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, **Respondents.**	)))))))))))))	**DECLARATION OF RICHARD J. ZACK IN OPPOSITION TO ENFORCEMENT COUNSEL'S MOTION FOR SUMMARY DISPOSITION**

DECLARATION OF RICHARD J. ZACK IN OPPOSITION TO
ENFORCEMENT COUNSEL'S MOTION FOR SUMMARY DISPOSITION

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 opposition to Enforcement Counsel's Motion for Summary Disposition (Dkt. 275).

2. Attached as Exhibit 1 is a true and correct copy of a document entitled "First Time and One-Time Loans," which was entered into evidence as Exhibit EC-EX-102 at the prior hearing the above-captioned matter.

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: June 4, 2020
       Philadelphia, PA

By:

Richard J. Zack, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June 2020, I caused a copy of the foregoing

Declaration of Richard J. Zack in Opposition to Enforcement Counsel's Motion for Summary

Disposition 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

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