

**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: ) ENFORCEMENT COUNSEL'S  
 ) REQUEST FOR ISSUANCE OF  
 ) SUBPOENAS REQUIRING  
 ) WITNESS TESTIMONY AT  
 ) THE HEARING  
INTEGRITY ADVANCE, LLC and )  
JAMES R. CARNES, )  
Respondents. )  
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**ENFORCEMENT COUNSEL'S REQUEST FOR ISSUANCE OF SUBPOENAS  
REQUIRING WITNESS TESTIMONY AT THE HEARING**

Pursuant to 12 C.F.R. § 1081.208, Enforcement Counsel respectfully requests the issuance of the attached subpoenas seeking testimony at the hearing in the above-captioned matter. In his July 1, 2016 order partially granting summary disposition in favor of the Bureau, the Administrative Law Judge expressed a desire to hear testimony on Respondent Carnes's role as chief executive of Integrity Advance. Each of the first five witnesses listed below has direct, first-hand knowledge of Respondent Carnes's role as an active chief executive and final decision-maker for the company. The final witness listed below is an Investigative Supervisor in the Office of the State Bank Commissioner of Delaware. Enforcement Counsel respectfully requests that the attached proposed subpoenas be issued to the following witnesses:

1. James Carnes- 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 and the relationship between the various Hayfield entities.
2. Edward Foster- 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. Mr. Foster also has knowledge about the various Hayfield entities.
3. Bruce Andonian- Mr. Andonian was the Director of Information Technology for Integrity Advance. He worked in the same office with Mr. Carnes on a daily basis. He can testify as to Mr. Carnes's role in running Integrity Advance.
4. Timothy Madsen- Mr. Madsen was the Vice President of Marketing for Integrity Advance. He worked in the same office with Mr. Carnes on a daily basis. He can testify as to Mr. Carnes's role in running Integrity Advance.
5. [REDACTED] of Clearvox, a company that provided telephone customer service support to Integrity Advance. [REDACTED] can testify about the relationship between Integrity Advance and its telephone vendors and has knowledge about Mr. Carnes's role in running Integrity Advance.

6. [REDACTED] is an Investigative Supervisor in the Office of the State Bank Commissioner of Delaware. She can talk about the process her office used to license payday lending entities.

Enforcement Counsel's request is reasonable in scope given that the Administrative Law Judge's July 1, 2016 summary disposition opinion. The request is not oppressive or unduly burdensome as it will require only relatively narrow testimony that can likely be completed quickly. Moreover, the Bureau is required to provide travel expenses and lodging to any of these witness who reside outside of the Washington D.C., area, the location of the hearing.

Respectfully submitted,

Attorneys for Plaintiff  
Consumer Financial Protection Bureau

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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 Request for Issuance of Subpoenas Requiring Witness Testimony at the Hearing, along with the attached proposed subpoenas, 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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