

**UNITED STATES OF AMERICA  
Before the  
CONSUMER FINANCIAL PROTECTION BUREAU**

**ADMINISTRATIVE PROCEEDING  
File No. 2015-CFPB-0029**

	)	
	)	
<b>In the Matter of:</b>	)	
	)	<b>ENFORCEMENT</b>
	)	<b>COUNSEL'S UNOPPOSED</b>
	)	<b>MOTION TO ALLOW TWO</b>
	)	<b>ATTORNEYS TO ARGUE</b>
	)	
<b>INTEGRITY ADVANCE, LLC and</b>	)	
<b>JAMES R. CARNES,</b>	)	
	)	
<b>Respondents.</b>	)	
	)	
	)	

**ENFORCEMENT COUNSEL'S UNOPPOSED MOTION TO ALLOW TWO  
ATTORNEYS TO ARGUE**

Enforcement Counsel respectfully requests that the Director allow two attorneys to argue on behalf of Enforcement Counsel during the January 11, 2017 oral argument scheduled in the above-captioned matter.

In support of this motion, Enforcement Counsel states as follows:

1. On September 27, 2016, Administrative Law Judge Parlen McKenna issued a Recommended Decision in the above-captioned matter pursuant to 12 C.F.R. § 1081.400.
2. Both Enforcement Counsel and Respondents filed Notices of Appeal, taking exception to various portions of the Recommended Decision.
3. Enforcement Counsel and Respondents have filed opening, answering, and reply appeal briefs before the Director pursuant to 12 C.F.R. § 1081.403.

4. On December 14, 2016, Director Cordray scheduled an oral argument to address the various issues raised by the parties' appeals. The order requires the parties to designate the arguing lawyers by January 4, 2017.
5. Respondents have appealed large portions of the Recommended Decision and have raised arguments concerning the jurisdiction of the Bureau and the Constitutionality of its processes.
6. In the proceedings before the Administrative Law Judge, the Bureau's Legal Division handled matters regarding the jurisdiction of the Bureau and the Constitutionality of its processes.
7. Accordingly, Enforcement Counsel requests that the Director allow two attorneys to argue on its behalf during the January 11 oral argument, one of whom would be an attorney from the Bureau's Legal Division.
8. Respondents have informed Enforcement Counsel that they have no objection to the relief sought herein.

WHEREFORE, Enforcement Counsel respectfully requests that the Director allow Enforcement Counsel to designate two attorneys for the January 11 oral argument. A proposed order to this effect is attached hereto as Exhibit A.

Respectfully submitted,

Attorneys for Plaintiff  
Consumer Financial Protection Bureau

ANTHONY ALEXIS  
Enforcement Director

DEBORAH MORRIS  
Deputy Enforcement Director

CRAIG COWIE  
Assistant Litigation Deputy

s/Alusheyi J. Wheeler

---

Alusheyi J. Wheeler  
1700 G Street NW  
Washington, DC 20552  
Phone: (202) 435-7786  
Facsimile: (202) 435-7722  
Email: [alusheyi.wheeler@cfpb.gov](mailto:alusheyi.wheeler@cfpb.gov)

*Enforcement Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of December 2016, I caused a copy of the foregoing Enforcement Counsel's Unopposed Motion to Allow Two Attorneys to Argue to be filed by electronic transmission (e-mail) with the Office of Administrative Adjudication (CFPB\_electronic\_filings@cfpb.gov), the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), Administrative Law Judge Parlen L. McKenna (cindy.j.melendres@uscg.mil), Heather L. MacClintock (Heather.L.MacClintock@uscg.mil), and served by email on the Respondents' counsel at the following addresses:

Allyson B. Baker, Esq.  
ABBaker@venable.com

Danielle R. Foley, Esq.  
DRFoley@venable.com

Peter S. Frechette, Esq.  
PSFrechette@venable.com

Hillary S. Profita, Esq.  
HSProfita@venable.com

Joanna P. Boyd, Esq.  
JPBoyd@venable.com

Christine E. White, Esq.  
CEWhite@venable.com

Andrew T. Hernacki, Esq.  
ATHernacki@venable.com

/s/ Alusheyi J. Wheeler  
Alusheyi J. Wheeler