

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the matter of:

**H&R Block Inc.,**  
a corporation,

**HRB Digital LLC,**  
a limited liability company, and

**HRB Tax Group, Inc.,**  
a corporation.

Docket No. 9427

**COMPLAINT COUNSEL’S UNOPPOSED MOTION TO REMOVE CERTAIN  
REDACTIONS FROM THE PUBLIC COMPLAINT**

Complaint Counsel respectfully moves for an order removing certain redactions from the public version of the Complaint, namely, all redactions in paragraphs 8, 17, 19, 20, 24, 25, 26, 27, 28, 33, 40, 53, and 54, and the yellow-highlighted text in paragraphs 29, 30, 31, and 32 as follows:

29. H&R Block

[Redacted text block containing multiple lines of blacked-out text and yellow-highlighted text]

In a March 2020

Public

30.


[Redacted text block for paragraph 30]

31.

[Redacted text block for paragraph 31]

32. In the 2020 [Redacted] discussed in paragraph 29 above, H&R Block [Redacted]

[Redacted text block for paragraph 32]



The redacted information Complaint Counsel seeks to make public is not confidential material, the public interest is best served by having open access to the unredacted information, and Respondents either consent or do not object to the disclosure.

## I. FACTUAL BACKGROUND

After the Commission voted to issue the Complaint on February 23, 2024, Complaint Counsel and Respondents' counsel provisionally redacted the Complaint to ensure Respondents had an opportunity to seek protection from disclosure for materials Respondents designated as confidential pursuant to 16 C.F.R. § 4.10(g)(2). Accordingly, the current public version of the Complaint contains redactions to the following paragraphs: 8, 17, 19, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 40, 53, and 54.

Complaint Counsel has conferred with Respondents' counsel and understands that Respondents consent to the removal of redactions in paragraphs 8, 17, 19, 24, 28, 33, and the second sentence of paragraph 40. Complaint Counsel further understands that Respondents will not oppose this motion to remove the redactions from paragraphs 20, 25, 26, 27, 53, 54, or the remainder of paragraph 40. Finally, Complaint Counsel and Respondents have agreed to remove redactions from the yellow-highlighted portions of paragraphs 29-32 as shown above.

## II. CONCLUSION

Because the Commission has consistently recognized the "substantial public interest in holding all aspects of adjudicative proceedings, including the evidence adduced therein, open to all interested persons," *In the Matter of Altria Grp.*, No. 9393, 2021 WL 2379509, at \*2 (May 26, 2021) (quoting *In re H. P. Hood & Sons*, 1961 FTC LEXIS 368 (Mar. 14, 1961)), and the parties have reached an agreement to remove nearly all the

Public

redactions from the Complaint, the Court should grant this motion to remove the above-mentioned redactions.

Respectfully submitted,

Dated: 4/2/2024

/s/ Simon Barth

**Claire Wack**, MD Bar No. 1312190275

**Simon Barth**, MA Bar No. 706122

**Christopher E. Brown**, VA Bar No. 72765

**Joshua A. Doan**, DC Bar No. 490879

Federal Trade Commission

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**Counsel Supporting the Complaint**

**Federal Trade Commission**

Public

UNITED STATES OF AMERICA  
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OFFICE OF ADMINISTRATIVE LAW JUDGES

In the matter of:

**H&R Block Inc.**,  
a corporation,

**HRB Digital LLC**,  
a limited liability company, and

**HRB Tax Group, Inc.**,  
Respondents.

Docket No. 9427

**[Proposed] ORDER GRANTING COMPLAINT COUNSEL'S UNOPPOSED  
MOTION TO REMOVE CERTAIN REDACTIONS FROM THE PUBLIC  
COMPLAINT**

On April 1, 2024, Complaint Counsel filed a Motion to Remove Certain Redactions from the Public Complaint. Complaint Counsel represents that Respondents do not oppose or have agreed to remove the redactions as identified in the Motion. Accordingly, Complaint Counsel's Motion to Remove Certain Redactions from the Public Complaint is **GRANTED**.

**SO ORDERED.**

Dated:

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Jay L. Himes  
Administrative Law Judge

# EXHIBIT A

Pursuant to 16 C.F.R. § 3.45(e), the following pages from Complaint Counsel's Unopposed Motion to Remove Certain Redactions from the Public Complaint contain confidential information protected by the February 26, 2024 Protective Order Governing Confidential Material (attached as Exhibit A).

Should the Commission intend to disclose in a final decision any of the confidential information in this document, please contact:

Antonio F. Dias  
afdias@jonesday.com  
600 Brickell Avenue, Suite 3300  
Miami, FL 33131  
Tel: (305) 714-9800

Exhibit A  
Filed Under Seal

Exhibit A  
Filed Under Seal



Exhibit A  
Filed Under Seal

### CONFERENCE STATEMENT

Counsel for the moving party has conferred with opposing counsel in an effort in good faith to resolve by agreement the issues raised by the motion and has reached the agreement described above.

/s/ Simon Barth  
Simon Barth

## CERTIFICATE OF SERVICE

I hereby certify that on 2 April 2024, I filed the foregoing Unopposed Motion to Remove Certain Redactions from the Public Complaint electronically using the FTC's E-Filing system, and I caused courtesy copies to be sent via email to:

April Tabor  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Suite CC-5610  
Washington, DC 20580  
ElectronicFilings@ftc.gov

*Secretary of the Commission  
Clerk of the Court*

Hon. Jay L. Himes  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Suite H-110  
Washington, DC 20580

*Administrative Law Judge*

I further certify that on 2 April 2024, I caused the foregoing document to be served via email on:

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/s/ Simon Barth  
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