

SAMPLE. Every institution, merchant, person, figure, hash and date in this file is invented to show the format of a review. It is not a client, a result, legal advice or a claim about any matter.

Sealed review record · Review R-9A4B3D · revision 2

Lantern Row Games (example)

Secondary review of a reasoned legal opinion, for Harbor & Pine Bank (example)

Approved with conditions

Relying institution	Harbor & Pine Bank (example)
Merchant and product	Lantern Row Games (example): Sweepstakes casino with a free entry route
Opinion reviewed	Lantern Row – Reasoned Legal Opinion, revision 2, 31 pp. sha256 e4a1c9b07d3f8a2c6e0b4d8f2a6c0e4b8d2f6a0c4e8b2d6f0a4c8e2b6d0f4a8c
Drafted and signed by	The merchant's outside law firm (example)
Reviewed and decided by	Reviewing counsel, Apparently Law PLLC, for the institution only
Standard applied	Verified Opinion Standard, draft 0.1
Submitted / decided	2026-09-24 / 2026-09-26
Bring-down covenant	Through 2027-09-26
Examiner file	Manifest sha256 a088412e17e4305fecbb2e840ab077f530091dd08b5e0523b5a64e551a628bef Chain head 9 9bc44508de90fb58e03a574f0b1ddddac62037ad39c4e9435e59cb502d8617de

Summary

14 facts in the opinion were tested against the merchant's code, database and public documents. Round one found 9 findings; after the merchant's fixes and its law firm's revision, round two closed the high-tier findings and carried three to conditions. Reviewing counsel approved the opinion for the institution's reliance, subject to four conditions, each with an owner and a date.

Decision: risk by section

Section	Risk, out of 100	Note
\$1 The promotion	16/100	Store sells Gold Coins only.
\$2 Eligibility and excluded states	27/100	Washington refused at redemption; age gate before first credit.
\$3 Federal law (UIGEA)	34/100	ACH redemption and identity verification raised.
\$4 State gambling law and free entry	82/100	Free entries 0.8% of entries against a 1% floor; the daily login bonus is not raised.
\$5 Nevada (NRS 463.0152)	61/100	Footnote 14 cites the 2019 text; the 2025 amendment is not addressed.
\$6 Official rules and public pages	38/100	Rules omit Washington from the void states.

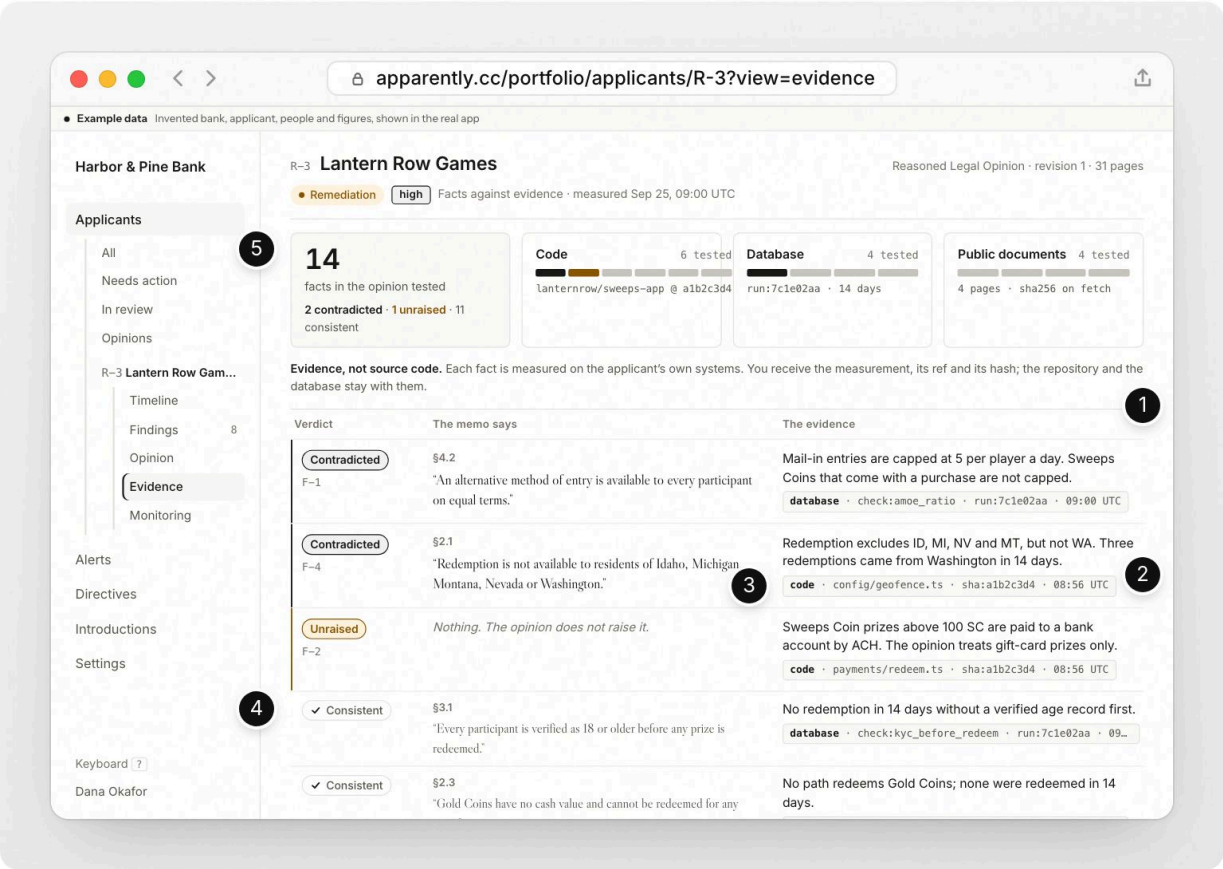
Conditions

Key	Where	The change	Owner	Due
C-1	Official rules §2.1	Void in Idaho, Michigan, Montana, Nevada and Washington.	Merchant	2026-09-30
C-2	Store · PurchaseSheet.tsx	Add “No purchase necessary: enter free” to the store; then free entries at or above 1% for 14 days, by check:amoe_ratio.	Merchant	2026-10-10
C-3	Opinion §4.2	Add: “Players also receive 1 Sweeps Coin a day for logging in, a further free route.”	Merchant’s law firm	2026-10-03
C-4	Opinion §5, fn. 14	Cite NRS 463.0152 as amended in 2025, and state that the amendment does not change the conclusion.	Merchant’s law firm	2026-10-03

Facts against evidence

Each fact the opinion relies on, against what was measured. Evidence is a reference and a hash, never source code.

Verdict	The opinion says	The evidence
Contradicted F-1 · §4.2	“An alternative method of entry is available to every participant on equal terms.”	Mail-in entries are capped at 5 per player a day; coins that come with a purchase are not capped. database · check:amoe_ratio · run:7c1e02aa
Contradicted F-4 · §2.1	“Redemption is not available to residents of Idaho, Michigan, Montana, Nevada or Washington.”	Redemption excludes ID, MI, NV and MT, but not WA. Three redemptions came from Washington in 14 days. code · config/geofence.ts · sha:a1b2c3d4
Unraised F-2	“Nothing. The opinion does not raise it.”	Sweeps Coin prizes above 100 SC are paid to a bank account by ACH. The opinion treats gift-card prizes only. code · payments/redeem.ts · sha:a1b2c3d4
Consistent F-0 · §3.1	“Every participant is verified as 18 or older before any prize is redeemed.”	No redemption in 14 days without a verified age record first. database · check:kyc_before_redeem · run:7c1e02aa



Finding register

Key	Tier	Finding	Owner	Round two	Proof
F-1	high	Free entry capped at 5 a day	Merchant	Resolved	commit 4e1f0a2
F-4	high	Redemption open in Washington	Merchant	Resolved	commit 7b91c3e
F-5	high	Store sells Sweeps Coins	Merchant	Resolved	commit 0c6d2e9
F-2	medium	Opinion omits ACH redemption	Merchant's law firm	Resolved	redline §3.4
F-6	medium	Free entries 0.3% of entries	Merchant	Carried to condition C-2	check 4 of 14 days
F-3	medium	§5 cites the 2019 text of NRS 463.0152	Merchant's law firm	Carried to condition C-4	law firm
F-7	low	Free-entry page omits equal odds	Merchant	Resolved	snapshot 3c7a5f08
F-8	low	Two governing-law clauses	Merchant	Resolved	snapshot 3c7a5f08
F-9	medium	Opinion omits the daily login bonus	Merchant's law firm	Carried to condition C-3	commit b2c3d4e5

Evidence summary

Source	What was linked	State	Tested	Ref
Repository	lanternrow/sweeps-app, read-only, one repository	linked	6 facts tested	a1b2c3d4
Database	Read-only role, SELECT only; 4 checks hourly	linked	4 facts tested	run:7c1e02aa
Public documents	Terms, official rules, free-entry page, privacy policy	linked	4 pages, sha256 on fetch	3c7a5f08
Opinion	Reasoned legal opinion, revisions 1 and 2	linked	31 pages	e4a1c9b0
Policies	KYC & AML policy v3; responsible gaming policy; FL promotion registration	linked	3 documents	b81f04c2

Timeline and chain of custody

When (UTC)	Event	What happened
2026-09-24 09:12	rlo_review.created	Merchant linked repository, database, documents and opinion
2026-09-24 09:31	rlo_review.linked	Facts tested: 9 consistent, 3 contradicted, 2 unraised
2026-09-25 06:43	rlo_review.status.findings_delivered	Round 1 findings delivered; opinion issues sent to the merchant's law firm
2026-09-26 11:20	rlo_review.status.resubmitted	Revision 2 resubmitted and checked against round 1
2026-09-26 16:42	rlo_review.decided	Reviewing counsel decided: approved with conditions C-1 to C-4
2026-09-26 16:44	reliance.granted	Reliance granted to the institution on revision 2
2026-10-01 10:00	living_rlo.hold.released	Condition C-1 met: official rules updated, page re-hashed

The examiner file

The review is filed under the headings an examiner looks for. A heading says where a record belongs, never that a requirement is met.

Folder	Heading	Filed under
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01-policies-and-procedures	Policies and procedures	12 CFR 233.6 (policies and procedures)
02-account-opening-due-diligence	Due diligence at account opening	12 CFR 233.6 (due diligence at account opening); BSA/AML customer due diligence
03-reasoned-legal-opinion	Reasoned legal opinion relied on	12 CFR 233.6 (reasoned legal opinion)
04-review-decisions	Review decisions and reviewer independence	12 CFR 233.6 (reasoned legal opinion); Third-party risk management
05-evidence-summary	Evidence summary	12 CFR 233.6 (due diligence at account opening)
06-ongoing-monitoring	Ongoing monitoring and cure log	12 CFR 233.6 (ongoing monitoring)
07-remedial-action	Remedial action	12 CFR 233.6 (remedial action)
08-reliance-letters	Reliance letters and grants	12 CFR 233.6 (reasoned legal opinion)
09-third-party-risk	Third parties in the review	Third-party risk management
10-access-and-decision-log	Access and decision log	Third-party risk management
11-chain-of-custody	Chain of custody	—
12-evidence-integrity	Evidence integrity	Third-party risk management

How to check it

Unzip `sample-examiner-file-lantern-row.zip` and run `node verify/verify-chain.mjs` (Node 18+, no dependencies). It recomputes every file's sha256, every event's hash and every link of the chain, and prints VERIFIED or every problem it finds. Compare the manifest sha256 it prints with the value on page one.

- Beneficial ownership identification and verification (31 CFR 1010.230) is out of scope of this file. It is performed and kept by the institution under its own CIP/CDD program.
- This file records the review the platform and the reviewing firm performed. The section headings say where each record belongs; they are not a conclusion that any requirement is met.
- Breaches still inside a cure window under the institution's own materiality policy, not yet disclosed to it, are not included.
- Evidence appears as hashes, states, counts and timestamps. No merchant source code, documents or data rows are included.
- Records are retained for 10 years (at least the 5-year BSA record-keeping floor). A legal hold blocks deletion.

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