

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

ADMINISTRATIVE PROCEEDING)	DECLARATION OF
File No. 2015-CFPB-0029)	PETER S. FRECHETTE
)	
In the matter of:)	
)	
INTEGRITY ADVANCE, LLC and)	
JAMES R. CARNES)	
)	

I, **PETER S. FRECHETTE**, declare under penalty of perjury that the information set forth below is true and correct:

1. I am an attorney at Venable LLP, which represents Respondents Integrity Advance, LLC and James R. Carnes (together, “Respondents”) in the above-captioned action (the “Action”). I am fully familiar with the facts and circumstances related to the Action. I make this Declaration in support of the Answering Appeal Brief filed by the Respondents.

EXHIBITS

2. Attached as Exhibit A is a true and correct copy of the Memorandum of Understanding agreed to between the Federal Trade Commission and the Consumer Financial Protection Bureau on January 23, 2012, located at <https://www.ftc.gov/system/files/120123ftc-cfpb-mou.pdf>.

3. Attached as Exhibit B is a true and correct copy, with yellow highlighting designating relevant areas, of CFPB042438, a document reflecting an Enforcement Counsel attorney’s search on March 29, 2012 of the Federal Trade Commission’s Consumer Sentinel

Network, produced by Enforcement Counsel to Respondents via encrypted disk on January 29, 2016.

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: Washington, D.C.
December 5, 2016

By: /s/ Peter S. Frechette
Peter S. Frechette

CERTIFICATION OF SERVICE

I hereby certify that on the 5th day of December, 2016, I caused a copy of the foregoing Declaration to be filed by electronic transmission (e-mail) with the CFPB's Office of Administrative Adjudication (CFPB_Electronic_Filings@cfpb.gov). A copy of this brief is provided by electronic mail to 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:

Kristin Bateman, Esq.
Kristin.Bateman@cfpb.gov

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

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

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

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

/s/ Peter S. Frechette
Peter S. Frechette, Esq.