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

In the matter of:

H&R Block Inc., a corporation,

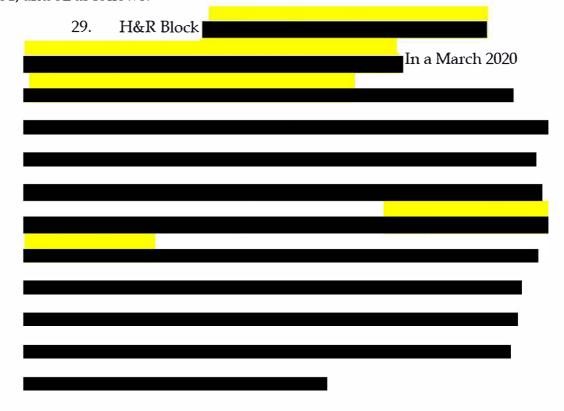
HRB Digital LLC, a limited liability company, and

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:



Public



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

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 600 Pennsylvania Ave., NW, CC-6316 Washington, DC 20580 (202) 326-2836 / cwack@ftc.gov (202) 326-3317 / sbarth@ftc.gov (202) 326-2825 / cbrown3@ftc.gov (202) 326-3187 / jdoan@ftc.gov

Counsel Supporting the Complaint

Federal Trade Commission

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	Docket No. 9427
HRB Tax Group, Inc.,	
Respondents.	
[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. Com	plaint 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	o Remove Certain Redactions from the
Public Complaint is GRANTED .	
SO ORDERED.	
Dated:	
	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

Administrative Law Judge

Washington, DC 20580

Administrative Law Judge

Federal Trade Commission

600 Pennsylvania Avenue, NW

Hon. Jay L. Himes

Suite H-110

Secretary of the Commission Clerk of the Court

I further certify that on 2 April 2024, I caused the foregoing document to be

served via email on:

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Attorneys for Respondents, H&R Block, Inc. HRB Digital LLC, and HRB Tax Group, Inc.

/s/ Simon Barth

Simon Barth