

UNITED STATES OF AMERICA  
Before the  
CONSUMER FINANCIAL PROTECTION BUREAU

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

**ADDENDUM TO**  
**RESPONDENTS' FEBRUARY**  
**12, 2016 REPLY**

**ADDENDUM TO RESPONDENTS' FEBRUARY 12, 2016 REPLY**

On February 8, 2016, this Court entered an Order Requiring the Bureau to Submit Additional Information (“Order”). The Order asked Advance, LLC and James R. Carnes (collectively, “Respondents”) to “[i]ndicate if any of the Integrity Advance loans are still extant, whether currently held by Respondents or another entity. If so, who services those extant loans?” Order at 4 n.1. Respondents respectfully submit this information, as set out below, as an Addendum to their February 12, 2016 Reply to the Bureau’s Response to the February 8, 2016 Order Requiring the Bureau to Submit Additional Information.

**Response:**

Integrity Advance has made no loans since December 2012. Integrity Advance has not collected on any loans, or otherwise serviced any loans, since on or before June 30, 2013. During or before June 2013, Integrity Advance charged-off all loans from its books. This charged-off debt was partially sold in a September 2013 debt sale and Respondents have no knowledge of the

status of the debt contained in that sale.<sup>1</sup> The remainder is held passively on Integrity Advance's books as charged-off debt.

Dated: February 16, 2016

By: Allyson B. Baker

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<sup>1</sup> Neither holding debt nor the sale of debt is a "financial product or service" as defined under the Consumer Financial Protection Act. *See* 12 U.S.C. § 5481(15).

**CERTIFICATION OF SERVICE**

I hereby certify that on the 16th day of February 2016, I caused a copy of the foregoing Answer to be filed by electronic transmission (e-mail) with the U.S. Coast Guard Hearing Docket Clerk ([aljdocketcenter@uscg.mil](mailto:aljdocketcenter@uscg.mil)), Heather L. MacClintock ([Heather.L.MacClintock@uscg.mil](mailto:Heather.L.MacClintock@uscg.mil)) and Administrative Law Judge Parlen L. McKenna ([cindy.j.melendres@uscg.mil](mailto:cindy.j.melendres@uscg.mil)), and served by electronic mail on the following parties who have consented to electronic service:

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/s/ Peter S. Frechette \_\_\_\_\_

Peter S. Frechette, Esq.