

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

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

	)	
	)	
<b>In the Matter of:</b>	)	
	)	
<b>INTEGRITY ADVANCE, LLC and</b>	)	<b>DECLARATION OF RICHARD J.</b>
<b>JAMES R. CARNES,</b>	)	<b>ZACK IN SUPPORT OF</b>
	)	<b>RESPONDENTS' MOTION TO</b>
<b>Respondents.</b>	)	<b>DISMISS AND/OR FOR SUMMARY</b>
	)	<b>DISPOSITION ON GROUNDS</b>
	)	<b>LIMITED TO OCTOBER 28, 2019</b>
	)	<b>ORDER</b>

**DECLARATION OF RICHARD J. ZACK IN SUPPORT OF RESPONDENTS'  
MOTION TO DISMISS AND/OR FOR SUMMARY DISPOSITION  
ON GROUNDS LIMITED TO OCTOBER 28, 2019 ORDER**

I, Richard J. Zack, declare under penalty of perjury that the information set forth below is true and correct:

1. I am an attorney at Pepper Hamilton LLP, which represents Respondents Integrity Advance, LLC and James R. Carnes (“Respondents”) in the above-captioned matter. I am fully familiar with the facts and circumstances related to this matter. I make this Declaration in support of Respondents’ Motion to Dismiss and/or for Summary Disposition on Grounds Limited to October 28, 2019 Order.

2. Attached as Exhibit A hereto is a true and correct copy of CFPB042438, a document reflecting an Enforcement Counsel attorney’s search on March 29, 2012 of the Federal Trade Commission’s (“FTC”) Sentinel Network of consumer complaints, produced to

Respondents as part of Enforcement Counsel's production under 12 C.F.R. § 1081.206 ("Rule 206").

3. Attached as Exhibit B hereto is a true and correct copy of CFPB042509, a document reflecting printouts of additional consumer complaints from the FTC's Sentinel Network of consumer complaints on August 14, 2012, produced to Respondents as part of Enforcement Counsel's Rule 206 production.

4. Attached as Exhibit C hereto is a true and correct copy of CFPB035707, a document reflecting a consumer complaint carbon copied to the FTC, produced to Respondents as part of Enforcement Counsel's Rule 206 production.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: November 15, 2019  
Philadelphia, PA

By:

A handwritten signature in black ink, appearing to be 'RJ Zack', with a long horizontal flourish extending to the right.

Richard J. Zack, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of November 2019, I caused a copy of the foregoing Declaration of Richard J. Zack in Support of Respondents' Motion to Dismiss and/or for Summary Disposition on Grounds Limited to October 28, 2019 Order to be filed by electronic transmission (email) with the Office of Administrative Adjudication (CFPB\_electronic\_filings@cfpb.gov), and served by email on opposing counsel at the following addresses:

Stephen Jacques, Esq.  
[Stephen.Jacques@cfpb.gov](mailto:Stephen.Jacques@cfpb.gov)

Benjamin Clark, Esq.  
[Benjamin.Clark@cfpb.gov](mailto:Benjamin.Clark@cfpb.gov)

Alusheyi Wheeler, Esq.  
[Alusheyi.Wheeler@cfpb.gov](mailto:Alusheyi.Wheeler@cfpb.gov)

Deborah Morris, Esq.  
[Debora.Morris@cfpb.gov](mailto:Debora.Morris@cfpb.gov)

/s/ Saverio S. Romeo  
Saverio S. Romeo, Esq.