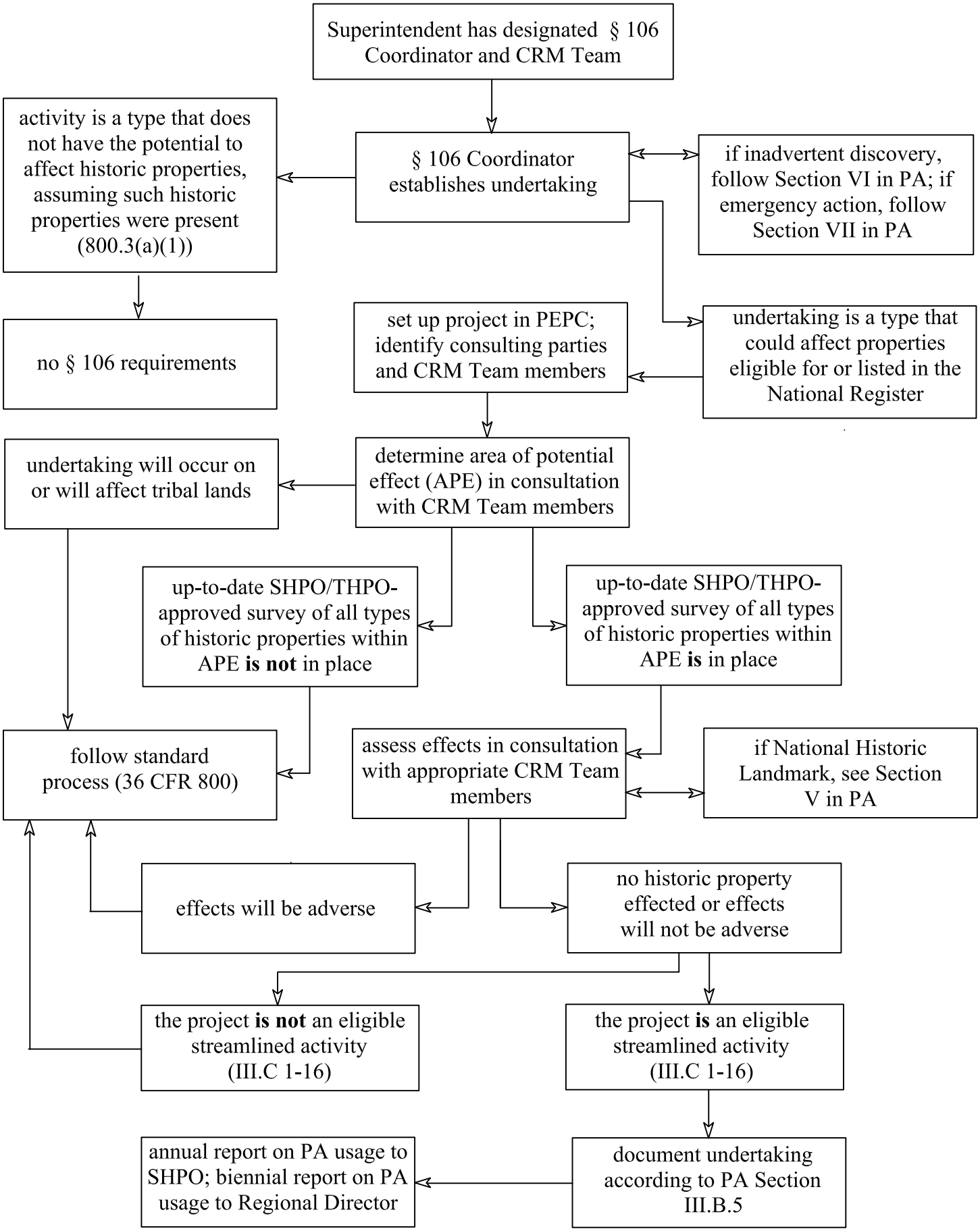§ 106 Compliance Process under the 2008 Programmatic Agreement