

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

**ADMINISTRATIVE PROCEEDING**

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

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In the Matter of:	)	<b>ENFORCEMENT COUNSEL'S WITNESS LIST</b>
INTEGRITY ADVANCE, LLC and	)	
JAMES R. CARNES,	)	
	)	
Respondents.	)	
	)	
	)	

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**ENFORCEMENT COUNSEL'S WITNESS LIST**

Pursuant to 12 C.F.R. § 1081.215 and the Administrative Law Judge's June 17, 2016 order, Enforcement Counsel hereby serves its witness list in the above-captioned matter.

In addition to those individuals identified on this witness list, Enforcement Counsel reserves the right to call any witness identified on Respondents' witness list. Because the Administrative Law Judge has not yet ruled on the admissibility of exhibits, Enforcement Counsel reserves the right to call witnesses necessary to introduce relevant documents.

<u>Name</u>	<u>Address</u>	<u>Expected Testimony</u>
James Carnes	2700 Verona Road Mission Hills, KS 66208	Mr. Carnes was the Chief Executive Officer of Integrity Advance and its parent company, Hayfield Investment Partners. He can testify as to his role in running Integrity Advance.
Edward Foster	1204 West 66 <sup>th</sup> Terrace Kansas City, MO 64113	Mr. Foster was the Chief Operating Officer of Integrity Advance for most of the company's history. He can testify as to Mr. Carnes's role in running Integrity Advance.
Bruce Andonian	7101 College Blvd. #600, Overland Park, KS 66210	Mr. Andonian was the Director of Information Technology for Integrity Advance. He can testify as to Mr. Carnes's role in running Integrity Advance.
Timothy Madsen	5321 NE Northgate Crossing, Lees Summit, MO 64064	Mr. Madsen was the Vice President of Marketing for Integrity Advance. He can testify as to Mr. Carnes's role in running Integrity Advance.
Robert J. Hughes	1275 First Street NE, Washington, DC 20002	Mr. Hughes is a data scientist with the Consumer Financial Protection Bureau. He has analyzed the consumer payments data produced by Respondents in response to the subpoena issued on February 19, 2016. He can testify as to the amount of monetary harm caused by Respondents' violations.
Joseph Baressi	1275 First Street NE, Washington, DC 20002	Mr. Baressi works in the Consumer Financial Protection Bureau's Regulations office. He can testify as to the mechanism behind remotely created checks and the consumer implications of their use.

Depending on the nature of Respondents' defense, Enforcement Counsel may call the following rebuttal witnesses:

1. Dr. Manoj Hastak- American University Marketing Professor.
2. [REDACTED]
- [REDACTED]
3. [REDACTED]
4. Shayna Thompson- Paralegal Specialist at the Consumer Financial Protection Bureau.
5. Christopher Albanese- Investigator at the Consumer Financial Protection Bureau.
6. John Marlow- Paralegal Specialist at the Consumer Financial Protection Bureau.
7. Douglas Lohr- Litigation Support Specialist at the Consumer Financial Protection Bureau.

Respectfully submitted,

Attorneys for Plaintiff  
Consumer Financial Protection Bureau

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Enforcement Director

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s/Alusheyi J. Wheeler

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*Enforcement Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of July 2016, I caused a copy of the foregoing Enforcement Counsel's Witness List to be filed by electronic transmission (e-mail) with the Office of Administrative Adjudication (CFPB\_electronic\_filings@cfpb.gov), the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), Administrative Law Judge Parlen L. McKenna (cindy.j.melendres@uscg.mil), Heather L. MacClintock (Heather.L.MacClintock@uscg.mil), and served by email on the Respondents' counsel at the following addresses:

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