

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

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

**REQUEST FOR ISSUANCE OF A SUBPOENA COMPELLING THE ATTENDANCE
AND TESTIMONY OF CHRIS CARSON**

Pursuant to 12 C.F.R. § 1081.208, Respondents Integrity Advance, LLC and James R. Carnes (collectively, “Respondents”) respectfully request that the Court issue the attached subpoena seeking the attendance and testimony of Chris Carson, President and Chief Operations Officer of TranDotComSolutions, LLC (“TDC”), at the Hearing to commence on July 19, 2016, at 10:00 AM, in the above-captioned proceeding. Respondents have attached the proposed subpoena hereto as Exhibit A. Rule 208(a) empowers Respondents to seek the issuance of one or more subpoenas requiring the attendance of a witness to testify at the Hearing. *See* 12 C.F.R. § 1081.208(a). Respondents respectfully request that the Court issue the proposed subpoena seeking the attendance and testimony of Mr. Carson during Respondents’ case-in-chief.

Respondents intend to seek testimony from Mr. Carson regarding customized queries of the database that TDC hosted on behalf of Integrity Advance pursuant to a Master Service Agreement (“MSA”) between Integrity Advance and TDC. These queries, in part, provide information regarding first-time and returning Integrity Advance customers.

The requested testimony is reasonable in scope and relevant to, among other things, the Bureau's claims and Respondents' defenses.

Respectfully submitted,

Dated: July 6, 2016

By: Allyson B. Baker

Allyson B. Baker, Esq.
Peter S. Frechette, 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

CERTIFICATION OF SERVICE

I hereby certify that on the July 6, 2016, I caused a copy of the foregoing Request 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:

Deborah Morris, Esq.
Deborah.Morris@cfpb.gov

Craig A. Cowie, Esq.
Craig.Cowie@cfpb.gov

Alusheyi J. Wheeler, Esq.
Alusheyi.Wheeler@cfpb.gov

Wendy J. Weinberg, Esq.
Wendy.Weinberg@cfpb.gov

Vivian W. Chum, Esq.
Vivian.Chum@cfpb.gov

/s/ Peter S. Frechette

Peter S. Frechette, Esq.