

UNITED STATES OF AMERICA  
Before the  
CONSUMER FINANCIAL PROTECTION BUREAU

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ADMINISTRATIVE PROCEEDING	)	
	)	<b>RESPONDENTS' AMENDED</b>
	)	<b>DISCLOSURE OF WITNESSES</b>
File No. 2015-CFPB-0029	)	
	)	
In the matter of:	)	
	)	
INTEGRITY ADVANCE, LLC and	)	
JAMES R. CARNES	)	
	)	

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**RESPONDENTS' AMENDED DISCLOSURE OF WITNESSES**

Pursuant to the Scheduling Order in the above-captioned proceeding, as modified, Dkts. 27, 48, 80, 107, and 12 C.F.R. § 1081.215(a), Respondents Integrity Advance, LLC and James R. Carnes (together, “Respondents”) hereby disclose the following amended list of witnesses who may be called to testify on behalf of Respondents in the hearing of this matter

1. James R. Carnes, who can be reached through undersigned counsel; from Integrity Advance, LLC, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801, to testify regarding the setup and general business practices of Integrity Advance.
2. Edward Foster, who can be reached through Gerald S. Sachs of Paul Hastings LLP; to testify regarding the setup, Delaware licensure and examination, and business practices of Integrity Advance.
3. Chris Carson from TranDotComSolutions, LLC, 2015 Vaughn Rd NW, Suite 575, Kennesaw, Georgia 30144, to testify regarding queries of the Integrity Advance database hosted by TranDotComSolutions.
4. E. Quinn Miller, Investigative Supervisor of the State of Delaware Office of the State Bank Commissioner, 55 East Loockerman Street, Dover, DE 19901, to testify regarding the regulation of financial institutions in the state of Delaware and the approval and subsequent renewal of Integrity Advance’s Delaware lending license.

5. Dr. Nathan Novemsky (rebuttal expert witness), who can be reached through undersigned counsel.

Respondents reserve the right to call any witness listed by the Consumer Financial Protection Bureau or any other party, and to call additional witnesses for purposes of impeachment or rebuttal. While the total number of rebuttal witnesses will be determined by the arguments and witnesses put forward by Enforcement Counsel, at this time, based on Respondents' limited understanding of the Bureau's case, Counsel for Respondents currently anticipate possibly calling the following rebuttal witness<sup>1</sup>:

1. Dr. Xiaoling (Ling Ling) Ang of Edgeworth Economics, 1111 19<sup>th</sup> Street, NW, Suite 200, Washington, DC 20036, to testify in rebuttal to the Bureau's estimates of monetary harm.

Respondents also renew their request that all social security numbers or other personally identifiable information ("PII") or personally identifiable financial information ("PIFI") listed on any Enforcement Counsel exhibit be redacted.

Respectfully submitted,

Dated: July 15, 2016

By: Allyson B. Baker

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<sup>1</sup> Respondents' counsel understood from the Court's Clerk that the Court wanted an estimate of rebuttal witnesses and evidence for planning purposes. Pursuant to the Court's request, Respondent's Amended Disclosure includes the following changes: (1) removes Brent Jackson of TranDotCom; (2) removes Integrity Advance customer witnesses; and (3) includes one potential rebuttal witness.

**CERTIFICATION OF SERVICE**

I hereby certify that on the 15th day of July, 2016, I caused a copy of the foregoing Amended Disclosure 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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