

## **ATTACHMENT B: REMEDIAL FRAMEWORK**

1. Timing: Unless otherwise set forth in the below paragraphs, the requirements of this Remedial Framework will expire on December 31, 2020.
2. Civil Penalty: CG Technology L.P., f/k/a Cantor G&W (Nevada) L.P., d/b/a Cantor Gaming (CG Technology), agrees to pay a civil money penalty to FinCEN in the amount of \$12,000,000, of which \$6,000,000 will be concurrent with the penalty and forfeiture agreed to by CG Technology in the Settlement Agreement with the United States Attorney's Offices for the Eastern District of New York (USAO-EDNY) and District of Nevada.
3. External Independent Reviewer: By December 31, 2016, CG Technology will secure and retain an independent, external, and qualified party or entity (External Independent Reviewer), not subject to any conflict of interest, and subject to FinCEN's and USAO-EDNY's determination of non-objection after FinCEN's and USAO-EDNY's review of the engagement contract prior to execution, to examine CG Technology's Bank Secrecy Act (BSA) compliance program and evaluate whether the program is reasonably designed to ensure and monitor compliance with the requirements of the BSA and the FinCEN rules applicable to casinos. The External Independent Reviewer will evaluate program governance; compliance structure and staffing; risk assessments; compliance with all BSA recordkeeping and reporting requirements, including currency transaction reporting (CTR), suspicious activity reporting (SAR), and "Know Your Customer" (KYC) policies, procedures and controls; transaction monitoring; and training and communications. The External Independent Reviewer will evaluate all remedial measures taken to address all deficiencies and violations found or described in the 2010 IRS Examination and in the Determinations section of CG Technology's Consent to Assessment of Civil Money Penalty. Three reviews will occur: the first will commence on or before March 31, 2017; the rest will commence annually thereafter for the next two years (on or before March 31, 2018, and March 31, 2019). Each review will cover the previous year, with no less than six months' worth of transactional analysis. The External Independent Reviewer will prepare a written report (External Independent Reviewer's Report) for CG Technology's compliance committee, setting forth its findings, and will transmit the report and all draft reports to FinCEN, IRS, and USAO-EDNY simultaneously with any transmission to CG Technology, or its agents. To the extent that the report identifies any material deficiencies in CG Technology's programs and procedures, CG Technology shall address and rectify the deficiencies as soon as is reasonably practicable and will advise FinCEN, IRS, and USAO-EDNY of the remedial steps taken.
4. Effective AML Program: CG Technology will implement and maintain, or continue to implement and maintain, an effective anti-money laundering (AML) program, risk

assessment, and other compliance measures as required by applicable law, including the BSA and its implementing regulations.

5. AML Program Report: By April 30, 2017, and annually thereafter for the next three years (i.e., by April 30, 2018, April 30, 2019, and April 30, 2020), CG Technology will provide a comprehensive report (AML Program Report) to FinCEN, IRS, and USAO-EDNY on the implementation of its BSA compliance or AML Program which will include all initiatives to improve BSA compliance and any material breakdowns or deficiencies in internal controls, and management's responses and action plans to address any issues raised in the Third-Party Reviewer's Report. The AML Program Report will also include the most recent AML risk assessment methodology and risk assessment; the status of BSA staffing and organization and governance initiatives; any revised policies and procedures, including policies and procedures for ensuring and monitoring compliance with CTR, SAR, KYC, and recordkeeping requirements; and the quality assurance (compliance testing) program.
6. AML Compliance Officer: CG Technology will employ, or will continue to employ, an AML compliance officer to ensure day-to-day compliance with its obligations under the BSA and implementing regulations.
7. Training Program:
  - a. By March 31, 2017, CG Technology will create an AML training program and will provide a copy of the training program to FinCEN, IRS, and USAO-EDNY;
  - b. By March 31, 2017, CG Technology will provide training to each of its employees and provide to FinCEN, IRS, and USAO-EDNY written evidence of such training, including a certification of such training, attendance records of all employees and officers who attended the training, including the name of each employee and officer who attended such training and the dates of such training.
8. Look-Back for Suspicious Activity: CG Technology will conduct, or have a third party conduct, a review of all transactions and attempted transactions taking place in 2010, 2011, 2012, and 2013 involving or aggregating to at least \$5,000 in funds or other assets. For any such transaction CG Technology knows, suspects, or has reason to suspect (a) involves funds involved in illegal activity; (b) is intended or conducted in order to hide or disguise funds or assets derived from illegal activity, or to disguise the ownership, nature, source, location, or control of funds or assets derived from illegal activity; (c) is designed, whether through structuring or other means, to evade any requirement in the BSA or its implementing regulations; (d) serves no business or apparent lawful purpose,

where the casino knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction; or (e) involves the use of the casino to facilitate criminal activity, CG Technology, will file a Suspicious Activity Report within 30 days of such determination. This Look-Back for Suspicious Activity, including all related SAR findings, will be completed by March 31, 2017.

9. Requirements for the Transmittals of Funds: For all “transmittals of funds” as defined at 31 C.F.R. § 1010.100(ddd), CG Technology will comply with the requirements in 31 C.F.R. §§ 1010.410 and 1021.410 and guidance interpreting those provisions.