UNITED STATES OF AMERICA Before the CONSUMER FINANCIAL PROTECTION BUREAU

ADMINISTRATIVE PROCEEDING)
File No. 2015-CFPB-0029) DISCLOSURE OF WITNESSE
In the matter of:)
INTEGRITY ADVANCE, LLC and JAMES R. CARNES)))

RESPONDENTS' DISCLOSURE OF WITNESSES

Pursuant to the Scheduling Order in the above-captioned proceeding, as modified, Dkts. 27, 48, 80, 107, and 12 C.F.R. § 1081.215(a), Respondents Integrity Advance, LLC and James R. Carnes (together, "Respondents") hereby disclose the following witnesses who may be called to testify on behalf of Respondents in the hearing of this matter:

- 1. James R. Carnes, who can be reached through undersigned counsel; from Integrity Advance, LLC, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801, to testify regarding the setup and general business practices of Integrity Advance.
- 2. Edward Foster, who can be reached through undersigned counsel; to testify regarding the setup, Delaware licensure and examination, and business practices of Integrity Advance.
- 3. Chris Carson from TranDotComSolutions, LLC, 2015 Vaughn Rd NW, Suite 575, Kennesaw, Georgia 30144, to testify regarding queries of the Integrity Advance database hosted by TranDotComSolutions.
- 4. Brent Jackson from TranDotComSolutions, LLC, 2015 Vaughn Rd NW, Suite 575, Kennesaw, Georgia 30144, to testify regarding queries of the Integrity Advance database hosted by TranDotComSolutions.
- 5. Representative from the State of Delaware Office of the State Bank Commissioner, 55 East Loockerman Street, Dover, DE 19901, to testify regarding the regulation of

financial institutions in the state of Delaware and the approval and subsequent renewal of Integrity Advance's Delaware lending license.

- 6. Potential Integrity Advance customer(s), to testify regarding his/her experience with the Integrity Advance loan application, customer service, and issues relating to general customer satisfaction.
- 7. Dr. Nathan Novemsky (rebuttal expert witness), who can be reached through undersigned counsel.

Respondents reserve the right to call any witness listed by the Consumer Financial Protection Bureau or any other party, and to call additional witnesses for purposes of impeachment or rebuttal.¹

Respectfully submitted,

By: Allyson B. Baker

Allyson B. Baker, Esq. Danielle R. Foley, Esq. Peter S. Frechette, Esq. Andrew T. Hernacki, Esq. Hillary S. Profita, Esq. Christine E. White, Esq. VENABLE LLP 575 7th St. N.W. Washington, D.C. 20004 (202) 344-4000

Attorneys for Respondents Integrity Advance, LLC and James R. Carnes

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Dated: July 6, 2016

¹ While the total number of rebuttal witnesses will be determined by the arguments and witnesses put forward by Enforcement Counsel, at this time, based on Respondents' limited understanding of the Bureau's case, Counsel for Respondents do not currently anticipate calling rebuttal witnesses.

CERTIFICATION OF SERVICE

I hereby certify that on the 6th day of July, 2016, I caused a copy of the foregoing disclosure to be filed by electronic transmission (e-mail) with the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), Heather L. MacClintock (Heather.L.MacClintock@uscg.mil), and Administrative Law Judge Parlen L. McKenna (cindy.j.melendres@uscg.mil), and served by electronic mail on the following parties who have consented to electronic service:

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