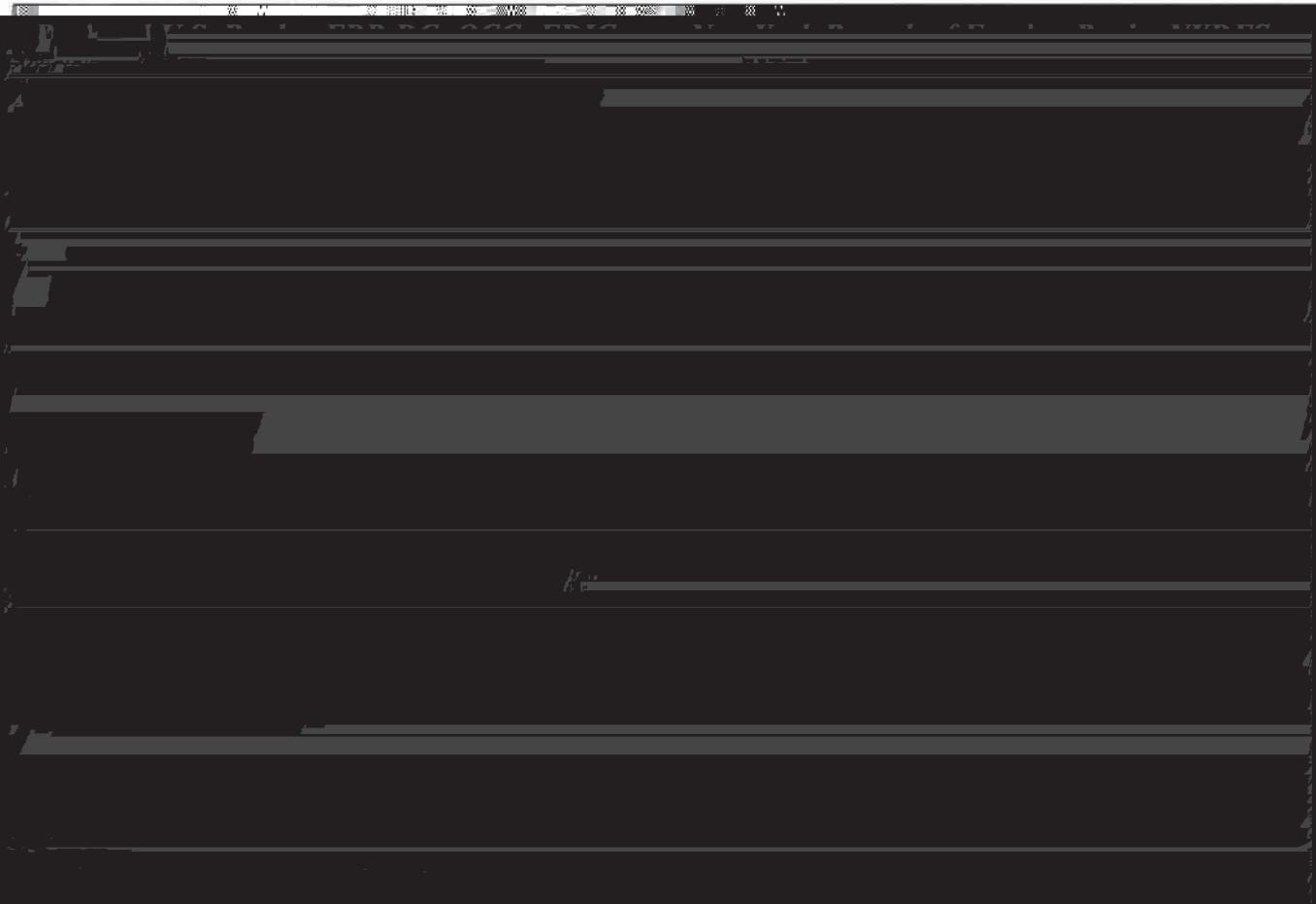
under the Order have extensive experience in compliance and operational risk issue remediation and corrective actions arising from enforcement matters for major global institutions related to BSA/AML

[REDACTED]

customers fairly issues (e.g., UDAP; UDAAP) as compliance officers, compliance auditors and compliance consultants.

Treliant's team member qualifications are described in section B, above. The team individually and collectively represents an experienced group of professionals, each bringing with them specific subject





- AML/BSA

- OFAC

Multi-year agreement with approval by regulators to co-source audit department as AML/BSA & OFAC subject matter experts

New York Branch of Foreign Bank - NYDFS

- IBOR

Migration for implementation into IBOR

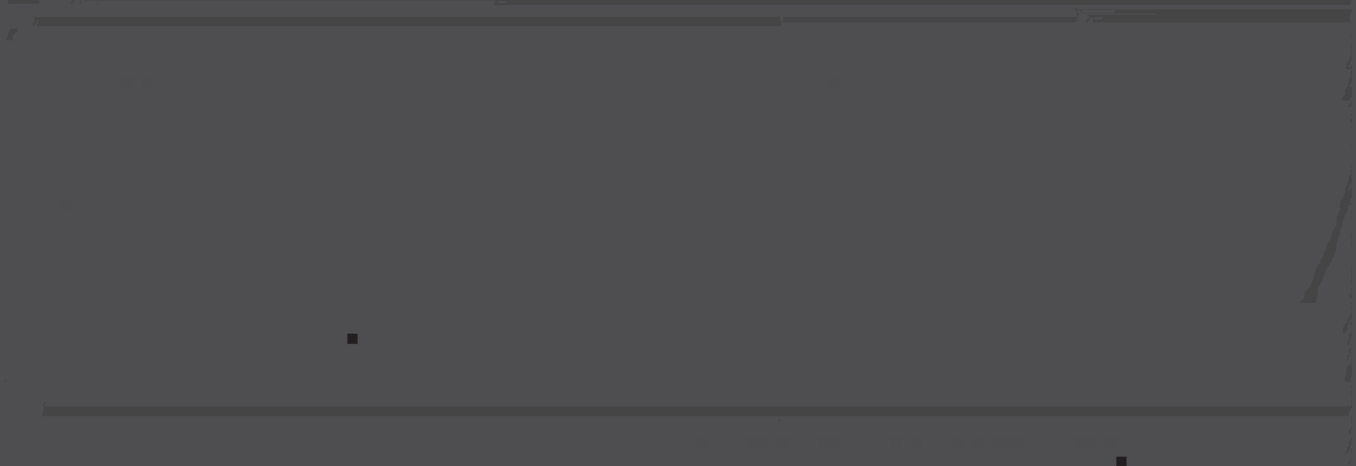
- FX

Independent consultancy intended to create a framework for the bank to take appropriate steps to ensure the soundness of the bank's operations and trading processes

U.S. Branch of Foreign Bank – OTS; OCC

- Mortgage foreclosure review

Independent consultancy for mortgage





Prior to the beginning of each audit and as part of audit planning, Treliant will prepare a deliverables request list specific to the areas required to be reviewed under the Order, which will enumerate the documentation and information to be delivered by Herbalife to Treliant prior to commencement of formal planning.

- Methods of analyzing information

Treliant will first ensure the completeness and accuracy of any data required for analysis/testing by either independently extracting the data or by performing an ‘over-the-shoulder’ extract from the systems. Additionally, Treliant will evaluate the controls within the systems to further assess the integrity of the data and reporting. Finally, Treliant will utilize data analytics and/or perform sample

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



on behalf of Treliant, it shall require such individual to agree not to be retained by the FTC or Herbalife for a period of two years after the conclusion of the engagement.

[REDACTED]







**EXHIBIT A**  
**TRELIANT RISK ADVISORS**  
**DRAFT BUDGET**

