

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

ADMINISTRATIVE PROCEEDING
File No. 2015-CFPB-0029

In the Matter of)

INTEGRITY ADVANCE, LLC and)
JAMES R. CARNES,)

) ORDER GRANTING ENFORCEMENT
) COUNSEL’S MOTION TO ALLOW
) TWO ATTORNEYS TO ARGUE
)
)

On November 18, 2020, Enforcement Counsel filed a motion seeking permission to divide its time at the December 8, 2020, oral argument between an attorney from the Bureau’s Office of Enforcement and the Bureau’s Legal Division. Respondents filed an opposition, expressing concern that, because the Legal Division serves as the legal advisor to the Bureau, it might create a conflict of interest if an attorney from the Legal Division presents argument before the Bureau’s Director. There will not be any such conflict. Indeed, nothing in the Bureau’s Rules prohibits members of the Legal Division from assisting Enforcement Counsel, even as others serve as decisional employees, so long as they refrain, as they have, from any discussion of this matter. *See* 12 C.F.R. § 1081.110(e). Accordingly, I GRANT Enforcement Counsel’s Motion and Enforcement Counsel may divide its argument time between two attorneys.

SO ORDERED.



Kathleen Kraninger
Director
Consumer Financial Protection Bureau

November 24, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the *Order Granting Enforcement Counsel's Motion to Allow Two Attorneys to Argue* upon the following parties and entities in Administrative Proceeding 2015-CFPB-0029 as indicated in the manner described below:

Via Electronic Mail to Representatives for Consumer Financial Protection Bureau

Benjamin Clark, Esq.
1700 G Street, NW
Washington, DC 20552
benjamin.clark@cfpb.gov

Stephen C. Jacques, Esq., Email: stephen.jacques@cfpb.gov
Alusheyi J. Wheeler, Esq., Email: alusheyi.wheeler@cfpb.gov
Deborah Morris, Esq., Email: deborah.morris@cfpb.gov

Via Electronic Mail to Representatives for Respondent

Richard J. Zack, Esq.
Pepper Hamilton, Esq.
3000 Two Logan Square
Philadelphia, PA 19103
zackr@pepperlaw.com

Michael A. Schwartz, Esq., Email: schwarma@pepperlaw.com
Christen M. Tuttle, Esq., Email: tuttlec@pepperlaw.com
Saverio S. Romeo, Esq., Email: romeos@pepperlaw.com

Jameelah
Morgan

Digitally signed by
Jameelah Morgan
Date: 2020.11.30
18:24:24 -05'00'

Jameelah Morgan
Docket Clerk
Office of Administrative Adjudication
Bureau of Consumer Financial Protection

Signed and dated on this 30th day of November
2020 at Washington, D.C.